

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING

ANALYSIS OF IMPEDIMENTS TO FAIR
HOUSING CHOICE



TREVOR KEITH

Director

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CHAPTER 1: INTRODUCTION AND GOALS

1.1 Executive Summary

The Fair Housing Act (FHA) was enacted in 1968 to remedy the adverse effects of past and present housing discrimination. Section 3608 in the Act requires that the U.S. Department of Housing and Urban Development (HUD) and other federal agencies shall administer their housing programs in a manner to actively promote fair housing and integration. Regulations of HUD make clear that recipients of federal funds from HUD are required to administer those funds in a manner that affirmatively furthers fair housing.

Thus, as a condition of receiving federal housing and community development funds, the County of San Luis Obispo is required to affirmatively further fair housing (AFFH). HUD has interpreted that statutory obligation to mean that the County must conduct an Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome those impediments, and maintain records reflecting the AI and the corrective actions. This document is intended to serve as the County's AI.

The County of San Luis Obispo's Analysis of Impediments to Fair Housing Choice is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination¹ by the federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards the County's obligation to affirmatively further fair housing. The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with the County and with input from a wide range of stakeholders through a community participation process, prepared this AI. To provide a foundation for the conclusions and recommendations presented in this AI, the Lawyers' Committee reviewed and analyzed:

- Data from the U.S. Census Bureau and other sources about the demographic, housing, economic, and educational landscape of the Consortium, nearby communities, and the broader region;
- Various County and City planning documents and ordinances;
- Data reflecting housing discrimination complaints;

¹ The seven classes protected under the Federal Fair Housing Act are: Color, Disability, Familial Status (i.e., having children under 18 in a household, including pregnant women), National Origin, Race, Religion, and Sex.

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- The input of a broad range of stakeholders that deal with the realities of the housing market and the lives of members of protected classes¹ in San Luis Obispo.

The AI draws from these sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes², racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes², and disproportionate housing needs. The analysis also examines publicly supported housing in the city as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

1.2 Overview of the County of San Luis Obispo

The County of San Luis Obispo is a coastal community in central California that also contains extensive swaths of rural land. Though the County has historically been and remains strongly majority non-Hispanic White, there have been some demographic shifts—most notably a large increase in the Hispanic/Latino population. The expanding Hispanic population has borne the brunt of disproportionate housing needs in the region, including cost burden and overcrowding. Disparities in access to opportunity in the categories of education, employment, transportation, poverty, and environmental health exhibit lesser patterns, although a general deficiency in access to transportation does emerge as a theme. Additionally, although publicly supported housing in the region is highly focused on elderly housing, there is a dearth of affordable, accessible housing to serve low income families and people with disabilities. The region also faces a lack of resources in enforcing fair housing protections, leaving members of protected classes vulnerable.

Progressive steps have been taken by the County and its cities to increase the affordable housing supply, as described below in Section IV – Assessment of Past Goals and Action. Several communities within the County have enacted rent control ordinances for mobile homes, and the City of San Luis Obispo recently expanded its inclusionary zoning ordinance to increase its supply of affordable housing. Likewise, the County recently revised its inclusionary housing in-lieu fee program to collect additional revenue for the construction of affordable housing. As the cost of housing in the region has skyrocketed at one of the fastest rates in the state, this pressing issue requires immediate action.

² The seven classes protected under the Federal Fair Housing Act are: Color, Disability, Familial Status (i.e., having children under 18 in a household, including pregnant women), National Origin, Race, Religion, and Sex.

1.3 Contributing Factors to Fair Housing Issues

An AI for any jurisdiction will provide an analysis of all of the contributing factors to fair housing issues listed below. Those contributing factors that were found to exist within the County of San Luis Obispo are addressed within this AI. The Appendix of this AI goes on to summarize the County's standing on all the contributing factors.

1. Access to financial services
2. Access for persons with disabilities to proficient schools
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability of affordable units in a range of sizes
7. Availability, type, frequency, and reliability of public transportation
8. Community opposition
9. Deteriorated and abandoned properties
10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
11. Displacement of residents due to economic pressures
12. Impediments to mobility
13. Inaccessible public or private infrastructure
14. Inaccessible government facilities or services
15. Lack of access to opportunity due to high housing costs
16. Lack of affordable, accessible housing in a range of unit sizes
17. Lack of affordable in-home or community-based supportive services
18. Lack of affordable, integrated housing for individuals who need supportive services
19. Lack of assistance for housing accessibility modifications
20. Lack of assistance for transitioning from institutional settings to integrated housing
21. Lack of community revitalization strategies
22. Lack of local private fair housing outreach and enforcement
23. Lack of local public fair housing enforcement
24. Lack of local or regional cooperation
25. Lack of meaningful language access for individuals with limited English proficiency
26. Lack of private investment in specific neighborhoods

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27. Lack of public investment in specific neighborhoods, including services or amenities
28. Lack of resources for fair housing agencies and organizations
29. Lack of state or local fair housing laws
30. Land use and zoning laws
31. Lending discrimination
32. Location of accessible housing
33. Location of employers
34. Location of environmental health hazards
35. Location of proficient schools and school assignment policies
36. Location and type of affordable housing
37. Loss of affordable housing
38. Occupancy codes and restrictions
39. Private discrimination
40. Quality of affordable housing information programs
41. Regulatory barriers to providing housing and supportive services for persons with disabilities
42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
43. Source of income discrimination
44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings
45. Unresolved violations of fair housing or civil rights law

1.4 Proposed Goals and Actions

All the contributing factors listed above contribute to fair housing issues. The AI evaluates housing choice and availability within the County against these contributing factors. Where impediments to fair housing choice have been identified, the AI proposes goals and strategies to address those impediments, as follows. These goals are more fully described in Section VI – Fair Housing Goals and Priorities

Goal 1: Strengthen Public and Private Fair Housing Enforcement Infrastructure throughout San Luis Obispo County

Strategies:

1. Increase financial support for fair housing services through a collaborative strategy that engages city governments, the private sector, and local philanthropy.

Goal 2: Increase the Supply of Affordable Housing in High Opportunity Areas (areas of high-quality jobs, education, and services) throughout San Luis Obispo County.

Strategies:

1. Increase financial resources for affordable housing through a countywide bond issue.
2. Reform local zoning and land use regulations to facilitate the development of housing types that are more likely to be affordable.
3. Build upon efforts to encourage cities' use of Community Development Block Grant (CDBG) for affordable housing development.
4. Encourage more cities to reduce fees, waive fees, or use CDBG funds to cover part or all of the cost of fees for affordable housing developments.

Goal 3: Meet the Supportive Housing Needs of Persons with Disabilities

Strategies:

1. If a bond issue is passed, require that 25% of all affordable units in developments assisted with bond proceeds be set aside for persons with disabilities who need supportive services.
2. Provide funding to public housing authorities or non-profits for the purchase of affordable, inclusionary housing units for use as supportive housing for extremely low-income persons with disabilities.

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Goal 4: Increase Public Transportation to Connect Protected Class Members to Opportunity

Strategies:

1. Advocate for greater state and federal resources for public transportation.

The AI lays out a series of achievable action steps that will help San Luis Obispo to not only meet its obligation to affirmatively fair housing but to continue to be a model for equity and inclusion.

CHAPTER 2: COMMUNITY PARTICIPATION PROCESS

This section describes community outreach and participation efforts used to conduct this Analysis of Impediments (AI). The process reached out to a number of diverse populations, fair housing stakeholders, and government offices in order to paint a complete picture of fair housing issues in the jurisdiction.

- 1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AI process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For Public Housing Authorities (PHAs), identify your meetings with the Resident Advisory Board and other resident outreach.*

To date, the community participation process has consisted of a series of one-on-one stakeholder meetings designed to solicit detailed input from organizations and agencies that have a deep well of knowledge and expertise related to fair housing issues and broader community development issues in the County of San Luis Obispo. Stakeholder organizations engaged through this process were, in turn, engaged as partners in advertising a pre-draft community meeting, which was held at the public library in the City of San Luis Obispo on Monday, June 10, 2019. The meeting was also advertised through the County of San Luis Obispo's website and social media channels.

- 2. Provide a list of organizations consulted during the community participation process.*

Groups consulted during community participation process include:

- California Rural Legal Assistance
- City of Atascadero
- City of Morro Bay
- City of Pismo Beach
- City of San Luis Obispo
- City of Arroyo Grande
- Community Action Partnership of San Luis Obispo County
- Family Care Network
- Habitat for Humanity for San Luis Obispo County

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- Home Builders Association of the Central Coast
- Home Front Morro Bay
- Hope’s Village
- Housing Authority of San Luis Obispo
- People’s Self-Help Housing
- San Luis Obispo Council of Governments
- Transitions-Mental Health Association

3. *Describe whether outreach activities elicited broad community participation during the development of the AI. If there was low participation, or low participation among particular protected class³ groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class³ groups?*

Outreach efforts successfully elicited broad community participation in the Analysis of Impediments process. Additional targeted outreach to the Hispanic community through service providers and religious congregations may help further improve participation among protected class³ members.

4. *Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.*

This information will be provided in the final Analysis of Impediments to Fair Housing Choice following the formal public comment period.

³ The seven classes protected under the Federal Fair Housing Act are: Color, Disability, Familial Status (i.e., having children under 18 in a household, including pregnant women), National Origin, Race, Religion, and Sex.

CHAPTER 3: ASSESSMENT OF PAST GOALS, ACTIONS, AND STRATEGIES

The Assessment of Past Goals, Actions, and Strategies is a summary of both the goals and recent actions taken by the County and its cities to advance fair housing. This section 1) lists the 2016 AI goals and 2) describes the jurisdiction’s efforts to complete those goals.

3.1 List of 2016 AI Impediments and Action Steps

Part 1: Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

The County of San Luis Obispo’s 2016 Analysis of Impediments to Fair Housing Choice (2016 AI) identified four impediments to fair housing choice and one issue. For three of those impediments, the 2016 AI proposed a combined total of 12 action steps. Those impediments and action steps are listed below.

Impediment 1: Lack of Fair Housing, Education, Outreach, and Enforcement Infrastructure in San Luis Obispo County and on the Central Coast.

- Action Step 1.1: Convene meetings with California Rural Legal Assistance (CRLA), the Fair Housing Council of Central California, and the Housing Rights Center to gauge interest and capacity to start a fair housing organization on the Central Coast or expand existing operations into the region.
- Action Step 1.2: Convene meetings with housing and community development staff from entitlement jurisdictions along the Central Coast to develop a joint funding strategy for increased fair housing infrastructure.
- Action Step 1.3: Work with key partners to secure funding for a new or expanded fair housing organization from local foundations and businesses.
- Action Step 1.4: Provide Community Development Block Grant (CDBG) funding to a new or existing private fair housing organization in order to support its operations in the county.

Impediment 2: High housing costs constrain the ability of low-income Latino households in the Central Coast to live in San Luis Obispo County.

- Action Step 2.1: Expand multi-family residential zoning and zoning that allows for the development of small single-family homes in cities and census-designated places throughout the County of San Luis Obispo with a strong emphasis on sites that are outside of the Coastal Zone and that do not currently have concentrations of multi-family housing.
- Action Step 2.2: In the future, if the County's Growth Management Ordinance is frequently triggered, expand exceptions to the Growth Management Ordinance or otherwise ease its restrictions.
- Action Step 2.3: Ease procedural barriers to multi-family housing development.
- Action Step 2.4: Allow for increased density within residential multi-family districts.
- Action Step 2.5: Prioritize the use of city allocations of CDBG funds for assisting affordable housing development.
- Action Step 2.6: Waive or reduce building fees for developments that include affordable housing.

Impediment 3: Limited Access to Public Transportation, Particularly in Northern San Luis Obispo County.

- Action Step 3.1: Coordinate with transit agencies to ensure that expanded bus lines effectively serve new affordable and multi-family housing.
- Action Step 3.2: Monitor the implementation of reduced required numbers of parking spaces for residential developments when developers agree to provide complimentary bus passes to low-income residents in the City of San Luis Obispo.

Impediment 4: Inconsistent State Housing Policies and Lack of Available Funds.

The 2016 AI did not include actions steps to address this impediment.

3.2 Progress in Meeting the 2016 AI Action Steps

Part 2: Discuss what progress has been made toward their achievement:

- Action Step 1.1: Convene meetings with California Rural Legal Assistance (CRLA), the Fair Housing Council of Central California, and the Housing Rights Center to gauge interest and capacity to start a fair housing organization on the Central Coast or expand existing operations into the region.

In 2016 and 2017, the County of San Luis Obispo met with a number of key potential partners to assess interest in the creation of a new fair housing organization on the Central Coast or the expansion of services of an existing organization into the Central Coast. The County discovered that organizations outside of the Central Coast were not interested in expanding their service areas and that starting a new organization would be too resource intensive. As a result, the County continues to contract with CRLA to provide fair housing services. As of 2016, the County increased the annual award amount from \$25,000 to \$50,000. CRLA continues to provide counseling, mediation, case management (40+ fair housing cases annually) as well as training seminars. CRLA also opened a rental clinic in the County superior courthouses that serves both landlords and tenants.

- Action Step 1.2: Convene meetings with housing and community development staff from entitlement jurisdictions along the Central Coast to develop a joint funding strategy for increased fair housing infrastructure.

Because the County determined that it was not feasible to either create a new fair housing organization or incentivize an existing organization to expand its service area, the County did not develop a joint public sector funding strategy to support either of those strategies.

- Action Step 1.3: Work with key partners to secure funding for a new or expanded fair housing organization from local foundations and businesses.

Because the County determined that it was not feasible to either create a new fair housing organization or incentivize an existing organization to expand its service area at this time, the County did not develop a private sector funding strategy to support either of those strategies.

- Action Step 1.4: Provide County general funds to a new or existing private fair housing organization in order to support its operations in the county.

As described above, the County used general funds to pay California Rural Legal Assistance to provide the public with fair housing services.

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- Action Step 2.1: Expand multi-family residential zoning and zoning that allows for the development of small single-family homes in cities and census-designated places throughout San Luis Obispo County with a strong emphasis on sites that are outside of the Coastal Zone and that do not currently have concentrations of multi-family housing.

The County and most of its cities have adopted denser multi-family zoning in several areas, and this effort is on-going. Since the last Analysis of Impediments, the County has converted approximately 20 acres of commercial and low density residentially zoned land into multi-family zoned land. The City of San Luis Obispo has approved three specific plans that increase the supply of multi-family zoned land. These are the San Luis Ranch, Avila Ranch, and Froom Ranch Specific Plans. San Luis Ranch and Avila Ranch are under construction and include rental and ownership units for workforce, moderate, and low-income households.

Additionally, the City of Arroyo Grande has approved two specific plan projects that rezoned commercial and agricultural parcels into single family zoning. The City of Paso Robles is currently processing two specific plans which together will provide 14+ acres of residential multi-family zoned land with a density of 20 units/acre (for a total of 284 units). The City of Atascadero has amended its residential zones as needed to reach its share of the Regional Housing Needs Allocation. Finally, each city and the County must update their Housing Elements for the Years 2020-2028. These updates will include an analysis of land that is suitable for new multi-family zoning and that will help meet the County and cities shares of their Regional Housing Needs Allocation.

The County and most of its cities have amended or are amending their accessory dwelling unit (ADU) ordinances to streamline the permitting and development of ADUs, which would increase residential densities and create more diverse housing opportunities in single family neighborhoods. The County and City of San Luis Obispo have also acted to allow movable tiny houses as accessory dwellings in residential zones. In general, a movable tiny house is a 400 square foot or less residential unit mounted on a wheeled trailer chassis and designed to resemble a conventional single-family dwelling.

- Action Step 2.2: In the future, if the County's Growth Management Ordinance is frequently triggered, expand exceptions to the Growth Management Ordinance or otherwise ease its restrictions.

Because the Growth Management Ordinance has not been triggered, the need has not arisen for the County to consider expanding exceptions to the Growth Management Ordinance or otherwise ease its restrictions.

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- Action Step 2.3: Ease procedural barriers to multi-family housing development.

The County is engaged in coordinating a broader regional effort to examine infrastructure and housing needs countywide and to integrate efforts to address the region's critical housing and infrastructure shortage. The goal is to create a Regional Infrastructure and Housing Plan. As part of this effort, the County is working with its cities, for-profit and non-profit builders, and the San Luis Obispo Council of Governments (SLOCOG) to identify priority development areas for making infrastructure investments and incentivizing the construction of higher density and affordable housing in those priority development areas. This collaborative planning process is currently underway and is slated for completion in late 2020, so its specific contents and recommendations are not identified at this time; however, the agencies involved may consider identifying any opportunities for reducing potential procedural barriers to multi-family and/or affordable housing.

The County is amending its Accessory Dwelling, Agriculture Worker Housing, and Density Bonus Ordinances to incentivize higher density housing. The County is also exploring the feasibility of adding an affordable housing funds bond measure to the ballot for the November 2020 election. The County has revised its in-lieu and housing impact fee schedules to increase the anticipated fee revenue amount from \$100,000/year to \$700,000-\$1,000,000/year. The increased revenue will go toward the County's Title 29 Affordable Housing Fund.

The City of San Luis Obispo and the County are adopting new ordinances for tiny homes.

The Cities of San Luis Obispo and Arroyo Grande have streamlined environmental review for affordable housing projects by using the exemption for urban infill projects provided under the California Environmental Quality Act (CEQA Class 32 – Urban Infill Exemption) (e.g., 790 Foothill Blvd. in San Luis Obispo, and the Brisco Road Townhouses and South Halcyon Apartments in Arroyo Grande). Additionally, the City of San Luis Obispo deferred to California's Housing Accountability Act when approving a density bonus project that required a waiver of setback and height standards to reach a density of 58 units / acre (i.e., 790 Foothill Blvd).

The County and the Cities of Arroyo Grande, San Luis Obispo, and Paso Robles have all waived or deferred fees to incentivize affordable housing projects.

- Action Step 2.4: Allow for increased density within residential multi-family districts.

As described above, the County is coordinating a broader regional strategic planning effort with local agencies to address the region's critical housing and infrastructure shortage. This

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collaborative planning process is currently underway and is slated for completion in late 2020, so its specific contents and recommendations are not identified at this time; however, the agencies involved may consider exploring opportunities to facilitate development such as exploring opportunities for increased residential densities.

The City of San Luis Obispo has increased the allowable density in its R-3 zone and established density allowance minimums in the R-2, R-3, and R-4 zones.

- Action Step 2.5: Prioritize the use of city allocations of CDBG funds for assisting affordable housing development.

The County includes a section in its Urban County Memorandum of Understanding that requires each city to consider ways to use their shares of CDBG funds to support affordable housing. Specifically, the County and the City of San Luis Obispo have partnered in providing CDBG funds and other funds to affordable housing projects located within the City (i.e., Iron Works Apts, Bishop Street Studios, 860-On-The-Wye Apts, and Courtyard Apts). Smaller cities, including Atascadero and Morro Bay, have developed models for sharing CDBG funds in order to allow cities to tackle more ambitious CDBG-funded projects in particular years.

- Action Step 2.6: Waive or reduce building fees for developments that include affordable housing.

The County and the Cities of Arroyo Grande, San Luis Obispo, and Paso Robles have all waived or deferred fees to incentivize affordable housing projects. The Cities of Arroyo Grande and San Luis Obispo have used public funds to cover the cost of fees for affordable housing developments. Some cities, such as Paso Robles, have taken action to reduce the permitting fees for accessory dwelling units.

- Action Step 3.1: Coordinate with transit agencies to ensure that expanded bus lines effectively serve new affordable and multi-family housing.

Public transportation, including bus service, is being included in new developments with specific plans in the City of San Luis Obispo and Paso Robles. Some of these developments, like Avila Ranch and San Luis Ranch, include affordable housing units.

The County is also engaged in coordinating a broader regional effort to examine infrastructure and housing needs countywide and to integrate efforts to address the region's critical housing and infrastructure shortage. The goal is to create a Regional Infrastructure and Housing Plan. Improved public transportation will be addressed by this regional planning effort. As part of this effort, the County is working with its cities, non-profit builders and the San Luis Obispo Council of Governments (SLOCOG) to identify priority development

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areas for making infrastructure investments and incentivizing the construction of higher density and affordable housing in those priority development areas.

- Action Step 3.2: Monitor the implementation of reduced required numbers of parking spaces for residential developments when developers agree to provide complimentary bus passes to low-income residents in the City of San Luis Obispo.

The City of San Luis Obispo does not have a formal program as described above.

Impediment 4: Inconsistent State Housing Policies and Lack of Available Funds.

Although the last Analysis of Impediments did not propose specific action steps to address this impediment, the State of California has made significant progress toward increasing funds for affordable housing and eliminating inconsistencies between state housing policies.

In 2017, the State passed California Senate Bill 2 - Building Homes and Jobs Act which established a new permanent on-going funding source that will go to cities and counties to use to address housing shortages and homelessness. The Housing Accountability Act was passed, which requires jurisdictions to approve multi-family housing projects without adding design constraints when the projects comply with the General Plan requirements. Local cities have begun using a new exemption in the California Environmental Quality Act (CEQA Class 32 – Urban Infill Exemption). This exemption requires cities to streamline their environmental review process for affordable housing projects that comply with the General Plan. The State also passed a law that requires jurisdictions to streamline certain multi-family housing projects when they haven't met their regional housing production targets.

In addition, the State passed legislation empowering municipalities to apply mandatory inclusionary housing to rental units, and California voters have approved major affordable housing bond measures. The California Supreme Court also clarified that inclusionary housing is constitutional in its decision in *California Building Industry Association v. City of San Jose* (February 2016).

- a. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and*

The County of San Luis Obispo and its cities have experienced both success and setbacks in their efforts to achieve the goals of the last Analysis of Impediments. Specifically, progress was made towards rezoning more land for multi-family housing development, adopting ordinances and streamlining environmental review to incentivize higher density housing,

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and waiving or deferring fees for affordable housing projects. The County and its cities are currently developing a Regional Infrastructure and Housing Plan, which will identify areas best suited for future development and then direct regional efforts and financing towards those identified priority growth areas. Regarding setbacks, the County was not able to facilitate a new fair housing organization on the Central Coast. The County and its cities should continue their progress in updating local land use and zoning policies as recommended in the last Analysis of Impediments.

- b. Discuss any additional policies, actions, or steps that you could take to achieve past goals or mitigate the problems you have experienced.*

To better achieve the goals from the last Analysis of Impediments there could be more specific recommendations regarding zoning and land use changes. For example, instead of recommending generally that the County and its cities should allow greater residential density in multi-family zoning districts, future recommendations should specify which zoning districts should be amended and what higher density should be allowed. The specific plans adopted by the cities actually achieve these goals. The Cities, County, and San Luis Obispo Council of Governments should also continue their efforts to develop and implement the Regional Infrastructure and Housing Plan, and coordinate future funding for transportation, housing, and infrastructure.

- c. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.*

The goals selected for this Analysis of Impediments are more concrete and specific than the recommendations from the last Analysis of Impediments. Particularly with respect to issues like zoning and land use policies that contribute to disproportionate housing cost burden and segregation, the process of implementing more tangible goals is more effective than with respect to more general goals.

CHAPTER 4: FAIR HOUSING ANALYSIS

4.1 Demographic Summary

This Demographic Summary provides an overview of data concerning race and ethnicity, sex, familial status, disability status, limited English proficiency, national origin, and age. The data included reflects the composition of the County of San Luis Obispo and the cities of Arroyo Grande, Atascadero, Grover Beach, Morro Bay, Paso Robles, Pismo Beach, and San Luis Obispo. The County and the Region will be the same, as they are coterminous. The slight differences reflected in the columns for the County and Region below account for the fact that HUD does not include Grover Beach in their delineation of the jurisdiction (the County), as they no longer receive CDBG funds. However, the City of Grover Beach is still counted as part of the region. In addition to capturing current conditions, the data reflects change over time in the nearly three decades since the 1990 Census. The data and analysis in the succeeding sections of this Analysis build upon the foundation laid in this section and, at times, refer to this section.

A. Demographic Tables

- i. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).*

The County of San Luis Obispo is a coastal community in central California that also contains extensive swaths of rural land. Though the County has historically been and remains strongly majority non-Hispanic White, there have been some demographic shifts—most notably a large increase in the Hispanic/Latino population.

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Table 4-1: Demographics, San Luis Obispo County

Race/Ethnicity	San Luis Obispo County (CDBG, HOME, ESG) Jurisdiction		San Luis Obispo-Paso Robles- Arroyo Grande Region			
	#	%	#	%		
White, Non-Hispanic	176,995	71.13%	191,696	71.09%		
Black, Non-Hispanic	4,969	2.00%	5,128	1.90%		
Hispanic	51,419	20.66%	55,973	20.76%		
Asian/Pacific Island, Non-Hispanic	7,705	3.10%	8,452	3.13%		
Native American, Non-Hispanic	1,263	.51%	1,367	0.51%		
National Origin of Foreign-Born Residents						
#1 country of origin	Mexico	14,506	6.08%	Mexico	15,286	5.91%
#2 country of origin	Canada	1,181	0.49%	Philippines	1,373	0.53%
#3 country of origin	Philippines	1,160	0.49%	Canada	1,238	0.48%
#4 country of origin	England	788	0.33%	England	832	0.32%
#5 country of origin	Germany	690	0.29%	Germany	724	0.28%
#6 country of origin	India	502	0.21%	Korea	518	0.20%
#7 country of origin	Korea	451	0.19%	India	502	0.19%
#8 country of origin	Other UK	446	0.19%	Other UK	479	0.19%
#9 country of origin	Vietnam	434	0.18%	Vietnam	475	0.18%
#10 country of origin	El Salvador	314	0.13%	China excl. Hong Kong & Taiwan	387	0.15%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	13,547	5.68%	Spanish	14,263	5.51%
#2 LEP Language	Chinese	366	0.15%	Tagalog	402	0.16%
#3 LEP Language	Tagalog	346	0.14%	Chinese	376	0.15%
#4 LEP Language	Korean	260	0.11%	Korean	364	0.14%
#5 LEP Language	Other Pacific Island Language	260	0.11%	Other Pacific Island Language	320	0.12%
#6 LEP Language	Vietnamese	196	0.08%	Vietnamese	262	0.10%
#7 LEP Language	German	133	0.06%	Portuguese	210	0.08%
#8 LEP Language	Portuguese	120	0.05%	German	133	0.05%
#9 LEP Language	Japanese	112	0.05%	Russian	133	0.05%

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#10 LEP Language	French	111	0.05%	French	116	0.04%
Disability Type						
Hearing difficulty		9,049	3.92%		9,881	3.94%
Vision difficulty		4,181	1.81%		4,543	1.81%
Cognitive difficulty		7,972	3.46%		8,904	3.55%
Ambulatory difficulty		12,815	5.56%		14,445	5.76%
Self-care difficulty		4,258	1.85%		4,810	1.92%
Independent living difficulty		8,515	3.69%		9,481	3.78%
Sex						
Male		127,868	51.39%		137,999	51.18%
Female		120,958	48.61%		131,638	48.82%
Age						
Under 18		46,880	18.84%		50,841	18.86%
18-64		164,461	66.09%		177,774	65.93%
65+		37,485	15.06%		41,022	15.21%
Family Type						
Families with children		23,010	39.42%		25,038	39.31%
<p><i>Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately. Note 3: Data Sources: Decennial Census; ACS. Note 4: China does not include Hong Kong and Taiwan. Note 5: Refer to the Data Documentation for details www.hudexchange.info/resource/4848/affh-data-documentation.</i></p>						

Race and Ethnicity

The County of San Luis Obispo has a very strong non-Hispanic/Latino White majority. Non-Hispanic White residents make up 71.13% of the population. The next largest racial/ethnic group is Hispanic/Latino residents, who make up 20.66% of the County population. Non-Hispanic Asian residents make up 3.10% and non-Hispanic Black residents comprise just 2% of the population. 0.5% of County residents are non-Hispanic Native American.

National Origin of Foreign-Born Residents

Within the County, the most common country of origin is overwhelmingly Mexico, with residents from Mexico comprising 6.08% of the population. The remaining most common

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countries of origin are, in order, Canada, the Philippines, England, Germany, India, Korea, Other United Kingdom countries, Vietnam, and El Salvador.

Limited English Proficiency

The most commonly spoken language for those in the County with Limited English Proficiency (LEP) is Spanish. The remaining most common languages for those with Limited English Proficiency are, in order, Chinese, Tagalog, Korean, another Pacific Island Language, Vietnamese, German, Portuguese, Japanese, and French.

Disability

The most common type of disability experienced by residents of the County is ambulatory difficulties. The remaining most common disabilities are, in order of prevalence, hearing difficulties, independent living difficulty, cognitive difficulty, self-care difficulty, and vision difficulty.

Table 4-2: Disability by Type, San Luis Obispo County

San Luis Obispo County		
Disability Type	Number	Percentage
Hearing Difficulty	9,049	3.92%
Vision Difficulty	4,181	1.81%
Cognitive Difficulty	7,972	3.46%
Ambulatory Difficulty	12,815	5.56%
Self-care Difficulty	4,258	1.85%
Independent Living Difficulty	8,515	3.69%

Sex

County residents are 51.39% male and 49.61% Female.

Age

The majority of residents in the County are ages 18-64, with 66.09% of residents falling into that age range. 18.84% of the population is under 18, and 15.06% of residents are over age 65.

Familial Status

Families with children constitute 39.42% of the total County population.

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Table 4-3: Demographic Trends

Table 2 – Demographic Trends

Race/Ethnicity	[San Luis Obispo County, CA CDBG, HOME, ESG] Jurisdiction								[San Luis Obispo-Paso Robles-Arroyo Grande, CA] Region							
	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	160,799	81.22%	171,363	76.13%	176,995	71.13%	176,995	71.13%	176,209	81.14%	187,824	76.13%	191,696	71.09%	191,696	71.09%
Black, Non-Hispanic	4,080	2.06%	5,299	2.35%	6,006	2.41%	4,369	2.00%	4,300	1.98%	5,495	2.23%	6,254	2.32%	5,128	1.90%
Hispanic	26,119	13.19%	36,649	16.28%	51,419	20.66%	51,419	20.66%	28,895	13.30%	40,177	16.29%	55,973	20.76%	55,973	20.76%
Asian or Pacific Islander, Non-Hispanic	5,133	2.59%	7,489	3.33%	10,387	4.17%	7,705	3.10%	5,744	2.64%	8,433	3.42%	11,369	4.22%	8,452	3.13%
Native American, Non-Hispanic	1,467	0.74%	3,020	1.34%	3,133	1.26%	1,263	0.51%	1,628	0.75%	3,334	1.35%	3,398	1.28%	1,367	0.51%
National Origin																
Foreign-born	14,474	7.32%	19,824	8.81%	24,366	9.79%	26,172	10.52%	16,213	7.47%	22,015	8.92%	26,556	9.85%	28,173	10.45%
LEP																
Limited English Proficiency	8,597	4.35%	12,424	5.52%	15,144	6.09%	16,238	6.53%	9,786	4.51%	13,927	5.65%	16,646	6.17%	17,448	6.47%
Sex																
Male	102,709	51.91%	116,021	51.55%	127,868	51.39%	127,868	51.39%	112,024	51.60%	126,449	51.26%	137,999	51.18%	137,999	51.18%
Female	95,138	48.09%	109,050	48.45%	120,958	48.61%	120,958	48.61%	105,061	48.40%	120,232	48.74%	131,638	48.82%	131,638	48.82%
Age																
Under 18	43,452	21.96%	50,957	22.64%	46,880	18.84%	46,880	18.84%	47,673	21.95%	55,696	22.58%	50,841	18.86%	50,841	18.86%
18-64	126,955	64.17%	141,994	63.09%	164,461	66.09%	164,461	66.09%	138,800	63.94%	155,306	62.96%	177,774	65.93%	177,774	65.93%
65+	27,441	13.87%	32,120	14.27%	37,485	15.06%	37,485	15.06%	30,612	14.10%	35,679	14.46%	41,022	15.21%	41,022	15.21%
Family Type																
Families with children	21,507	45.23%	13,792	45.37%	23,010	39.42%	23,010	39.42%	23,603	44.78%	15,521	45.36%	25,038	39.31%	25,038	39.31%

Over time, the non-Hispanic White population and the Hispanic/Latino population have seen the most change within the County of San Luis Obispo. The non-Hispanic White population has dropped approximately 10% since 1990. The Hispanic/Latino population in the region has increased from 13.1% in 1990 to 20.66% as of 2010, and the Black population experienced a brief increase in 2000 before returning to almost equivalent levels of 1990, though these differences have only fluctuated between 2.06 and 2.41% of the total county population. The Asian population has seen growth as well, increasing from 2.59% to 4.17% from 1990-2010.

Since 1990, the foreign-born population and the percentage of the population with Limited English Proficiency have seen slight yet steady increases, but still make up less than 10% of the County population.

The percentage of the population that are families with children has dropped over time, from 45.23% in 1990 to 39.42% in 2010. This drop may be attributed in part to increases in older retirees moving to the area and may correspond to the slight increases in the population over the age of 65. There has also been a rapid increase in housing costs forcing working class families to relocate.

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4.2 General Issues

4.2.1 Segregation/Integration

A. Analysis

- 1. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*

Table 4-4: Dissimilarity Index

	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-40	Low Segregation
	41-54	Moderate Segregation
	55-100	High Segregation

Table 4-5: Dissimilarity Index Values by Race and Ethnicity for San Luis Obispo County, CA.

San Luis Obispo County, CA				
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	26.30	24.96	24.58	29.95
Black/White	48.57	48.64	48.97	60.48
Hispanic/White	28.66	28.63	28.21	32.25
Asian or Pacific Islander/White	31.39	25.89	23.40	27.59

Source: HUD AFFH Tool Table 3 – Racial/Ethnic Dissimilarly Trends

The tables above reflect the Dissimilarity Indices for each jurisdiction. The Dissimilarity Index measures the percentage of a certain group’s population that would have to move to a different census tract in order to be evenly distributed within a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the extent of the segregation.

The County of San Luis Obispo experiences low levels of segregation across the majority of racial groups and these levels have remained fairly consistent across all racial groups. The

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very large White population and the spread-out nature of the county may account for this. The two largest racial groups, White and Hispanic/Latino, are spread widely throughout the County. Given the small percentages of other racial groups present, they are likely to be located in areas that have significant numbers of White residents. Black/White residents experience the highest levels of segregation, moving into the high segregation category. Black residents are not as evenly distributed throughout the county. Rather, they are concentrated mainly in the Cities of Paso Robles, Atascadero, and San Luis Obispo.

In addition to the Dissimilarity Index, social scientists also use the Isolation and Exposure Indices to measure segregation. These indices, when taken together, capture the neighborhood demographics experienced, on average, by members of a particular racial or ethnic group within a City or metropolitan area. The Isolation Index measures what percentage of the census tract in which a person of a certain racial identity lives is comprised of other persons of that same racial/ethnic group. Values for the Isolation Index range from 0 to 100. The Exposure Index is a group's exposure to all racial groups. Values for the Exposure Index also range from 0 to 100. A larger value means that the average group member lives in a census tract with a higher percentage of people from another group.

Table 4-6: Isolation Index Values by Race and Ethnicity in San Luis Obispo County

San Luis Obispo County	1980	1990	2000	2010
Isolation Index				
White/White	86.5	83	77.9	73.7
Black/Black	12.7	8.8	9.5	18.3
Hispanic/Hispanic	14.7	20.3	22.5	27.1
Asian/Asian	2.6	4.4	4.9	6.2

The steadily decreasing White/White Isolation Index corresponds with the steadily decreasing White population of the County of San Luis Obispo over the last 30 years. As populations of other racial and ethnic groups have increased, it follows that the percentage of nonwhite people in census tracts where White residents live would increase as well. However, based on the 2010 numbers, a White resident in the county still lives in a census tract that is 73.7% White. Similarly, as the Black and Hispanic/Latino populations in the County of San Luis Obispo have continued to increase, the Isolation Index indicates that despite still being a small portion of the total county population, residents of both races have been increasingly more likely to live in a census tract with other members of their racial groups. Overall, the indices are reflective of the growth in minority populations within a county that still maintains a strong White majority, in that due to small population size,

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minority groups would be hard pressed to find a census tract where their racial group made up a majority.

Table 4-7: Exposure Index Values for San Luis Obispo County

San Luis Obispo County				
Exposure Index	1980	1990	2000	2010
Black/White	69.7	62.7	64.4	49.7
Hispanic/White	79.4	72.6	69.4	64.6
Asian/White	85	81.3	76.3	72.5
White/Black	1.4	1.5	1.9	1.6
Hispanic/Black	2.4	3.8	2.9	2.9
Asian/Black	1.3	1.6	2	1.5
White/Hispanic	8.8	11.9	14.8	18.9
Black/Hispanic	13.6	25.3	21.4	25.6
Asian/Hispanic	9.6	11.9	15	18.6
White/Asian	1.8	2.7	3.5	4.4
Black/Asian	1.4	2.1	3.2	2.8
Hispanic/Asian	1.8	2.4	3.2	3.8

The Exposure Indices for the County of San Luis Obispo also reflect the aforementioned general population and segregation trends. For example, White residents are now more than twice as likely to live in a census tract with a higher percentage of Hispanic/Latino residents as they were in 1980. This trend is consistent with the White/Asian Exposure Index, though on a smaller scale. The Black population has seen the steadiest numbers in terms of population share since 1990, fluctuating between 2.06% and 2.41%. However, the Isolation and Exposure indices show that Black residents are more segregated from White residents than other populations. Over time, the Black/White exposure Index has dropped a staggering 20 points.

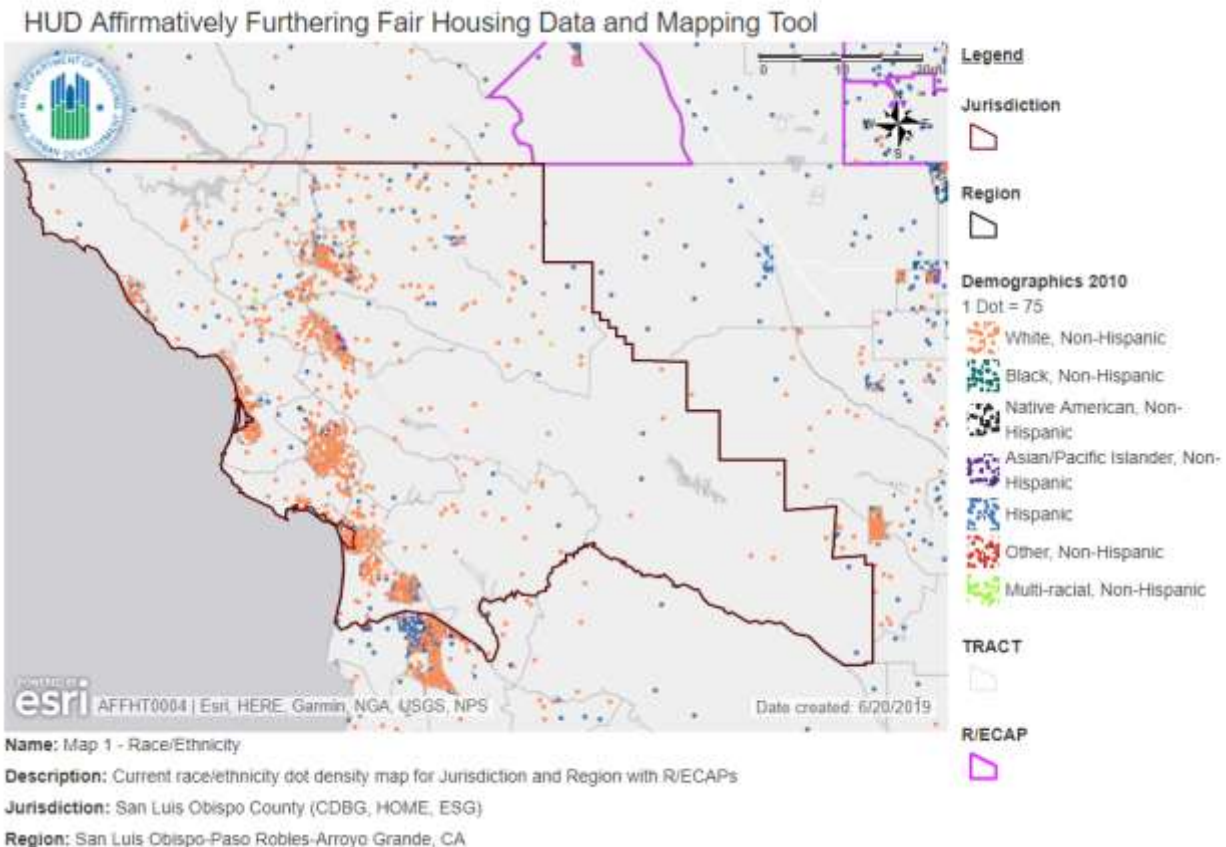
The Hispanic/White Exposure Index and the White/Hispanic Exposure index are firmly in line with the shifting racial demographics of the County. As the population of Hispanic/Latino residents has increased, White residents have become more likely to live in a census tract with Hispanic/Latino Residents. Black and Asian residents have also become more likely to live in a census tract with a higher percentage of Hispanic/Latino residents, consistent with the increase in the steady growth of the Hispanic/Latino population.

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2. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Race/Ethnicity

Map 4-1: Race/Ethnicity, San Luis Obispo County, CA



Hispanic/Latino residents are concentrated heavily in Paso Robles, Atascadero, San Luis Obispo City, and Arroyo Grande. Black residents are also most heavily concentrated in Paso Robles, Atascadero, and the City of San Luis Obispo. The strong majority of the County's Asian population is located within the City of San Luis Obispo, with a few pockets in Paso Robles, Atascadero, and Arroyo Grande. Non-Hispanic White residents are the most dispersed throughout the region. While some minority residents inhabit the rural, eastern side of the county, a significant number of White residents do. However, White residents are most concentrated in the major cities, specifically Paso Robles, Atascadero, San Luis Obispo, and Arroyo Grande. There are also significant concentrations in Morro Bay and Pismo Beach.

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In addition, there is a very heavy concentration of Black, Asian, and Hispanic/Latino residents located just across the county border in Santa Maria. Though not within the jurisdiction of the County of San Luis Obispo, residential patterns in Santa Maria are of high interest to this analysis, as our research and stakeholder engagement has revealed many residents of the county have been pushed out to Santa Maria due to high housing costs. As such, though many of these residents of Santa Maria are not technically residents of the County, a notable portion of them may be commuting daily to jobs within the County.

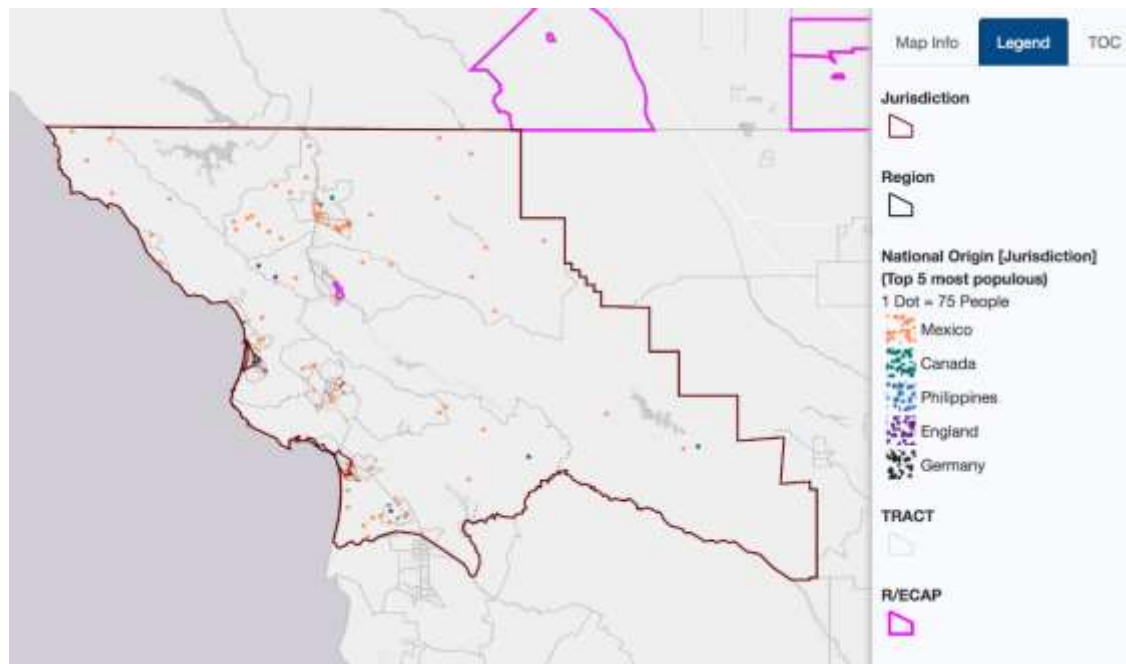
Integration

The most integrated parts of the County are the larger cities, as the vast majority of the small minority populations are concentrated in them. In particular, the central portion of Paso Robles is fairly integrated, specifically with regard to the White and Hispanic/Latino populations. The City of San Luis Obispo, Atascadero, and Arroyo Grande are also relatively well-integrated areas of the County. There is also a small cluster of integration located near the southern portion of the County, concentrated in Nipomo.

National Origin & Limited English Proficiency

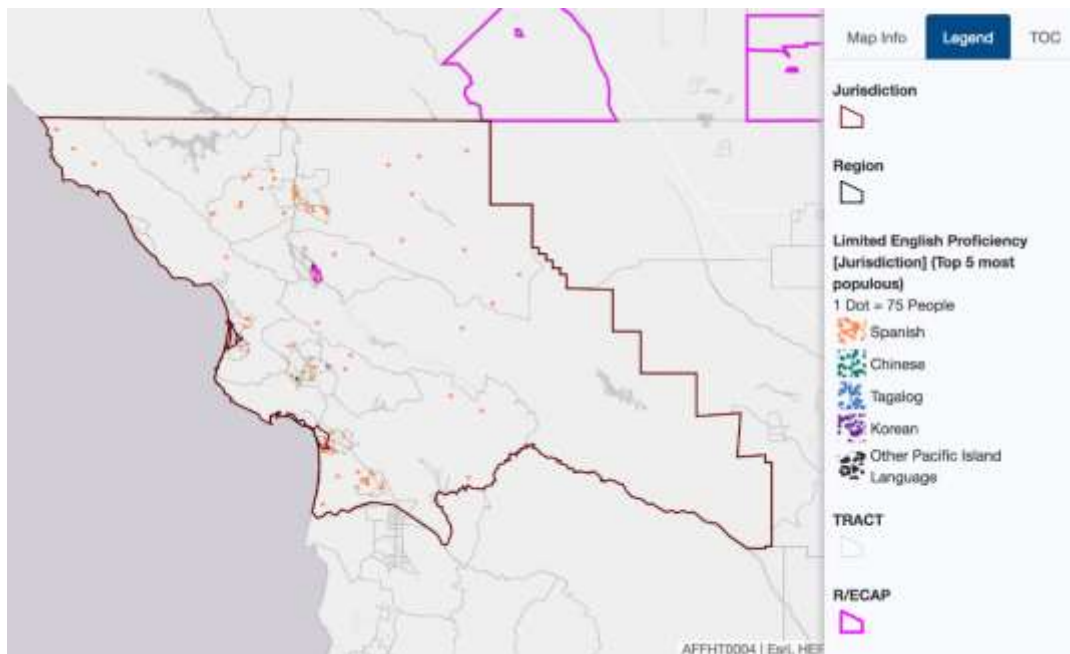
In considering patterns of segregation and integration on the basis of national origin and limited English proficiency (LEP) status, it is important to keep in mind that, although certain national origins are likely to be correlated with LEP individuals who speak the primary languages of those countries, there are nuances to the analysis. For instance, recent immigrants, who are more likely to have LEP status, may be concentrated in different neighborhoods than second or third generation Americans. This can have important implications for the implementation of local housing and community development policies. It may not make sense to prioritize resources for translated materials in a neighborhood that is, for example, 20% Filipino but within which just 1% of residents are LEP Tagalog speakers. At the same time, if a neighborhood is 10% Filipino but 5% of residents are LEP Tagalog speakers, such an investment may be more effective. Apparent discrepancies between which neighborhoods have national origin concentrations and which have LEP concentrations are reflective of the underlying HUD-provided data, and those differences may be useful for planning purposes.

Map 4-2: National Origin, San Luis Obispo County, CA



For the most part, residents from various countries of origin are concentrated most heavily in the northern central portion of the County, in Paso Robles and the surrounding areas. Residents of Mexican origin are the most dispersed, with small populations around the entire County, and clusters in most of the cities. Residents of Canadian origin are clustered mostly in Paso Robles, Atascadero and its surrounding areas, and San Luis Obispo City. There is a concentration of residents of Filipino origin located just to the east of Pismo Beach, and in the southeastern portion of Grover Beach, spilling across the city line. There are also clusters near Atascadero, San Luis Obispo City, and the unincorporated community of Nipomo. Residents of English origin are concentrated mainly in Atascadero and the surrounding area. Lastly, residents of German origin are most heavily concentrated in Paso Robles and just outside of San Luis Obispo City.

Map 4-3: Limited English Proficiency, San Luis Obispo County, CA



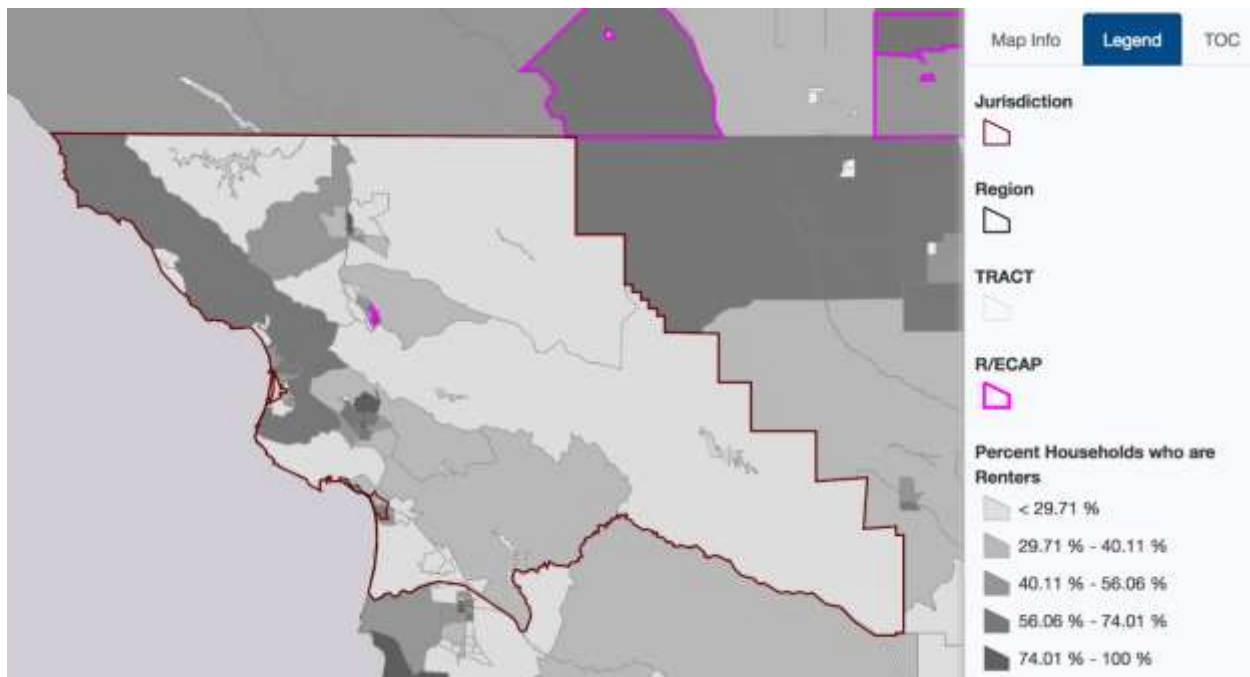
Spanish speakers with Limited English Proficiency are concentrated mainly on the western side of the County. Specifically, they are clustered in Paso Robles and the eastern surrounding area, San Luis Obispo City, the southern portion of Pismo Beach and the surrounding area, and Nipomo. Chinese-speaking residents with Limited English Proficiency are concentrated almost exclusively in San Luis Obispo City, with much smaller clusters in southern Paso Robles, Morro Bay, and Nipomo. Residents with Limited English Proficiency who speak Tagalog are clustered in Paso Robles, Atascadero, San Luis Obispo City, and the southern portion of Pismo Beach. In addition, there are some Tagalog speakers sprinkled throughout the rural southern central portion of the County. Lastly, Korean speaking residents with Limited English Proficiency are located in Paso Robles, within the R/ECAP (Racially or Ethnically Concentrated Areas of Poverty) in Atascadero, San Luis Obispo City, and the southern portion of Pismo Beach.

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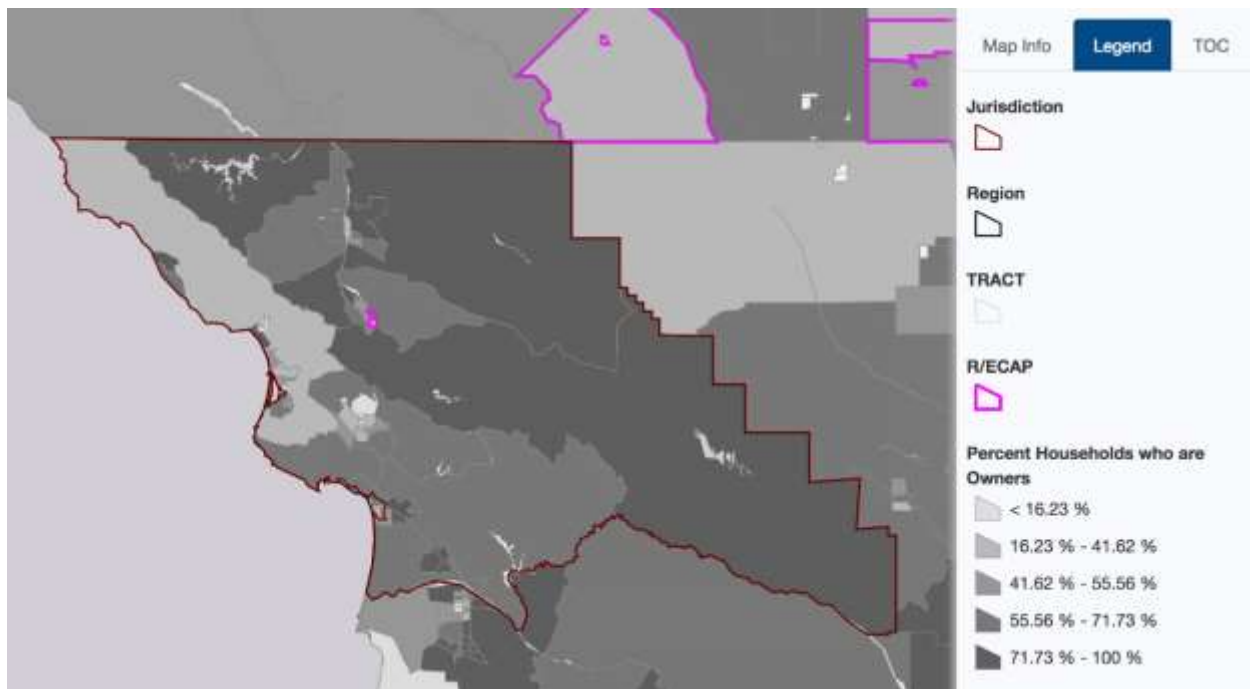
3. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

(Note: A definition and map of R/ECAP are provided in Section 4.2.2.)

Map 4-4: Housing Tenure by Renters with R/ECAPs, San Luis Obispo County



Map 4-5: Housing Tenure by Owners with R/ECAPs, San Luis Obispo County



The area with the highest percentage of households that own homes is located in the rural and eastern half of the county, where that percentage ranges from 71.73-100%. The other portion of the County with this range is the southern coastal region starting just east of San Luis Obispo City and stretching down to the southern border of the County. The south-central portion of the County, to the north and east of Nipomo, also has a high percentage of homeownership, ranging from 55.56-71.73%. The area with the highest percentage of households that rent is along the western coast of the County, from the most northern border and down to the western side of San Luis Obispo City. On the opposite end of the County, to the north and east of Paso Robles, there is a large percentage of renters, ranging from 56.06% to 74.01%. In addition, there are smaller areas within the County, such as a sliver of Paso Robles and the northern portion of San Luis Obispo City that have a percentage of renters ranging from 74.01-100%. The area with the highest mix of renters and owners is to the east of Paso Robles, just south of the northern County border.

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B. Additional Information

- i. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.*

Religion

HUD does not provide and the Census Bureau does not collect data concerning religious affiliation, but religion remains a prohibited basis for discrimination under the Fair Housing Act. Although the data discussed above with respect to national origin and LEP status can provide some insight into residential patterns with respect to religious given correlations between language, national origin, and religion, the resulting picture is merely a rough proxy. It is also a proxy that does not genuinely capture minority religious communities whose members are less likely to be recent immigrants.

Data from the 2010 Religion Census provides information regarding the different congregants and adherents in the County.⁴ In 2010, 46% of survey respondents claimed no religion, 33% identified as Catholic, 10% identified as Evangelical Protestant, 5% claimed Mainline Protestant, .3% identified as Black Protestant, .07% identified as Orthodox, and 4.27% identified as some other denomination.⁵

The Center for Religion and Civic Culture at the University of Southern California found that in 2010, 54% of the County of San Luis Obispo population belonged to one of the 263 congregations in the County. The Center also provided information about minority faith congregations. As of 2010, there were 13 congregations of the Church of Jesus Christ of Latter-Day Saints (LDS), four Buddhist congregations, three Jewish Congregations, three Baha'i congregations, two Hindu congregations, two Muslim congregations, and two Orthodox congregations. There were no reported Sikh congregations.⁶

⁴ Despite the availability of more recent population counts, percentages were calculated using 2010 population data to correspond with the Religion Census numbers.

⁵ <http://www.thearda.com/rcms2010/rcms2010.asp?U=06079&T=county&Y=2010&S=Name>

⁶ <https://crcc.usc.edu/county-profiles/>

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Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

More information can be found in the Contributing Factors of Segregation.

C. Contributing Factors of Segregation

- i. Consider the listed factors and any other factors affecting the jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

Please see the Appendix for the following Contributing Factors to Segregation:

Community opposition

Displacement of residents due to economic pressures

Lack of community revitalization strategies

Lack of private investment in specific neighborhoods

Lack of public investment in specific, neighborhoods, including services and amenities

Lack of local or regional cooperation

Land use and zoning laws

Lending discrimination

Location and type of affordable housing

Loss of affordable housing

Occupancy codes and restrictions

Private discrimination

Source of income discrimination

Lack of public investment in specific neighborhoods, including services and amenities

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

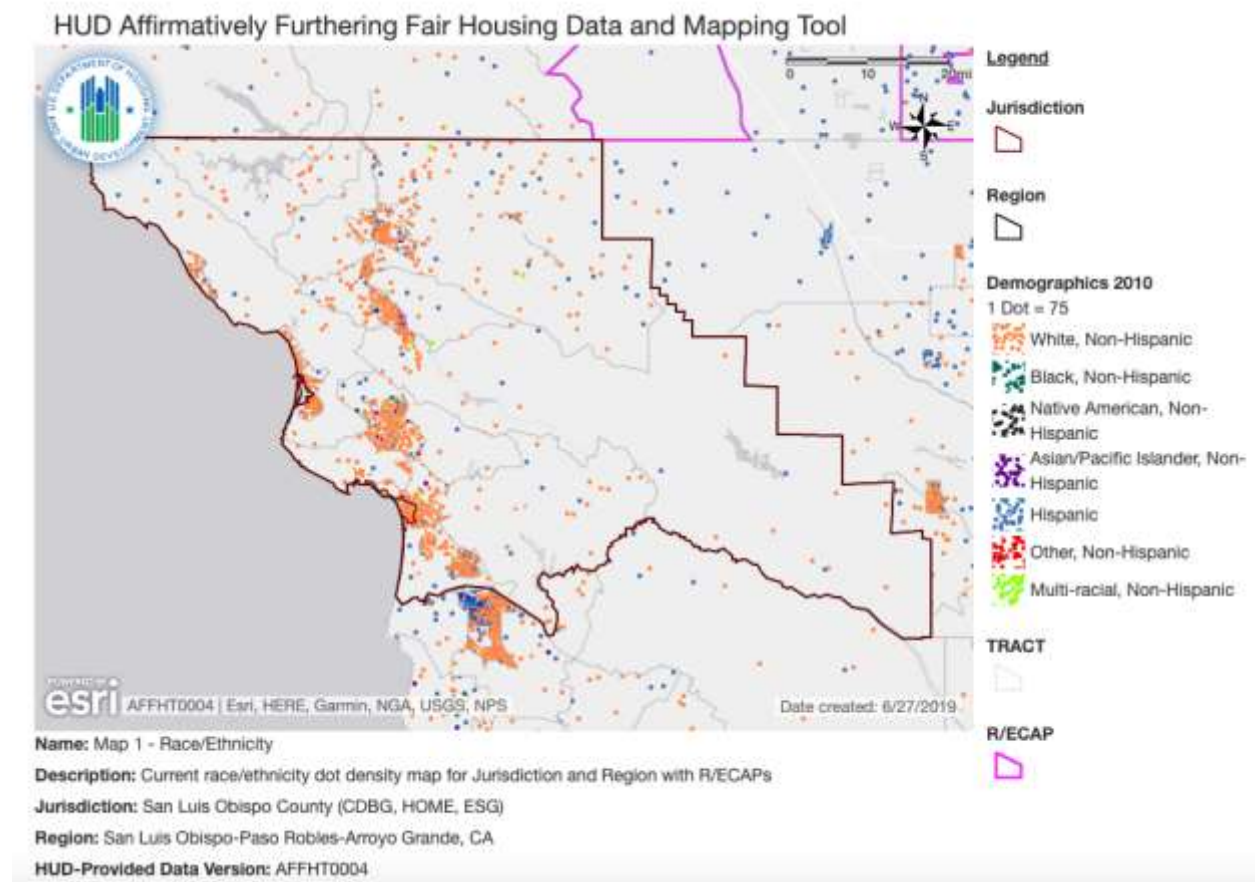
R/ECAPs are geographic areas with significant concentrations of poverty and minority populations. HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-White population of 50 percent or more. With regards to poverty, R/ECAPs are census tracts in which 40 percent or more of individuals are living at or below the poverty limit or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower.

Where one lives has a substantial effect on mental and physical health, education, crime levels, and economic opportunity. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation. Concentrated poverty is also associated with higher crime rates and worse health outcomes. However, these areas may also offer some opportunities as well. Individuals may actively choose to settle in neighborhoods containing R/ECAPs due to proximity to job centers and access to public services. Ethnic enclaves in particular may help immigrants build a sense of community and adapt to life in the U.S. The businesses, social networks, and institutions in ethnic enclaves may help immigrants preserve their cultural identities while providing a variety of services that allow them to establish themselves in their new homes. Overall, identifying R/ECAPs is important in order to better understand entrenched patterns of segregation and poverty.

A. R/ECAP

- i. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and Region.*

Map 4-6: R/ECAPs in San Luis Obispo County



There is one R/ECAP located within the County of San Luis Obispo, found in census tract 012800. The R/ECAP is adjacent to Atascadero State Hospital, Heilman Regional Park, and the Chalk Mountain Golf Course.

- ii. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and Region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and Region?

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Table 4-8: R/ECAP Demographics

	(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction		(San Luis Obispo-Paso Robles- Arroyo Grande, CA) Region			
R/ECAP Race/Ethnicity		#	%		#	%
Total Population in R/ECAPs		1,107	-		1,107	-
White, Non-Hispanic		452	40.83%		452	40.83%
Black, Non-Hispanic		289	26.11%		289	26.11%
Hispanic		286	25.84%		286	25.84%
Asian or Pacific Islander, Non-Hispanic		53	4.79%		53	4.79%
Native American, Non-Hispanic		11	0.99%		11	0.99%
Other, Non-Hispanic		4	0.36%		4	0.36%
R/ECAP Family Type						
Total Families in R/ECAPs		18	-		18	-
Families with children		8	44.44%		8	44.44%
R/ECAP National Origin						
Total Population in R/ECAPs		1,107	-		1,107	-
#1 country of origin	Mexico	61	5.51%	Mexico	61	5.51%
#2 country of origin	Thailand	17	1.54%	Thailand	17	1.54%
#3 country of origin	Philippines	3	0.27%	Philippines	3	0.27%
#4 country of origin	Cuba	2	0.18%	Cuba	2	0.18%
#5 country of origin	Honduras	2	0.18%	Honduras	2	0.18%
#6 country of origin	Korea	2	0.18%	Korea	2	0.18%
#7 country of origin	Switzerland	2	0.18%	Switzerland	2	0.18%

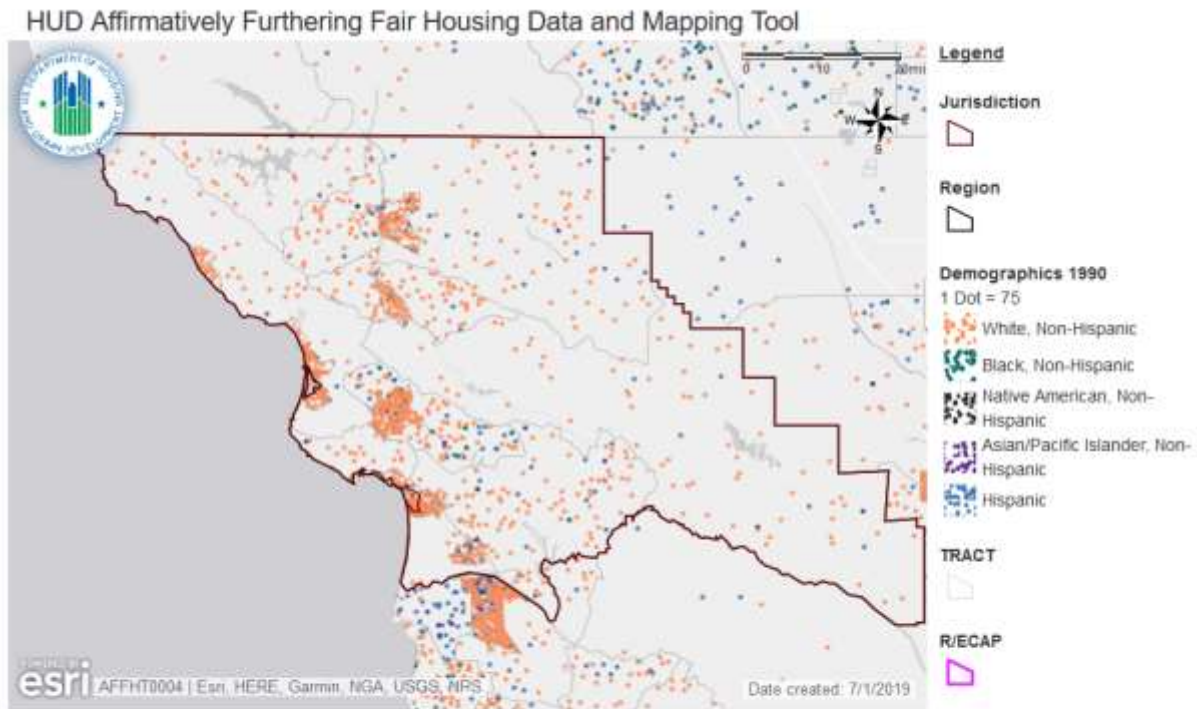
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#8 country of origin	Syria	2	0.18%	Syria	2	0.18%
#9 country of origin	Null	0	0.00%	Null	0	0.00%
#10 country of origin	Null	0	0.00%	Null	0	0.00%
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.						
Note 2: Data Sources: Decennial Census; ACS						
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).						

Black, Non-Hispanic and Hispanic residents are found in disproportionately higher numbers than in the rest of the County in the R/ECAP. Whereas the jurisdiction overall is made up of 69.38% White, Non-Hispanic residents, 1.77% Black, Non-Hispanic residents, and 22.20% Hispanic residents, the R/ECAP is made up of 40.83% White, Non-Hispanic residents, 26.11% Black, Non-Hispanic residents, and 25.84% Hispanic residents. Black residents in particular are overrepresented in this area. This R/ECAP is located on the outskirts of Atascadero, along a railway line and Chalk Mountain Golf Course, and is less populated than the rest of the town. A possible reason for the creation of this R/ECAP may be that it neighbors the Atascadero State Hospital, a psychiatric facility for mentally ill convicts. The population of the hospital may contribute to the demographics of the area, or it may be that White residents who do not live below the poverty line choose not to live near the hospital.

iii. Describe how R/ECAPs have changed over time in the jurisdiction and the Region (since 1990).

Map 4-7: R/ECAPs 1990, San Luis Obispo County



Name: Map 2 - Race/Ethnicity Trends

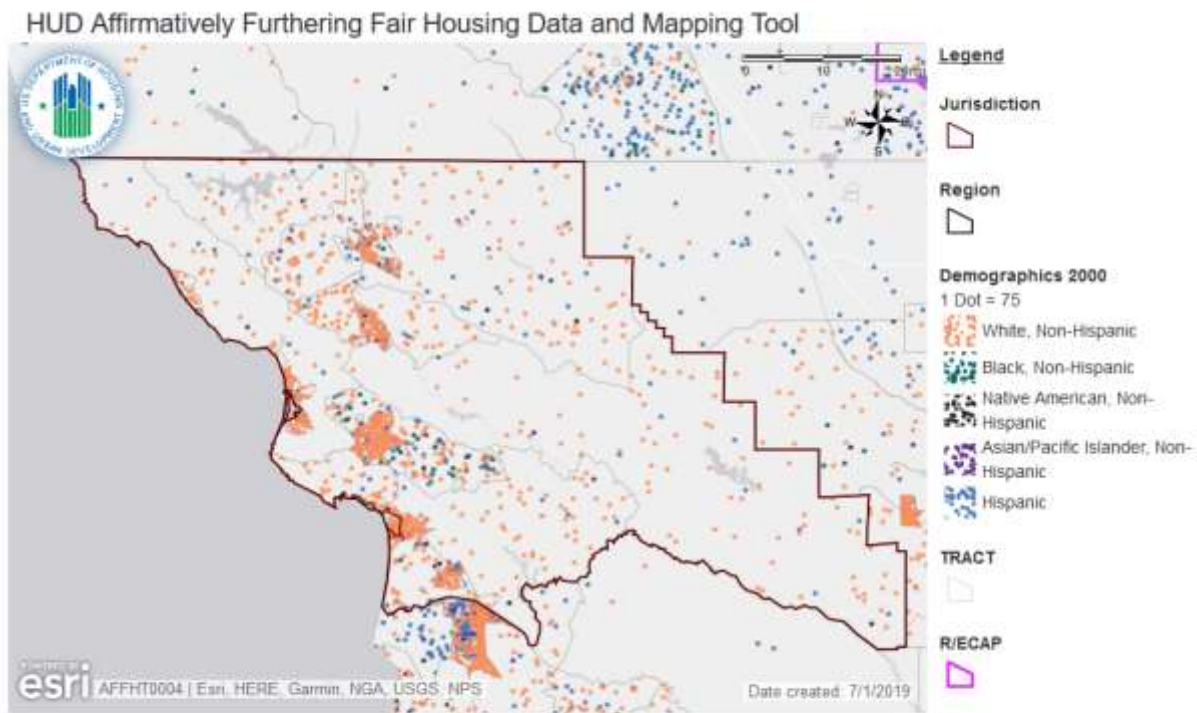
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)

Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA

HUD-Provided Data Version: AFFHT0004

Map 4-8: R/ECAPs 2000, San Luis Obispo County



Name: Map 2 - Race/Ethnicity Trends

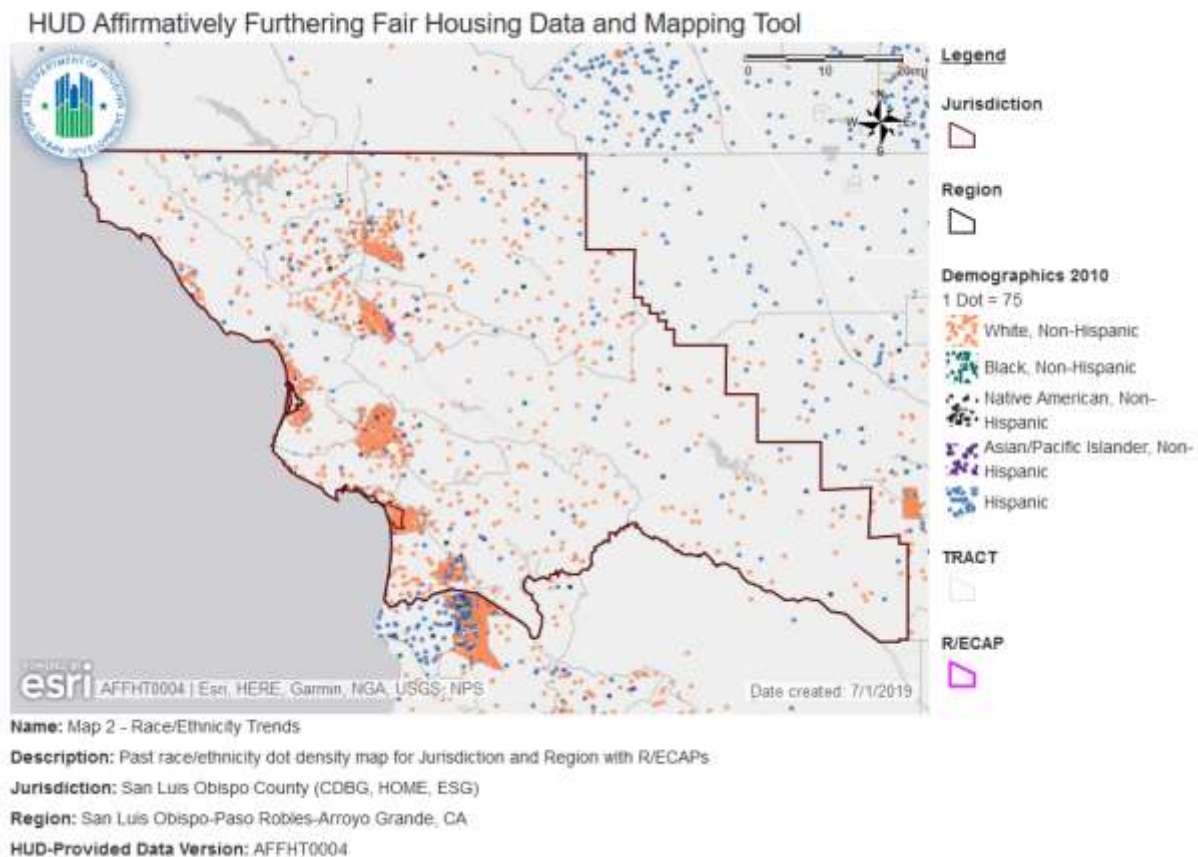
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)

Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA

HUD-Provided Data Version: AFFHT0004

Map 4-9: R/ECAPs 2010, San Luis Obispo County



The location of R/ECAPs has seen little variation across the last three decades. No R/ECAPs existed in the region until 2010, when the area in Atascadero was created.

B. Additional Information

- i. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and Region affecting groups with other protected characteristics.*
- ii. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.*

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There are currently no revitalization efforts underway within the R/ECAP. Atascadero does have a downtown revitalization plan, which would change zoning to encourage the creation of more retail business and condo units in the community and benefit this R/ECAP.⁷

C. Contributing Factors of R/ECAPs

- i. Consider the listed factors and any other factors affecting the jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.*

Please see the Appendix for the following Contributing Factors to R/ECAPs:

Community opposition

Deteriorated and abandoned properties

Displacement of residents due to economic pressures

Lack of community revitalization strategies

Lack of local or regional cooperation

Lack of private investments in specific neighborhoods

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

Land use and zoning laws

Location and type of affordable housing

Loss of affordable housing

Occupancy codes and restrictions

Private discrimination

Source of income discrimination

⁷ <https://www.atascaderochamber.org/atascadero-honoring-its-past-while-modernizing-its-future/>

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4.2.3 Disparities in Access to Opportunity

A. Education

- i. For the protected class groups for which HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.*

Table 4-9:

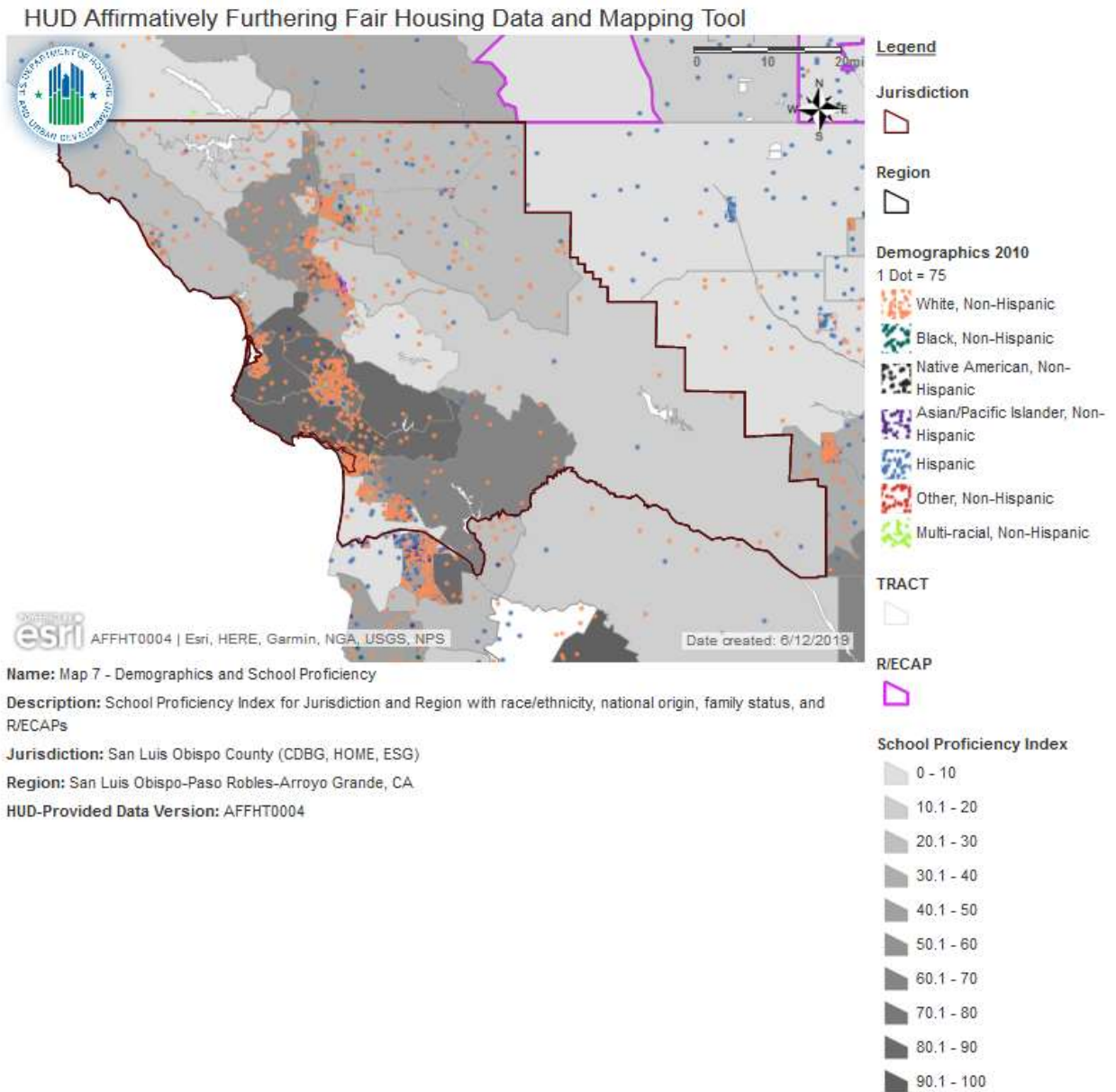
(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction	School Proficiency Index
Total Population	
White, Non-Hispanic	57.83
Black, Non-Hispanic	68.02
Hispanic	51.83
Asian or Pacific Islander, Non-Hispanic	62.66
Native American, Non-Hispanic	52.36
Population below federal poverty line	
White, Non-Hispanic	63.35
Black, Non-Hispanic	53.07
Hispanic	51.09
Asian or Pacific Islander, Non-Hispanic	67.53
Native American, Non-Hispanic	66.13
(San Luis Obispo-Paso Robles-Arroyo Grande, CA) Region	
Total Population	
White, Non-Hispanic	58.89
Black, Non-Hispanic	67.94
Hispanic	52.37
Asian or Pacific Islander, Non-Hispanic	62.61
Native American, Non-Hispanic	53.42
Population below federal poverty line	
White, Non-Hispanic	63.39
Black, Non-Hispanic	53.07
Hispanic	51.75
Asian or Pacific Islander, Non-Hispanic	67.53
Native American, Non-Hispanic	66.13

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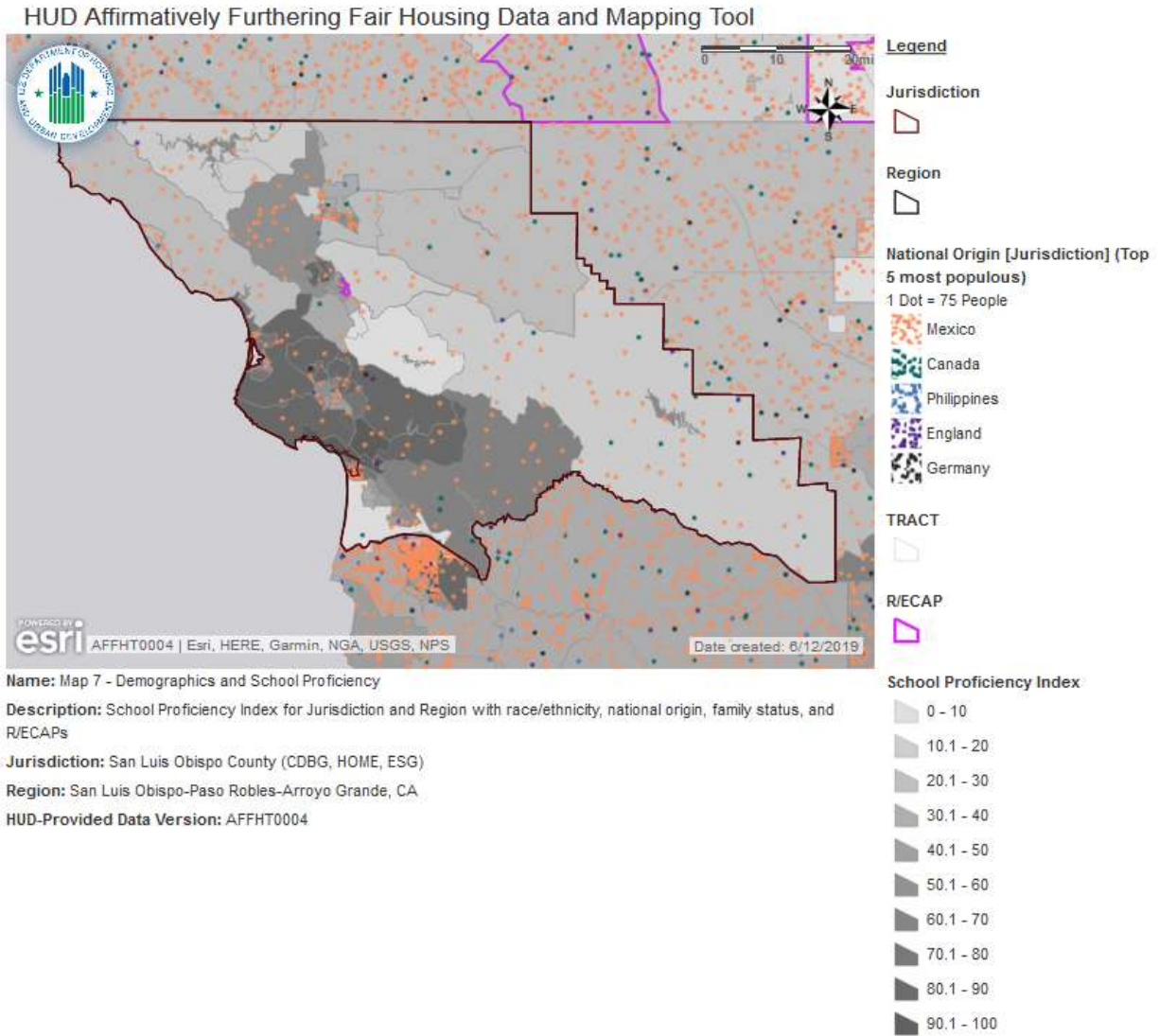
The County of San Luis Obispo is served by 12 school districts and 81 public schools. Values in the HUD School Proficiency Index are ranked from 0 to 100 with higher scores indicating higher quality schools in a neighborhood. HUD data provided through the AFFH tool indicate that there is moderate disparity in school proficiency across San Luis Obispo. Disparities across racial and ethnic groups are not great, with each group scoring in either the 50s or 60s. Black residents have the greatest access to proficient schools, at 68.02, with the next highest group, Asian American or Pacific Islanders, trailing by five points, and White residents trailing by ten points. Hispanic and Native American residents have the poorest access to proficient schools, scoring in the low 50s. Below the poverty line, scores remain in the 50s and 60s, although Black student access to proficient schools falls by 15 points while Asian American or Pacific Islander, White, and Native American scores all rise. There are no significant regional differences.

- ii. For the protected class groups for which HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.*

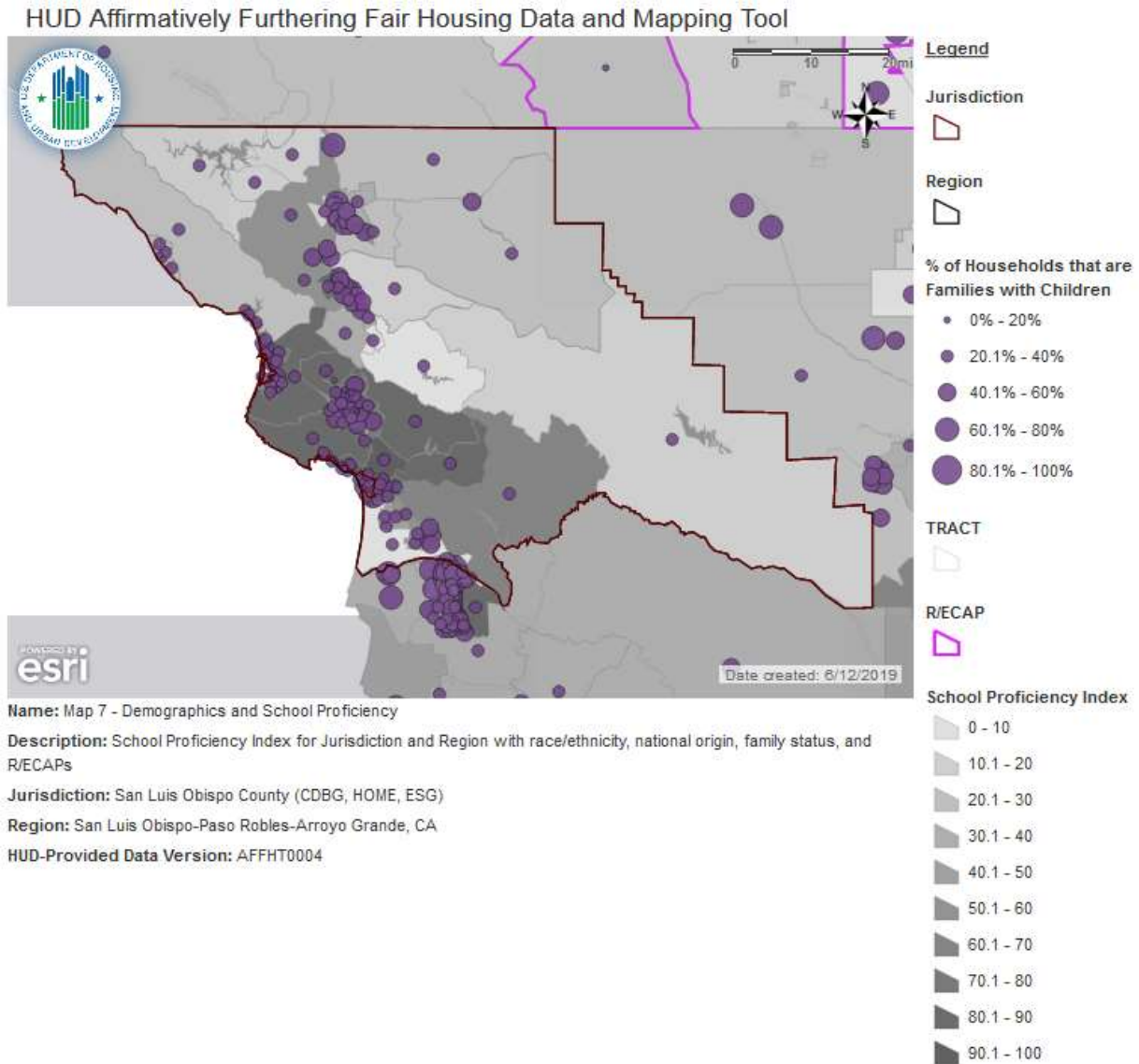
Map 4-10: Race/Ethnicity and School Proficiency, San Luis Obispo



Map 4-11: National Origin and School Proficiency, San Luis Obispo



Map 4-12: Family Status and School Proficiency, San Luis Obispo



As illustrated by the maps, the southern part of the County has significantly higher school proficiency than the northern part, excepting schools near the Paso Robles-Templeton-Atascadero area. In some places, schools within the city boundaries stand in stark contrast to those just outside. For example, in the City of San Luis Obispo, school proficiency levels dip as low as the 40s, while just outside they rise to as high as the 90s. Similarly, in the Grover Beach-Oceano-Arroyo Grande area, neighboring census tracts switch abruptly from the 30s to the 90s on the School Proficiency Index. These disparities between the population centers and the suburbs merit discussion because they likely indicate that lower-income city dwellers

do not have the same access to proficient schools as their wealthier suburban neighbors. There is indeed some correlation between these lower-proficiency areas and Black and Hispanic residents, although there are strong presences away from these areas as well. Similarly, while immigrants are congregated in the main population centers and are present throughout the County, residents of Mexican national origin seem particularly affected by the school proficiency disparities in both the City of San Luis Obispo and the Grover Beach-Oceano-Arroyo Grande area, with Filipinos particularly affected by the school proficiency disparities in the latter.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

Public schools in California are funded through a combination of state and federal funding, local property taxes, the state lottery, and other local funding.⁸ In 2013, California adopted the Local Control Funding Formula (LCFF), which provides extra funding to schools per each “high need” (economically disadvantaged, English learner, or foster youth) student. Accordingly, per pupil funding has increased by more than 23%, but still remains significantly below the national average. A statewide survey found that 60% of Californians and 2 in 3 public school parents think California underfunds education.

In 2015, President Barack Obama signed the Every Student Succeeds Act (ESSA) into law. The law was put into effect during the 2017–18 school year. The ESSA reauthorizes the Elementary and Secondary Education Act (ESEA), the nation’s federal education law, and replaces the No Child Left Behind Act (NCLB). As part of California’s transition to the ESSA, California submitted an ESSA Consolidated State Plan (State Plan) to the U.S. Department of Education in 2017, which was approved in July of 2018.⁹ The State was required to develop the plan in consultation with stakeholders and made a complete draft of California’s ESSA State Plan available for public comment. The approved State Plan describes the State’s implementation of standards, assessments, accountability, and assistance programs. It also describes how the State will put into place federal programs that support:

- Low-income students
- Minority students
- English learners

⁸ <https://www.ppic.org/publication/financing-californias-public-schools/>

⁹ <https://www.cde.ca.gov/re/es/documents/essastateplan2018.pdf>

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- Migratory children and youth
- Neglected, delinquent, or at-risk children and youth
- Homeless children and youth
- Effective instruction
- Well-rounded education opportunities
- Community learning centers
- Rural and low-income schools

Many of these categories are reflected in the new California School Dashboard evaluations. The California State Plan includes some specific policy proposals addressing these topics, including a new English Language Proficiency Assessment for California, homeless student identification training, and revising special education program standards to allow for broadened credential authorization that will allow special educators to serve general education students in an integrated setting.

In 2018, public schools across the state of California tested students in math and English. Students in grades three through eight and eleventh grade were tested to assess whether the State's school age youth were on track to matriculate in college. 2016 was the first year of testing under the Common Core State Standards (CCSS), which were adopted by the State in 2010. The Common Core required classroom changes and provided specifications on what students should know in Math and English by certain grade levels.¹⁰ The California School Dashboard ranks schools based on a colored graph, from low to high: red, orange, yellow, green, and blue.

The dashboard replaces the Academic Performance Index (API), which previously provided each school an overall rating based on test scores. The dashboard provides three measurement reports graded on a curve and evaluates schools on test scores and annual progress. In addition to math and English test scores, the dashboard ratings consider the current status of schools on measurements such as graduation rates and suspensions, along with annual progress on each measurement. The color-coded designations are a combined measurement of current status and longitudinal trends.

¹⁰ Public Policy Institute of California, "Implementing the Common Core Standards in California," 2016, <https://www.ppic.org/publication/implementing-the-common-core-state-standards-in-california/>.

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

Table 4-10: Atascadero

Student Group Report for 2018

[Pivot Data by Stud](#)

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Orange	Orange	Green	Green	Yellow	Yellow
English Learners	Red	Red	None	None	Orange	Yellow
Foster Youth	Red	Yellow	None	None	None	None
Homeless	Orange	Red	Orange	Green	Orange	Yellow
Socioeconomically Disadvantaged	Orange	Orange	Green	Yellow	Orange	Yellow
Students with Disabilities	Orange	Red	None	None	Red	Red
African American	Green	Yellow	None	None	None	None
American Indian or Alaska Native	None	Green	None	None	None	None
Asian	Green	Green	None	None	None	None
Filipino	Orange	Blue	None	None	None	None
Hispanic	Red	Orange	Green	Yellow	Orange	Yellow
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Orange	Orange	Blue	Green	Yellow	Yellow
Two or More Races	Green	Orange	None	None	Yellow	Green

Note: Red and orange colors signify underperformance compared to statewide levels, whereas green and blue colors signify a high level of performance.

Table 4-11: Coast Unified School District

Student Group Report for 2018

[Pivot Data by Stud](#)

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Orange	Orange	Green	Green	Yellow	Yellow
English Learners	Green	Orange	None	None	Orange	Orange
Foster Youth	None	None	None	None	None	None
Homeless	Blue	Green	None	None	Orange	Orange
Socioeconomically Disadvantaged	Green	Orange	Green	Green	Orange	Orange
Students with Disabilities	Green	Yellow	None	None	Red	Orange
African American	None	None	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	None	None	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	Green	Yellow	None	None	Orange	Orange
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Orange	Orange	None	None	Blue	Green
Two or More Races	None	None	None	None	None	None

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

Table 4-12: Lucia Mar Unified

Student Group Report for 2018

[CIVIL RIGHTS BY STATE](#)

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Yellow	Green	Green	Green	Yellow	Orange
English Learners	Orange	Green	Orange	Yellow	Orange	Orange
Foster Youth	Orange	Orange	None	None	Yellow	Yellow
Homeless	Yellow	Yellow	Green	Green	Yellow	Orange
Socioeconomically Disadvantaged	Orange	Green	Green	Green	Orange	Orange
Students with Disabilities	Orange	Orange	Green	Yellow	Orange	Red
African American	Orange	Orange	None	None	Orange	Orange
American Indian or Alaska Native	Red	Orange	None	None	None	None
Asian	Orange	Green	None	None	Blue	Green
Filipino	Green	Yellow	None	None	Blue	Yellow
Hispanic	Yellow	Green	Green	Green	Orange	Orange
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Yellow	Yellow	Green	Blue	Green	Yellow
Two or More Races	Green	Green	None	None	Green	Green

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

Table 4-13: Paso Robles Joint Unified School District

Student Group Report for 2018

Pivot Data by Student Group

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Orange	Orange	Yellow	Blue	Orange	Orange
English Learners	Red	Orange	Yellow	Yellow	Orange	Orange
Foster Youth	Yellow	Red	None	None	Orange	Orange
Homeless	Orange	Green	Orange	Orange	Orange	Orange
Socioeconomically Disadvantaged	Orange	Orange	Orange	Yellow	Orange	Orange
Students with Disabilities	Orange	Red	Green	Yellow	Red	Red
African American	Orange	Orange	None	None	Orange	Orange
American Indian or Alaska Native	None	Blue	None	None	None	None
Asian	None	Orange	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	Orange	Orange	Orange	Green	Orange	Orange
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Orange	Orange	Yellow	Blue	Green	Green
Two or More Races	Orange	Orange	None	None	Green	Green

Table 4-14: San Luis Coastal Unified

Student Group Report for 2018

Pivot Data by Student Group

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Yellow	Green	Blue	Green	Green	Green
English Learners	Green	Green	Yellow	Yellow	Orange	Orange
Foster Youth	Orange	Orange	None	None	Orange	Orange
Homeless	Orange	Orange	Orange	Yellow	Orange	Orange
Socioeconomically Disadvantaged	Orange	Yellow	Yellow	Green	Yellow	Yellow
Students with Disabilities	Yellow	Yellow	Orange	Orange	Red	Yellow
African American	Red	Yellow	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	Green	Green	None	None	Blue	Blue
Filipino	Yellow	Yellow	None	None	Blue	Blue
Hispanic	Green	Yellow	Yellow	Green	Orange	Orange
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Yellow	Green	Blue	Blue	Blue	Blue
Two or More Races	Green	Green	None	None	Blue	Blue

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Table 4-15: San Luis Obispo County Office of Education

Student Group Report for 2018

[Pivot Data by Student Group](#)

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Orange	Red	Red	Orange	None	None
English Learners	None	Orange	None	None	None	None
Foster Youth	None	Red	None	None	None	None
Homeless	None	Red	Red	Orange	None	None
Socioeconomically Disadvantaged	Red	Red	Red	Orange	None	None
Students with Disabilities	Orange	Red	None	None	None	None
African American	None	None	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	None	None	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	None	Red	None	None	None	None
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	None	Red	None	None	None	None
Two or More Races	None	None	None	None	None	None

Table 4-16: San Miguel Joint Union

Student Group Report for 2018

[Pivot Data by Student Group](#)

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Yellow	Orange	None	None	Orange	Orange
English Learners	Orange	Orange	None	None	Orange	Orange
Foster Youth	None	None	None	None	None	None
Homeless	Green	Red	None	None	Orange	Orange
Socioeconomically Disadvantaged	Yellow	Orange	None	None	Orange	Orange
Students with Disabilities	Orange	Red	None	None	None	None
African American	None	None	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	None	None	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	Orange	Orange	None	None	Orange	Orange
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Yellow	Yellow	None	None	Yellow	Orange
Two or More Races	None	None	None	None	None	None

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Table 4-17: Shandon Joint Unified

Student Group Report for 2018

CVS Data by CMS

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Yellow	Green	None	None	Orange	Yellow
English Learners	Green	Orange	None	None	Orange	Yellow
Foster Youth	None	None	None	None	None	None
Homeless	Orange	Orange	None	None	Orange	Yellow
Socioeconomically Disadvantaged	Yellow	Yellow	None	None	Orange	Yellow
Students with Disabilities	Green	Green	None	None	None	None
African American	None	None	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	None	None	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	Yellow	Green	None	None	Orange	Yellow
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Green	Red	None	None	None	None
Two or More Races	None	None	None	None	None	None

Table 4-18: Templeton Unified

Student Group Report for 2018

CVS Data by CMS

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Orange	Orange	Blue	Green	Green	Yellow
English Learners	Orange	Orange	None	None	Orange	Orange
Foster Youth	None	None	None	None	None	None
Homeless	Green	Blue	None	None	None	None
Socioeconomically Disadvantaged	Green	Yellow	Yellow	Green	Orange	Orange
Students with Disabilities	Green	Red	None	None	Orange	Red
African American	None	None	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	None	Orange	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	Red	Yellow	Yellow	Yellow	Yellow	Orange
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Yellow	Yellow	Blue	Blue	Green	Green
Two or More Races	Yellow	Orange	None	None	Green	Yellow

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Table 4-19: Almond Acres Charter Academy

Student Group Report for 2018

[Print Data by Student Group](#)

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Red	Red	None	None	Orange	Orange
English Learners	None	None	None	None	None	None
Foster Youth	None	None	None	None	None	None
Homeless	None	None	None	None	None	None
Socioeconomically Disadvantaged	Yellow	Orange	None	None	Orange	Orange
Students with Disabilities	Red	Red	None	None	None	None
African American	None	None	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	None	None	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	Orange	Orange	None	None	None	None
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Red	Red	None	None	Orange	Orange
Two or More Races	None	None	None	None	None	None

Table 4-20: Cayucos Elementary

Student Group Report for 2018

[Print Data by Student Group](#)

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Green	Red	None	None	Green	Green
English Learners	None	None	None	None	None	None
Foster Youth	None	None	None	None	None	None
Homeless	None	None	None	None	None	None
Socioeconomically Disadvantaged	Green	Orange	None	None	Green	Green
Students with Disabilities	None	None	None	None	None	None
African American	None	None	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	None	None	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	Green	Orange	None	None	Yellow	Green
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Orange	Orange	None	None	Green	Green
Two or More Races	None	None	None	None	None	None

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

Table 4-21: Pleasant Valley Elementary

Student Group Report for 2018

[LINK TO STUDENT REPORT](#)

Student Group	Chronic Absenteeism	Suspension Rate	Graduation Rate	College/Career	English Language Arts	Mathematics
All Students	Green	Blue	None	None	Orange	Yellow
English Learners	None	None	None	None	None	None
Foster Youth	None	None	None	None	None	None
Homeless	None	None	None	None	None	None
Socioeconomically Disadvantaged	Green	Blue	None	None	None	None
Students with Disabilities	None	None	None	None	None	None
African American	None	None	None	None	None	None
American Indian or Alaska Native	None	None	None	None	None	None
Asian	None	None	None	None	None	None
Filipino	None	None	None	None	None	None
Hispanic	Orange	Blue	None	None	None	None
Native Hawaiian or Pacific Islander	None	None	None	None	None	None
White	Green	Blue	None	None	None	None
Two or More Races	None	None	None	None	None	None

This new dashboard can be used to analyze data specific to school districts in the County of San Luis Obispo. The charts for the elementary schools listed above should mostly be discounted because common metrics such as graduation rates do not apply, and so many of the data fields are marked “none.” One theme that emerges from the districts with more complete data is that many school districts in San Luis Obispo received a “red” score for the suspension of students with disabilities. Lucia Mar, Atascadero, and Paso Robles school districts also received a multitude of red and orange scores, indicating underperformance compared to statewide levels. Foster Youth and English Learners fared particularly poorly in these school districts. On the flipside, Lucia Mar and San Luis Coastal had multiple green and blue rankings, although San Luis Coastal does not have the poor results in other categories that Lucia Mar displays.

A comparative measure of access to educational opportunities is the percentage of students eligible for free or reduced lunch. The state eligibility average is quite high, hovering around 60%. In San Luis Obispo, out of 86 schools, 51 of them had a rate of 40% or more eligible for free or reduced price meals (FRPM). In particular, Paso Robles Joint Unified School District saw 10 out of 13 schools meet this mark, and all four of the schools in Coast Unified School District met this mark. Conversely, only one out of seven schools in Templeton Unified School District met this rate. The other school districts had mixed results, but the majority of schools overall have very high levels of FRPM.

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

B. Employment

- i. For the protected class groups for which HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.*

Table 4-22:

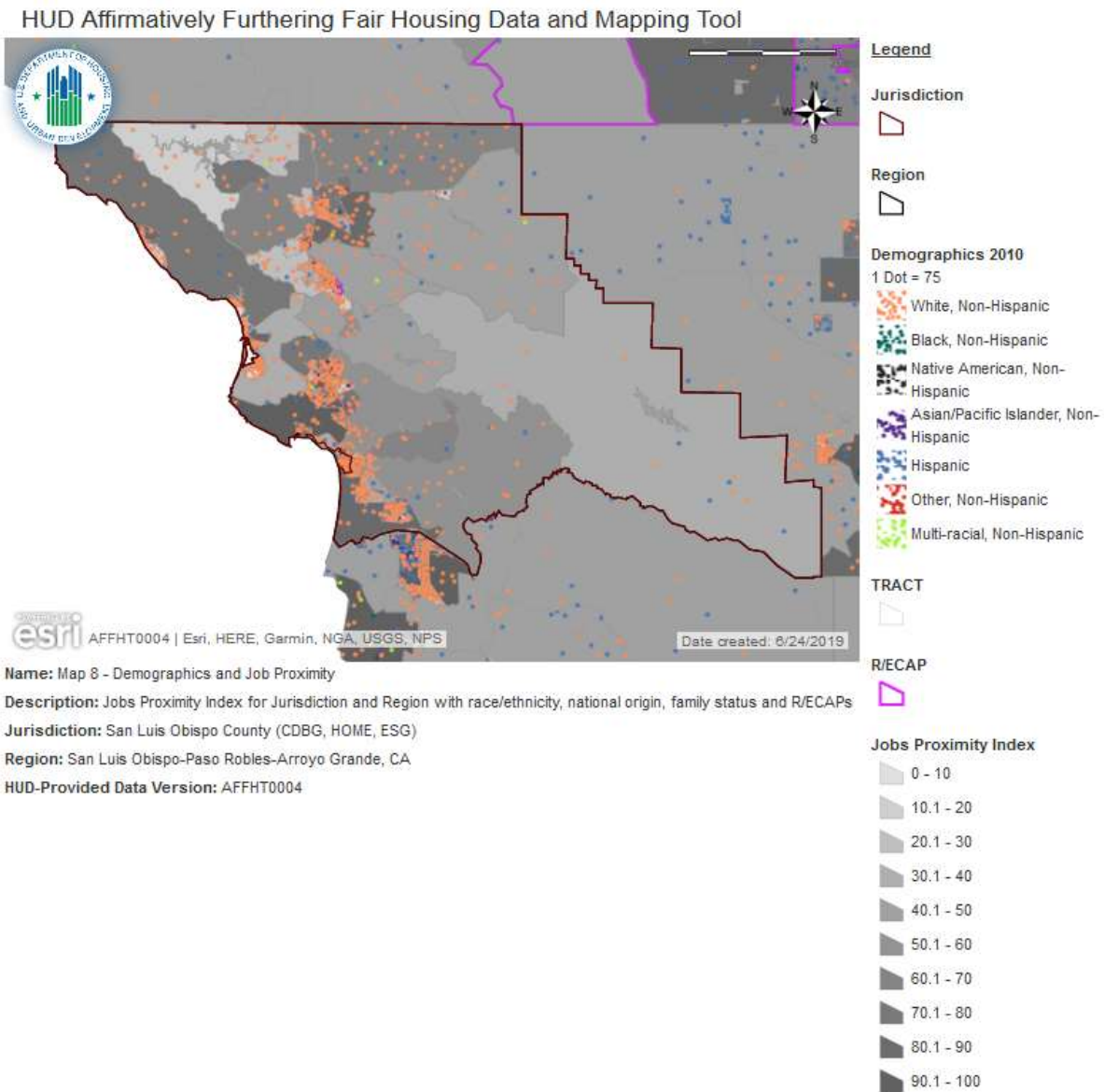
(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction	Labor Market Index	Jobs Proximity Index
Total Population		
White, Non-Hispanic	58.62	49.81
Black, Non-Hispanic	23.36	23.89
Hispanic	51.94	45.39
Asian or Pacific Islander, Non-Hispanic	53.91	52.20
Native American, Non-Hispanic	52.97	46.62
Population below federal poverty line		
White, Non-Hispanic	57.68	53.52
Black, Non-Hispanic	50.53	63.87
Hispanic	52.70	49.11
Asian or Pacific Islander, Non-Hispanic	51.60	56.58
Native American, Non-Hispanic	48.23	50.99
(San Luis Obispo-Paso Robles-Arroyo Grande, CA) Region		
Total Population		
White, Non-Hispanic	58.06	49.95
Black, Non-Hispanic	24.16	23.97
Hispanic	51.34	45.45
Asian or Pacific Islander, Non-Hispanic	53.19	52.47
Native American, Non-Hispanic	52.51	46.55
Population below federal poverty line		
White, Non-Hispanic	56.99	53.30
Black, Non-Hispanic	50.53	63.87
Hispanic	51.84	48.94
Asian or Pacific Islander, Non-Hispanic	51.60	56.57
Native American, Non-Hispanic	48.23	50.99

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The Labor Market Index values and Jobs Proximity Index values respectively measure the strength of labor markets and how physically close a resident is to their workplace. The higher the Labor Market Index value, the stronger the job market, and the higher the Jobs Proximity Index value, the closer a resident is to their job. In the County of San Luis Obispo, disparities in job proximity are generally modest between White, Hispanic, Asian or Pacific Islander, and Native American residents. Values range from the high 40s to the low 50s. However, Black residents score only 23.89, significantly lower than the next highest group, Hispanics, who score 45.39. Curiously, this stark disparity is not repeated for the population below the poverty line, where Black residents have the *highest* job proximity score, at 63.87. In fact, every group below the poverty line scores better than their racial or ethnic group, writ large. A similarly striking disparity is reflected in the Labor Market (Engagement) Index. Black residents received a score of 23.36, while every other group scored in the 50s. For people below the poverty line, the scores range from 48.23 (Native American residents) to 57.68 (White residents). Differences between the jurisdiction and the region are negligible.

- ii. For the protected class groups for which HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.*

Map 4-13: Demographics and Job Proximity (Race/Ethnicity)



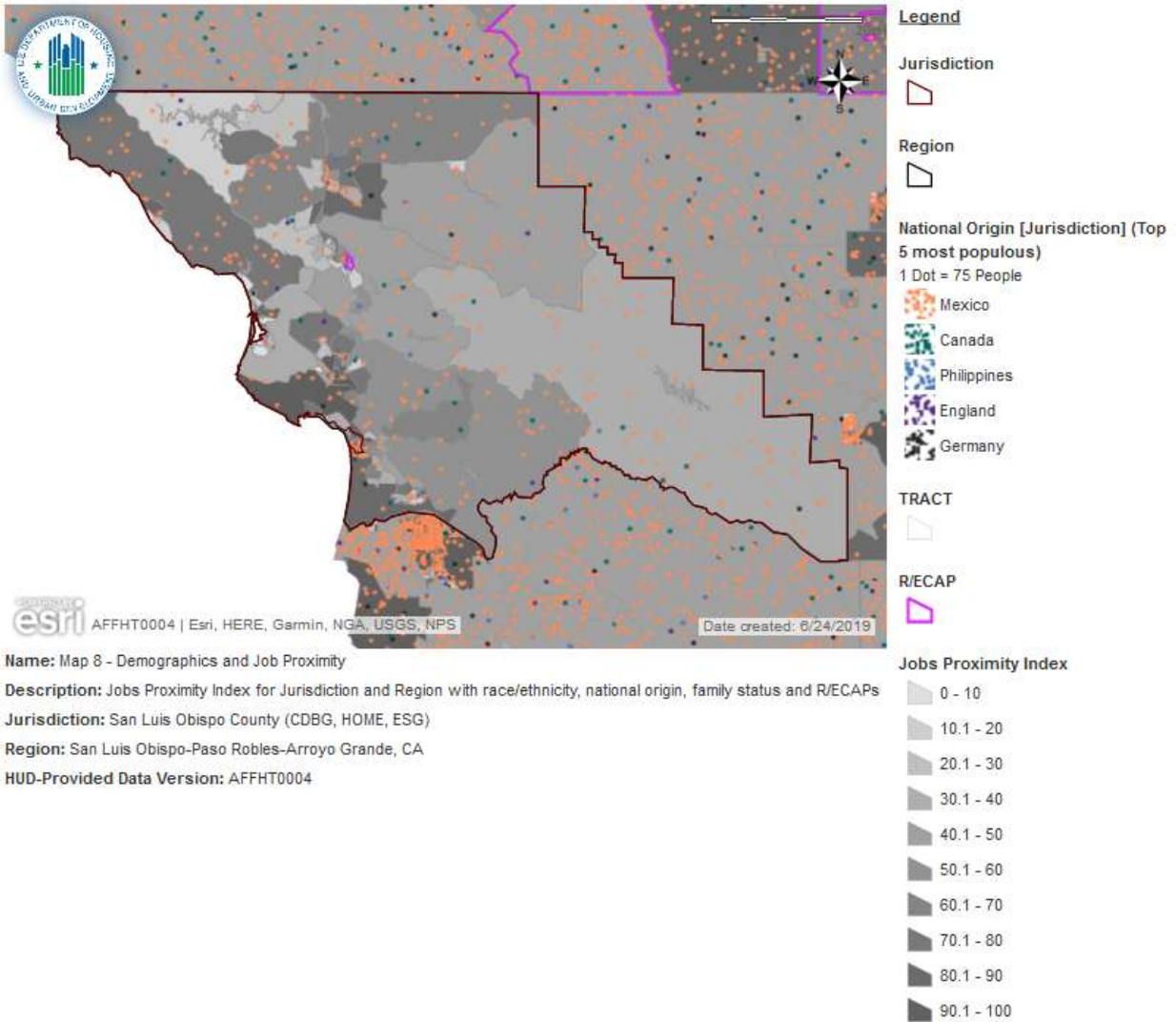
Map 1: Demographics and Job Proximity (Race/Ethnicity) is a dot density map depicting the population of the County of San Luis Obispo by race and ethnicity. Each dot represents 75 individuals residing within a Census Tract, which is a geographic area containing approximately 5,000 people. Orange dots, which represent White population, and blue dots, which represent Hispanic population, are most numerous on the map. Within the County of San Luis Obispo, most of the county is predominantly White although there are some areas, including in Paso Robles and in the unincorporated communities of Oceano and Nipomo in the southern part of the county,

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

that have concentrations of Hispanic population. The grayscale shading within each Census Tract reflects data from HUD's Jobs Proximity Index on a 0-100, with areas that are shaded the darkest having the greatest proximity to jobs. Job proximity is generally highest within incorporated cities in the County of San Luis Obispo, regardless of neighborhood racial concentration. Thus, the disproportionately Hispanic northwestern portion of the City of Paso Robles benefits from high job proximity while the more geographically isolated Hispanic communities in Oceano and Nipomo do not.

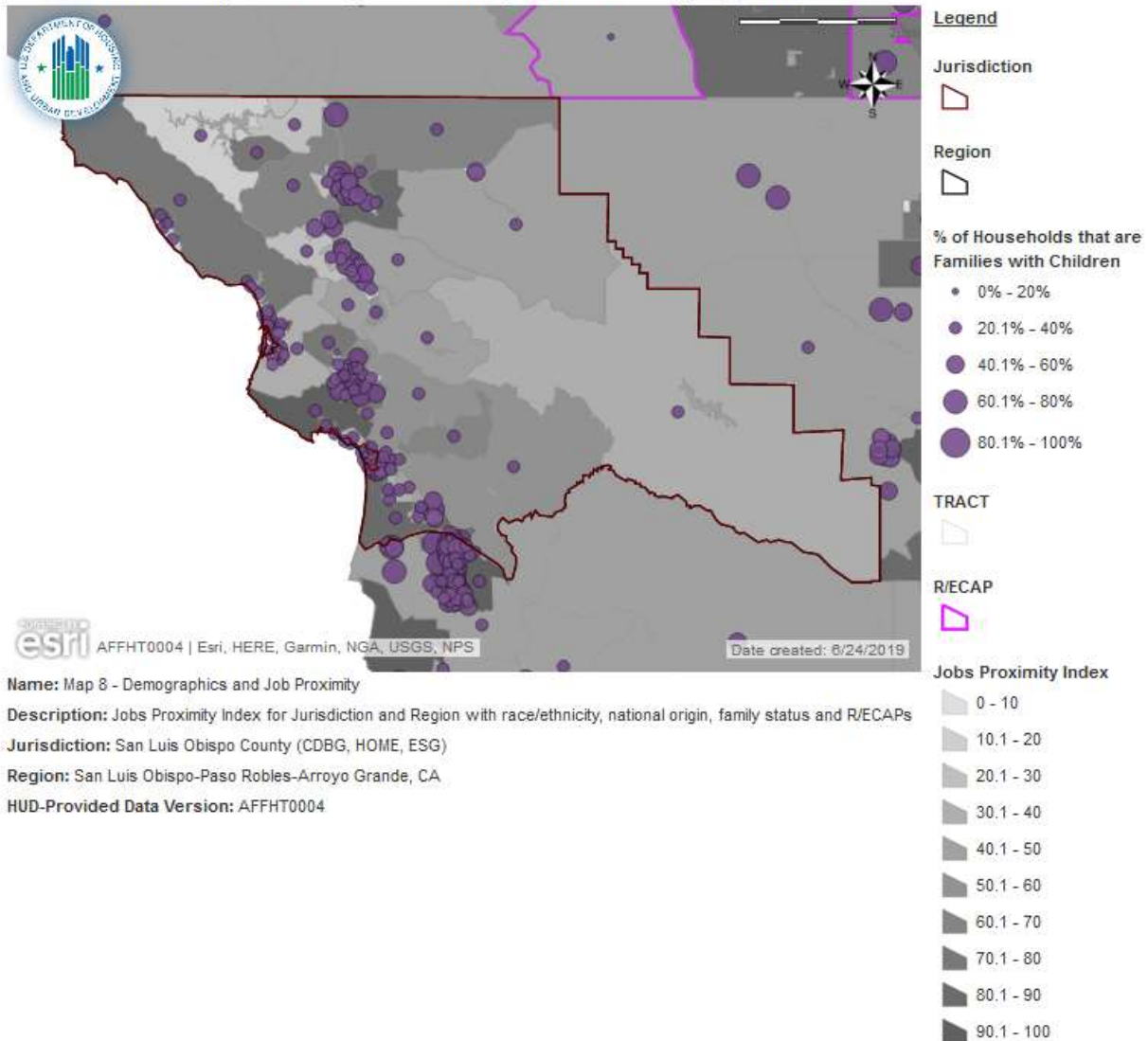
Map 4-14: Demographics and Job Proximity (National Origin)

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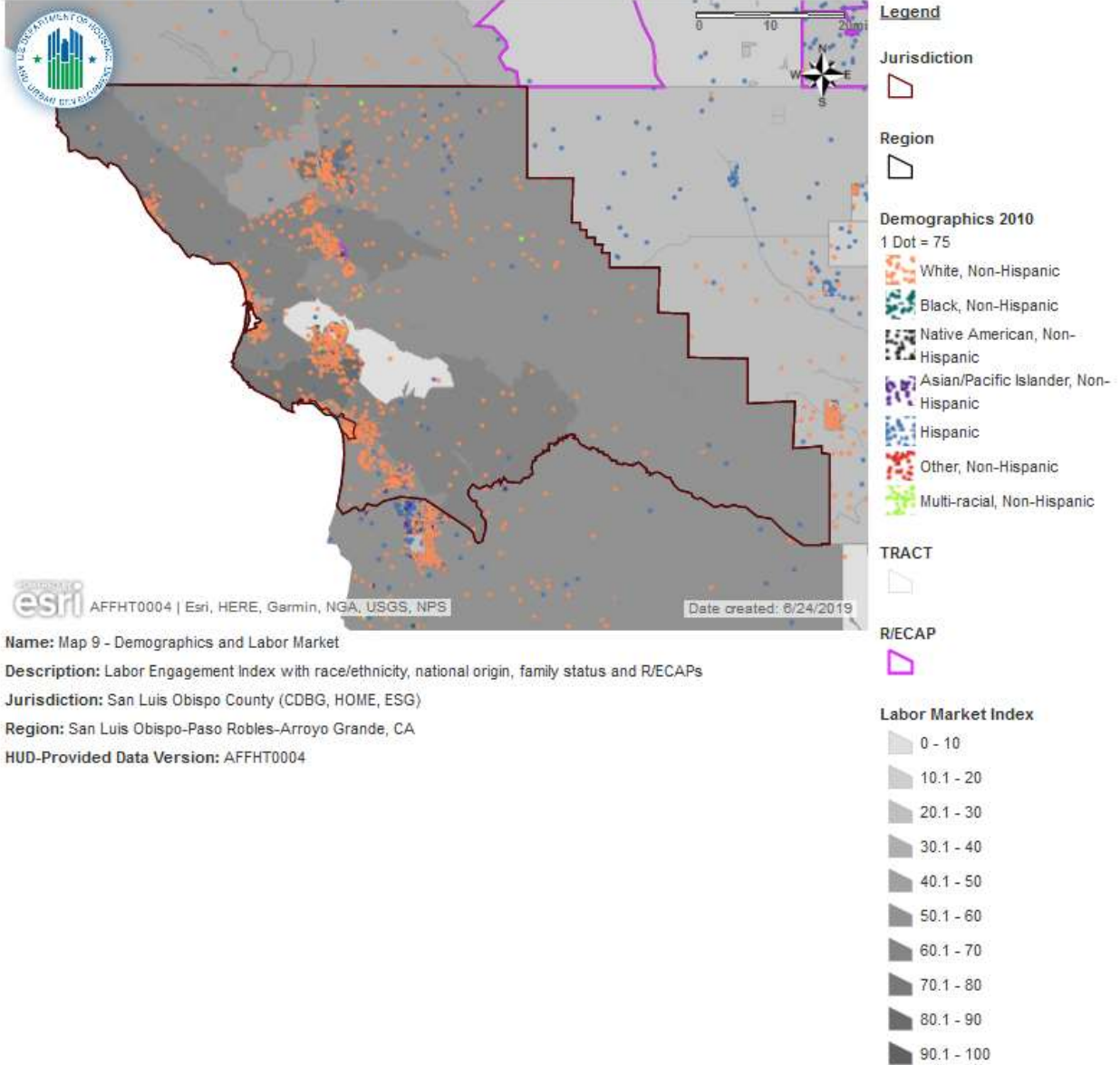
Map 4-15: Demographics and Job Proximity (Family Status)

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Map 4-16: Demographics and Labor Market (Race/Ethnicity)

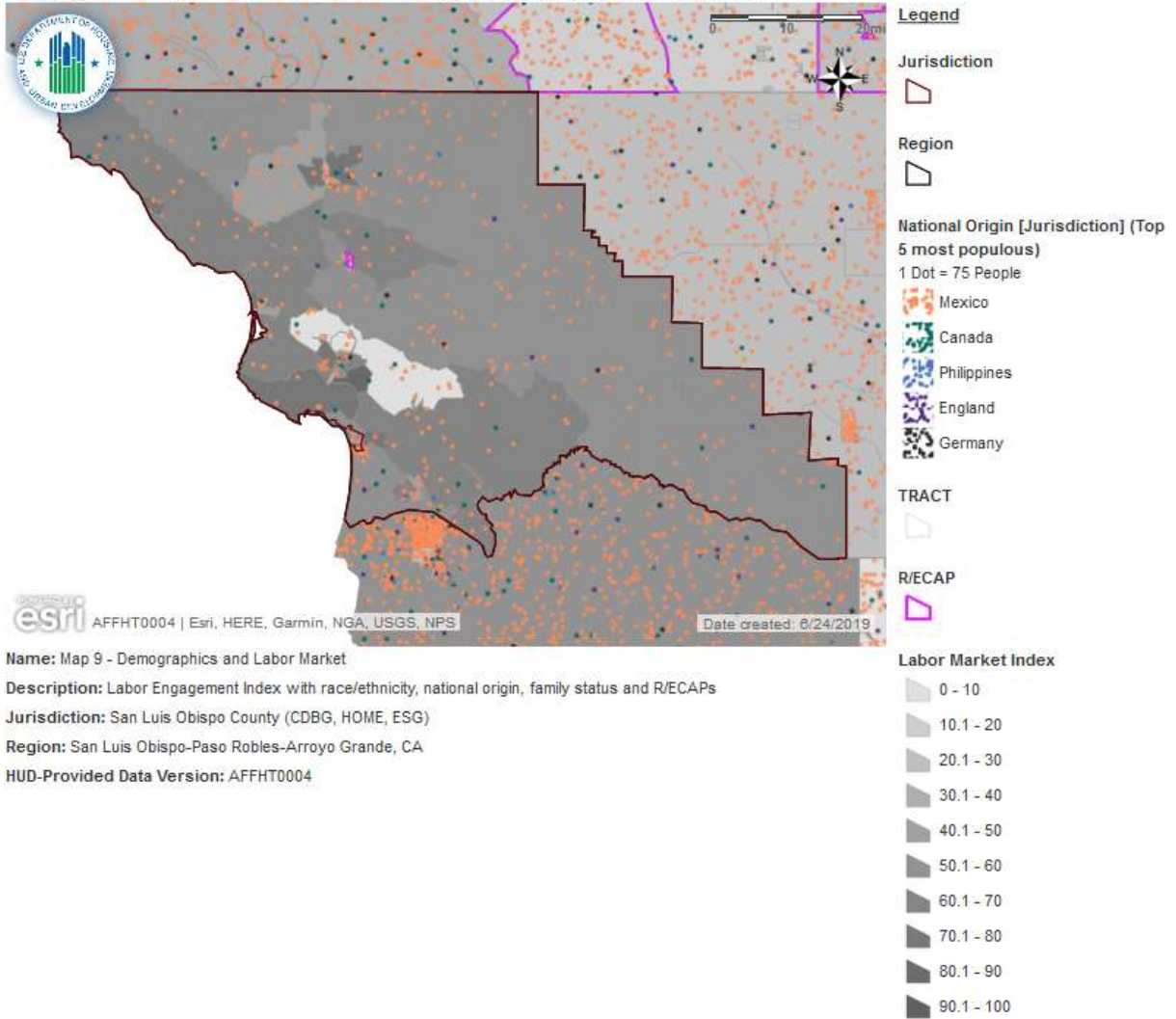
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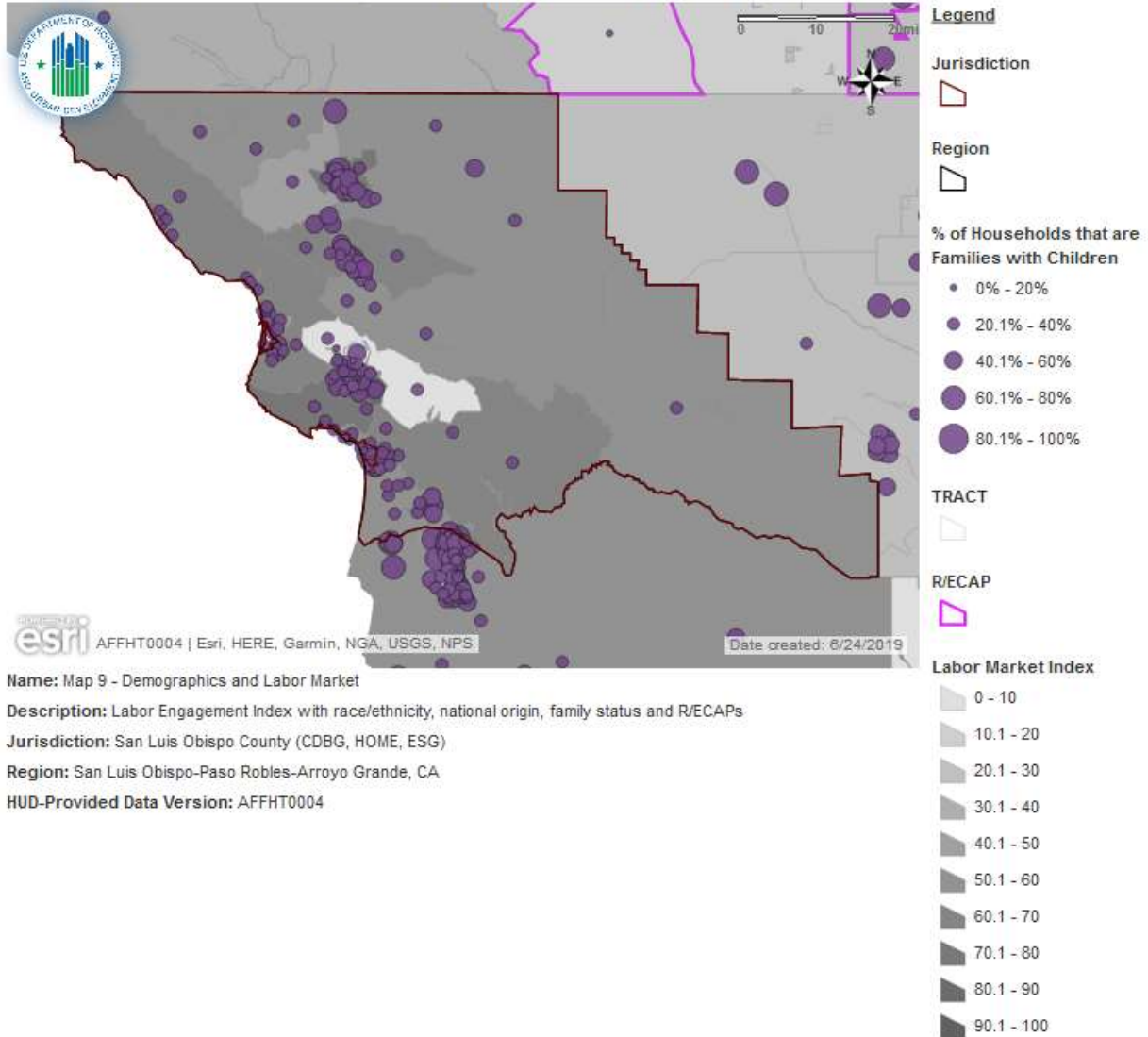
Map 4-17: Demographics and Labor Market (National Origin)

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Map 4-18: Demographics and Labor Market (Family Status)

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The highest values for Job Proximity are observed along the beach, as well as along Highway 101 in San Luis Obispo, Atascadero, Templeton, and Paso Robles. Areas to the east are noticeably lower in Job Proximity scores; however, not many people live there to begin with, so the disparity is not wide in practical terms. The high Job Proximity scores along Highway 101 indicate good prospects for the County’s minorities, as they tend to live in these population centers. The northeastern corner of the County has a fairly good Job Proximity score of 68. This area sees a high rate of Housing Choice Voucher use for both households

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with children and people with disabilities; it is reassuring that job proximity does not suffer, even though this area is seemingly out of the way from the main transportation corridor.

Overall, Labor Market Index values are lower than Job Proximity Index values. This is clear both in the above tables breaking down these values by race/ethnicity, but also in the maps showing values by census tracts. Areas along the coast receive the highest scores again, but with swaths of the Highway 101 transportation corridor severely underperforming. A large census tract just north of the City of San Luis Obispo scores only 3, while the interior of Paso Robles scores in the 30s. In particular, these census tracts in Paso Robles are much more heavily Hispanic than neighboring tracts. These underperforming areas are more likely to be diverse than the coastal areas, driving potential disparities in opportunity in those cities.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

The County of San Luis Obispo has a strong local employment climate with an unemployment rate of just 2.9% according to the Bureau of Labor Statistics average for 2018. Meanwhile, in California the unemployment rate is 4.2% statewide. Unemployment data does not fully capture the strength of the local employment situation. According to the 2013-2017 American Community Survey 5-Year Estimates, San Luis Obispo had a labor force participation rate of 58.5% as opposed to 63.5% for the State of California. It is likely that racial and ethnic disparities in employment are persistent in San Luis Obispo, although less stark than other areas in the state. Subject to extremely high margins of error, the American Community Survey reports, as of 2013-2017 (and thus capturing worse employment conditions than those that are currently present), unemployment rates of 4.7% for White workers, 4.3% for Black workers, 5.3% for Asian workers, and 6.7% for Hispanic workers. There are a variety of employment and training programs available in the community through America's Job Center, Mission Community Services Corporation, the Economic Vitality Commission, Cuesta Community College's Institute for Professional Development, PathPoint, Transitions-Mental Health Association, Achievement House, and the California Conservation Corps' Los Padres Center. On a state level, California's Employment Development Department also provides job training and job matching services.

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C. Transportation

- i. For the protected class groups for which HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.*

Table 4-23:

(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction	Low Transportation Cost Index	Transit Index
Total Population		
White, Non-Hispanic	50.63	23.27
Black, Non-Hispanic	54.31	24.31
Hispanic	51.66	24.15
Asian or Pacific Islander, Non-Hispanic	56.63	25.26
Native American, Non-Hispanic	49.23	22.79
Population below federal poverty line		
White, Non-Hispanic	59.98	26.63
Black, Non-Hispanic	62.69	25.88
Hispanic	54.03	24.80
Asian or Pacific Islander, Non-Hispanic	65.04	27.41
Native American, Non-Hispanic	56.24	24.49
(San Luis Obispo-Paso Robles-Arroyo Grande, CA) Region		
Total Population		
White, Non-Hispanic	51.53	23.53
Black, Non-Hispanic	55.00	24.54
Hispanic	52.96	24.56
Asian or Pacific Islander, Non-Hispanic	57.32	25.51
Native American, Non-Hispanic	50.45	23.19
Population below federal poverty line		
White, Non-Hispanic	60.30	26.71
Black, Non-Hispanic	62.69	25.88
Hispanic	55.29	25.22
Asian or Pacific Islander, Non-Hispanic	65.04	27.41
Native American, Non-Hispanic	56.24	24.49

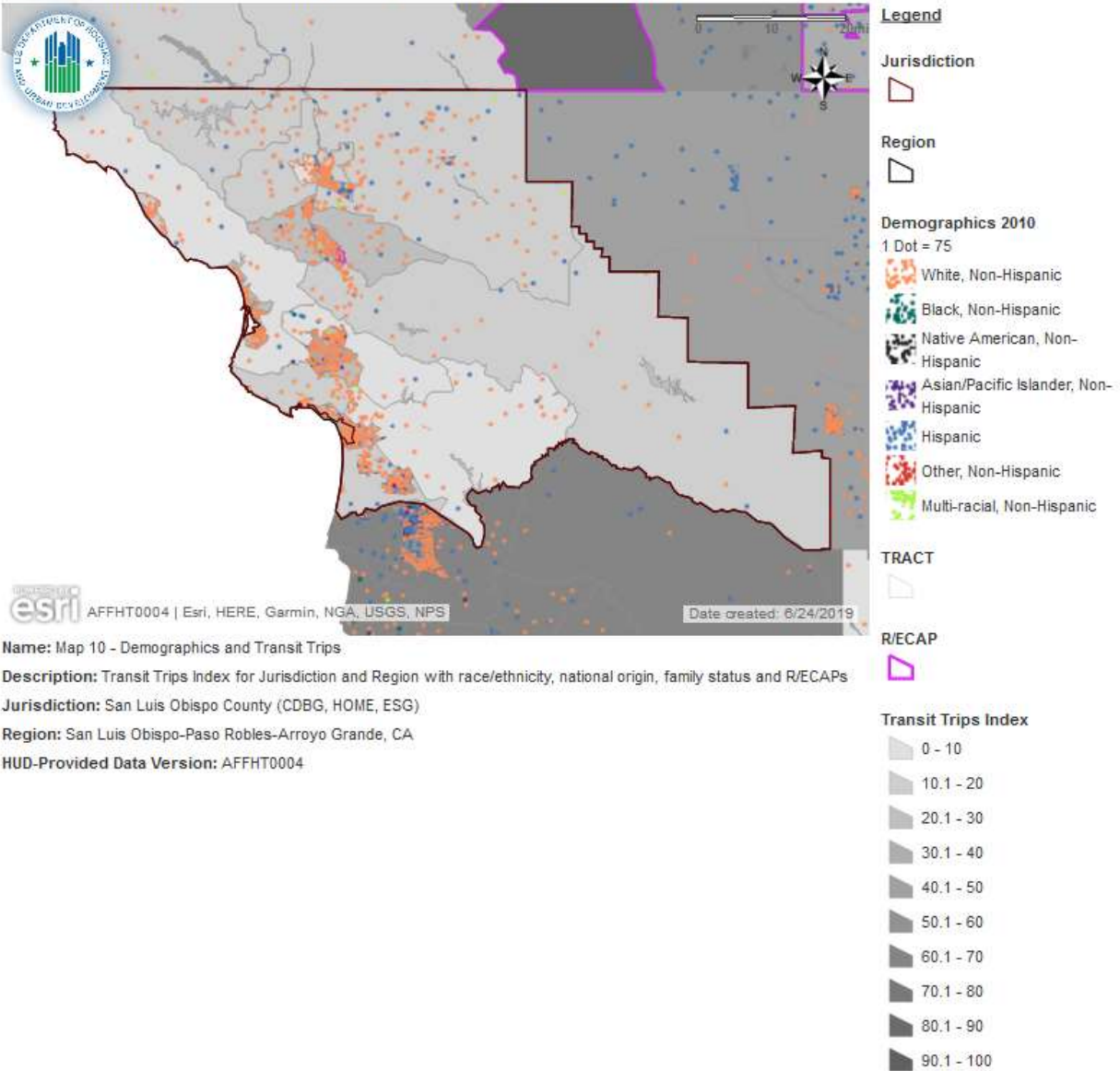
Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

HUD's Transit Trips Index displays the utilization of public transit, with higher numbers indicating a higher rate of use. Utilization of public transit is generally poor, with every group (including those below the poverty line) scoring in the 20s. There are negligible differences between racial and ethnic groups. Low Transportation Cost Index scores, which indicate modestly low cost of transportation, are significantly better than these Transit Index scores. Across racial and ethnic groups, the scores range from 49.23 (Native American) to 56.63 (Asian American or Pacific Islander). Below the poverty line, for each group the score rises. The scores range between 54.03 (Hispanic) to 65.04 (Asian American or Pacific Islander). While the 50s-60s range is decidedly in the middle, the huge disparity between the Low Transportation Cost Index and Transit Trips Index scores is notable.

- ii. For the protected class groups for which HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.*

Map 4-19: Demographics and Transit Trips (Race/Ethnicity)

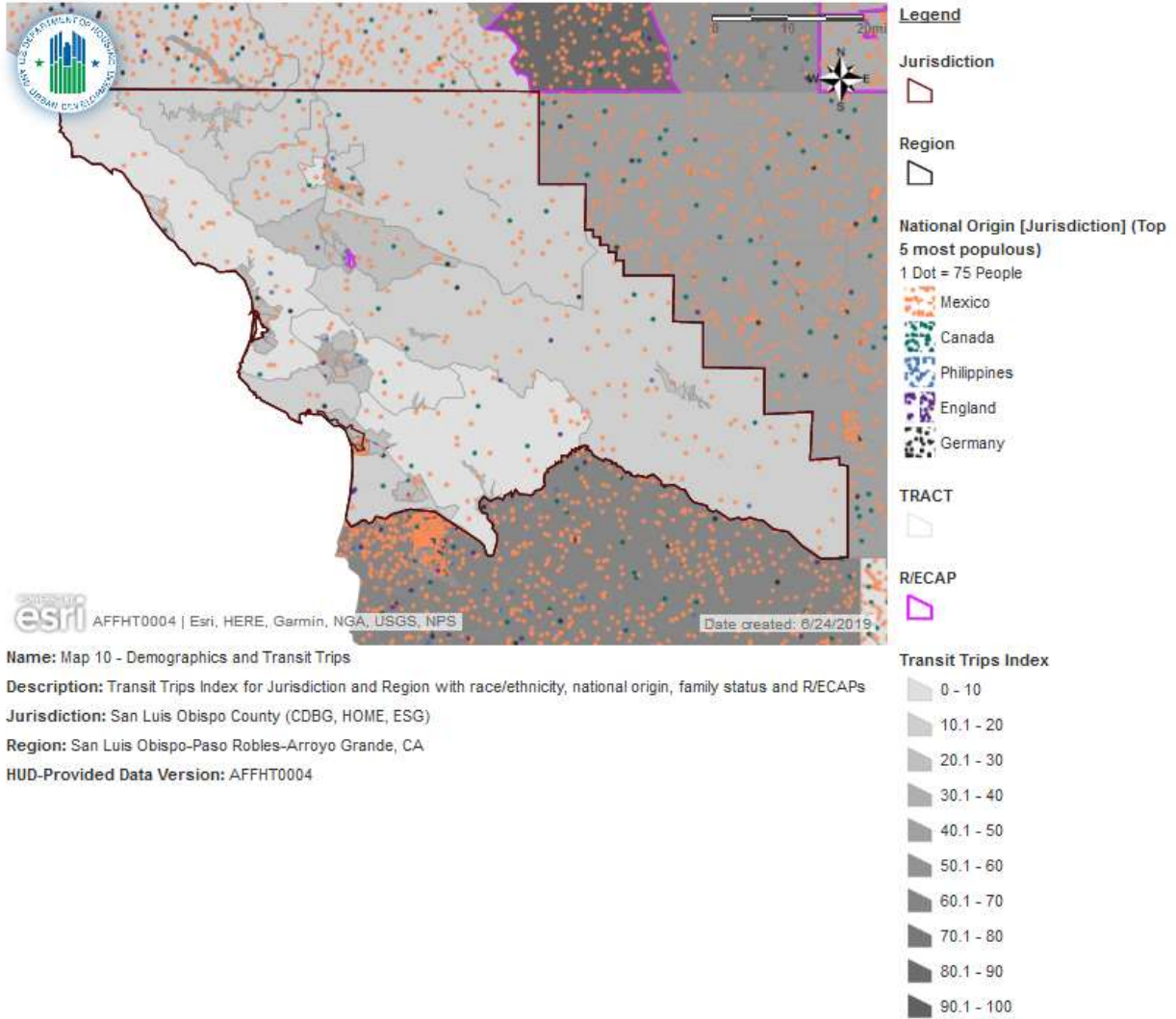
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 1: Demographics and Transit Trips (Race/Ethnicity) shows data from a HUD index, in this case measuring the frequency of public transportation service (with 0 reflecting a lack of service and 100 robust service), overlaid with a dot density map depicting patterns of racial and ethnic concentration. The map does not appear to show any correlation between racial and ethnic concentration and access to high frequency traffic. This is likely because, although Nipomo and Oceano are comparatively isolated from some amenities, Nipomo in particular has access to a major corridor, U.S. Highway 101, that offers bus service.

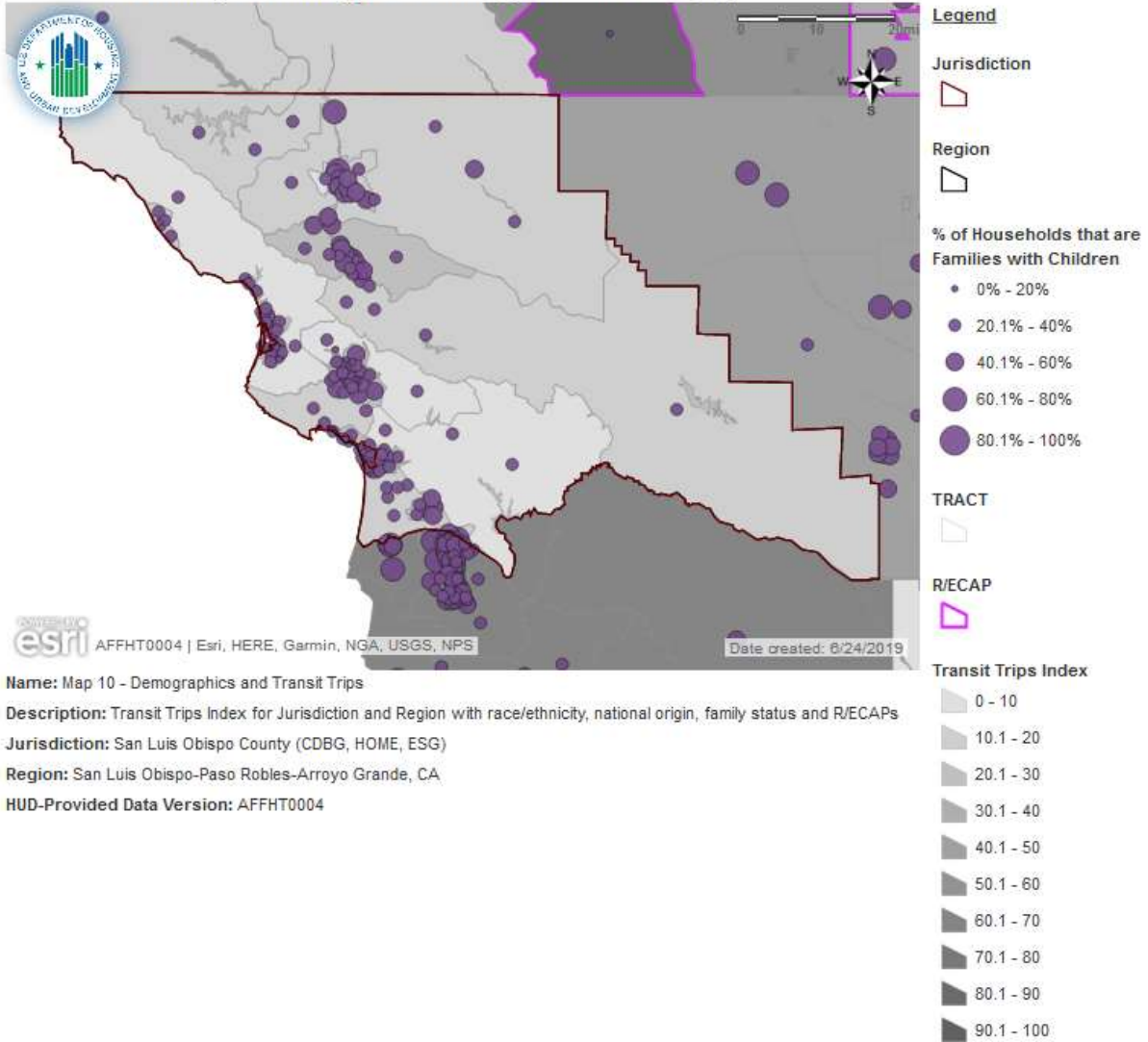
Map 4-20: Demographics and Transit Trips (National Origin)

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Map 4-21: Demographics and Transit Trips (Family Status)

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Name: Map 10 - Demographics and Transit Trips

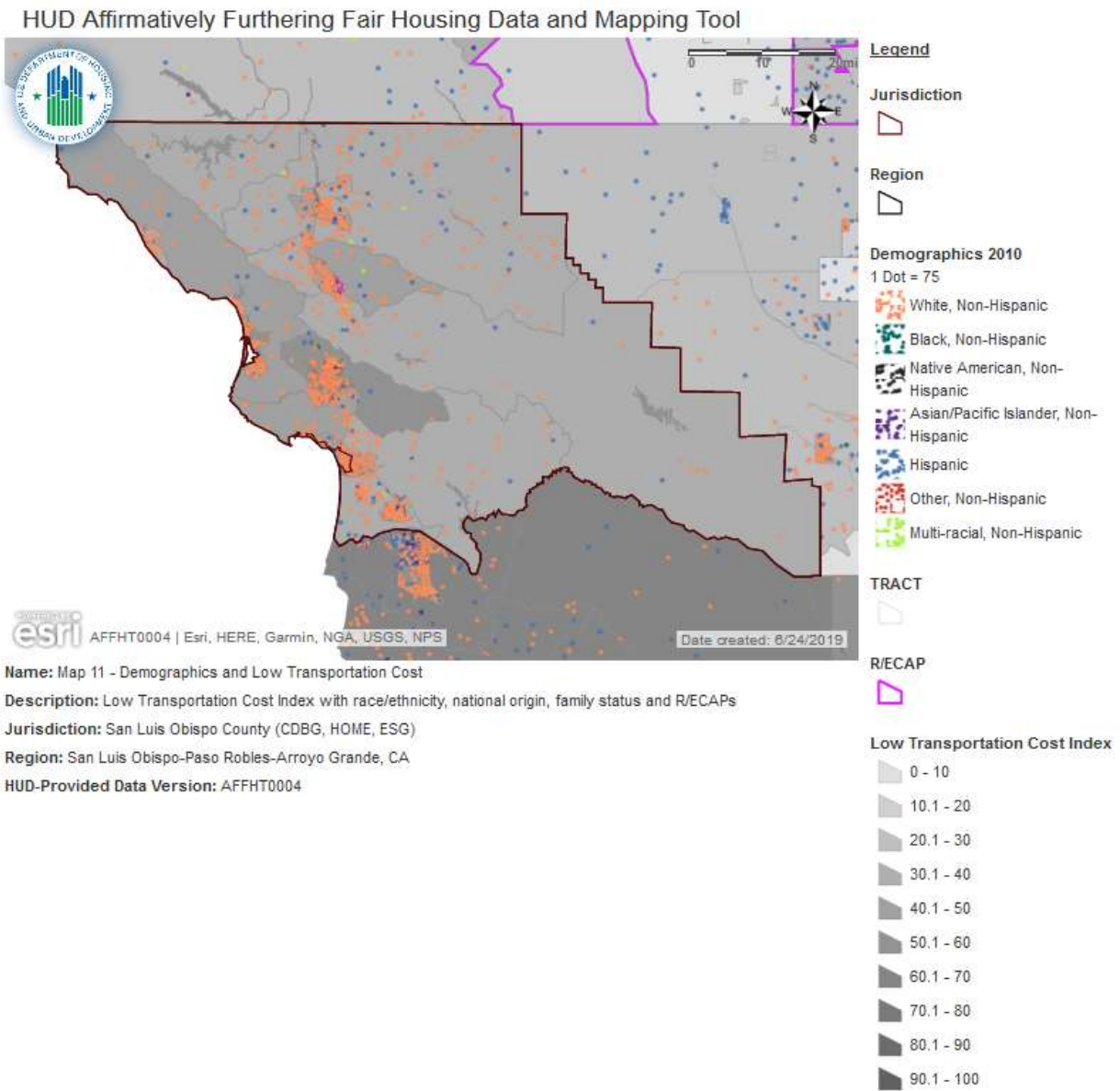
Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)

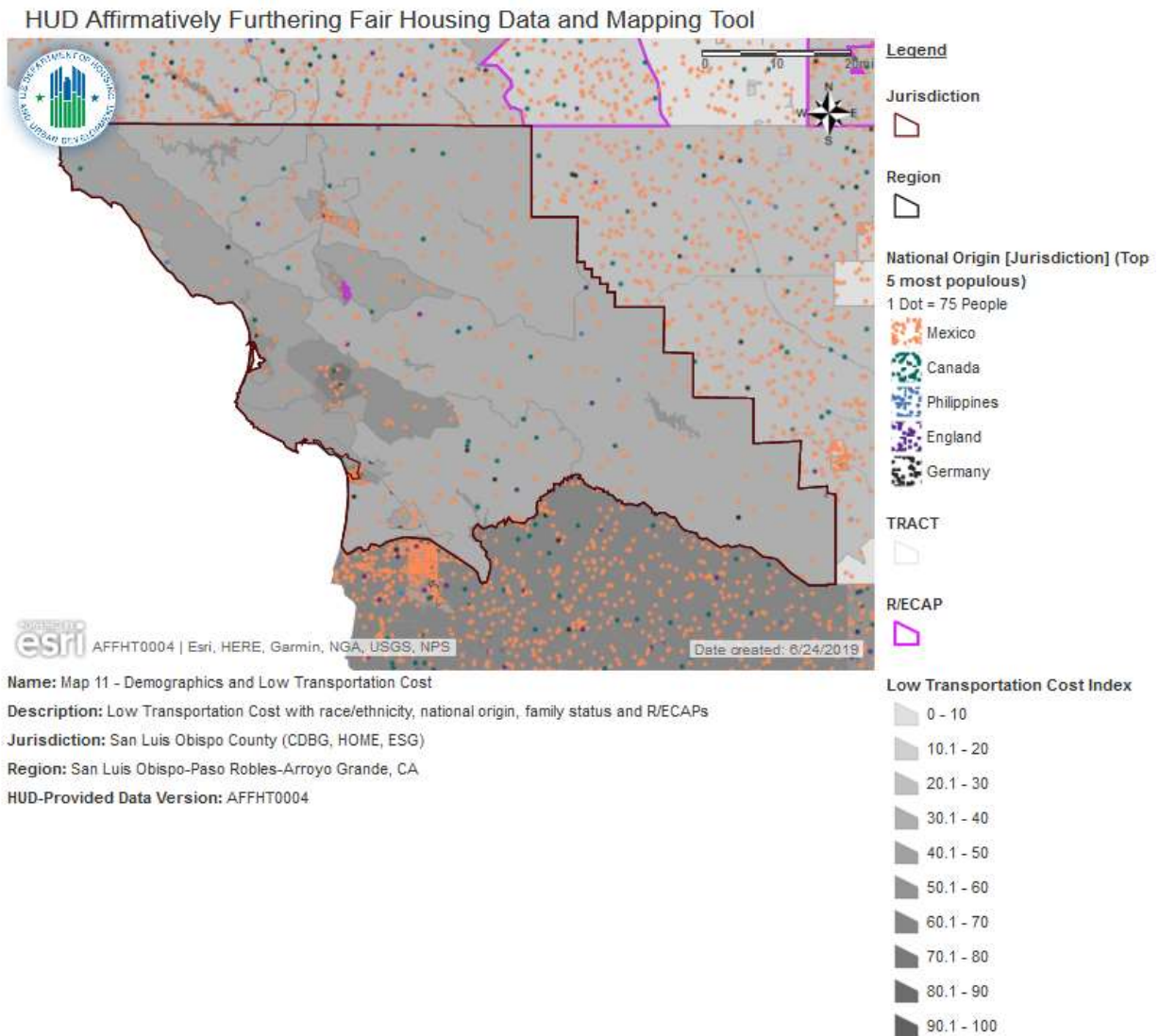
Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA

HUD-Provided Data Version: AFFHT0004

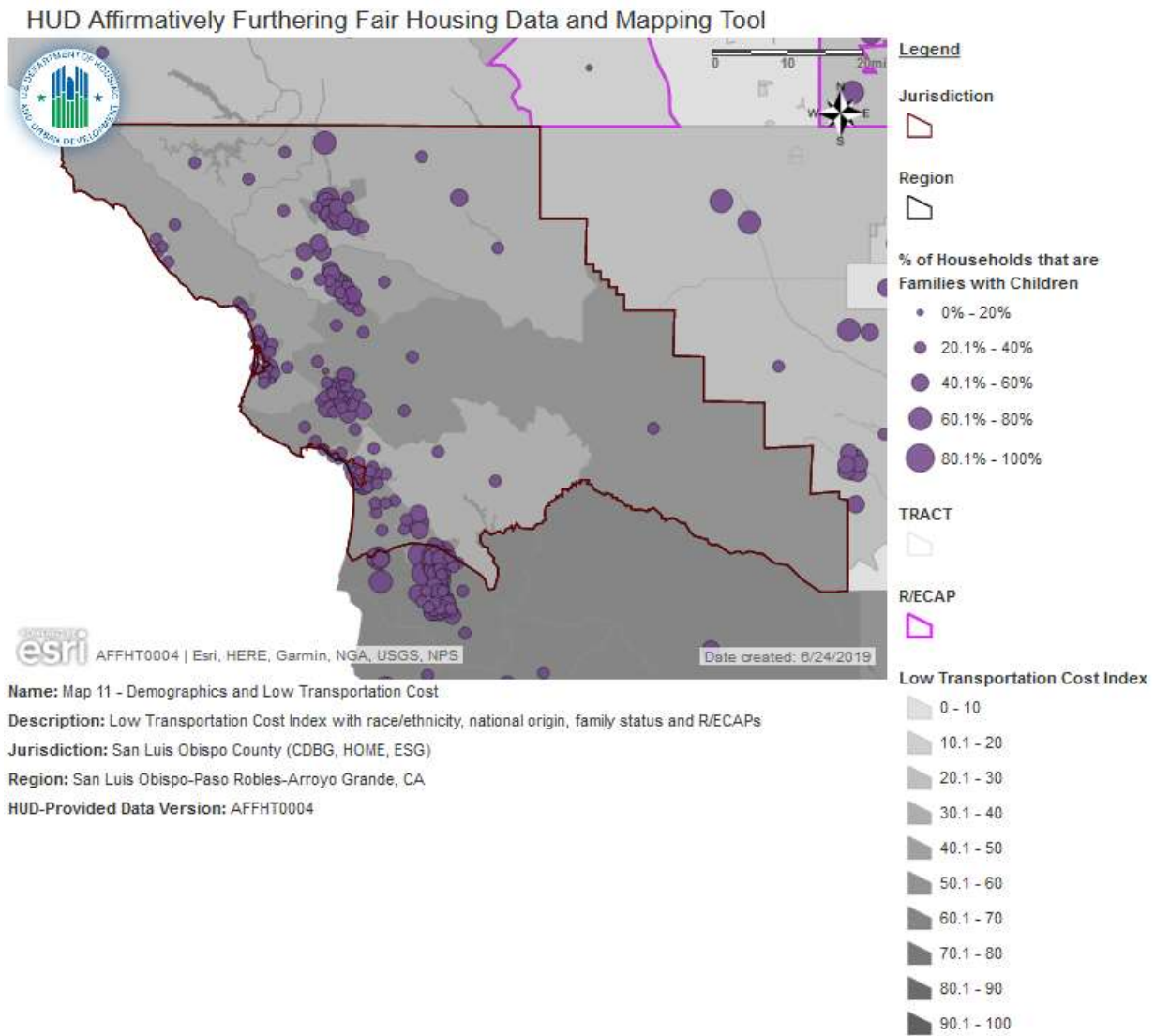
Map 4-22: Demographics and Low Transportation Cost (Race/Ethnicity)



Map 4-23: Demographics and Low Transportation Cost (National Origin)



Map 4-24: Demographics and Low Transportation Cost (Family Status)



Regardless of residential patterns, Transit Trips Index scores are very poor across the County. The highest ranking census tracts score in the 30s, and are mostly located along Highway 101 or on the coast (Arroyo Grande, Los Osos, Morro Bay, etc.). Low Transportation Cost fares much better, with most of the same areas scoring the highest on the index. These scores tend to cluster in the 60s. The cities along Highway 101, which tend to be more racially/ethnically diverse, have more immigrants, and more families with children, can all benefit from this uptick. However, the lower cost of transportation is less meaningful if it does not serve the necessary areas and achieve high use in the community.

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- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.*

The County of San Luis Obispo and its cities provide a number of transit options. The San Luis Obispo Regional Transit Authority (RTA), in conjunction with South County Transit and Paso Express, operates a countywide / fixed-route bus system. RTA also provide Runabout Paratransit, Dial-A-Ride, and *Senior Go!* Ride-On is a nonprofit agency that offers county-wide transit services at reduced costs for eligible low-income households and disabled individuals. The City of San Luis Obispo runs SLO Transit as a part of their public transportation service. This system runs throughout the city and provides a monthly discounted pass for persons with disabilities. Moreover, the City is designated a “Bike Friendly Community,” which provides another transit option outside of the fixed-route system.

The County of San Luis Obispo is engaged in a public notice and comment period wherein it leverages the experiences of persons with disabilities and those organizations that serve them to update its ADA Transition Plans. For its current planning stage, it used feedback from Access for All—a community organization advocating for the needs of persons with disabilities—and Community Advisory Councils—resident-led organizations that represent community interests and review development proposals for the County.

Transportation access is not limited to public transit (e.g., fixed-route bus routes and light rail), as transportation throughout the City of San Luis Obispo requires attention to walkability and other accessibility services. Many of the public accessibility needs were identified through the County's ADA transition plan. More broadly, improving public infrastructure likely has an impact on disparate access to transportation for persons with disabilities. The County of San Luis Obispo within the greater Region is focusing on promoting accessibility for persons with disabilities in this regard by improving curb ramps into public buildings as a first priority, followed by commercial areas, and lastly residential areas. The Region is likewise doing this work to increase the number of accessible parking spots.

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D. Access to Low Poverty Neighborhoods

- i. For the protected class groups for which HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.*

Table 4-24:

(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index
Total Population	
White, Non-Hispanic	63.77
Black, Non-Hispanic	52.21
Hispanic	55.78
Asian or Pacific Islander, Non-Hispanic	65.02
Native American, Non-Hispanic	58.96
Population below federal poverty line	
White, Non-Hispanic	66.47
Black, Non-Hispanic	53.94
Hispanic	50.72
Asian or Pacific Islander, Non-Hispanic	69.00
Native American, Non-Hispanic	61.59
(San Luis Obispo-Paso Robles-Arroyo Grande, CA) Region	
Total Population	
White, Non-Hispanic	63.77
Black, Non-Hispanic	52.67
Hispanic	55.88
Asian or Pacific Islander, Non-Hispanic	64.51
Native American, Non-Hispanic	59.11
Population below federal poverty line	
White, Non-Hispanic	66.09
Black, Non-Hispanic	53.94
Hispanic	51.19
Asian or Pacific Islander, Non-Hispanic	69.00
Native American, Non-Hispanic	61.58

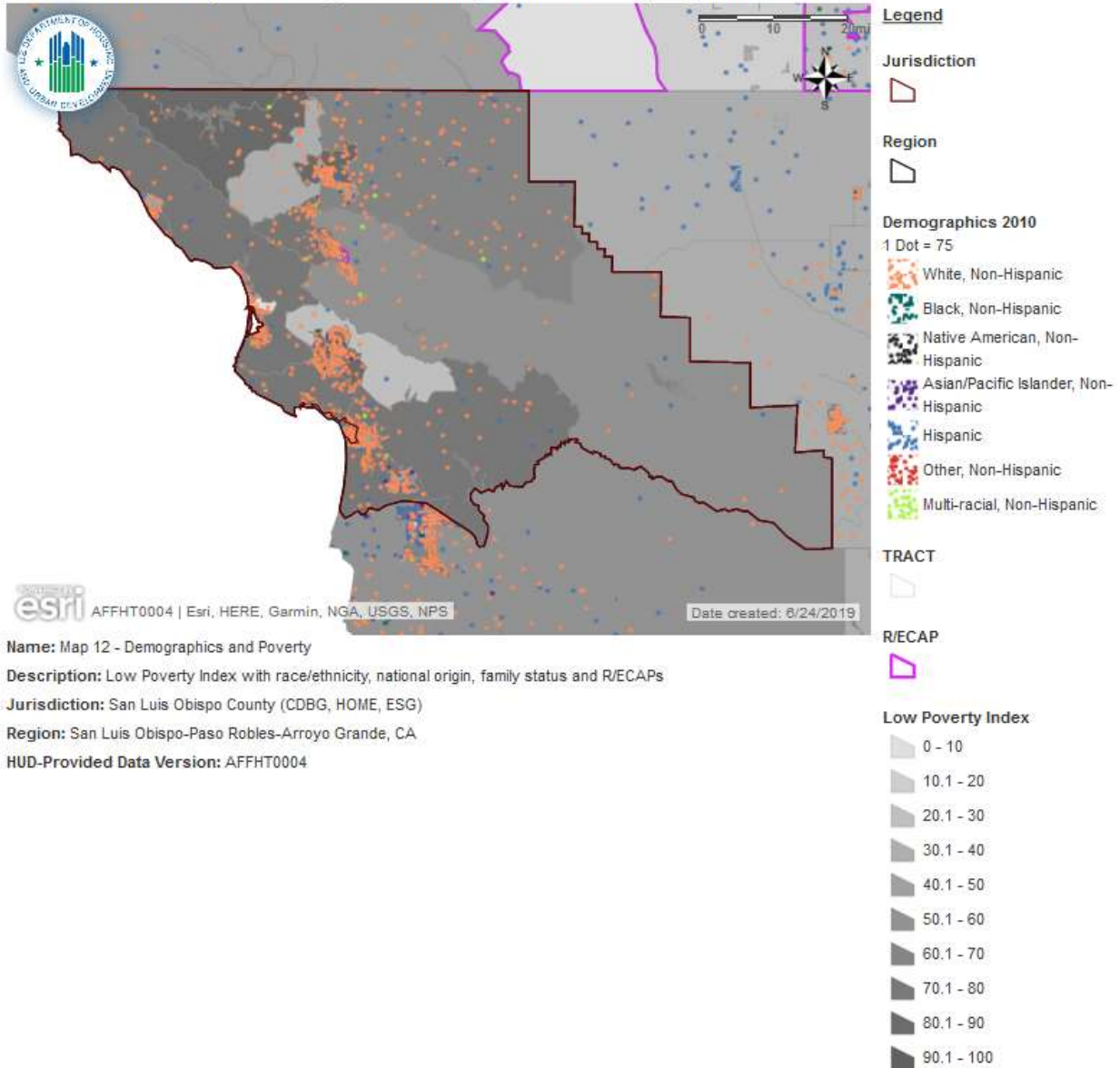
Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

Low Poverty Index values measure poverty in a given neighborhood. A low Low Poverty Index value would indicate higher amounts of poverty in an area. In the County of San Luis Obispo, each racial or ethnic group has middling access to low poverty neighborhoods. The Low Poverty Index scores range between 52.21 (Black residents) and 65.02 (Asian American or Pacific Islander residents), with no significant disparities between groups. Below the poverty line, each group except Hispanics (50.72) saw modest increases in their Index scores. Differences between the jurisdiction and the region are negligible.

- ii. For the protected class groups for which HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.*

Map 4-25: Demographics and Poverty (Race/Ethnicity)

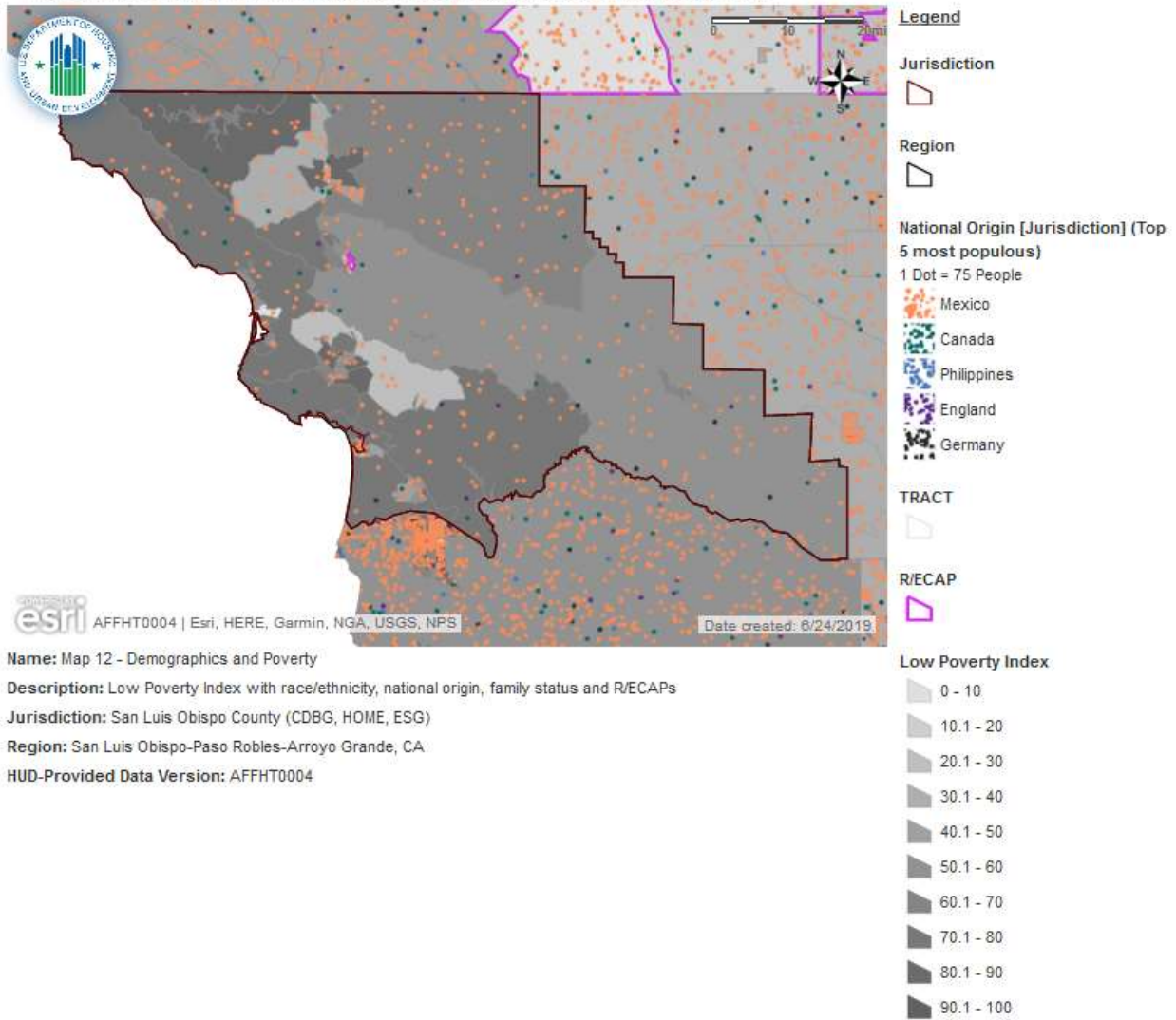
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 1: Demographics and Poverty (Race/Ethnicity) overlays HUD index data with race and ethnicity data. On this HUD index, a score of 0 reflects a lack of access to low poverty neighborhoods (or, in the alternative, a high concentration of poverty), and a score of 100 reflects high access to low poverty neighborhoods. Disproportionately Hispanic areas in all parts of the county, as well as some rural areas that do not have concentrations of Hispanic residents, consistently have less access to low poverty neighborhoods than do predominantly White neighborhoods.

Map 4-26: Demographics and Poverty (National Origin)

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Name: Map 12 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)

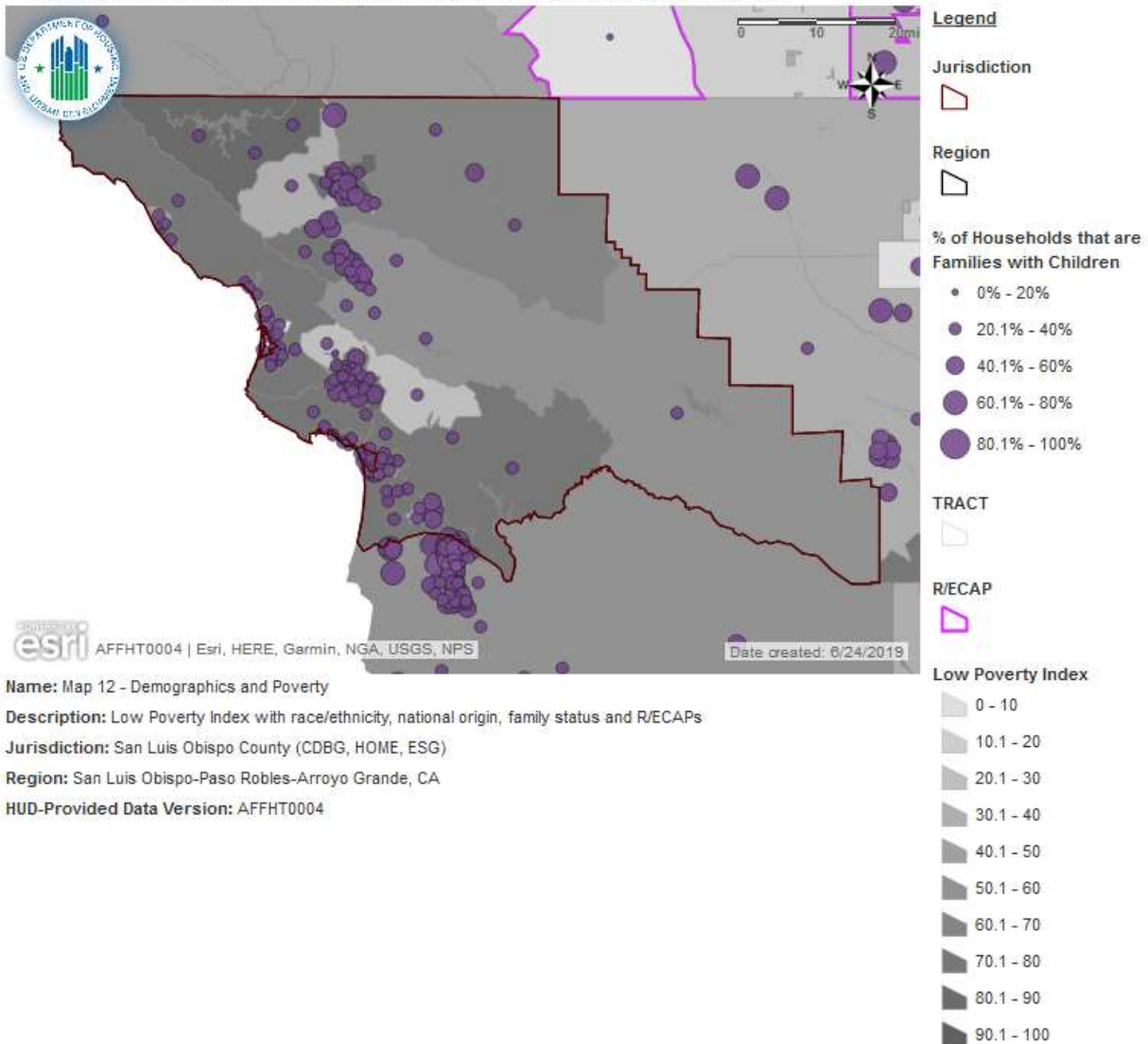
Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA

HUD-Provided Data Version: AFFHT0004

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Map 4-27: Demographics and Poverty (Family Status)

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Low poverty census tracts in the County of San Luis Obispo tend to be located near the coast. This is likely correlated with the higher demand and cost of real estate along the coast. Poverty levels are highly dependent on residential patterns, with a number of census tracts in metropolitan areas abruptly declining when compared to adjacent census tracts. A large census tract north of the City of San Luis Obispo scores only 28 on the Low Poverty Index. While two census tracts in Paso Robles score in the high 80s, the others score in the 20s-40s. And despite high scores along the coast, one census tract near Morro Bay scores only 6.

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Mexican immigrants are well dispersed throughout the County, but do have a strong presence in several high poverty areas. Several of these high poverty areas have concentrations of Filipino immigrants as well; however, the correlation is not as strong as with Mexican immigrants, and there are strong concentrations of Filipinos in low poverty neighborhoods as well. While most of these high poverty areas maintain majority-White populations, there are larger concentrations in many of these census tracts than in the County at large. Family size does not seem to be correlated with high and low poverty areas in the same way as race/ethnicity or, more noticeably, national origin.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

Although the HUD-provided data accurately reflects that the County of San Luis Obispo has relatively low exposure to high poverty neighborhoods in comparison to other metropolitan areas in California, HUD's reliance upon the federal poverty level, which is the same for California as it is for the rest of the 48 contiguous states, downplays the true extent of poverty in the region. Metrics that adjust for housing costs routinely show California to be one of the highest poverty states in the country (and sometimes the highest poverty state). This means that, for example, if a family of four in San Luis Obispo making minimum wage has an income of \$48,000 (above the federal poverty level of \$25,100), they are still falling short of a living wage, especially as San Luis Obispo experiences one of the fastest rates of rent increases in the state.¹¹ There are services available in the area, such as the County's *CalWORKs* program, which provides wraparound support to families who need help becoming self-sufficient. There are also financial literacy programs available. However, these programs are focused on the idea of individual responsibility and don't seem to address the systemic, outside forces of living in a poor neighborhood, combined with the skyrocketing cost of living in California. While some other local governments have taken aggressive steps to try to bridge the gap between income and cost of living through minimum wage increases and increased paid sick leave requirements, it does not appear that communities in the County have taken those or similar steps.

¹¹ <https://www.sanluisobispo.com/news/local/article202776724.html>

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E. Access to Environmentally Healthy Neighborhoods

- i. For the protected class groups for which HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

Table 4-25:

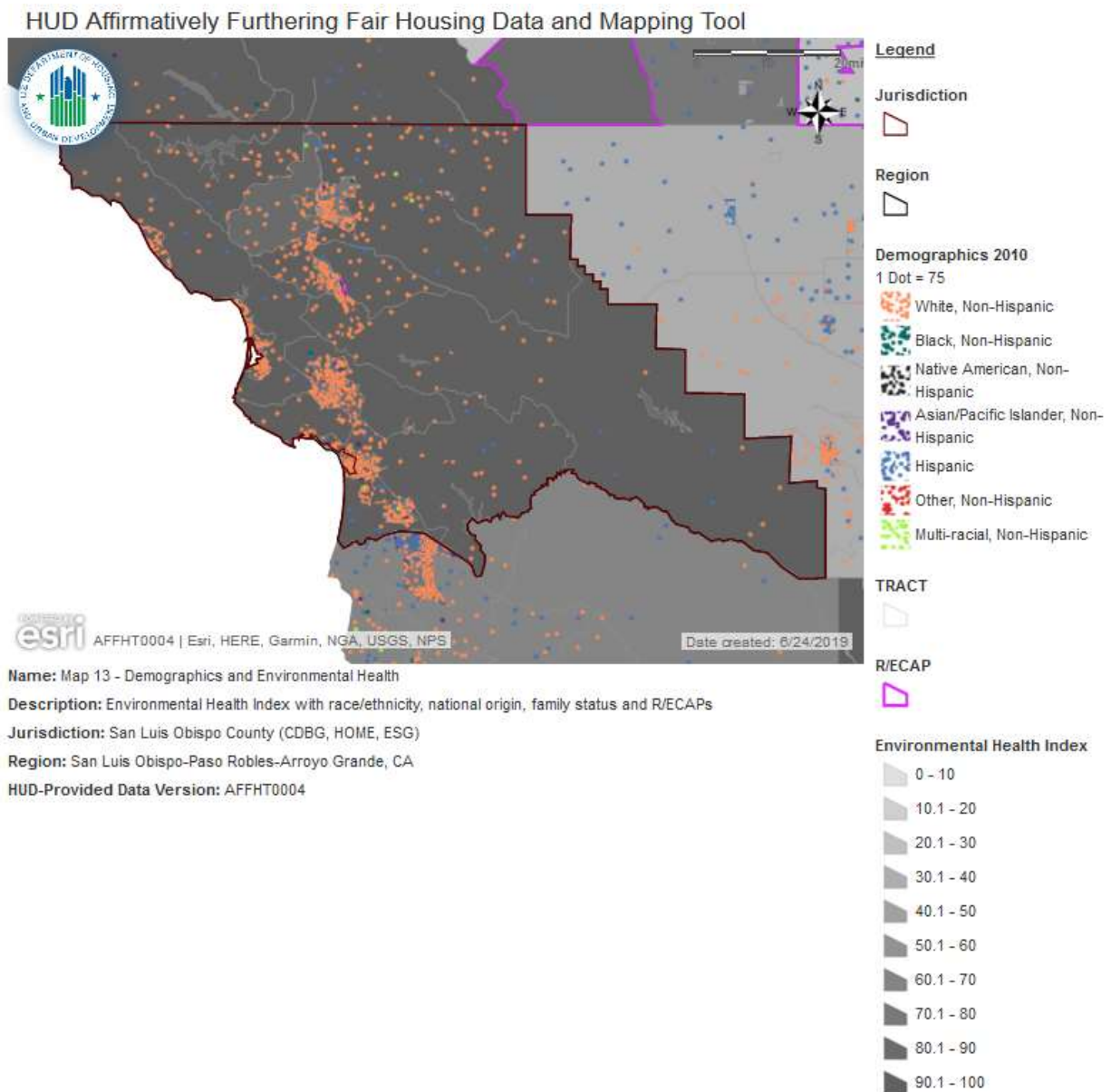
(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction	Environmental Health Index
Total Population	
White, Non-Hispanic	85.27
Black, Non-Hispanic	85.83
Hispanic	82.42
Asian or Pacific Islander, Non-Hispanic	85.14
Native American, Non-Hispanic	84.57
Population below federal poverty line	
White, Non-Hispanic	82.16
Black, Non-Hispanic	76.00
Hispanic	81.42
Asian or Pacific Islander, Non-Hispanic	84.66
Native American, Non-Hispanic	82.31
(San Luis Obispo-Paso Robles-Arroyo Grande, CA) Region	
Total Population	
White, Non-Hispanic	84.98
Black, Non-Hispanic	85.62
Hispanic	81.97
Asian or Pacific Islander, Non-Hispanic	84.59
Native American, Non-Hispanic	84.15
Population below federal poverty line	
White, Non-Hispanic	81.94
Black, Non-Hispanic	76.00
Hispanic	80.94
Asian or Pacific Islander, Non-Hispanic	84.66
Native American, Non-Hispanic	82.31

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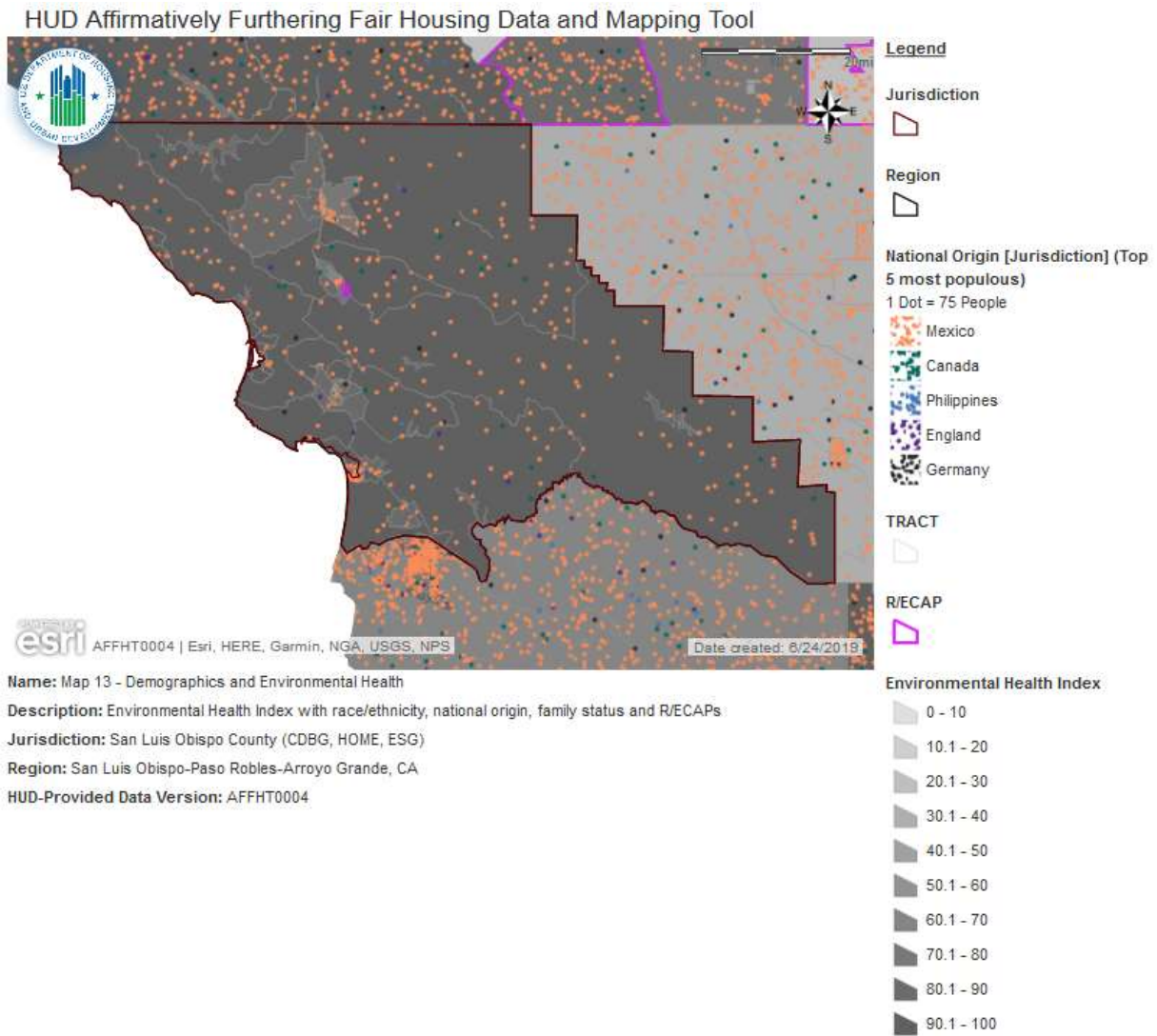
In the County of San Luis Obispo, access to environmentally healthy neighborhoods is extremely high across every racial and ethnic group, including those below the poverty line. Above the poverty line, every group ranks in the 80s, and below the poverty line only Black residents fall slightly below, to 76.

- ii. For the protected class groups for which HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.*

Map 4-28: Demographics and Environmental Health (Race/Ethnicity)

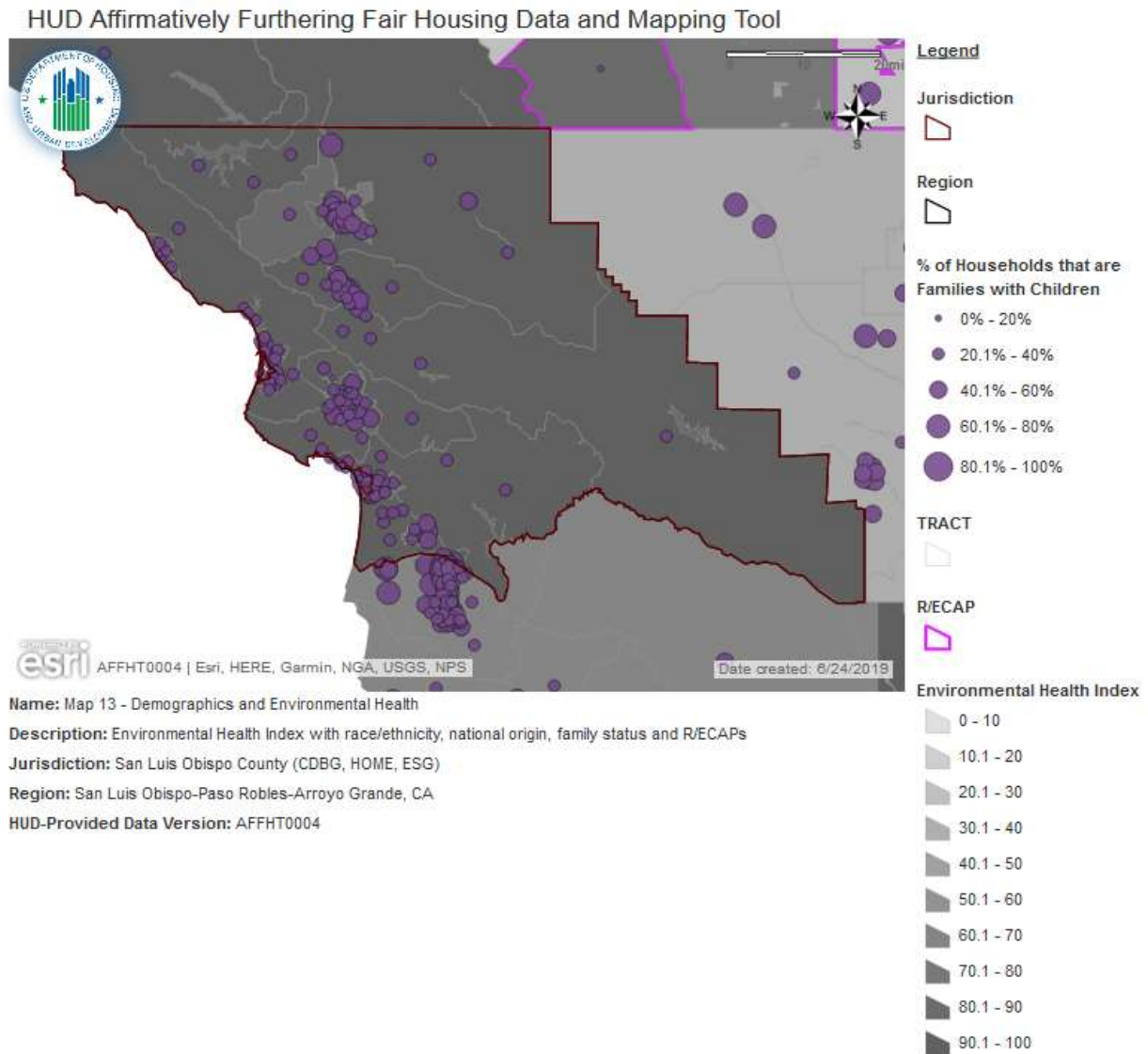


Map 4-29: Demographics and Environmental Health (National Origin)



Name: Map 13 - Demographics and Environmental Health
Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)
Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA
HUD-Provided Data Version: AFFHT0004

Map 4-30: Demographics and Environmental Health (Family Status)



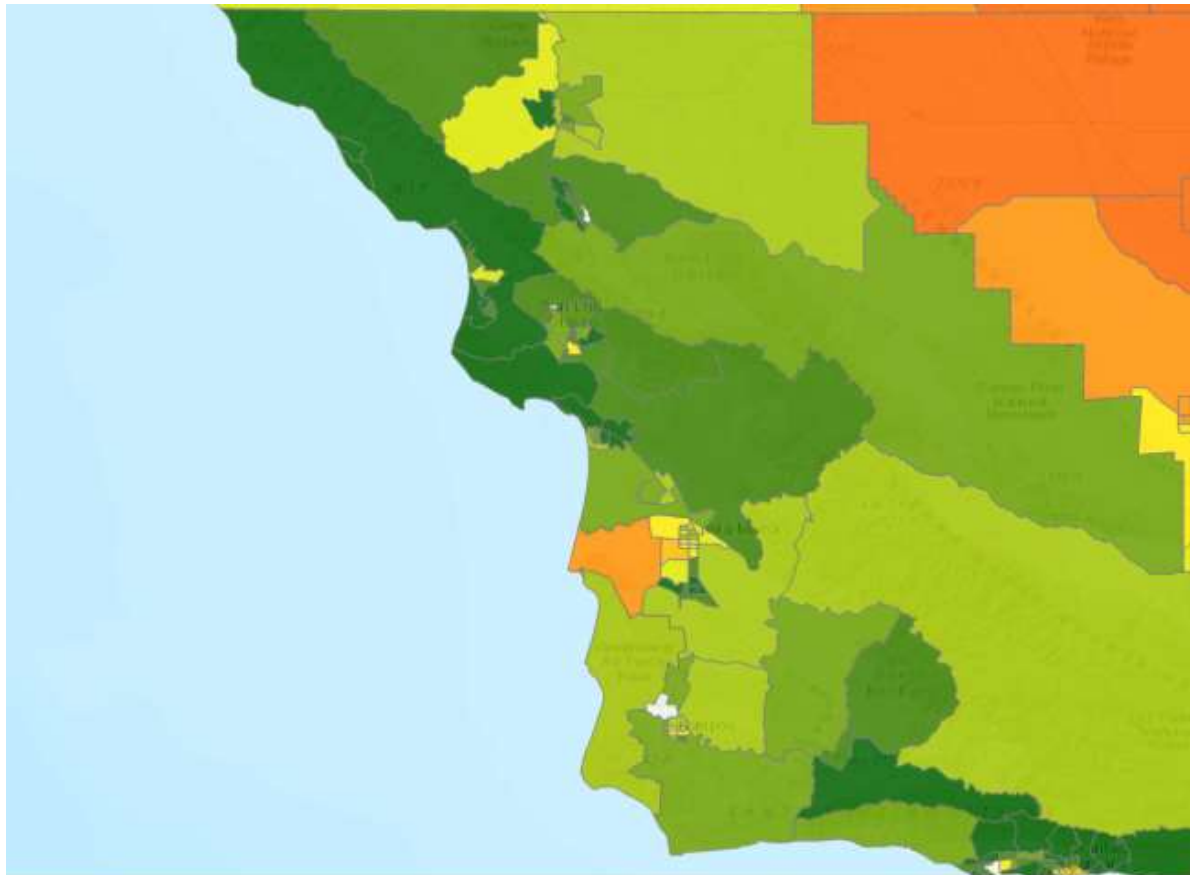
In the County of San Luis Obispo, it is clear from both the Environmental Health Index and the maps above that areas throughout the County experience very good environmental conditions. The places with the poorest environmental health are located in the more populous cities, such as Atascadero, the City of San Luis Obispo, and Paso Robles, but even then, the very lowest census tract scores rank in the high 50s. Because disparities in access to environmentally healthy neighborhoods are modest in light of the high environmental quality in all neighborhoods, residential patterns do not play a significant role in disparities.

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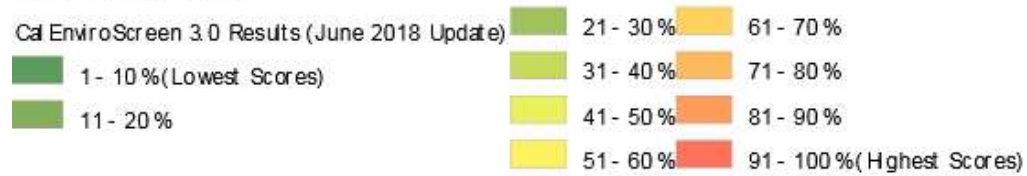
iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

HUD's Environmental Health Index does not reflect significant disparities in access to environmentally healthy neighborhoods within San Luis Obispo. The map below from the California Environmental Protection Agency substantiates the view that the entire County has very high levels of environmental health, while also pointing out with more nuance the stark contrast between the County and neighboring Santa Maria, which is home to more low income people and communities of color.

Map 4-31: CalEnviroScreen 3.0 Results (June 2018 Update) – San Luis Obispo



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Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

F. Patterns in Disparities in Access to Opportunity

- i. For the protected class groups for which HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.*

The County of San Luis Obispo does not exhibit serious disparities in access to opportunity across racial or ethnic groups for any particular category in this analysis. Across the board, environmental health levels are very high and transportation access is quite low. Larger differences, especially when it comes to residential patterns, are observable in school proficiency, employment, and poverty. Generally, areas with the highest access to opportunity include the main population centers along Highway 101 and cities on the coast.

- ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.*

As has been discussed, the areas in the County of San Luis Obispo with the highest access to opportunity tend to be located in the population centers along Highway 101 and in cities on the coast. The areas with the lowest opportunity include parts of Paso Robles, the City of San Luis Obispo, and Atascadero, where the interiors of the cities tend to perform worse than their more affluent suburbs. Even recognizing these disparities, when disaggregated by racial or ethnic groups disparities are not large, and the region is much more affected by low opportunity that affects every group – most notably, deficits in transportation access.

G. Additional Information

- i. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.*

N/A

H. Contributing Factors of Disparities in Access to Opportunity

- i. Consider the listed factors and any other factors affecting the jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.*

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Please see the Appendix for the following Contributing Factors to Disparities in Access to Opportunity:

Access to financial services

Availability, type, frequency, and reliability of public transportation

Impediments to mobility

Lack of access to opportunity due to high housing costs

Lack of private investments in specific neighborhoods

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

Lack of local or regional cooperation

Land use and zoning laws

Lending discrimination

Location and type of affordable housing

Location of employers

Location of environmental health hazards

Location of proficient schools and school assignment policies

Loss of affordable housing

Occupancy codes and restrictions

Private discrimination

Source of income discrimination

4.2.4 Disproportionate Housing Needs

A. Housing Cost Burden – Who and Where

- i. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?*

Despite low populations of non-White residents in the County of San Luis Obispo, racial or ethnic minority groups generally experience slightly higher rates of housing problems than White residents. The exception to this is the Native American, Non-Hispanic population in the county, which experiences slightly lower numbers of housing problems at 35.40% rather than 42.25% for White residents. Hispanic residents, on the other hand, experience significantly higher numbers of housing problems than White residents, at 59.93%. Disparities are more pronounced in the category of severe housing problems, where Hispanic and Asian or Pacific Islander residents tend to face severe housing problems more often.

Disparities are more apparent between racial or ethnic groups when it comes to severe cost burden. While 19.43% of White, Non-Hispanic residents have a severe cost burden, the number is significantly higher for Black Non-Hispanic residents at 26.30% and Hispanic residents at 26.10%. Approximately 27.52% of Asian or Pacific Islander residents have a severe cost burden, which is significantly higher than that of White residents despite the relatively small population in the County. Approximately 17.18% of Native American residents have severe cost burdens, which is slightly lower than that of the White population. Disparities also exist across family household sizes, with non-family households experiencing higher rates of severe cost burden than family households.

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Table 4-26: Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction			(San Luis Obispo-Paso Robles-Arroyo Grande, CA) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
9.A: Households experiencing any of 4 housing problems						
9.A.1: Race/Ethnicity						
White, Non-Hispanic	31,151	73,730	42.25%	34,030	80,440	42.30%
Black, Non-Hispanic	509	1,137	44.77%	565	1,259	44.88%
Hispanic	8,277	13,810	59.93%	9,285	15,330	60.57%
Asian or Pacific Islander, Non-Hispanic	1,170	2,504	46.73%	1,335	2,870	46.52%
Native American, Non-Hispanic	103	291	35.40%	135	355	38.03%
Other, Non-Hispanic	1,036	1,691	61.27%	1,195	1,914	62.43%
Total	42,243	93,129	45.36%	46,550	102,155	45.57%
9.A.2: Household Type and Size						
Family households, <5 people	20,201	52,263	38.65%	22,305	57,055	39.09%
Family households, 5+ people	4,499	7,247	62.08%	4,935	7,705	64.05%
Non-family households	17,524	33,554	52.23%	19,310	37,400	51.63%
9.B: Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
9.B.1: Race/Ethnicity						
White, Non-Hispanic	15,558	73,730	21.10%	17,200	80,440	21.38%

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Black, Non-Hispanic	299	1,137	26.30%	299	1,259	23.75%
Hispanic	5,275	13,810	38.20%	5,820	15,330	37.96%
Asian or Pacific Islander, Non-Hispanic	815	2,504	32.55%	934	2,870	32.54%
Native American, Non-Hispanic	64	291	21.99%	90	355	25.35%
Other, Non-Hispanic	628	1,691	37.14%	710	1,914	37.10%
Total	22,670	93,129	24.34%	25,055	102,155	24.53%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: The Jurisdiction and Region are different in this report as the Region encompasses Grover Beach, while the Jurisdiction receiving CDBG funding does not.

Note 3: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

[Note 4: Refer to the Data Documentation for details \(www.hudexchange.info/resource/4848/affh-data-documentation\).](http://www.hudexchange.info/resource/4848/affh-data-documentation)

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Table 4-27: Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction			(San Luis Obispo-Paso Robles-Arroyo Grande, CA) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
10.A.1: Race/Ethnicity						
White, Non-Hispanic	14,328	73,730	19.43%	15,755	80,440	19.59%
Black, Non-Hispanic	299	1,137	26.30%	295	1,259	23.43%
Hispanic	3,604	13,810	26.10%	4,040	15,330	26.35%
Asian or Pacific Islander, Non-Hispanic	689	2,504	27.52%	770	2,870	26.83%
Native American, Non-Hispanic	50	291	17.18%	75	355	21.13%
Other, Non-Hispanic	565	1,691	33.41%	625	1,914	32.65%
Total	19,535	93,129	20.98%	21,560	102,155	21.11%
10.A.2: Household Type and Size						
Family households, <5 people	7,918	52,263	15.15%	8,850	57,055	15.51%
Family households, 5+ people	1,340	7,247	18.49%	1,435	7,705	18.62%
Non-family households	10,221	33,554	30.46%	11,260	37,400	30.11%
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						
Note 5: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).						

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In addition to the data provided by HUD above, the American Community Survey also provides data detailing the numbers of households subject to overcrowding or incomplete plumbing and kitchen facilities. These numbers are fairly even across race/ethnicity, with the exception of Hispanic households, which experience an overcrowding rate of 12.44%. A lack of complete kitchen or plumbing facilities is not a significant issue affecting residents of the County of San Luis Obispo.

Table 4-28: Percentage of Overcrowded Households by Race or Ethnicity, 2013-2017 American Community Survey

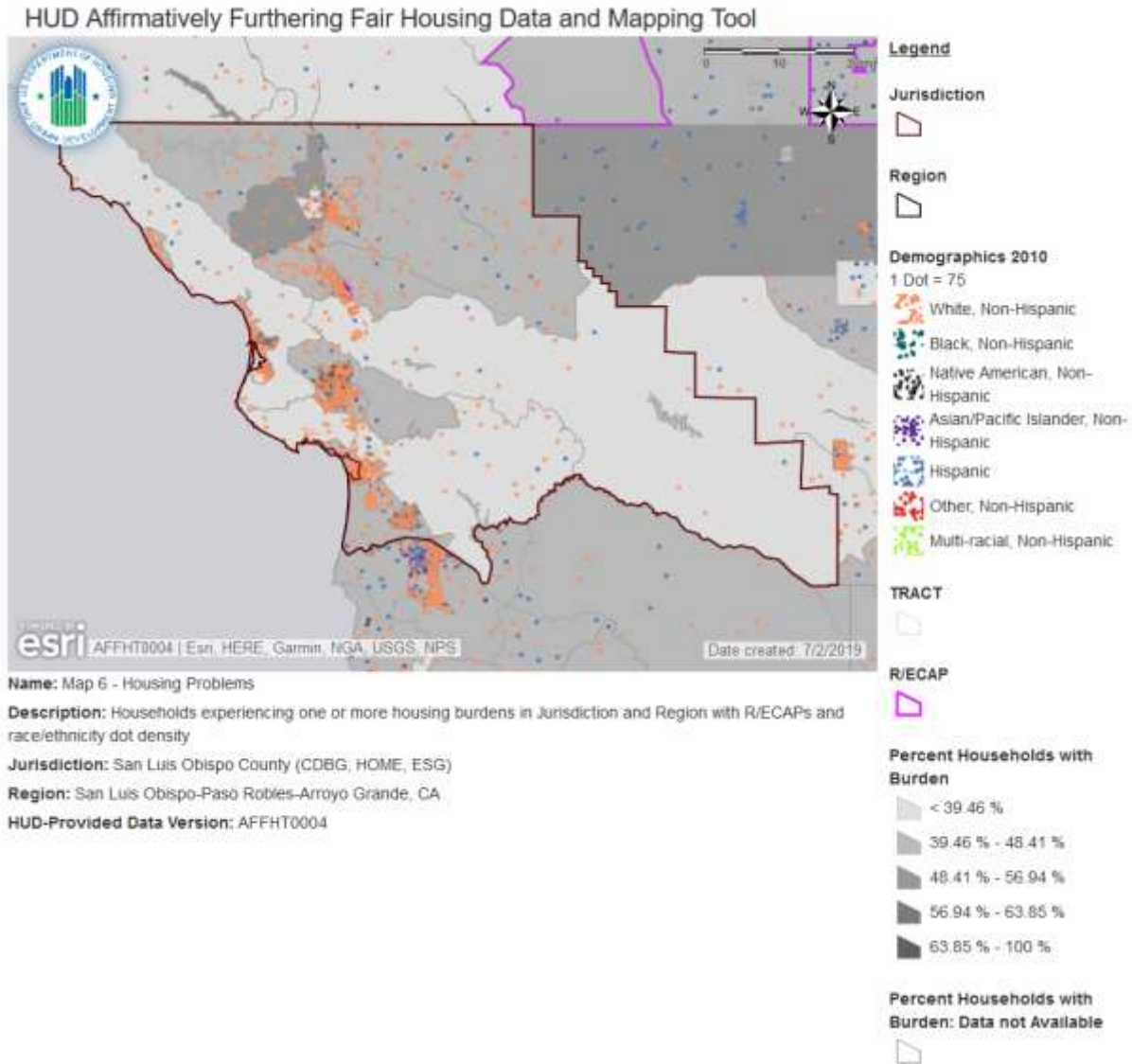
Non-Hispanic White Households	Black Households	Native American Households	Asian American or Pacific Islander Households	Hispanic Households
2.95%	2.00%	2.06%	3.67%	12.44%

- ii. Which areas in the jurisdiction and Region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?*

In the County of San Luis Obispo, a two-bedroom apartment costs \$2200/month on average. While rents are rising quickly throughout much of California, the cost of rent in the County of San Luis Obispo rose more quickly than anywhere else in the state. In 2019, the county ranked the 7th least affordable place to buy a home in the country, with housing and rent prices still on the rise¹². The County has encouraged development of more affordable housing in order to address these needs, though an affordable housing gap still exists.

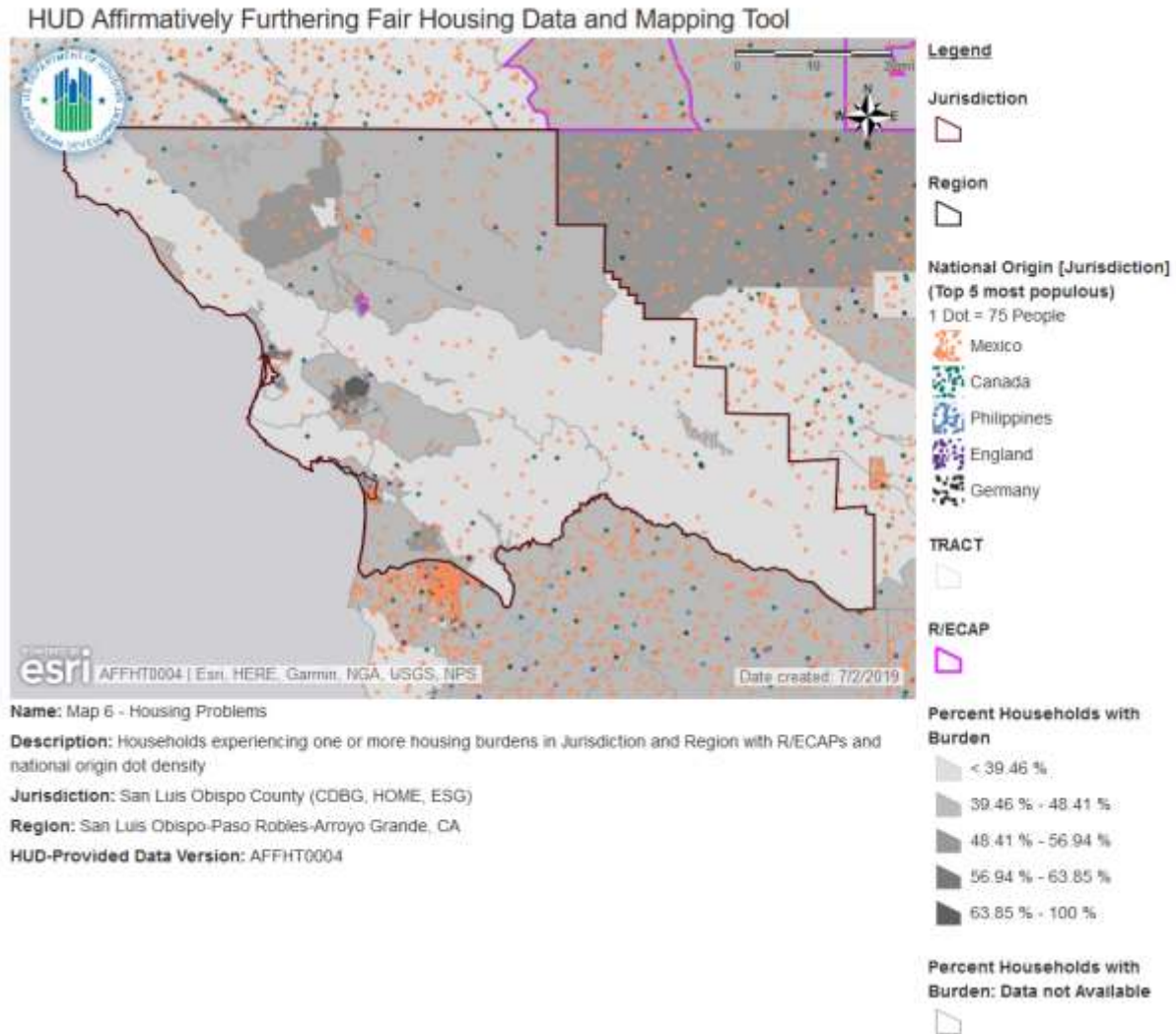
¹² <https://www.sanluisobispo.com/news/local/article226474360.html>

Map 4-32: Households with Disproportionate Housing Needs by Race/Ethnicity, San Luis Obispo County



Map 1: Households with Disproportionate Housing Needs by Race/Ethnicity is a dot density map of racial and ethnic concentration overlaid with data reflecting the percentage of households with one or more of the following housing problems: housing cost burden of more than 30%, overcrowding, incomplete kitchen, or incomplete plumbing. Areas with darker shading have a higher prevalence of housing problems. Housing problems are most intense in the area near Cal Poly in the City of San Luis Obispo and in Morro Bay, which are not areas of racial or ethnic population concentration.

Map 4-33: Households with Disproportionate Housing Needs by National Origin, San Luis Obispo County



Name: Map 6 - Housing Problems

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)

Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA

HUD-Provided Data Version: AFFHT0004

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Table 4-29: Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children, San Luis Obispo County

	(San Luis Obispo County, CA (CDBG, HOME, ESG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	22	13.50%	50	30.67%	89	54.60%	102	62.58%
Project-Based Section 8	289	97.97%	0	0.00%	0	0.00%	N/A	N/A
Other Multifamily	59	100.00%	0	0.00%	0	0.00%	N/A	N/A
HCV Program (Housing Choice Voucher)	847	45.15%	613	32.68%	362	19.30%	571	30.44%
Note 1: Data Sources: APSH								
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								

Households with severe housing burdens tend to be concentrated more in urban or densely populated areas within the County of San Luis Obispo. The main areas with higher rates of housing cost burdens are the west side of Paso Robles, the R/ECAP located in Atascadero, San Luis Obispo City, and Morro Bay. No patterns of housing burdens correlated to race/ethnicity appear by Paso Robles and Morro Bay. This is not the case for Atascadero or San Luis Obispo, however. The R/ECAP in Atascadero, as discussed the R/ECAPs section, contains a maximum-security facility housing mentally ill convicts, which may explain racial patterns in the city and drive away residents from the area. Black residents are slightly more concentrated in the north side of San Luis Obispo City, by California Polytechnic State University, in an area which has significant burdens as compared to the rest of the city.

Notably, little support is offered for those looking for two-plus bedroom or multi-family housing, as evidenced by the lack of those units for Project-Based Section 8 or Other Multifamily housing. This suggests that families in particular might need more options for publicly supported housing.

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iii. Describe the differences in rates of renter and owner-occupied housing by race/ethnicity in the jurisdiction and Region.

**Table 4-30: B25003: TENURE-- Universe: Occupied housing units
2013-2017 American Community Survey 5-Year Estimates**

	San Luis Obispo County, California	
	Estimate	Margin of Error
Total:	105,044	+/-886
Owner occupied	63,052	+/-1,069
Renter occupied	41,992	+/-1,107

**Table 4-31: B25003H: TENURE (WHITE ALONE, NOT HISPANIC OR LATINO
HOUSEHOLDER)-- Universe: Occupied housing units with a householder who is
White alone, not Hispanic or Latino
2013-2017 American Community Survey 5-Year Estimates**

	San Luis Obispo County, California	
	Estimate	Margin of Error
Total:	82,444	+/-817
Owner occupied	54,022	+/-961
Renter occupied	28,422	+/-971

**Table 4-32: B25003B: TENURE (BLACK OR AFRICAN AMERICAN ALONE
HOUSEHOLDER)-- Universe: Occupied housing units with a householder who is
Black or African American alone
2013-2017 American Community Survey 5-Year Estimates**

	San Luis Obispo County, California	
	Estimate	Margin of Error
Total:	1,297	+/-254
Owner occupied	383	+/-161
Renter occupied	914	+/-245

**Table 4-33: B25003D: TENURE (ASIAN OR PACIFIC ISLANDER ALONE HOUSEHOLDER)-- Universe: Occupied housing units with a householder who is Asian or Pacific Islander alone
2013-2017 American Community Survey 5-Year Estimates**

	San Luis Obispo County, California	
	Estimate	Margin of Error
Total:	2,536	+/-254
Owner occupied	1,393	+/-205
Renter occupied	1,143	+/-191

**Table 4-34: B25003I: TENURE (HISPANIC OR LATINO HOUSEHOLDER)-- Universe: Occupied housing units with a householder who is Hispanic or Latino
2013-2017 American Community Survey 5-Year Estimates**

	San Luis Obispo County, California	
	Estimate	Margin of Error
Total:	16,449	+/-611
Owner occupied	6,256	+/-410
Renter occupied	10,193	+/-548

**Table 4-35: B25003C: TENURE (AMERICAN INDIAN AND ALASKA NATIVE ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is American Indian and Alaska Native alone
2013-2017 American Community Survey 5-Year Estimates**

	San Luis Obispo County, California	
	Estimate	Margin of Error
Total:	680	+/-132
Owner occupied	337	+/-98
Renter occupied	343	+/-111

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The proportions of owners to renters varies greatly across race/ethnicity in the County of San Luis Obispo. On average, 60.02% of housing units in the county are owner occupied. This number is slightly higher for Non-Hispanic White residents, at 65.53%, but lower across all other demographics. 29.53% of Non-Hispanic Black residents are owners, 54.93% of Asian or Pacific Islander residents are owners, 38.03% of Hispanic or Latino residents are owners, and 49.56% of American Indian and Alaska Native residents are owners. Significant discrepancies clearly exist for Non-Hispanic Black and Hispanic residents in particular.

B. Additional Information

- i. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and Region affecting groups with other protected characteristics.*

The primary concern facing residents of the County of San Luis Obispo is not the quality of housing stock, but its affordability. American Community Survey (ACS) data indicates that 54.4% of residents spend 30.0% or more of their household income on rent. This, along with the data presented above regarding severe housing cost burden, suggests that rents and other housing costs are becoming increasingly pressing on residents.

- ii. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.*

C. Homelessness

The County conducts a point in time count of its homeless population every two years. The latest count occurred in January of 2019 and reflected a homeless population of 1,483.¹³ The 2017 Homeless Census & Survey stated that the homeless population was 1,125. Thus, the count increased by 31.8% in just two years. This is a significant leap and is consistent with the trend of increasing homelessness throughout much of California. While 21% of the population is sheltered overall, only 16% of Chronically Homeless individuals and 3% of veterans are sheltered..Homeless individuals are more likely to be people of color than the population of the County of San Luis Obispo as a whole. 28% of homeless individuals are Hispanic, 6% are Black, and 4% are American Indian or Alaska Native. By contrast, 22% of the county's population is Hispanic, 2% is Black, and less than 1% is American Indian or Alaska Native.

¹³ <https://www.slocounty.ca.gov/getattachment/f1b2caef-10c6-4415-b0ad-1396eeb97a0b/2019-Homeless-Census-Survey-Report.aspx>

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

D. Contributing Factors of Disproportionate Housing Needs

Please see the Appendix for the following Contributing Factors to Disproportionate Housing Needs:

Availability of affordable units in a range of sizes

Displacement of residents due to economic pressures

Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Lack of access to opportunity due to high housing costs

Lack of private investments in specific neighborhoods

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

Land use and zoning laws

Lending discrimination

Loss of affordable housing

Source of income discrimination

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

4.3 Publicly Supported Housing Analysis

4.3.1 Analysis

A. Publicly Supported Housing Demographics

Table 4-36: Publicly Supported Housing Units by Program Category

	(San Luis Obispo County, CA (CDBG, HOME, ESG) Jurisdiction	
Housing Units	#	%
Total housing units	105,979	-
Public Housing	167	0.16%
Project-based Section 8	303	0.29%
Other Multifamily	59	0.06%
Section 8 HCV Program	1,999	1.89%

According to the California Tax Credit Allocation Committee, there are 32 Low Income Housing Tax Credit (LIHTC) developments in San Luis Obispo. These developments include 1,354 low-income units. Ten of the developments are restricted to seniors, three are for at-risk populations, one is non-targeted, and 18 are for large family occupancy. Across the developments, 16 units are affordable for households at 30% of the Area Median Income or below, and another 245 are targeted at income levels above 30% of Area Median Income but below typical LIHTC affordability limits. Targeted affordability data is not available for older developments for which applications were submitted prior to 2011.

- i. *Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Section 8 Housing Choice Voucher (HCV) in the jurisdiction?*

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Table 4-37: Publicly Supported Housing Demographics

San Luis Obispo County, CA (CDBG, HOME, ESG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type	#	%	#	%	#	%	#	%
Public Housing	73	45.06%	13	8.02%	68	41.98%	8	4.94%
Project-Based Section 8	232	84.06%	6	2.17%	26	9.42%	10	3.62%
Other Multifamily	51	92.73%	0	0.00%	4	7.27%	0	0.00%
Section 8 HCV Program	1,332	73.23%	52	2.86%	411	22.59%	15	0.82%
Total Households	73,730	79.17%	1,137	1.22%	13,810	14.83%	2,504	2.69%
0-30% of AMI	8,235	69.20%	219	1.84%	2,555	21.47%	470	3.95%
0-50% of AMI	13,326	61.46%	324	1.49%	4,660	21.49%	702	3.24%
0-80% of AMI	24,339	66.09%	449	1.22%	7,906	21.47%	1,040	2.82%
(San Luis Obispo-Paso Robles-Arroyo Grande, CA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	73	45.06%	13	8.02%	68	41.98%	8	4.94%
Project-Based Section 8	232	84.06%	6	2.17%	26	9.42%	10	3.62%
Other Multifamily	51	92.73%	0	0.00%	4	7.27%	0	0.00%
Section 8 HCV Program	1,458	73.30%	54	2.71%	449	22.57%	16	0.80%
Total Households	80,440	78.74%	1,259	1.23%	15,330	15.01%	2,870	2.81%
0-30% of AMI	9,050	69.72%	219	1.69%	2,700	20.80%	520	4.01%
0-50% of AMI	14,870	61.48%	324	1.34%	5,220	21.58%	815	3.37%
0-80% of AMI	26,795	66.03%	449	1.11%	8,675	21.38%	1,205	2.97%

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In the County of San Luis Obispo, Hispanic, Black, and Asian American or Pacific Islander residents are most likely to use Public Housing. Meanwhile, White residents make up supermajorities of Project-Based Section 8, Other Multifamily, and Section 8 Housing Choice Vouchers. Hispanics also make up a strong percentage of Section 8 Housing Choice Voucher recipients (22%). With regard to LIHTC developments, there are 32 Low Income Housing Tax Credit (LIHTC) developments within San Luis Obispo. Many of the census tracts which contain LIHTC developments have a large Hispanic population of approximately 25% (with some variation). This closely tracks the demographic data of the County as a whole, so there is no particular reason to suspect that the demographics of these LIHTC developments are drastically different from the population at large, especially when considering the high percentage of White residents in the forms of publicly supported housing for which we do have data.

- ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.*

With the exception of Grover Beach, which is not an entitlement area, the jurisdiction and the region are co-extensive with the county. There are not any significant differences that merit a separate discussion of the region.

- iii. Compare the demographics, in terms of protected class, of residents in each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and Section 8 HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.*

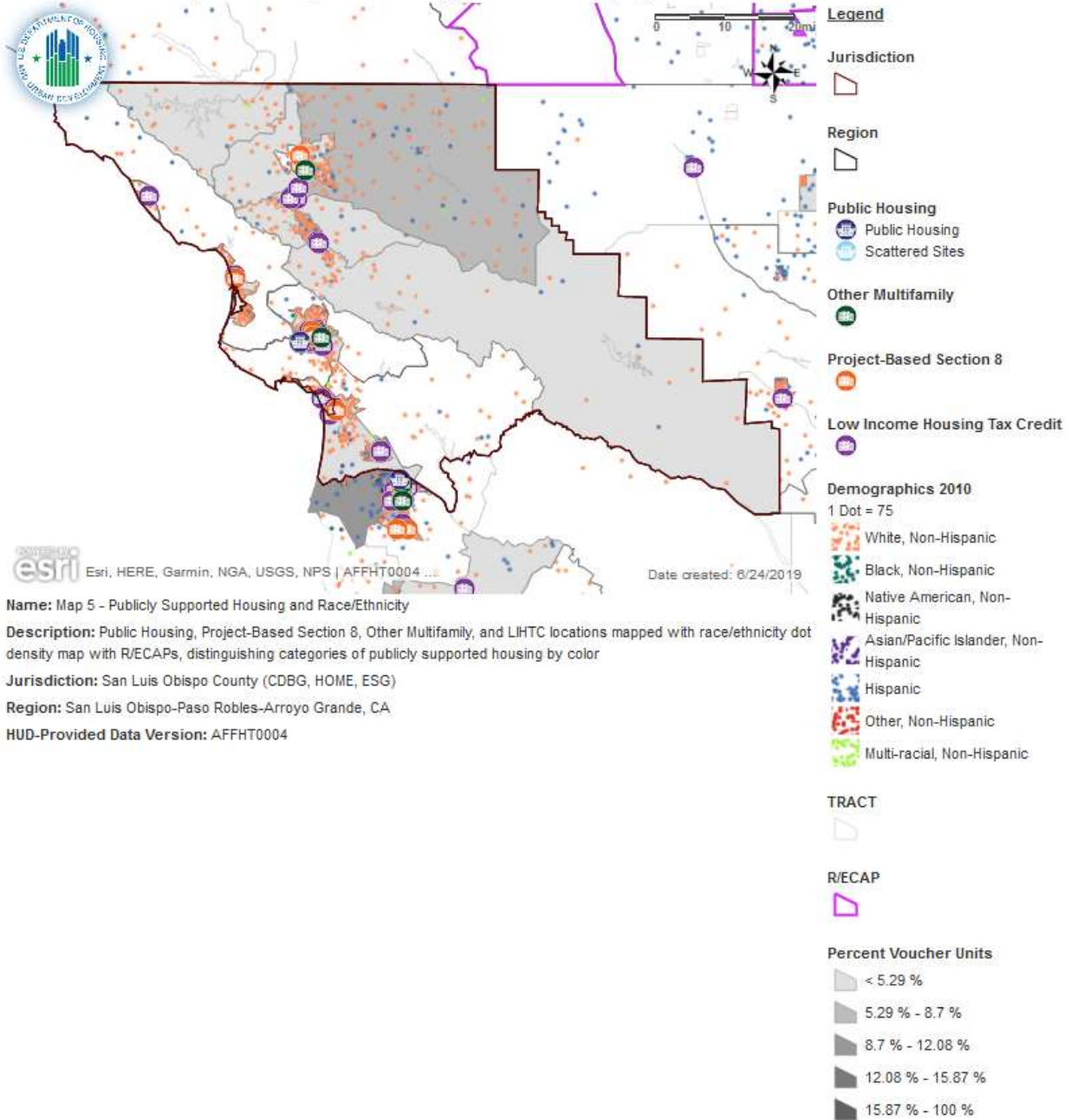
In comparison to the demographics of the County of San Luis Obispo, White residents are overrepresented in each category of publicly supported housing except for Public Housing. Meanwhile, Hispanics are overrepresented in Public Housing, and underrepresented in both Project-Based Section 8 and Other Multifamily housing. Asian American or Pacific Islanders are completely absent from Other Multifamily housing and make up less than 1% of the Section 8 Housing Choice Voucher program. Black residents are similarly absent from Other Multifamily housing, and overrepresented in Public Housing. The distribution across income levels aligns roughly with the general population distribution.

Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

- B. Publicly Supported Housing Location and Occupancy*
 - i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, Section 8 HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.*

Map 4-34: Publicly Supported Housing and Race/Ethnicity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color

Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)

Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA

HUD-Provided Data Version: AFFHT0004

While there are a few publicly supported housing developments near the County of San Luis Obispo’s singular R/ECAP, there are none within it (R/ECAP description and map are on pages 30 & 31). Within the County of San Luis Obispo, publicly supported housing is concentrated along the coast and in the Cities of San Luis Obispo and the Paso Robles-Templeton-

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Atascadero area. There is only one Public Housing development, in the City of San Luis Obispo, and there is also one in neighboring Santa Maria. There are two multi-family developments in the City of San Luis Obispo and Paso Robles, and two in neighboring Santa Maria. There are seven Project-Based Section 8 developments in the City of San Luis Obispo, Arroyo Grande, Morro Bay, and Paso Robles, as well as four nearby in Santa Maria. By far the most numerous are Low Income Housing Tax Credit (LIHTC) units, which are clustered in the Arroyo Grande area, the City of San Luis Obispo, and the Templeton area, among others, as well as in Santa Maria. The areas with the highest percentage of voucher use are in the extreme Northeast corner of the County, the City of San Luis Obispo, and Atascadero (all in the 6-8% range); Nipomo and Paso Robles (11-12%); Arroyo Grande (14%); and in nearby Santa Maria, where voucher use is 20% or more in some areas of the city. As has been discussed, the population centers of the County are much more diverse than the suburbs, so the concentration of publicly supported housing within these cities aligns with diverse population centers.

- ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.*

A significant proportion of Project-Based Section 8 units (74.58%) house elderly residents, as do 100% of Other Multifamily units. Additionally, ten LIHTC developments are restricted to seniors. The Paso Robles Housing Authority, in collaboration with the Housing Authority of San Luis Obispo (HASLO), also administers 40 affordable units reserved for seniors which are not funded by HUD. It seems that senior-restricted housing is well-dispersed, as the dedicated developments are scattered across the City of San Luis Obispo, Arroyo Grande, Morro Bay, Paso Robles, Atascadero, and Templeton. Persons with disabilities heavily utilize Section 8 Housing Choice Vouchers and Project-Based Section 8 units, followed closely by Public Housing. While publicly supported housing is well-dispersed across the main cities in the County, Section 8 Housing Choice Vouchers are notably concentrated in the upper eastern corner of the County, somewhat removed from the main population centers. This may indicate some segregation for people with disabilities who utilize Section 8 Housing Choice Vouchers. Families with children, like most residents, are congregated in the cities. However, the northeast corner of the County, which has strong voucher use, does have a strong number of families with children.

- iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?*

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Table 4-38: Publicly Supported Housing Demographics by R/ECAP and Non R/ECAP Tracts

(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	163	45.06%	8.02%	41.98%	4.94%	62.58%	14.72%	20.86%
Project-based Section 8								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	280	84.06%	2.17%	9.42%	3.62%	N/a	74.58%	31.53%
Other Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	58	92.73%	0.00%	7.27%	0.00%	N/a	100.00%	1.69%
Section 8 HCV Program								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	1,766	74.64%	2.58%	21.41%	0.86%	29.25%	32.96%	36.18%

There is one R/ECAP in the County of San Luis Obispo (see pages 30 & 31), and there are no publicly supported housing developments within that R/ECAP (which contains the Atascadero State Hospital). Therefore, as the table reflects, there are no significant differences between the occupants of publicly supported housing inside of and outside of R/ECAPs in the jurisdiction.

- iv. *Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.*

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Table 4-39: Publicly Supported Housing Demographics

Public Housing								
(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Arbor Place	CA064	Housing Authority Of The City Of San Luis Obispo	167	45%	8%	42%	5%	63%
Project-Based Section 8								
(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Dan Law Apts	N/a	N/a	9	N/a	N/a	N/a	N/a	N/a
Hacienda Del Norte Apts	N/a	N/a	44	83%	2%	14%	N/a	N/a
Parkview Manor	N/a	N/a	61	79%	N/a	13%	7%	N/a
Judson Terrace Homes	N/a	N/a	43	81%	N/a	14%	5%	N/a
Los Robles Terrace	N/a	N/a	39	63%	10%	12%	12%	N/a
Monterey Arms	N/a	N/a	68	87%	4%	7%	N/a	N/a
Ocean View Manor	N/a	N/a	39	94%	N/a	3%	N/a	N/a
Other Multifamily Assisted Housing								
(San Luis Obispo County, CA CDBG, HOME, ESG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children

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Creekside Gardens	N/a	N/a	28	86%	N/a	14%	N/a	N/a
Judson Terrace Lodge	N/a	N/a	31	90%	3%	3%	3%	N/a

Among all of these publicly supported housing developments, Arbor Place is significantly more racially and ethnically diverse than the other developments, which are majority White. This difference is likely explained by the fact that, unlike the other developments, Arbor Place is the only development for which a statistic is provided indicating family occupancy. The majority, and nearly the supermajority, of households at Arbor Place are families. Hispanic occupancy is especially high, at about twice the proportion of the Hispanic population county-wide. All other developments are close to or exceed the proportion of White residents as the County at large.

LIHTC units are more numerous than other publicly supported housing, and based on the addresses we can ascertain the racial and ethnic composition of the census tracts where they are located. The LIHTC developments vary widely (from 3.7% to 31.9%) with regard to poverty levels, indicating that LIHTC developments are well dispersed in both high poverty and high opportunity areas. While other categories of publicly supported housing border on overrepresentation of White residents, LIHTC units seem to be much more diverse, with at least half of all developments located in census tracts with below-average proportions of White residents.

- v. Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.*

Units that are subject to rent control laws are a significant source of additional affordable housing, supplementing what is made available through federally assisted programs. Rent control ordinances for mobile home parks exist in the unincorporated areas of the County, as well as the cities of Morro Bay, Pismo Beach, and San Luis Obispo. Unfortunately, demographic data reflecting the race and ethnicity of residents of rent-controlled units is not available. Cutting in the opposite direction, Ellis Act evictions of rent-controlled units have the potential to undermine any positive influence that these rent control laws may have on the affordable housing landscape. Data about Ellis Act evictions in the area is not widely available, so it is difficult to estimate the effect they may have.

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- vi. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Table 4-40: Publicly Supported Housing Demographics and Surrounding Census Tract Demographics

Project Name	Program Type	Units in Project	Property White (%)	Property Black (%)	Property Hispanic (%)	Property Asian (%)	Households with children in the development	Census Tract Number	Tract White %	Tract Black (%)	Tract Hispanic (%)	Tract Asian (%)	Census Tract Poverty Rate
Arbor Place	Public Housing	167	45%	8%	42%	5%	63%	11300	65.0%	2.4%	20.0%	8.9%	15.3%
Dan Law Apts	Project-Based Section 8	9	N/A	N/A	N/A	N/A	N/A	11102	79.0%	1.3%	14.8%	2.4%	22.4%
Hacienda Del Norte Apts	Project-Based Section 8	44	83%	2%	14%	N/A	N/A	10102	37.2%	3.5%	58.7%	0.2%	17.8%
Parkview Manor	Project-Based Section 8	61	79%	N/A	13%	7%	N/A	11902	61.1%	1.2%	27.7%	7.4%	5.8%
Judson Terrace Homes	Project-Based Section 8	43	81%	N/A	14%	5%	N/A	11001	74.8%	2.3%	13.7%	6.3%	15.7%
Los Robles Terrace	Project-Based Section 8	39	63%	10%	12%	12%	N/A	10102	37.2%	3.5%	58.7%	0.2%	17.8%

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Mont erey Arms	Project -Based Section 8	68	87%	4%	7%	N/A	N/A	1110 1	64.7 %	2.4 %	22.1 %	6.2 %	31.9 %
Ocea n View Mano r	Project -Based Section 8	39	94%	N/A	3%	N/A	N/A	1050 3	84.3 %	2.6 %	9.9%	0.5 %	8.3%
Creek side Garde ns	Other Multifa mily	28	86%	N/A	14%	N/A	N/A	1020 4	54.6 %	2.2 %	39.9 %	0.7 %	14.0 %
Judso n Terra ce Lodge	Other Multifa mily	31	90%	3%	3%	3%	N/A	1100 1	74.8 %	2.3 %	13.7 %	6.3 %	15.7 %

In the County of San Luis Obispo, the most predominant trend when comparing the residents of publicly supported housing to the total residents of the census tract is the tendency of *overrepresentation* of White residents. In eight publicly supported housing developments, the percentage of White residents outstrips the surrounding census tract, and, in almost every case, outstrips the proportion of White residents in the County. The upshot of this observation is that many of the publicly supported housing developments in the County are located in diverse, integrated areas. If we assume that the LIHTC population mirrors the surrounding census tract, then LIHTC developments are most likely more diverse than other categories of publicly supported housing.

4.3.2 Disparities in Access to Opportunity

Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Throughout the County, there are no significant disparities in access to opportunity when it comes to environmental health or transportation. Residents of publicly supported housing actually fare better than the County as a whole with regard to transportation. However, there are some disparities with regard to school proficiency and job proximity. School proficiency

levels in the northeastern corner of the County, where there is strong Housing Choice Voucher use, is particularly stark.

4.3.3 Additional Information

- i. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.*

The County recently approved an expansion of its inclusionary zoning ordinance, with the potential to raise up to \$1 million per year for affordable developments (the Coalition of Housing Partners estimates that \$2-\$4 million will ultimately be necessary).¹⁴ The new ordinance requires developers to designate 8% of units as affordable or pay in lieu fees, using a tiered fee schedule based on square footage. The new ordinance also applies to *all* new houses, whereas before it was limited to projects of two or more dwellings. Additional strategies to fund affordable housing, including a sales tax hike, transient occupancy tax hike, and affordable housing bond, are due to be presented by county staff in the summer of 2019.

There are at least 13 LIHTC developments which have secured preliminary reservations but have not yet been placed into service. These have the potential to add over 950 units of affordable housing to the County's stock. Ten of these developments are slated for large family occupancy, whereas only three are specific to seniors.

In addition to the federal publicly supported housing in the County, the Paso Robles Housing Authority operates several affordable housing developments. Oak Park 1, 2, 3, and 4 are a series of developments totaling over 300 affordable housing units, some of which are still under construction, built to replace 148 units of deteriorated public housing units. Additionally, the Chet Dotter Senior Apartment Community has 40 units restricted to seniors. All these properties are targeted to families making 30%-60% of the County of San Luis Obispo AMI. Additionally, HASLO provides a comprehensive list of affordable housing options, categorizing them by agency, features, location, etc.¹⁵

¹⁴ <https://www.sanluisobispo.com/news/local/article228105059.html>

¹⁵ https://static1.squarespace.com/static/538622a1e4b0eca47f761f/t/5c4f2cb94ae237479fbd0e9/1548692665989/Affordable+Housing+by+City_SLOCounty.pdf

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- ii. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.*

HASLO runs a Family Self-Sufficiency (FSS) Program designed to assist households to become economically independent and self-sufficient.¹⁶ It is a voluntary program for Section 8 and Public Housing participants. As FSS participants increase their household income, their contribution to rent also increases. A percentage of rent is deposited into an escrow account. If, within five years, a household is suitably employed, free from welfare for twelve consecutive months, and completes a financial training workshop, they will receive the funds in the account.

There are no dedicated mobility counseling programs in San Luis Obispo, with the exception of some limited housing counseling available to veterans through Supportive Services for Veteran Families. Nevertheless, mobility counseling is not a pressing issue in the area. HASLO covers the entire County, leaving many options for voucher holders who may like to move to a higher opportunity area. Additionally, disparities in access to opportunity are not great throughout the County, making mobility a less pressing issue. Mobility is not overly restricted by HASLO, should a new opportunity open up outside of the PHA's reach.

4.3.4 Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

¹⁶ <https://www.haslo.org/resident-services>

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Please see the Appendix for the following Contributing Factors to Publicly Supported Housing Location and Occupancy:

Admissions and occupancy policies and procedures, including preferences in publicly supported housing

Community opposition

Displacement of residents due to economic pressures

Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Impediments to mobility

Lack of access to opportunity due to high housing costs

Lack of meaningful language access for individuals with limited English proficiency

Lack of local or regional cooperation

Lack of private investment in specific neighborhoods

Lack of public investment in specific neighborhoods, including services and amenities

Land use and zoning laws

Loss of affordable housing

Occupancy codes and restrictions

Quality of affordable housing information programs

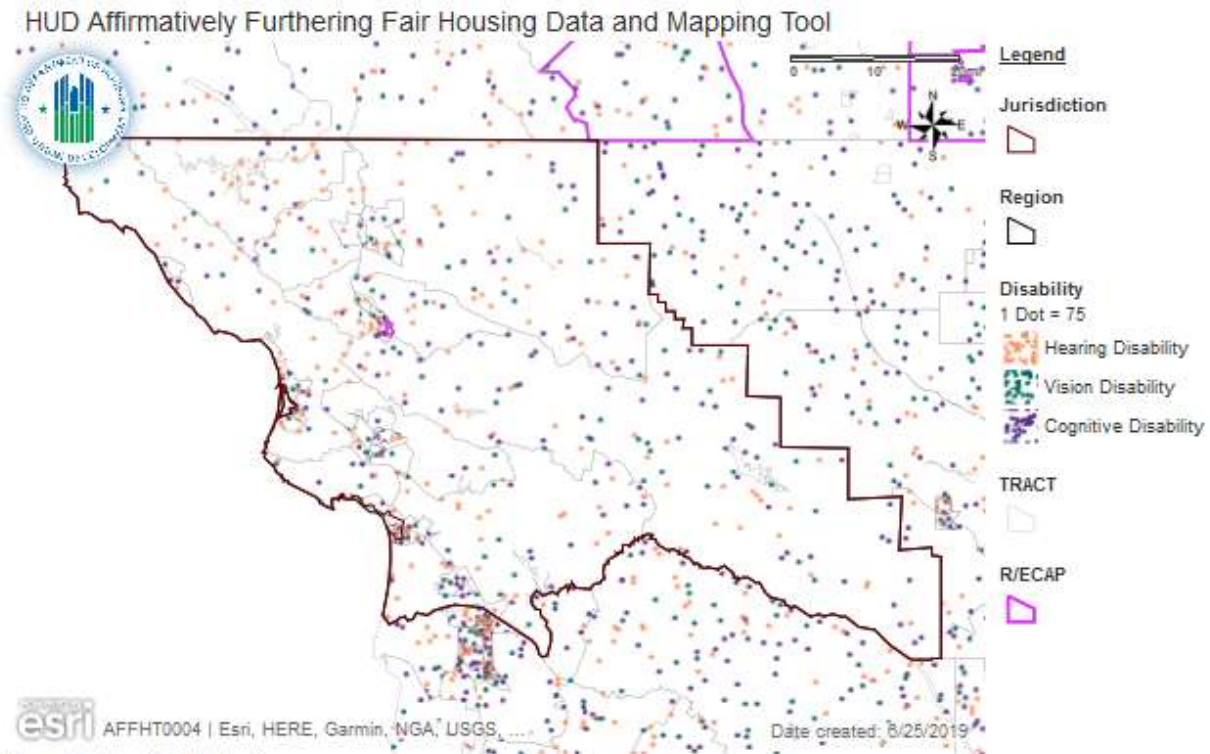
Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Source of income discrimination

4.4 Disability and Access Analysis

4.4.1 Population Profile

Map 4-35: Disability by Type (Hearing, Vision, Cognitive), San Luis Obispo



Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

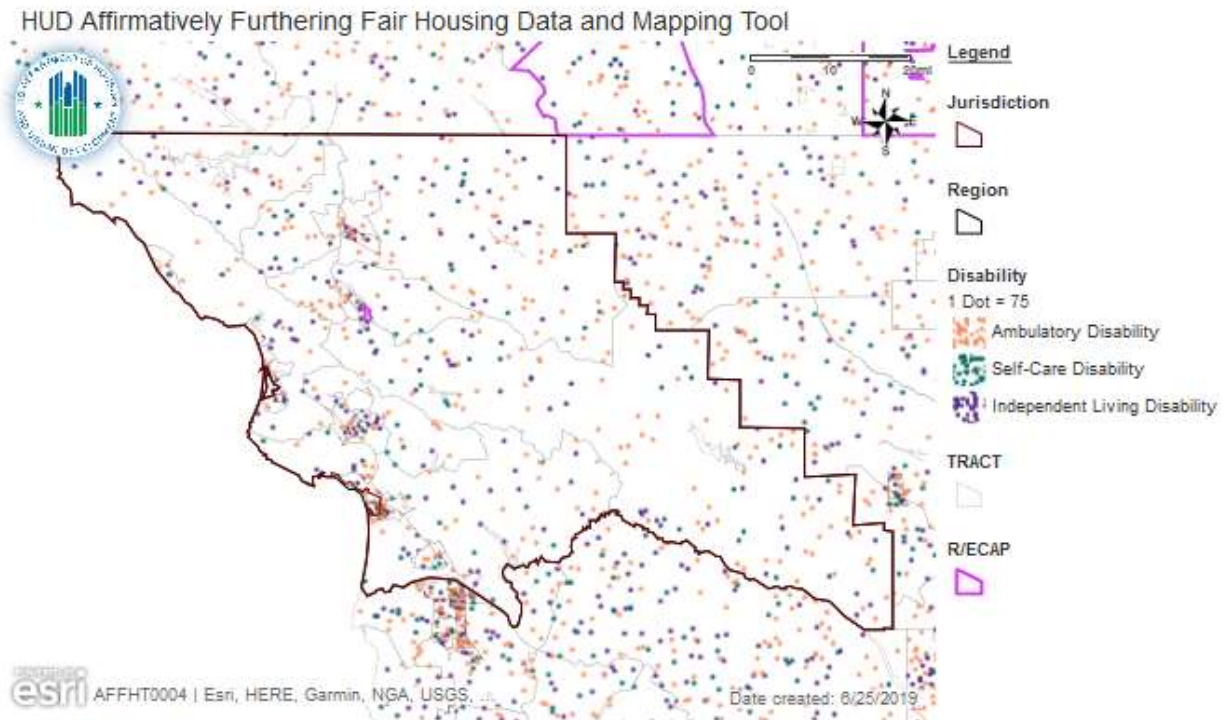
Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)

Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA

HUD-Provided Data Version: AFFHT0004

Map 1: Disability by Type (Hearing, Vision, Cognitive) is a dot density map reflecting the population of people with three specific types of disabilities by Census Tract. Each dot represents 75 people. Orange dots reflect individuals with hearing disabilities, green dots reflect individuals with vision disabilities, and purple dots reflect individuals with cognitive disabilities. Persons with these disabilities do not appear to be concentrated beyond the extent to which they tend, like people who do have disabilities, to live in areas of greater population density.

Map 4-36: Disability by Type (Ambulatory, Self-Care, Independent), San Luis Obispo



Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: San Luis Obispo County (CDBG, HOME, ESG)

Region: San Luis Obispo-Paso Robles-Arroyo Grande, CA

HUD-Provided Data Version: AFFHT0004

Map 4-37: Disability by Age, San Luis Obispo

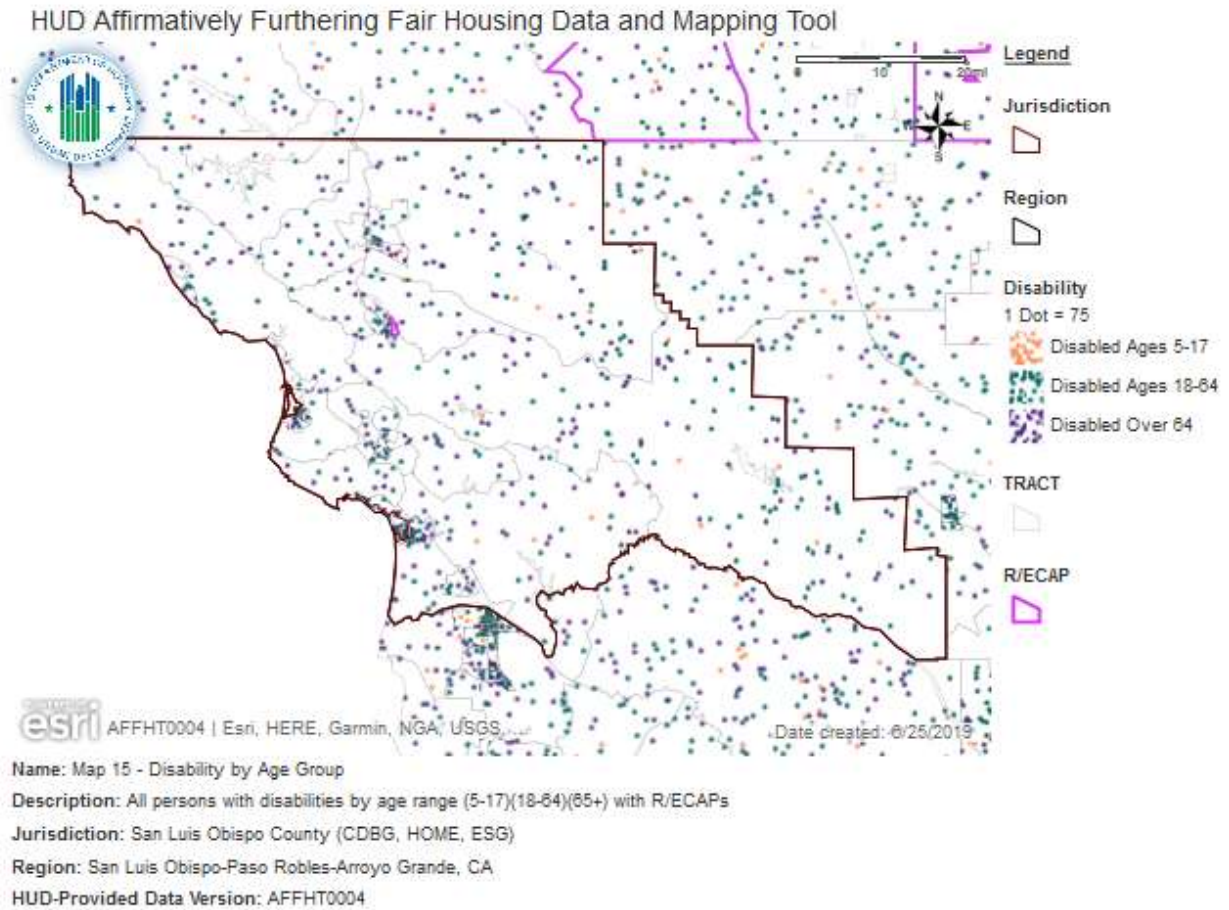


Table 4-41: Disability by Type, San Luis Obispo

Disability Type	#	%
Hearing Difficulty	11,188	4.1
Vision Difficulty	4,627	1.7
Cognitive Difficulty	9,697	3.7
Ambulatory Difficulty	14,108	5.4
Self-Care Difficulty	4,856	1.9
Independent Living Difficulty	9,725	4.4
Total	54,201	21.2

A. ACS Disability Information

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According to the 2013-2017 American Community Survey (ACS) 5-Year Estimates, 14,108 residents of San Luis Obispo have ambulatory disabilities, which represents 5.4% of the County's population; 11,188 residents have hearing disabilities; and 4,627 residents have vision disabilities. The definition of ambulatory disabilities is "having serious difficulty walking or climbing stairs." People with ambulatory disabilities may not need a fully accessible unit, particularly if they do not use wheelchairs. They may require a unit on the ground floor or in an elevator building, perhaps with some architectural modifications. Therefore, the number of residents with ambulatory disabilities is not a perfect indicator of the number of accessible mobility units needed since some people with ambulatory disabilities do not necessarily move to a wheelchair.

Approximately 21.2% of individuals in the County have one or more disabilities, and within that population 23.49% of people with disabilities have incomes below the poverty line, as opposed to 11.41% of individuals without disabilities. Although a breakdown of poverty status by type of disability is not available through the American Community Survey (ACS), it is clear that the need for affordable housing is greater among people with disabilities than it is among people without disabilities. Another indicator of disability and limited income are the number of people receiving Supplemental Social Security (SSI) which is limited to people with disabilities. According to 2017 numbers, 4,532 disabled individuals receive SSI (1.62% of the total population), which is such a small subsidy that all the recipients are extremely low-income. Not all SSI recipients have the types of disabilities that necessitate accessible units.

A. Geographic Disbursement

- i. How are people with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?*

As seen in American Community Survey data, San Luis Obispo demonstrates patterns of concentration of people with disabilities in its main population centers, including the City of San Luis Obispo, Paso Robles, Atascadero, Cambria, Los Osos, Nipomo, and the Grover Beach-Oceano-Arroyo Grande area. While the County-wide disability rate is about 21%, in Oceano, Los Osos, Grover Beach, and Cambria, that number notably rises to about 25%. These areas are all near the beach, making them high cost real estate.

- ii. Describe whether these geographic patterns vary for people with each type of disability or for people with disabilities in different age ranges for the jurisdiction and region.*

Individuals with cognitive disabilities are more numerous, and as such have strong presences in more cities than those previously mentioned; specifically, Morro Bay has a noticeable concentration of people with cognitive disabilities. Additionally, working-aged residents with disabilities have a stronger presence in Nipomo than seniors, and children with disabilities are far less concentrated in Nipomo, Cambria, and Los Osos than working-aged adults. All categories of disabilities become more prevalent as individuals age, with the number of people 65 and over (15,363) with a disability outnumbering the amount of people under 65 (14,884) with a disability.

4.4.2 Housing Availability and Accessibility

A. Housing Availability

- i. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.*

Accessibility Requirement for Federally-Funded Housing

HUD's implementation of Section 504 of the Rehabilitation Act of 1973 (24 CFR Part 8) requires that federally financed housing developments have five percent (5%) of total units be accessible to individuals with mobility disabilities and an additional two percent (2%) of total units be accessible to individuals with sensory disabilities. It requires that each property, including site and common areas, meet the Federal Uniform Accessibility Standards (UFAS) or HUD's Alternative Accessibility Standard.

In the County of San Luis Obispo, there are 167 public housing units and 303 Project-Based Section 8 units that are subject to Section 504 of the Rehabilitation Act. Public Housing and Project-Based Section 8 units are considered Publicly Supported Housing. Thirty-four (34) people with disabilities reside in public housing, and 93 reside in Project-Based Section 8 units. At this time, we do not know how many accessible units are in public housing or among Project Based Section 8 units. The HOME Partnership Program is a grant of federal funds for housing, therefore, these units are subject to Section 504.

Low Income Housing Tax Credit (LIHTC) Units

According to data from HUD's LIHTC database, there are 1,354 low-income units in LIHTC-financed developments in the County of San Luis Obispo. All but one of these LIHTC developments was constructed after 1991, so the amount of low-income units built to current accessibility requirements is actually 1,334. However, projects in the early years of the LIHTC were not approved or regulated by the County since the developer could apply directly to the California Tax Credit Allocation Committee (CTCAC). In the mid-1990s, CTCAC

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changed its policy and required developers to obtain local jurisdiction approval of their projects. The majority of LIHTC developments in San Luis Obispo were built after this policy change. However, even jurisdictional approval does not give jurisdictions regulatory authority over a project.

In 2015, CTCAC issued guidance stating that the accessibility requirements of the California Building Code (CBC) for public housing (Chapter 11B) apply to LIHTC developments. Chapter 11B is the California equivalent of the 2010 ADA Standards. Section 1.9.1.2.1. of the CBC states that the accessibility requirements apply to “any building, structure, facility, complex... used by the general public.” Facilities made available to the public include privately owned buildings. CTCAC has expanded the requirement so that 10% of total units in a LIHTC development must be accessible to people with mobility disabilities and that 4% be accessible to people with sensory (hearing/vision) disabilities.

Also, effective 2015, CTCAC required that 50% of total units in a new construction project and 25% of all units in a rehabilitation project located on an accessible path will be mobility accessible units in accordance with CBC Chapter 11B. CTCAC also provides incentives for developers to include additional accessible units through its Qualified Allocation Plan. LIHTC units comprise an important segment of the supply of affordable, accessible units in the County of San Luis Obispo.

Housing Choice Vouchers

Six hundred and fifty-eight (658) people with disabilities reside in units assisted with Section 8 Housing Choice Vouchers in the County of San Luis Obispo (when including the one non-entitlement area of the region, that number rises to 732), but this does not represent a proxy for actual affordable, accessible units. Rather, Section 8 Housing Choice Vouchers are a mechanism for bringing otherwise unaffordable housing, which may or may not be accessible, within reach of low-income people with disabilities. Unless another source of federal financial assistance is present, units assisted with Section 8 Housing Choice Vouchers are not subject to Section 504 although participating landlords remain subject to the Fair Housing Act’s duty to provide reasonable accommodations and to allow tenants to make reasonable modifications at their own expense.

Fair Housing Amendments Act Units

The Fair Housing Amendments Act of 1988 (FHAA) covers **all** multi-family buildings of four or more units that were first occupied on or after March 13, 1991 – not just affordable housing developments. The FHAA added protections for people with disabilities and prescribed certain basic accessibility standards, such as one building entrance must be

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accessible; there must be an accessible route throughout the development, and public rooms and common rooms must be accessible to people with disabilities. Although these accessibility requirements are not as intensive as those of Section 504, they were a first step in opening many apartment developments to people with disabilities regardless of income level. The FHAA was also very helpful for middle-income and upper-income people with disabilities who also need accessible housing. It is important to note that FHAA units are **not** the same as accessible units under Section 504 or ADA Title II. Therefore, utilizing FHAA units as a proxy for the number of accessible housing units available or required under Section 504 or ADA Title II does not produce an accurate count. Although they are not fully accessible, these units are an important source of housing for people with disabilities who do not need a mobility or hearing/vision unit.

Data breaking down affordable, accessible units by number of bedrooms is not available for private housing. For Publicly Supported Housing, the overwhelming majority (97.97%) of Project-Based Section 8 units are 0-1 bedroom units, as are Other Multifamily units (100%). A strong plurality of Section 8 Housing Choice Vouchers are also limited to 0-1 bedroom units (45.15%). Only Public Housing has a majority of units devoted to 3+ bedrooms (54.60%); 62.58% of Public Housing occupants are also households with children, the highest of any category of publicly supported housing. It appears that affordable, accessible units that can accommodate families with children or individuals with live-in aides are extremely limited in San Luis Obispo. Although data reflecting the percentage of families with children that include children with disabilities is not available, about 3.8% of all children in the County have a disability. If children with disabilities are evenly distributed across families with children, about 933 families in the County include a child with a disability.

Summary

The supply of affordable, accessible units in San Luis Obispo is insufficient to meet the need. In the County, some 11,188 residents have hearing difficulty, 4,627 residents have vision difficulty, and 14,108 residents have ambulatory difficulty, potentially requiring the use of accessible units. Meanwhile, by the most generous, over-inclusive measures, there may be roughly 4,000 units that have been produced subject to the Fair Housing Act's design and construction standards and approximately 500 units within developments that must include accessible units subject to Section 504. There is, without question, some overlap between these two categories, some of these units are likely non-compliant, and some accessible units are occupied by individuals who do not have disabilities.

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ii. Describe the areas where affordable, accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Relying on the discussion of Publicly Supported Housing to guide the assessment of which types of housing are most likely to be affordable and accessible, such housing is highly concentrated along Highway 101 as well as near the coast, roughly aligning with the main population centers in the County. Additionally, accessible housing is most likely located in places with newer construction, thus conforming to the Fair Housing Act’s accessibility standards. Areas with newer construction include the suburbs of the City of San Luis Obispo and Atascadero, and the southernmost tip of the County. Areas with the most units in each structure tend to be within the urban center, rather than the suburbs.

iii. To what extent are people with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Table 4-42: Disability by Publicly Supported Housing Program Category

San Luis Obispo	People with a Disability	
	#	%
Public Housing	34	20.86%
Project-Based Section 8	93	31.53%
Other Multifamily	1	1.69%
Section 8 HCV Program	658	35.07%
San Luis Obispo-Paso Robles-Arroyo Grande, CA Region		
Public Housing	34	20.86%
Project-Based Section 8	93	31.53%
Other Multifamily	1	1.69%
Section 8 HCV Program	732	35.67%

In the County of San Luis Obispo, according to the 2013-2017 American Community Survey 5-Year Estimates, 21.2% of the civilian noninstitutionalized population has a disability. The American Community Survey does not facilitate the disaggregation of the population of people with disabilities by income in order to allow a determination of what percentage of households that are income-eligible for Publicly Supported Housing include one or more people with disabilities. As the table above reflects, the proportion of people with disabilities in each category of Publicly Supported Housing, with the exception of Other Multifamily,

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exceeds the overall population concentration of people with disabilities. In light of the socioeconomic disparities between people with disabilities discussed above, it is possible that the representation of people with disabilities in those categories of Publicly Supported Housing is merely at parity with or even lags representation in the income-eligible population. However, in the County of San Luis Obispo residents with disabilities very clearly have the greatest access to Section 8 Housing Choice Vouchers than any other form of publicly supported housing in sheer numbers as well as percentagewise.

B. Integration of People with Disabilities Living in Institutions and Other Segregated Settings

i. To what extent do people with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Up until a wave of policy reforms and court decisions in the 1960s and 1970s, states, including California, primarily housed people with intellectual and developmental disabilities and individuals with psychiatric disabilities in large state-run institutions. In California, institutions for people with intellectual and developmental disabilities are called developmental centers, and institutions for people with psychiatric disabilities are called state hospitals. Within these institutions, people with disabilities have had few opportunities for meaningful interaction with individuals without disabilities, limited access to education and employment, and a lack of individual autonomy. The transition away from housing people with disabilities in institutional settings and toward providing housing and services in home and community-based settings accelerated with the passage of the Americans with Disabilities Act in 1991 and the U.S. Supreme Court's landmark decision in *Olmstead v. L.C.* in 1999. In *Olmstead*, the Supreme Court held that, under the regulations of the U.S. Department of Justice (DOJ) implementing Title II of the Americans with Disabilities Act (ADA), if a state or local government provides supportive services to people with disabilities, it must do so in the most integrated setting appropriate to the needs of a person with a disability and consistent with their informed choice. This obligation is not absolute and is subject to the ADA defense that providing services in a more integrated setting would constitute a fundamental alteration of the state or local government's programs.

The transition from widespread institutionalization to community integration has not always been linear, and concepts of what comprises a home and community-based setting have evolved over time. Although it is clear that developmental centers and state hospitals are segregated settings and that an individual's own house or apartment in a development where the vast majority of residents are individuals without disabilities is an integrated setting, significant ambiguities remain. Nursing homes and intermediate care facilities are

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clearly segregated though not to the same degree as state institutions. Group homes fall somewhere between truly integrated supported housing and such segregated settings, and the degree of integration present in group homes often corresponds to their size.

Below, this assessment includes detailed information about the degree to which people with intellectual and developmental disabilities and individuals with psychiatric disabilities reside in integrated or segregated settings. The selection of these two areas of focus does not mean that people with other types of disabilities are never subject to segregation. Although the State of California did not operate analogous institutions on the same scale for people with ambulatory or sensory disabilities, for example, many people with disabilities of varying types face segregation in nursing homes. Data concerning people with various disabilities residing in nursing homes is not as available as data relating specifically to people with intellectual and developmental disabilities and people with psychiatric disabilities.

Table 4-43: Intellectual and Developmental Disabilities Performance of Tri-Counties Regional Center, December 2018

Dec. 2018 Performance Reports	Fewer consumers live in developmental centers	More children live with families	More adults live in home settings	Fewer children live in large facilities (more than 6 people)	Fewer adults live in large facilities (more than 6 people)
State Average	0.12	99.38	80.20	0.04	2.31
Tri-Counties Regional Center	0.16	99.58	81.47	0.01	3.10

In California, a system of regional centers is responsible for coordinating the delivery of supportive services primarily to individuals with intellectual and developmental disabilities. The regional centers serve individuals with intellectual disabilities, individuals with autism spectrum disorder, individuals with epilepsy, and cerebral palsy. These disabilities may be co-occurring. Individuals with intellectual disabilities and individuals with mild/moderate intellectual disability and individuals with autism spectrum disorder make up the lion’s share of consumers. All data regarding the regional centers is drawn from their annual performance reports.

On an annual basis, regional centers report to the California Department of Developmental Services on their performance in relation to benchmarks for achieving community

integration of people with intellectual and developmental disabilities. As reflected in the table above, the Tri-Counties Regional Center closely tracks the statewide average data, with the largest differences demonstrating that the rate of institutionalization of adults is slightly higher than the rate statewide. Though the difference is less stark, children with intellectual and developmental disabilities are more likely to reside with their families in San Luis Obispo than statewide. The Tri-Counties Regional Center provides services for these families and has offices in Atascadero, San Luis Obispo City and in Santa Maria.

The central coast area is also served by the Porterville Developmental Center in Porterville. It is one of three remaining developmental centers run by the state, all of which are expected to close in the coming years. Porterville Developmental Center is scheduled to close in 2021, with the exception of patients who have been institutionalized because they have been adjudged incompetent to stand trial.

Overall, this data shows that within San Luis Obispo children fare better than adults in terms of residing in a community-based setting. It is highly likely that not all people with intellectual and developmental disabilities who would like to live in integrated settings in the County have the opportunity to do so.

ii. Psychiatric Disabilities

In San Luis Obispo, the Behavioral Health Department (part of the County Health Agency) is responsible for coordinating the provision of supportive services for people with psychiatric disabilities. The Department provides Full Service Partnership programs to allow for the provision of supportive services that facilitate community integration for Adults, Older Adults, Assisted Outpatient Treatment, and Homeless Outreach. During the 2017-2018 fiscal year, of the 142 Full Service Partnership clients in San Luis Obispo, homelessness was reduced by 55%, emergency room visits were reduced by 48%, jail days were reduced by 96%, and Psychiatric Health Facility (PHF) days were reduced by 75%.¹⁷ Similarly, participants in the Middle School Comprehensive Project saw several outcomes indicating a decrease in mental health risk factors including a 25% improvement in self-esteem, a 13% reduction in physical fights and threats, a 38% increase in coping skills, an 18% reduction in suicidal ideation and self-harm, and an 18% increase in school connectedness/engagement. The Department also provides Adult Mental Health Outpatient Treatment, runs a Mental Health Evaluation Team (provided by the Sierra Mental Wellness Group), and administers the San

¹⁷ <https://www.slocounty.ca.gov/Departments/Health-Agency/Behavioral-Health/Behavioral-Health-Department-News/Mental-Health-Services-Act-Update-and-Plan-Approve.aspx>

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Luis Obispo Health Integration Project through a federal grant from the Substance Use and Mental Health Services Administration.

As a result of Proposition 63, a successful 2004 statewide ballot initiative, funding is available for permanent supportive housing for people with psychiatric disabilities through the Mental Health Services Act (MHSA). The Department partners with Transitions-Mental Health Association (TMHA) to coordinate the Housing Program, which provides 55 units of housing for MHSA and MHSA-eligible clients in 2017-2018 (29 units in San Luis Obispo, 21 units in Atascadero, and 5 units in Arroyo Grande.) Residential site services include vocational and education opportunities, social rehabilitation support groups, supportive care, case management, rehabilitative mental health services, and regular appointments with psychiatrists and physicians.

Atascadero State Hospital is the institution that primarily houses involuntarily confined people with psychiatric disabilities (it is a state prison). The facility has approximately 1,184 beds, and houses patients that are incompetent to stand trial (22%), patients under LPS conservatorship (1%), mentally disordered offenders (48%), mentally ill prisoners transferred from the California Department of Corrections and Rehabilitation (CDCR) (19%), and patients adjudged not guilty by reason of insanity (10%) (numbers as of 2016). The Behavioral Health Department also assists in making referrals for the placement of adults in mental health residential programs and secure mental health residential programs, primarily targeting clients who receive County Mental Health Services and who are on Lanterman-Petris-Short (LPS) Conservatorship. The County operates a Crisis Stabilization Unit, a 24-hour voluntary residential care facility in order to help avoid unnecessary hospitalization and incarceration for people experiencing a mental health crisis. Additionally, the Department operates a 16-bed, licensed Psychiatric Health Facility (PHF), which provides observation and treatment for acute mental illness. It is the only such facility in the County, and it, along with the nearby facilities in Salinas, Santa Barbara, and Fresno/Bakersfield, are often at or near their licensed capacity.

iii. Describe the range of options for people with disabilities to access affordable housing and supportive services in the jurisdiction and region.

While some Section 8 HCV programs implement disability preferences, the closest that HASLO comes to this is a subset of their “involuntarily displaced” preference, which accounts for “displacement by non-suitability of the unit when a member of the family has mobility or other impairments that make the person unable to use a kitchen, sleeping area, full bathroom, the entry and egress of the unit and building.” Some disability programs covered by targeted funding include the Transitions-Mental Health Association 50Now Program, the

Access Support Network, the Transitions-Mental Health Association, and San Luis Obispo Drug and Alcohol (SLOCODA).

Supportive services are primarily provided through programs administered by the Tri-Counties centers and the County of San Luis Obispo Behavioral Health Department. Additionally, particularly for individuals with types of disabilities other than intellectual and developmental disabilities and psychiatric disabilities, services may be available through a range of health care providers, paid by Medi-Cal, Medicare, or private insurance, or through nursing homes. Payment for supportive services for people with intellectual and developmental disabilities is typically structured as Home and Community-Based Services Medicaid Waivers. These Waivers pay for a wide variety of services necessary to empower individuals to maintain stable residence in home and community-based services. There are, however, only as many Waivers available as there is funding from the federal government and the State of California.

4.4.3 Disparities in Access to Opportunity

A. Access to Services & Reasonable Accommodations

- i. To what extent are people with disabilities able to access the following services and facilities in the jurisdiction and region? Identify major barriers faced concerning:*

Government services and facilities

In 2005, the Department of Justice reviewed the City of San Luis Obispo's compliance with ADA Title II requirements – e.g., operating city programs such that they are accessible, facilitating changes to city infrastructure, and providing other accessibility services, such as TTY and appropriate signage.¹⁸ The Department's program review also evaluated services at local parks, recreation centers, schools, and city emergency management and disaster prevention policies.¹⁹ The Department identified a number of facilities and services to be updated for compliance (e.g., installing grab bars in public facilities, etc.)²⁰

Since that time the County and its cities have implemented ADA Action Plans to increase accessibility for persons with disabilities. The County of San Luis Obispo's ADA Transition Plan outlines a grievance procedure where persons with disabilities can report services and

¹⁸ <https://www.ada.gov/sanluis.htm>

¹⁹ <https://www.ada.gov/sanluis.htm>

²⁰ <https://www.ada.gov/sanluis.htm>

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facilities that are not ADA-compliant.²¹ Further, information on the County’s ADA Officer and ADA accessible policies were readily available on its website.²² Overall, the County’s policies, procedures, and practices in administering programs were found to be non-discriminatory.²³ However, the assessment also noted some deficits. For example, Planning Commission meetings were not posting statements on accommodation information, which could hamper the public’s engagement with these processes for those with disabilities.²⁴

The City of San Luis Obispo, in accordance with the Americans with Disabilities Act of 1990 (ADA) states it will not “discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.”²⁵ The County of San Luis Obispo provides aids and services to facilitate persons with disabilities’ equal participation in government activities (e.g., American Sign Language (ASL) interpreters, visual interpretive aids).²⁶ Moreover, the County provides reasonable modifications in its services and prohibits surcharges on persons with disabilities for those services they need to participate equally in program, aligned with ADA requirements.²⁷

The County of San Luis Obispo is currently engaged in a public notice and comment period as it updates its ADA Transition Plans, allowing persons with disabilities the opportunity to respond to surveys and provide feedback to organizations serving their community with the goal of improving its service provision.²⁸ Two avenues for public participation include Access for All and Advisory Councils. Access for all is a community organization that provides advocacy, community education, and outreach, and their efforts in these areas are noted as a resource in the County’s ADA Transition Plan for Public Works.²⁹ Similarly, the County’s Advisory Councils are comprised of area residents who represent community interests.

²¹ [https://www.slocounty.ca.gov/Departments/Human-Resources/Forms-Documents/Safety-and-Risk-Management/Americans-with-Disability-Act-\(ADA\)-Grievance-Poli.aspx](https://www.slocounty.ca.gov/Departments/Human-Resources/Forms-Documents/Safety-and-Risk-Management/Americans-with-Disability-Act-(ADA)-Grievance-Poli.aspx)

²² <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-County-Buildings-and-Facil.aspx>

²³ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-County-Buildings-and-Facil.aspx>

²⁴ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-County-Buildings-and-Facil.aspx>

²⁵ <https://www.slocounty.ca.gov/Home/Disability-Access-Request-for-Public-Input.aspx>

²⁶ <https://www.slocounty.ca.gov/Home/Disability-Access-Request-for-Public-Input.aspx>

²⁷ <https://www.slocounty.ca.gov/Home/Disability-Access-Request-for-Public-Input.aspx>

²⁸ <https://www.slocounty.ca.gov/Home/Disability-Access-Request-for-Public-Input.aspx>

²⁹ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-Public-Rights-of-Way.aspx>

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Permit and subdivision requests are referred to these councils for vetting.³⁰ Community-based approaches like these can help facilitate access to services for persons with disabilities.

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

The County and its cities are focusing on increasing accessibility as well. According to the County of San Luis Obispo's ADA Transition Plan for Public Right of Way, there are 1,030 existing curb ramps in the County.³¹ Presently, 617 curb ramps meet current accessibility standards, and 413 curb ramps will need to be replaced or modified over time. The County's ADA transition plan currently prioritizes replacing those curb ramps near public buildings as a first priority, followed by commercial areas, and finally residential areas.³² Further, the County in this plan identified a need for more accessible parking, and it added additional accessible parking spots in response.³³ Likewise, the cities have designated a significant portion of CDBG funds towards ADA compliance projects. These include the cities of Paso Robles, Atascadero, Morro Bay, San Luis Obispo and Arroyo Grande.

Transportation

The City of San Luis Obispo runs SLO Transit, which is the City's fixed-route transit service that runs throughout the city limits to Cal Poly.³⁴ Recently, the City of San Luis Obispo introduced a discounted monthly transit pass for persons with disabilities, which provides upwards of 50% or more reduction in transit pricing for qualifying individuals.³⁵ Further, in the broader Region of the County of San Luis Obispo, the San Luis Obispo Regional Transit Authority (RTA) provides an ADA Paratransit Service called Runabout which provides complementary paratransit services to qualifying individuals by scheduling these trips in advance.³⁶ However, these trips are twice the cost of the same trip a person without a disability would be able to take using the regional transit infrastructure, and persons

³⁰ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-Public-Rights-of-Way.aspx>

³¹ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-Public-Rights-of-Way.aspx>

³² <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-County-Buildings-and-Facil.aspx>

³³ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-Public-Rights-of-Way.aspx>

³⁴ <https://www.slocity.org/living/transportation>

³⁵ <https://ksby.com/news/local-news/2019/06/30/slo-transit-changing-fare-structure-for-senior-disabled-pass>

³⁶ <https://www.slorta.org/services/runabout-paratransit/faq/#one>

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traveling with an attendant must pay the full fare for the attendant as well.³⁷ RTA also operates the Dial-a-Ride and *Senior Go!* programs which pick up and drop off riders curb-to-curb. Ride-On is a nonprofit agency that offers county-wide transit services at reduced costs for eligible low-income households and disabled individuals.

Proficient schools and educational programs

The San Luis Obispo Unified School District provides disability services for students in San Luis Unified Schools. Programming for students with disabilities include (1) Inclusive Education, which provides program accommodations based on a student’s Individualized Education Program, to help “maximize the social development of everyone,” (2) Individualized Assessment Programs on an annual basis to develop goals and objectives for a student’s plan, (3) Preschool Early Education Program for students with disabilities who need evaluation assessments and services prior to entering preschool, and (4) Least Restrictive Environment to ensure that students with disabilities are educated with able-bodied / neurotypical students as much as is possible, based on the nature or severity of the disability.³⁸

Jobs

The broader Region offers employment services for persons with disabilities. The County of San Luis Obispo offers several programs: (1) EVR SLO Jobs provides persons with disabilities with vocational training and community access, (2) Individual Supported Employment supports persons with disabilities entering the workforce by pairing them with jobs at local employers as well as job retention services while employed, (3) Job Placement Services, which provides connections to the broader job market, and (4) Project Search, which is a school-to-work modeled based in the workplace that offers workplace immersion for persons with disabilities.³⁹

- ii. Describe the processes that exist in the jurisdiction and region for people with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*

Government services and facilities

The City of San Luis Obispo’s accessibility information is not readily accessible from its main webpage. Although the webpage for the City government has accessibility information,

³⁷ <https://www.slorta.org/services/runabout-paratransit/faq/#one>

³⁸ <https://www.slcusd.org/support-services-special-education.php>

³⁹ <https://www.pathpoint.org/locations/san-luis-obispo/>

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including stating that it “strives to meet emerging industry standards and best-practices,” there is no information on how to access disability services to use the platform (e.g., Text Telephone).⁴⁰ The City does, however, provide Government Access Channel 20, which provides a dedicated channel for City Government content. A service such as this could provide access to information for persons with disabilities, such as those with mobility impairments for whom it could be difficult to attend public meetings.⁴¹ To report an issue or file a grievance under the ADA, the City provides an overview of this process on its webpage: citizens can call or comment without filing a formal grievance, but, if they do want to file a formal complaint, there is information on completing required forms on the City’s webpage.⁴²

Within the County of San Luis Obispo, the County has a designated ADA/504 Coordinator who helps oversee the development, implementation, and monitoring of the County’s ADA/504 Self-Evaluation and Transition Plan.⁴³ This 2017 ADA Transition Plan is posted on the County’s webpage.⁴⁴ The County also provides an ADA/Section 504 grievance procedure. The ADA/Section 504 Coordinator handles complaints made through the ADA Grievance Procedure. Further, the County of San Luis Obispo posts its non-discrimination policy on its website and states its commitment to make reasonable modifications to policies and procedures to support its employees in the workplace.⁴⁵ Concurrently with the implementation of its 2017 ADA Transition Plan, the County is engaged in a notice and comment period to better understand how it can address the accommodation and accessibility needs of its residents.⁴⁶

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

The City of San Luis Obispo is working to update its existing ramps to comply with the ADA. Residents can request a ramp installation in a specific location by contacting the City Public Works Engineer. Similarly, the City provides operations and maintenance for street lights and traffic signals, and concerned individuals can request changes to those signals through the

⁴⁰ <https://www.slocity.org/services/website-accessibility>

⁴¹ <https://www.slocity.org/government/department-directory/city-clerk/government-access-channel-20>

⁴² <https://www.slocity.org/Home/Components/ServiceDirectory/ServiceDirectory/85/743>

⁴³ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-County-Buildings-and-Facil.aspx>

⁴⁴ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-County-Buildings-and-Facil.aspx>

⁴⁵ <https://www.slocounty.ca.gov/Home/Disability-Access-Request-for-Public-Input.aspx>

⁴⁶ <https://www.slocounty.ca.gov/Home/Disability-Access-Request-for-Public-Input.aspx>

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City website.⁴⁷ The City webpage on traffic signals and street light maintenance, however, makes no mention of how these services are designed to comply with the ADA.⁴⁸

Transportation

Information on accessibility accommodations in transit procedures is limited. The City of San Luis Obispo runs SLO Transit, which is the City's fixed-route transit service.⁴⁹ In the broader Region of the County of San Luis Obispo, the San Luis Obispo Regional Transit Authority (RTA), in conjunction with South County Transit and Paso Express, operates a county-wide fixed-route transit service. RTA runs an ADA Paratransit Service called Runabout, but trips must be scheduled in advance.⁵⁰ Accompanying this, the County provides ADA Rider Guidelines for the paratransit service, which includes certification guidelines for drivers, contact information, and eligibility criteria for riders.⁵¹ RTA provides other transportation services as well, such as Dial-A-Ride and Senior-Go!, where persons with disabilities can request rides online or by phone. Ride-On is a nonprofit agency that offers county-wide transit services at reduced costs for eligible low-income households and disabled individuals.

Proficient schools and educational programs

The San Luis Obispo Unified School District provides disability services for students in San Luis Unified Schools, but information on reasonable accommodations standards is difficult to find. The County of San Luis Obispo Office of Education posts a reasonable accommodation policy on their website that provides an overview of the procedure for requesting such accommodations for *employees* of the school district.⁵² An applicant must be a qualifying person with a disability, and the application process requires detailing how the disability impacts their ability to perform essential functions of their job without a

⁴⁷ <https://www.slocity.org/government/department-directory/public-works/programs-and-services/street-maintenance/traffic-signal-and-street-light-maintenance>

⁴⁸ <https://www.slocity.org/government/department-directory/public-works/programs-and-services/street-maintenance/traffic-signal-and-street-light-maintenance>

⁴⁹ <https://www.slocity.org/living/transportation>

⁵⁰ <https://www.slorta.org/services/runabout-paratransit/faq/#one>

⁵¹ <http://www.slorta.org/wordpress/wp-content/uploads/ADA-Ride-Guide-2018.pdf>

⁵² <https://www.slococoe.org/wp-content/uploads/2015/11/Reasonable-Accommodation-Administrative-Regulation-4031.pdf>

reasonable accommodation.⁵³ By contrast, both the City of San Luis Obispo and County do not provide readily accessible information on accommodations policies in their schools.⁵⁴

Jobs

There are service organizations in the City of San Luis Obispo that provide employment services to persons with disabilities, such as Path Point, where individuals can request assistance finding and staying engaged in work by setting up a consultation appointment.⁵⁵ Other private employers provide accessibility information, but centralized resources are limited.

4.4.4 Home Ownership

Describe any difficulties in achieving homeownership experienced by people with disabilities and by people with different types of disabilities in the jurisdiction and region.

The American Community Survey does not disaggregate disability status by housing tenure. Accordingly, it is not possible to precisely determine the homeownership rate for people with disabilities. Additionally, this Assessment did not reveal any local studies on homeownership among people with disabilities or lending discrimination against people with disabilities in the County of San Luis Obispo. Nonetheless, based on the age distribution of people with disabilities and the socioeconomic status of people with disabilities, two conclusions seem likely. First, it is unlikely that people with disabilities, overall, have significantly lower homeownership rates than the general public because people with disabilities are disproportionately elderly and homeownership rates are highest among elderly households. More than 80% of householders age 65 years and over are homeowners, as opposed to just 51% of householders under the age of 65. Second, among nonelderly people with disabilities, it is likely that homeownership is significantly lower than among nonelderly people who do not have disabilities because nonelderly people with disabilities are disproportionately low-income. Nationally, people with disabilities often face specific barriers in the mortgage lending process, including disparate treatment by mortgage brokers and failures to treat disability income as income. Despite the shortcomings in the California Fair Employment and Housing Act's source of income protections, as interpreted by the courts, that law unambiguously prohibits discrimination in mortgage lending on the basis of receipt of Supplemental Security Income or Social Security Disability Income. Thus, people with

⁵³ <https://www.slocoe.org/wp-content/uploads/2015/11/Reasonable-Accommodation-Administrative-Regulation-4031.pdf>

⁵⁴ <https://www.slcsud.org/department-details.php?id=10>

⁵⁵ <https://www.pathpoint.org/locations/san-luis-obispo/>

disabilities have more protection from lending discrimination in California than they do in many other states.

4.4.5 Disproportionate Housing Needs

Describe any disproportionate housing needs experienced by people with disabilities and by people with certain types of disabilities in the jurisdiction and region.

As with mortgage lending disparities, limited data is available on the extent to which people with disabilities face disproportionate housing needs. The American Community Survey does not disaggregate data relating to overcrowding, incomplete plumbing and kitchen facilities, and cost burden by disability status. Given the age distribution of people with disabilities, it would seem to be unlikely that people with disabilities are disproportionately subject to overcrowding. Just 0.3% of households with elderly heads of household are overcrowded while 4.7% of households with nonelderly heads of household are overcrowded. By contrast, in light of the relatively low earnings of people with disabilities, it is likely that people with disabilities are disproportionately subject to cost burden and severe cost burden.

4.4.6 Additional Information

- i. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting people with disabilities with other protected characteristics.*

This Assessment has made extensive use of local data throughout the Disability and Access section. The sources of data other than HUD-provided data are noted where appropriate.

- ii. The program participant may also describe other information relevant to its assessment of disability and access issues.*

Minor Home Repair Services are available for free to seniors in the County of San Luis Obispo and the Santa Maria Valley through the Area Agency on Aging and CDBG funds. Services include grab bars, handrails, smoke alarms and carbon monoxide detectors, handheld showerheads, and minor plumbing, carpentry, electrical, and drywall to increase accessibility.

4.4.7 Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs,

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Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

Access for persons with disabilities to proficient schools

Access to publicly supported housing for persons with disabilities

Access to transportation for persons with disabilities

Inaccessible government facilities or services

Inaccessible public or private infrastructure

Lack of access to opportunity due to high housing costs

Lack of affordable in-home or community-based supportive services

Lack of affordable, accessible housing in range of unit sizes

Lack of affordable, integrated housing for individuals who need supportive services

Lack of assistance for housing accessibility modifications

Lack of assistance for transitioning from institutional settings to integrated housing

Lack of local or regional cooperation

Land use and zoning laws

Lending discrimination

Location of accessible housing

Loss of affordable housing

Occupancy codes and restrictions

Regulatory barriers to providing housing and supportive services for persons with disabilities

Source of income discrimination

State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings

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4.5 Fair Housing Enforcement, Outreach Capacity, and Resources

4.5.1 Past and Current Enforcement Activities

A. List and summarize any of the following that have or have not been resolved:

(NOTE: Except for a recent investigation regarding an inmate's death in a San Luis Obispo County Jail, there are no current or unresolved enforcement cases pursuant to: 1) San Luis Obispo City's compliance with a 2005 Settlement Agreement between the City and the U.S. Department of Justice regarding improved ADA accessibility to city facilities and services, and 2) a HUD letter dated July 11, 2019 indicating that the County of San Luis Obispo had satisfied all requirements of a 2014 Voluntary Compliance Agreement between the County and the U.S. HUD Office of Fair Housing & Equal Opportunity.)

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the U.S. Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the U.S. Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing;
- Pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.
 - The family of an inmate who died in the County of San Luis Obispo custody is suing the county, alleging violations of the ADA and other civil rights laws for failing to provide adequate medical attention.⁵⁶ The U.S. Department of Justice has also opened an investigation into conditions in the County of San Luis Obispo Jail.⁵⁷

⁵⁶ <https://ksby.com/news/2019/04/17/san-luis-obispo-county-faces-new-civil-rights-federal-lawsuit-in-death-of-inmate>

⁵⁷ <https://ksby.com/news/local-news/2018/11/07/doj-to-investigate-medical-mental-health-care-at-slo-county-jail>

4.5.2 Applicable Laws and Agencies

A. Describe any state or local fair housing laws. What characteristics are protected under each law?

California Laws

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA) (Government Code Section 12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising
- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex, including Gender, Gender Identity, and Gender Expression
- Marital status
- Source of income
- Sexual orientation
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age
- Genetic information

In addition, FEHA contains similar reasonable accommodations, reasonable modifications, and accessibility provisions as the Federal Fair Housing Amendments Act. FEHA explicitly provides that violations can be proven through evidence of the unjustified disparate impact of challenged actions and inactions and establishes the burden-shifting framework that

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courts and the Department of Fair Employment and Housing must use in evaluating disparate impact claims.

The Unruh Civil Rights Act provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists “sex, race, color, religion, ancestry, national origin, disability, and medical condition” as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics. In practice, this has meant that the law protects against arbitrary discrimination, including discrimination on the basis of personal appearance.

Furthermore, the Ralph Civil Rights Act (California Civil Code Section 51.7) forbids acts of violence or threats of violence because of a person’s race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can include: verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual’s constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act may not be imposed for speech alone unless that speech itself threatened violence.

Finally, California Civil Code Section 1940.3 prohibits landlords from questioning potential residents about their immigration or citizenship status. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person’s citizenship or immigration status.

In addition to these acts, Government Code Sections 11135, 65008, and 65580-65589.8 prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, recent changes to Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities (SB 520)
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2)

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- Housing for extremely low-income households, including single-room occupancy units (AB 2634)
- Housing for persons with developmental disabilities (SB 812)

San Luis Obispo County Ordinances

The County does not currently have any fair housing laws or ordinances codified.

B. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

San Luis Obispo is served by two fair housing enforcement organizations, The Fair Housing Council of Central California (FHCCC) and the San Luis Obispo Regional Office of California Rural Legal Aid (CRLA). The Fair Housing Council operates in 34 counties across central California, despite having a small staff. To ensure compliance with state and local fair housing laws, the Fair Housing Council offers a variety of services including, “mediation, counseling, advocacy, research, and fair housing training and workshops.”⁵⁸ In the County of San Luis Obispo, the FHCCC reports that the majority of its complaints are related to discrimination on the basis of familial status. The organization has brought several cases in recent years regarding familial status, age, class, and race, but all settled out of court. Their website also includes information on fair housing laws that is available in Arabic, Chinese, Farsi, French, Hindi, Hmong, Japanese, Khmer, Korean, Lao, Polish, Russian, Tagalog, and Vietnamese.

CRLA has an office based in San Luis Obispo City, but they provide county-wide services. The County contracts each year with CRLA to administer a Fair Housing Program. In addition to County funds, CRLA operates using private donations and foundation grants. The San Luis Obispo office has just four employees. From January 2018 to January 2019, the office handled 40 discrimination cases. Of those cases, disability was the most common protected class basis, making up 70% of the caseload. Race made up 10% of the caseload, sex made up 7.5%, disability combined with national origin was 5%, familial status was 5%, and veteran’s status was 2.5%. The majority of CRLA cases in the last year involved private landlords, but the office also dealt with a significant number of cases involving federally subsidized housing. Nine of the cases in the last year involved mobile homes. In addition to direct legal services, CRLA runs a Landlord/Tenant Clinic at two courthouses in the County (Paso Robles and San Luis Obispo) three days a week.

⁵⁸ <http://www.fhc-cc.org/about.html>

4.5.3 Additional Information

Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

4.5.4 Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

Please see the Appendix for the following Contributing Factors to Fair Housing Enforcement, Outreach Capacity, and Resources:

Lack of local private fair housing outreach and enforcement

Lack of local public fair housing enforcement

Lack of resources for fair housing agencies and organizations

Lack of state or local fair housing laws

Unresolved violations of fair housing or civil rights law

CHAPTER 5: THE COUNTY OF SAN LUIS OBISPO FAIR HOUSING GOALS AND PRIORITIES

Goal 1: Strengthen Public and Private Fair Housing Enforcement Infrastructure throughout San Luis Obispo County.

The County of San Luis Obispo currently lacks the fair housing enforcement infrastructure to effectively counteract private housing discrimination in the area. There is no local agency or department that is dedicated solely to fair housing services or enforcement. California Rural Legal Assistance (CRLA) provide fair housing services, but there are limitations on its capacity and on what clients it can serve. The Fair Housing Council of Central California is in Fresno and lacks a physical presence in the county. Local municipalities currently play no role in enforcing fair housing laws while the California Department of Fair Employment and Housing and the U.S. Department of Housing and Urban Development (HUD) are not geographically focused on serving the County of San Luis Obispo.

- a. Increase financial support for fair housing services through a collaborative strategy that engages city governments, the private sector, and local philanthropy.*

To meet HUD's fair housing requirement of providing the public with fair housing services, the County of San Luis Obispo provides County general funds to California Rural Legal Assistance. In 2016, the County increased its general fund contribution to CRLA from \$25,000 to \$50,000 annually, and CRLA expanded its ability to provide the public with fair housing services. For example, CRLA established a rental clinic in the County Superior Court buildings that serves both landlords and tenants. Without an unlikely increase in CDBG funds from HUD, the County will not have the capacity to increase its financial support for California Rural Legal Assistance on its own. Instead, the County should work with its cities, the local business community, and philanthropy to encourage donations to California Rural Legal Assistance that would leverage the County's initial investment. Increased resources for fair housing services could facilitate more proactive investigative work on the part of California Rural Legal Assistance that goes beyond the defensive use of the Fair Housing Act to prevent eviction.

Goal 2: Increase the Supply of Affordable Housing in High Opportunity Areas throughout San Luis Obispo County (areas of high-quality jobs, education and services).

The County of San Luis Obispo is among the most unaffordable places to live in the country and within California when both the cost of housing and local incomes are taken into account. The unaffordability of housing disproportionately harms persons with disabilities and Hispanic residents of the County and even has the effect of disproportionately excluding Hispanic residents from the County. Many disproportionately Hispanic employees who work

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in the County of San Luis Obispo commute from Santa Maria in neighboring Santa Barbara County because of high housing costs.

a. Increase financial resources for affordable housing through a countywide bond issue.

Federal support for affordable housing is largely static, but municipalities can play a role in increasing available resources. Several counties and cities within California, as well as the State itself, have passed substantial bond issues to fund affordable housing development in recent years. Such funds provide an additional supply of needed funding and also give affordable housing developers in the County of San Luis Obispo a competitive advantage when seeking tax credits from the California Tax Credit Allocation Committee. Because of incentives for the leveraging of local funds, it is more difficult for tax credit applications to succeed in communities that have not passed bond issues.

The County is considering the placement of a bond measure on the November 2020 ballot that would provide funds for affordable housing development. The County has also taken steps to increase its existing source of affordable housing funds by revising its in-lieu fee schedule. The revised fee schedule is anticipated to increase funding for the County's Affordable Housing Fund by between \$700,000 and \$850,000 annually, which is over and above the \$100,000 per year generated under the prior fee schedule. The County anticipates that in 2020 it will begin receiving an annual allocation of affordable housing funds from the state pursuant to California Senate Bill 2 – Building Homes and Jobs Act.

b. Leverage reforms to local zoning and land use regulations to facilitate the development of housing types that are more likely to be affordable.

Progressive steps have been taken by the County and its cities to incentive more housing by rezoning, adoption of new ordinances for accessory dwellings and tiny homes, and providing local funds for affordable housing. These actions are described in Section IV – Assessment of Past Goals and Actions. There are a number of additional steps that the County of San Luis Obispo and its cities could take to ensure that zoning and land use regulations facilitate efforts to advance housing affordability.

- Increase the maximum allowable density in multi-family zoning districts. Although municipalities in the County of San Luis Obispo generally have one or more zoning classifications that allow multi-family housing, these districts often have density limitations that nonetheless have the effect of reducing housing affordability. For example, in the City of San Luis Obispo, which is more permissive of multi-family housing than other cities, the maximum density in the R-4 zone is 24 units per acre and the maximum height for a building is 35 feet. Particularly in infill areas, higher densities and higher building heights are likely to be appropriate. The County and its

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cities should ensure that at least some land is zoned to allow up to 40 units per acre in buildings of up to 45 feet in height.

- Prospectively rezone infill areas to allow for multi-family housing development by right. The County of San Luis Obispo and its cities should prospectively identify at least 10% of their land area that is within urban limit boundaries that is currently zoned for single-family housing or commercial use and rezone that land to allow multi-family housing. In doing so, municipalities should target high-opportunity areas with above average income levels. Rezoning should be tied to the imposition of robust inclusionary housing requirements.
- Expedite the process for approval of specific plans and planned unit developments. Most new, large-scale Greenfield development is governed by specific plans rather than traditional district-based zoning. These plans often allow for or even require an affordable, multi-family component, but the time that it takes for a plan to reach approval can stretch for many years, thus driving up developer costs and making it uneconomical to produce lower-priced units. Municipalities should set and enforce clear timelines for the approval of these types of plans.
- Create opportunities for the siting of tiny homes and other manufactured homes. Modular housing is significantly less expensive than site-built housing to construct. Strategies to allow for these types of housing may include creating a zoning classification for manufactured housing if none exists, and continue to permit manufactured homes in single-family districts.
- Ensure that recent changes to California’s Accessory Dwelling Unit (ADU) law that, under certain circumstances, allows three dwelling units on parcels in single-family residential districts result in meaningful access to affordable housing. Homeowners often have difficulty accessing financing to build ADUs because they cannot demonstrate a proven stream of rental income. The County could establish a revolving, low-interest loan fund for homeowners seeking to build ADUs in exchange for affordability restrictions and affirmative marketing requirements for units.

c. Build upon efforts to encourage cities’ use of CDBG for affordable housing development.

Through its cooperation agreements with its cities, the County of San Luis Obispo should continue to require that its cities prioritize the use of CDBG funds to support the development of affordable housing. The County should also provide cities with the flexibility, within regulatory constraints, to make the use of CDBG funds for affordable housing development easier. For example, the County should encourage arrangements whereby

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cities forgo small allocations in a given year in order to ensure that another municipality has enough funds to provide meaningful gap financing to a project that is in the pipeline.

- d. Encourage more cities to reduce fees, waive fees, or use CDBG funds to cover part or all of the cost of fees for affordable housing developments.*

Fees are a major component of the cost of all housing development, including affordable housing development, in the County of San Luis Obispo. The County and several of its municipalities have addressed this barrier by waiving or deferring fees for affordable housing developments. This practice should spread to other municipalities within the county.

Goal 3: Meet the Supportive Housing Needs of Persons with Disabilities

The County of San Luis Obispo has well-designed programs in place to provide supportive housing to persons with disabilities who need affordable housing and community-based services and supports in order to maintain stable residency in integrated settings. These programs, however, especially on the housing side do not operate at the scale necessary to meet the total need. Rather than creating new, dedicated permanent supportive housing programs, the County should build a focus on supportive housing into the types of efforts to expand affordable housing that are described in connection with Goal 2 above. The County is considering placement of a bond measure on the November 2020 ballot to support funding for affordable housing. If the bond issue is passed then bond funds could be earmarked to produce accessible, affordable housing units. HUD's Section 811 Project Rental Assistance program sets a goal that 25% of the affordable units with Section 811 funds shall be accessible to disabled tenants.

- a. If a bond issue is passed, require that 25% of all affordable units in developments assisted with bond proceeds be set aside for persons with disabilities who need supportive services.*

The County is considering placement of a bond measure on the November 2020 ballot that would provide funds for affordable housing development. If this bond measure is approved, the County should leverage the development that results in order to increase supportive housing opportunities. This housing would further community integration for persons with disabilities through its inclusion in broader developments that primarily serve individuals without disabilities.

- b. Provide funding to public housing authorities or non-profits for the purchase of affordable, inclusionary housing units for use as supportive housing for extremely low-income persons with disabilities.*

In its nationally recognized inclusionary housing program, Montgomery County, Maryland has its housing authority purchase a fraction of the affordable units that are produced in order to operate them as scattered-site public housing. The same strategy could be utilized, whether with housing authority or non-profit ownership, to sustainably create scattered-site supportive housing units. This will be increasingly necessary once zoning reforms and the increased use of inclusionary housing increase the portion of the housing stock that is in inclusionary housing developments. Currently, the cities of Atascadero, San Luis Obispo, and Arroyo Grande generate inclusionary housing units which could be purchased with funds to benefit disabled individuals.

Goal 4: Increase Public Transportation to Connect Protected Class⁵⁹ Members to Opportunity

Fixed-route bus service is the primary form of public transportation in the County, providing transportation to jobs, schools, and services. Too many residents and workers in the County of San Luis Obispo have long commutes that decrease the stability of job tenure, increase child-care costs, and otherwise reduce quality of life. Disproportionately those facing the longest commutes into job centers in the County of San Luis Obispo are members of protected classes⁵⁹ and, in particular, Hispanic residents. Santa Maria, Oceano, Nipomo, Paso Robles, and San Miguel are places with comparatively affordable housing but high transportation barriers for those who are employed in the City of San Luis Obispo. Having more frequent, reliable bus transportation would increase access to opportunity for many vulnerable residents.

a. Advocate for greater state and federal resources for public transportation.

The County of San Luis Obispo does not currently have the financial capacity to make transformative investments in its public transportation systems. Because of the significant need for such investments, the County should advocate for increased state and federal funding that it could apply for in future years.

CHAPTER 6: CONTRIBUTING FACTORS APPENDIX

Contributing Factors to Fair Housing Issues

⁵⁹ The seven classes protected under the Federal Fair Housing Act are: Color, Disability, Familial Status (i.e., having children under 18 in a household, including pregnant women), National Origin, Race, Religion and Sex.

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The AI includes a discussion and analysis of the following contributing factors to fair housing issues, all of which are typically covered when reviewing all jurisdictions:

1. Access to financial services
2. Access for persons with disabilities to proficient schools
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability of affordable units in a range of sizes
7. Availability, type, frequency, and reliability of public transportation
8. Community opposition
9. Deteriorated and abandoned properties
10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
11. Displacement of residents due to economic pressures
12. Impediments to mobility
13. Inaccessible public or private infrastructure
14. Inaccessible government facilities or services
15. Lack of access to opportunity due to high housing costs
16. Lack of affordable, accessible housing in a range of unit sizes
17. Lack of affordable in-home or community-based supportive services
18. Lack of affordable, integrated housing for individuals who need supportive services
19. Lack of assistance for housing accessibility modifications
20. Lack of assistance for transitioning from institutional settings to integrated housing
21. Lack of community revitalization strategies
22. Lack of local private fair housing outreach and enforcement
23. Lack of local public fair housing enforcement
24. Lack of local or regional cooperation
25. Lack of meaningful language access for individuals with limited English proficiency
26. Lack of private investment in specific neighborhoods
27. Lack of public investment in specific neighborhoods, including services or amenities
28. Lack of resources for fair housing agencies and organizations
29. Lack of state or local fair housing laws
30. Land use and zoning laws
31. Lending discrimination
32. Location of accessible housing

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33. Location of employers
34. Location of environmental health hazards
35. Location of proficient schools and school assignment policies
36. Location and type of affordable housing
37. Loss of affordable housing
38. Occupancy codes and restrictions
39. Private discrimination
40. Quality of affordable housing information programs
41. Regulatory barriers to providing housing and supportive services for persons with disabilities
42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
43. Source of income discrimination
44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings
45. Unresolved violations of fair housing or civil rights law

Data gathered regarding these contributing factors is provided below.

1. Access to financial services

Access to financial services is not a significant contributing factor to Disparities in Access to Opportunity within the County of San Luis Obispo. This analysis of access to financial services is measured by physical access to bank branch locations. The FDIC provides information on the location of banks by physical addresses, cities and towns, counties and states. This information illustrates disparities in access between municipalities that might have differing levels of diversity, but that does not demonstrate access to physical bank branch locations in areas specifically by neighborhoods, which would be the best indicator of access to financial services impacting disparities in access to opportunity. Lack of access to physical bank branches encourages exposure to predatory consumer lenders instead, impacting economic mobility and transportation.

Table 6-1: FDIC-Regulated Bank Branches by Municipality in 2018

Municipality	FDIC-Regulated Full-Service Brick and Mortar Branches
San Luis Obispo City	26

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Arroyo Grande	10
Atascadero	10
Grover Beach	2
Morro Bay	5
Paso Robles	14
Pismo Beach	2

Though this data does not reflect all means of accessing financial services (excluding, for example, credit unions), it does provide some insight. As the data above suggests, there are a significant amount of full-service financial institutions throughout the most populated areas of the County. In addition, the areas of the County of San Luis Obispo with the highest concentrations of minorities (San Luis Obispo, Arroyo Grande, Atascadero, and Paso Robles), have the highest number of full-service financial institutions. It does not appear that any group is disproportionately prevented from accessing financial services. However, it is important to note that mere physical access to financial institutions does not preclude the possibility of predatory lending practices (see Contributing Factor, Lending Discrimination).

2. Access for persons with disabilities to proficient schools

Access for students with disabilities to proficient schools is a contributing factor to Disability and Access. There are 81 public schools in San Luis Obispo, part of 12 school districts. Since the passage of the Individuals with Disabilities Education Act (IDEA) in 1990, there have been at least 24 administrative law judge decisions regarding violations of the IDEA across the various school districts in the County. There have also been at least eight individual IDEA lawsuits against the school district. The U.S. Department of Education Office of Civil Rights compiles data about disability and student discipline in public schools.⁶⁰ According to the National Center for Education Statistics, the average percentage of IDEA-classified students enrolled in any given public school is 14%.⁶¹ A school-by-school analysis for San Luis Obispo revealed that in 15 out of the 81 schools (nearly 20%), students were classified as IDEA-eligible at rates of 8% or less. In the Templeton Unified School District, every school in the district had such levels of IDEA classification, with three schools (out of seven) classifying zero students as IDEA-eligible. Beyond those three schools, six more schools throughout the County classified zero students as IDEA-eligible. This suggests that either 1) these schools

⁶⁰ <https://ocrdata.ed.gov/DataAnalysisTools/DataSetBuilder?Report=6>.

⁶¹ https://nces.ed.gov/programs/coe/indicator_cgg.asp.

are failing in their Child Find obligations, or 2) these schools are pushing out students with disabilities.

3. Access to publicly supported housing for persons with disabilities

Access to publicly supported housing for persons with disabilities is not a significant contributing factor to Disability and Access in the County of San Luis Obispo. This contributing factor primarily concerns whether persons with disabilities are able to access existing publicly supported housing resources at rates that are commensurate with their share of the income-eligible population. This is a separate analysis from whether there is a sufficient supply of publicly supported housing units that are available to persons with disabilities, which there is not. Within the County of San Luis Obispo, for Project-Based Section 8 developments and the Housing Choice Voucher program, persons with disabilities participate at rates that far exceed their share of the population and likely the income-eligible population, as well. For Public Housing, persons with disabilities comprise a proportion of residents that is greater than their share of the overall population and likely roughly similar to their share of the income-eligible population. Although data for Other Multifamily housing makes it appear that persons with disabilities are underrepresented, this is a very small segment of publicly supported housing in the County, just 59 units. Additionally, in light of the fact that both Other Multifamily developments in the County are designated for seniors, it is likely that the data showing only one household including a person with a disability residing in those developments is inaccurate.

4. Access to transportation for persons with disabilities

Access to transportation for persons with disabilities is a somewhat significant contributing factor to Disability and Access. The San Luis Obispo Regional Transit Authority (RTA), in conjunction with South County Transit and Paso Express, provides daily bus services throughout the county. While Fixed Route Buses, the Avila Beach Trolley, and Paso Express provide daily transportation, information on accessibility for Fixed Route Buses in particular is not available on the RTA website. However, the fixed-route buses are equipped to load and carry disabled passengers. RTA does provide other services geared towards residents with disabilities, including Runabout Paratransit, Dial-A-Ride, and *Senior Go!* Runabout Paratransit serves the entire county with wheelchair-equipped vehicles. Fares are twice the cost of bus fare for passengers and serves areas that are within $\frac{3}{4}$ miles of regular bus routes. Passengers must request use of the service the day before. Dial-A-Ride serves mobility-impaired passengers with curb-to-curb transportation, offered at any location and time so long as passengers reserve the service the day before. Specific services are available for Shandon-Paso Robles, Templeton-Paso Robles, Paso Robles and Nipomo.

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Ride-On is a nonprofit agency that offers county-wide transit services at reduced costs for eligible low-income households and disabled individuals.

5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing.

Admissions and occupancy policies and procedures, including preferences in publicly supported housing, are a high priority contributing factor to Segregation in the County of San Luis Obispo. The Housing Authority of San Luis Obispo maintains a live-work preference for the Housing Choice Voucher Program. Although it is only the fourth preference that applies, it has the potential to apply to all available vouchers beyond those allocated under the first three preferences. Since the County of San Luis Obispo is significantly more heavily non-Hispanic White than surrounding communities, particularly Santa Maria, it is likely that this preference disproportionately excludes Hispanic households from the county. By maintaining the preference as a live-work preference as required by HUD regulation, that effect is mitigated in part, but either eliminating the preference or applying it to only a subset of available vouchers would reduce fair housing concerns related to the preference. By contrast, HASLO's criminal background screening policies are highly consistent with fair housing principles in that they (1) apply a reasonable lookback period of just three years, (2) allow for individualized consideration of mitigating circumstances when there is a red flag, and (3) do not allow for denials based solely on arrest records.

6. Availability of affordable units in a range of sizes

Availability of affordable units in a range of sizes is a contributing factor to Disproportionate Housing Needs. A lack of affordable units in a range of sizes can cause overcrowding as families are forced to share smaller units. Overcrowding is already an issue within the County of San Luis Obispo, especially within Hispanic households. Hispanic households experience overcrowding at a rate of 12.44%, as described by the 2013-2017 American Community Survey data. This issue is compounded by the lack of Project-Based Section 8 or Other Multifamily 2 or 3+ bedroom units available within the county, meaning that households typically need to use the Housing Choice Voucher Program if they have large families. The Housing Authority of San Luis Obispo is closing its Public Housing Waitlists in August of 2019, including the Madonna Road 4-bedroom project-based voucher wait list. While other waiting lists are opening up, many prioritize smaller units.⁶²

7. Availability, type, frequency, and reliability of public transportation

⁶² <https://www.haslo.org/>

Availability, type, frequency, and reliability of public transportation is a moderate priority contributing factor to Disparities in Access to Opportunity. The City of San Luis Obispo runs a fixed-route transit service that provides service to areas within the city limits through Cal Poly,⁶³ and discounted transit passes are available for qualifying persons with disabilities.⁶⁴ Moreover, the City is a designated “Bike Friendly Community” that provides ample bike parking spaces, bike path, bike lanes, and other facilities for commuters.⁶⁵ Further, the City connects to the broader Region’s Regional Transit Authority.⁶⁶ The City, like many other localities, runs a local paratransit service, but these trips are costly—costing a qualifying individual upwards of twice the regional fare and requiring they pay the cost of transit for persons accompanied by a support aid. These financial barriers could be impactful on a person with a disability, many of whom are often already living on fixed incomes and limited means.⁶⁷

The San Luis Obispo Regional Transit Authority (RTA), in conjunction with South County Transit and Paso Express, provides daily bus services throughout the county. Fixed Route Buses, the Avila Beach Trolley, and Paso Express provide daily transportation, and information on accessibility for Fixed Route Buses is available on the RTA website at: <https://www.slorta.org/services/runabout-paratransit/>. The fixed-route buses are equipped to load and carry disabled passengers. RTA provides other services geared towards residents with disabilities, including Runabout Paratransit, Dial-A-Ride, and *Senior Go!* Runabout Paratransit serves the entire county with wheelchair-equipped vehicles. Fares are twice the cost of bus fare for passengers, and serves areas that are within ¾ miles of regular bus routes. Passengers must request use of the service the day before. Dial-A-Ride serves both the general public and mobility-impaired passengers with curb-to-curb transportation, offered at any location and time so long as passengers reserve the service the day before. Dial-A-Ride is available for Shandon-Paso Robles, Templeton-Paso Robles, Paso Robles and Nipomo.

Ride-On is a nonprofit agency that offers county-wide transit services at reduced costs for eligible low-income households and disabled individuals.

8. Community opposition

Community Opposition is a contributing factor to Segregation, R/ECAPs, and Publicly Supported Housing. San Luis Obispo historically has been a White, conservative county and

⁶³ <https://www.slocity.org/living/transportation>

⁶⁴ <https://ksby.com/news/local-news/2019/06/30/slo-transit-changing-fare-structure-for-senior-disabled-pass>

⁶⁵ <https://www.slocity.org/living/transportation>

⁶⁶ <https://www.slocity.org/living/transportation>

⁶⁷ <https://www.slorta.org/services/runabout-paratransit/faq/#one>

there has been resistance to affordable housing, multi-family housing, and housing options for the homeless. A representative of SLO Neighbors United was quoted after a recent San Luis Obispo City Council meeting saying that the organization represents “a group of concerned residents who feel that our city is heading in the wrong direction, that our historic, quaint, unique character is being destroyed.”⁶⁸ NIMBY-ism (“Not In My Backyard”) sentiment has successfully defeated a number of plans for affordable developments. Many of the larger cities in the county have been unable to approve additional warming centers or shelters for the homeless due to anticipated backlash and community fears that they will attract undesirable persons to the area. In addition, a coalition of local landlords has opposed attempts to provide more tenant protections. For example, there was significant backlash from landlords in San Luis Obispo City over an adopted ordinance that would increase the amount of rental inspections, and the ordinance was discontinued.

9. Deteriorated and abandoned properties

Deteriorated and abandoned properties is not a contributing factor to R/ECAPs. Such properties are not common in the County of San Luis Obispo. High housing costs make it unlikely that abandoned properties remain that way for long, and code enforcement mechanisms such as online forms to report deteriorated properties help address those issues as well. Robust community engagement also prevents properties from falling into disrepair.⁶⁹ One abandoned property in San Luis Obispo, Bishop Street Studios, was recently converted into housing for the mentally ill, though this effort did meet some community pushback.⁷⁰ Code enforcement and community engagement generally prevent deteriorated and abandoned properties from going unaddressed.

10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Displacement and lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking is not a contributing factor to Disproportionate Housing Needs and Publicly Supported Housing. Some legal protections are provided to victims of domestic violence or other abuse in the County of San Luis Obispo. The Superior Court of California, County of San Luis Obispo, allows victims of abuse to request restraining orders through an

⁶⁸ <https://www.newtimeslo.com/sanluisobispo/growing-pains-san-luis-obispo-grapples-with-change-development-and-character/Content?oid=6045099>

⁶⁹ <http://www.rqnslo.org/property.html>

⁷⁰ <https://www.kcbx.org/post/plans-abandoned-san-luis-obispo-property-getting-push-back-neighbors>

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online program, and also use the assistance of the Self-Help Center/Family Law Facilitator’s Office to make the request.⁷¹

The county code, in addition to laws in San Luis Obispo City, Paso Robles, and Atascadero, includes noise standards that do not explicitly carve out exceptions for victims of domestic violence or other abuse⁷²⁷³. There is no nuisance ordinance in the County that prevents residents from calling the police. While there is no indication that victims of domestic violence or other abuse are negatively impacted by noise standards, there are no legal protections from fines levelled against victims as a result of violence in their homes.

Some local resources are available to prevent displacement and find housing for victims of domestic violence and abuse. Stand Strong, a non-profit serving the county, has a crisis line, emergency shelter, transitional housing, and a host of other services dedicated to assisting victims.⁷⁴ RISE is another organization that serves the County with a crisis line, safe houses, and other assistance as necessary.⁷⁵ These resources are prominently featured on the District Attorney for the County of San Luis Obispo’s website.

11. Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is a medium priority contributing factor to Segregation, R/ECAPs, Disproportionate Housing Needs, and Publicly Supported Housing in the County of San Luis Obispo. Housing prices are high in the County of San Luis Obispo, with especially high housing costs in the City of San Luis Obispo and the beach communities. Housing costs have steadily increased since approximately 2012. Several economic factors contribute to this dynamic, including low interest rates, short-term rental activity, a robust market for second homes, and a lack of price sensitivity among higher education students receiving parental support. Housing production has not kept pace with demand at all income levels, but has particularly not kept pace for those with the lowest income levels, as vacancy rates are low. In the County, the homeowner vacancy rate is just 1.3%, while the rental vacancy rate is 2.8%. Members of protected classes, including racial and ethnic minorities and persons with disabilities, disproportionately feel the burden of high housing costs resulting from economic pressures. There is significant anecdotal evidence of households moving from the County of San Luis Obispo to more heavily

⁷¹ <https://www.slo.courts.ca.gov/sh/selfhelp-domesticviolence.htm>

⁷²

https://library.municode.com/ca/san_luis_obispo_county/codes/county_code?nodeId=TIT22LAUSOR_ART3SIPLP_RDEST_CH22.10GEPRDEOPST_22.10.120NOST

⁷³ <https://www.slocity.org/home/showdocument?id=15164>

⁷⁴ <https://standstrongnow.org/>

⁷⁵ https://www.riseslo.org/about_rise.php

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Hispanic/Latino Santa Maria in neighboring Santa Barbara County and moving from more centrally located parts of the County of San Luis Obispo to Paso Robles, Oceano, or Nipomo. The County of San Luis Obispo has historically been predominantly White but racial and ethnic minorities are moving into the County. To date, displacement of residents due to economic pressures has not been substantial enough to cause a reduction in the overall share of residents who are racial and ethnic minorities. Moving forward, it will be important for the County and its cities to monitor housing market conditions in areas of Hispanic population concentration like the northwest portion of Paso Robles and Oceano. Planning for future development in those areas should account for and mitigate the risk of displacement.

12. Impediments to mobility

Impediments to mobility are a contributing factor to Disparities in Access to Opportunity and the Segregation of residents of publicly supported housing in the Region. As discussed in connection with the quality of affordable housing information programs contributing factor, there is not a mobility counseling program operating in the area. However, Supportive Services for Veteran Families does provide some limited housing counseling services specific to veterans. There is also not a consolidated waitlist for affordable housing programs, and several of the affordable housing applications are only available online, potentially alienating people without reliable internet access. Additionally, although HASLO utilizes exception payment standards with its Section 8 Housing Choice Voucher program, exceptions are only available if the family requests and HASLO determines an exception is compelled by relationship, age, sex, health or disability, or other individual circumstances. This individualized exception payment standard system does not work to bring more apartments within reach of Section 8 holders when it comes to price. The payment standard for a one-bedroom unit is \$1,196. A Zillow search conducted during this Analysis of Impediments process revealed just eight advertised units within that price range. The payment standard for a two-bedroom unit is \$1,542. A Zillow search revealed only twelve available units under that price. Additionally, there is no source of income discrimination protection, meaning that these units would not be required to accept tenants with vouchers. This Analysis did not reveal barriers within the portability process to voucher holders exercising their rights.

13. Inaccessible public or private infrastructure

Inaccessible public or private infrastructure is a moderate priority contributing factor for Disparities in Access to Opportunity. The County of San Luis Obispo and the broader Region are making a concentrated effort to promote accessibility in their public infrastructure. The County has an ADA Transition Plan for Public Right of Way, which documents the locations of curb ramps in the Region and assesses their accessibility. Out of 1,030 curb ramps, there

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are 617 currently accessible, and it is a priority for the County to replace all curb ramps on public buildings and increase accessible parking.⁷⁶

14. Inaccessible government facilities or services

Inaccessible government facilities or services is not a significant contributing factor to Disability and Access in the County of San Luis Obispo. In recent years, the City of San Luis Obispo has undergone ADA Title II compliance efforts through U.S. Department of Justice reviews.⁷⁷ In 2005, the U.S. Department of Justice found a number of services and facilities that needed to be updated to meet ADA compliance standards,⁷⁸ but since that time, the City and broader Region have enacted ADA Action Plans that address accessibility needs for persons with disabilities in their communities. For example, the County details reporting procedures for ADA violations,⁷⁹ information on contacting the County's ADA officers,⁸⁰ opportunities to provide feedback on the Planning Commission's work on behalf of persons with disabilities,⁸¹ and provides reasonable modifications for all its programs and services in compliance with the ADA.⁸² In 2017 the County adopted an ADA/Section 504 Self-Evaluation and Transition Plan, which provides a 20-year schedule for ADA improvements to all of the County's facilities and parks.

15. Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is a highly significant contributing factor to Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing, and Disability and Access. The average cost of a home is \$734,800 within the county, according to Zillow. Costs went up 4.8% in the last year and are projected to go up 1.3% in the next year.⁸³ Less than 25% of residents can afford to buy a house in the county.⁸⁴ The cost to rent a two-bedroom apartment in the county is \$2,200 per month, a

⁷⁶ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-County-Buildings-and-Facil.aspx>

⁷⁷ <https://www.ada.gov/sanluis.htm>

⁷⁸ <https://www.ada.gov/sanluis.htm>

⁷⁹ [https://www.slocounty.ca.gov/Departments/Human-Resources/Forms-Documents/Safety-and-Risk-Management/Americans-with-Disability-Act-\(ADA\)-Grievance-Poli.aspx](https://www.slocounty.ca.gov/Departments/Human-Resources/Forms-Documents/Safety-and-Risk-Management/Americans-with-Disability-Act-(ADA)-Grievance-Poli.aspx)

⁸⁰ <https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Transportation/ADA-Transition-Plan-for-County-Buildings-and-Facil.aspx>

⁸¹ <https://www.slocounty.ca.gov/Home/Disability-Access-Request-for-Public-Input.aspx>

⁸² <https://www.slocounty.ca.gov/Home/Disability-Access-Request-for-Public-Input.aspx>

⁸³ <https://www.zillow.com/san-luis-obispo-ca/home-values/>

⁸⁴ <https://ksby.com/news/local-news/2019/03/22/summit-addresses-widening-gap-between-slo-county-home-costs-and-wages>

number which is also rising quickly.⁸⁵ Housing costs are severely burdensome across the state of California, but costs are rising most quickly in the County of San Luis Obispo. In order to afford housing, workers must buy homes that are far away from their workplaces, impacting access to both employment and transportation. Median housing costs in the county are consistent with those in the rest of the state, but the median household income is \$20,000 less than the average for California, creating a major affordability gap.⁸⁶ This gap impacts the ability of residents to afford housing that meets their needs, makes overcrowding more likely, and adds additional burdens to the county's transportation system.

One potential solution to address high housing costs is developing more housing to address the statewide housing shortage. However, this measure is not enough to address the specific need for affordable housing. Other proposed solutions include creating deed-restricted housing and fully implementing the county's inclusionary housing ordinance,⁸⁷ which has met some community opposition.

16. Lack of affordable, accessible housing in a range of unit sizes

Lack of affordable, accessible housing in a range of unit sizes is a high priority contributing factor to Segregation and Disproportionate Housing Needs for persons with disabilities in the County of San Luis Obispo. Publicly supported housing, which is more likely to be accessible than unsubsidized units, is highly skewed toward studio and one-bedroom units in the county. All units of the Project-Based Section 8 (289 units) and Other Multifamily (59 units) housing programs in the county are either a studio or a one-bedroom unit. Although this distribution of units is likely based on the presumption that elderly households are less likely to have children present and thus need additional bedrooms, it does not account for the additional bedroom needs of elderly persons with disabilities who would benefit from the services of live-in aides. The housing stock which HUD data describes as Public Housing but which has recently been converted under the Rental Assistance Demonstration program has more units with a large number of bedrooms. Thus, that housing more effectively serves families with children that include persons with disabilities with accessibility needs. At the same time, however, the proportion of people residing in recently converted public housing who have disabilities is significantly lower than in Project-Based Section 8 and the Housing Choice Voucher Program. The housing that has the greatest potential to meet the needs of

⁸⁵ <https://www.sanluisobispo.com/news/local/article202776724.html>

⁸⁶ <https://www.newtimeslo.com/sanluisobispo/affordability-gap-slo-county-battles-an-expensive-housing-market-as-it-searches-for-ways-to-build-cheaper-homes/Content?oid=3775806>

⁸⁷ <https://www.newtimeslo.com/sanluisobispo/affordability-gap-slo-county-battles-an-expensive-housing-market-as-it-searches-for-ways-to-build-cheaper-homes/Content?oid=3775806>

families with children that also have persons with disabilities could be more effectively targeted toward those families.

Low Income Housing Tax Credit (LIHTC) properties may not be as accessible as other publicly supported housing developments because it has historically been the view of most LIHTC administering agencies that the enhanced accessibility requirements of Section 504 of the Rehabilitation Act do not apply to the program. In recent years, the California Tax Credit Allocation Committee (CTCAC) has elected to impose more rigorous accessibility requirements than even those under Section 504, but many older LIHTC developments came online before CTCAC made that important policy change. In the County of San Luis Obispo, there are 32 developments that have been placed in service using assistance from CTCAC, primarily federal LIHTC assistance. Combined, these developments include 417 units of three-bedrooms or more out of a total of 1,383 units. This is a more substantial source of supply of housing that may include larger units that are affordable and accessible, but the stock is still skewed toward smaller units.

17. Lack of affordable in-home or community-based supportive services

California offers several home and community-based services through Medi-Cal (California's Medicaid program) waivers.⁸⁸ Often, these services are provided to patients who would otherwise have to live in an institution but who are able to remain in the community and maintain networks of support through these programs. Services include case management, skilled nursing, attendant care, psychotherapy, home-delivered meals, nutritional counseling, nutritional supplements, medical equipment and supplies, minor physical adaptations to the home, non-emergency medical transportation, financial supplements for foster care, and others. Although California does not provide Medi-Cal to undocumented immigrants, it does carve out exceptions for some low-income undocumented immigrants.⁸⁹ Under SB 75, to be implemented no sooner than May 1, 2016, all children under age 19 are eligible for Medi-Cal, regardless of immigration status.⁹⁰

Seniors and people with disabilities who wish to live at home can also qualify for In-Home Supportive Services (IHSS) through Medi-Cal. IHSS is the nation's largest publicly-funded home care program, open to documented California residents who don't live in an institution

⁸⁸ Including the AIDS Medi-Cal Waiver program, Specialty Mental Health Services Waiver, Section 1115 Medicaid Waiver, Assisted Living Waiver, Home and Community-Based Services Waiver for the Developmentally Disabled, In-Home Operations, Multipurpose Senior Services Program, and Pediatric Palliative Care.

⁸⁹ <http://www.ppic.org/publication/health-coverage-and-care-for-undocumented-immigrants/>.

⁹⁰ <http://www.dhcs.ca.gov/services/medi-cal/eligibility/Pages/sb-75.aspx>.

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and are 65 or older, blind, or long-term disabled.⁹¹ IHSS pays a caregiver (which can be a friend or relative) to perform necessary daily living activities depending on the person's needs (including housekeeping, spoon feeding, bathing, grocery shopping, etc.). A yearly visit by a social worker is required, and an additional visit by a social worker is required if there are to be any changes to the scope of IHSS. IHSS is administered by the County of San Luis Obispo Department of Social Services.

Dental care is also available to elderly and disabled patients through Denti-Cal. However, recent changes to the budget and authorization procedures have created large gaps in service to needy individuals.⁹² Dental hygienists perform in-home visits to vulnerable patients who often have major dental problems and gum disease due to various factors stemming from disability and in-home care. Hygienists often need to visit every three months for preventative care and in order to treat gum disease. The reimbursement rate for these services was recently cut from \$130 to \$55 in a bid to "reduce unnecessary dental treatment."⁹³ This drastic cut has forced some hygienists out of the market, and prompted a lawsuit arguing that the reimbursement rate was cut without the requisite prior federal approval.

18. Lack of affordable, integrated housing for individuals who need supportive services

Lack of affordable, integrated housing for individuals who need supportive services is a high priority contributing factor to Segregation and Disproportionate Housing Needs for persons with disabilities in the County of San Luis Obispo. There are programs in place to connect persons with disabilities and, in particular, persons with psychiatric disabilities, to permanent supportive housing in the county. However, these programs do not operate at the scale necessary to adequately meet the need. As a result, persons with disabilities are exposed to segregation in congregated settings and, at times, the worst-case scenarios of homelessness and incarceration. Existing interventions include People's Self-Help Housing, which sets aside 10% of units in each of its developments for formerly homeless households with supportive needs, a population that disproportionately consists of persons with disabilities. Transitions-Mental Health Association is collaborating with the Housing Authority of San Luis Obispo on

⁹¹ They must also meet one of the following criteria: currently receiving SSI/SSP, meeting all SSI/SSP standards except for income, meeting all SSI/SSP standards except for being a non-citizen, was once eligible for SSI/SSP but became ineligible because of substantial gainful work and meeting BUT meeting all other SSI/SSP standards.

⁹² <https://khn.org/news/frail-patients-losing-access-to-dental-house-calls/>

⁹³ The California state health department found it "unusual" that nearly 88% of Denti-Cal patients in nursing homes received deep cleanings in 2013-2014. This statistic raised questions of their necessity. Now, patients that live in special care facilities must get prior authorization (via x-rays) to treat gum disease.

the development of permanent supportive housing. At the same time, in 2017-2018 Fiscal Year, the County of San Luis Obispo Behavioral Health Department served 142 adults with psychiatric disabilities through its robust Full Service Partnership, and the Tri-Counties Regional Center, which is not limited to the County of San Luis Obispo, served approximately 14,800 individuals with developmental disabilities. Despite these efforts, the level of need for affordable integrated, supportive housing far outpaces supply.

19. Lack of assistance for housing accessibility modifications

Lack of assistance for housing accessibility modifications is a medium priority contributing to Segregation and Disproportionate Housing Needs for persons with disabilities. The County of San Luis Obispo has allocated CDBG funding for CAPSLO's Minor Home Repair Program. This funding, \$29,598 in Fiscal Year 2017, can be used for housing accessibility modifications but is not limited to addressing accessibility needs. Additionally, the City of Pismo Beach utilizes a portion of its CDBG funds for minor home repairs that include accessibility modifications. Outside of Pismo Beach and the unincorporated areas primarily served by CAPSLO's program, there is a significant unmet need for accessibility modifications which can be the difference between a person with a disability maintaining stable residence in the community or having to live in a nursing home. Using CDBG funds for this purpose is easier to manage and can be more predictably executed than using CDBG funds for pre-development costs in new affordable housing developments and may be an effective means for furthering the transition of the County of San Luis Obispo's cities to prioritizing housing needs with their funds. Habitat for Humanity of San Luis Obispo County recently established a Neighborhood Revitalization Program, which will focus on home repairs for low-income homeowners. The program's goal is to improve lower income communities and also help low-income senior citizens to age in place in their homes.

20. Lack of assistance for transitioning from institutional settings to integrated housing

Lack of assistance for transitioning from institutional settings to integrated settings is a contributing factor to the segregation of people with disabilities. Since 2007, the California Department of Health Care Services has operated its California Community Transitions project, which is designed to assist Medi-Cal beneficiaries who are long-term residents of state-licensed health care facilities to home and community-based settings. The program is a Medicaid demonstration program and is approved through 2020. The program funds costs like household set-up costs, home modifications, vehicle adaptations, and assistive devices that may not be covered by housing subsidies or other Medicaid funding streams. Non-profit organizations including the Independent Living Resource Center, Inc. (ILRC-SB) provide services to individuals who are transitioning to home and community-based settings in the County. Additionally, the Tri-Counties Regional Center serves San Luis Obispo and provides services that aid people with developmental disabilities in transitioning from institutional settings. At this juncture, robust data on the adequacy of existing efforts to provide assistance for transitioning from institutional settings to integrated housing is not available. Preliminarily, it appears likely that the correct pieces are in place to facilitate transitions, but the scale of those efforts may need expanding to fully meet the need.

21. Lack of community revitalization strategies

Lack of community revitalization strategies is not a contributing factor to Segregation or R/ECAPs. Numerous community revitalization projects are underway across the county. Habitat for Humanity takes part in several efforts to make minor improvements in communities across the county, including in Paso Robles.⁹⁴ Strong community engagement across the county contributes to a number of similar small improvement projects.⁹⁵ The City of San Luis Obispo also has plans to improve Railroad Street in order to increase foot traffic.

Atascadero had plans for downtown revitalization dating back to 2000. The city has added pedestrian friendly improvements around its refurbished central park and central business district, and intends to build mixed-use multi-story buildings that can serve both commercial and residential purposes.⁹⁶

The City of San Luis Obispo has several plans for its different neighborhoods, including plans to build residential developments and mixed-use developments. Pismo Beach currently has

⁹⁴ <https://www.hfhsloco.org/2018/08/08/neighborhood-revitalization-work-paso-robles/>

⁹⁵ <https://www.slocity.org/government/departments-directory/community-development/planning-zoning/specific-area-plans>

⁹⁶ <https://atowndailynews.com/city-manager-discusses-downtown-revitalization/48910/>

plans to improve the Five-Cities wastewater system in order to conserve water more carefully.⁹⁷

Most of the cities in the county, including Grover Beach, Morro Bay, Nipomo, and Arroyo Grande, have plans for revitalization as well. It appears that those areas in significant need of revitalization have revitalization plans to do so.

22. Lack of local private fair housing outreach and enforcement

Lack of local private fair housing outreach and enforcement is a significant contributing factor to Fair Housing Enforcement, Outreach Capacity, and Resources. The two nonprofit fair housing organizations that serve the County of San Luis Obispo are both significantly understaffed. The Fair Housing Council of Central California (FHCCC) has just five staff to conduct investigations and testing across over 30 counties. California Rural Legal Assistance (CRLA) has just four staff members in the office that serves the County. FHCCC has handled just a few cases in the County of San Luis Obispo in recent years. CRLA had 40 cases in the last year, the minimum number of cases required by their grant from the County. The office does, however, conduct an annual fair housing workshop in conjunction with the County and the California Department of Fair Employment and Housing and also provides on-request training seminars to public service agencies. FHCCC and CRLA do not have sufficient capacity to conduct the amount of investigation, testing, and enforcement required to meet the needs of residents in the County facing housing discrimination. In addition, there is a lack of resources provided by organizations that are able to provide services to undocumented residents in the County.

23. Lack of local public fair housing enforcement

Lack of local public fair housing outreach and enforcement is a significant contributing factor Fair Housing Enforcement, Outreach Capacity, and Resources. Neither the County, nor any of the major cities within the County, have offices or staff dedicated to enforcement of fair housing laws. While covered by state protections, the nearest offices of the California Department of Fair Employment and Housing are in Bakersfield or Los Angeles. Enforcement then falls mainly to California Rural Legal Assistance, which, as discussed above, is not staffed or funded adequately to address all the fair housing issues across the County.

24. Lack of local or regional cooperation

⁹⁷ <https://www.newtimeslo.com/sanluisobispo/inside-pismo-beachs-plan-to-revitalize-the-santa-maria-groundwater-basin/Content?oid=7687439>

Lack of local or regional cooperation is a low priority contributing factor to Segregation and Disability and Access in the County of San Luis Obispo. The County serves as a hub for facilitating coordination around fair housing issues and housing and community development issues among its cities. Additionally, the San Luis Obispo Regional Transit Authority (RTA) provides service countywide and across the county border to Santa Maria. Although Santa Maria technically is not within the Region, its connectivity to the County is extremely important for efforts to promote residential racial integration and access to housing near job centers. The volume of service provided by RTA is not sufficient to ensure a truly robust public transit system connecting Santa Maria to communities in the County, but that is an outcome of insufficient resources, rather than lack of coordination. The one area where lack of local or regional cooperation plays a more pronounced role is with respect to access to proficient schools. There are several school districts within the County of San Luis Obispo, and the consolidation of those districts would make it easier for students living in areas with lower performing schools, disproportionately Hispanic areas in particular, to attend higher performing schools.

25. Lack of meaningful language access for individuals with Limited English proficiency

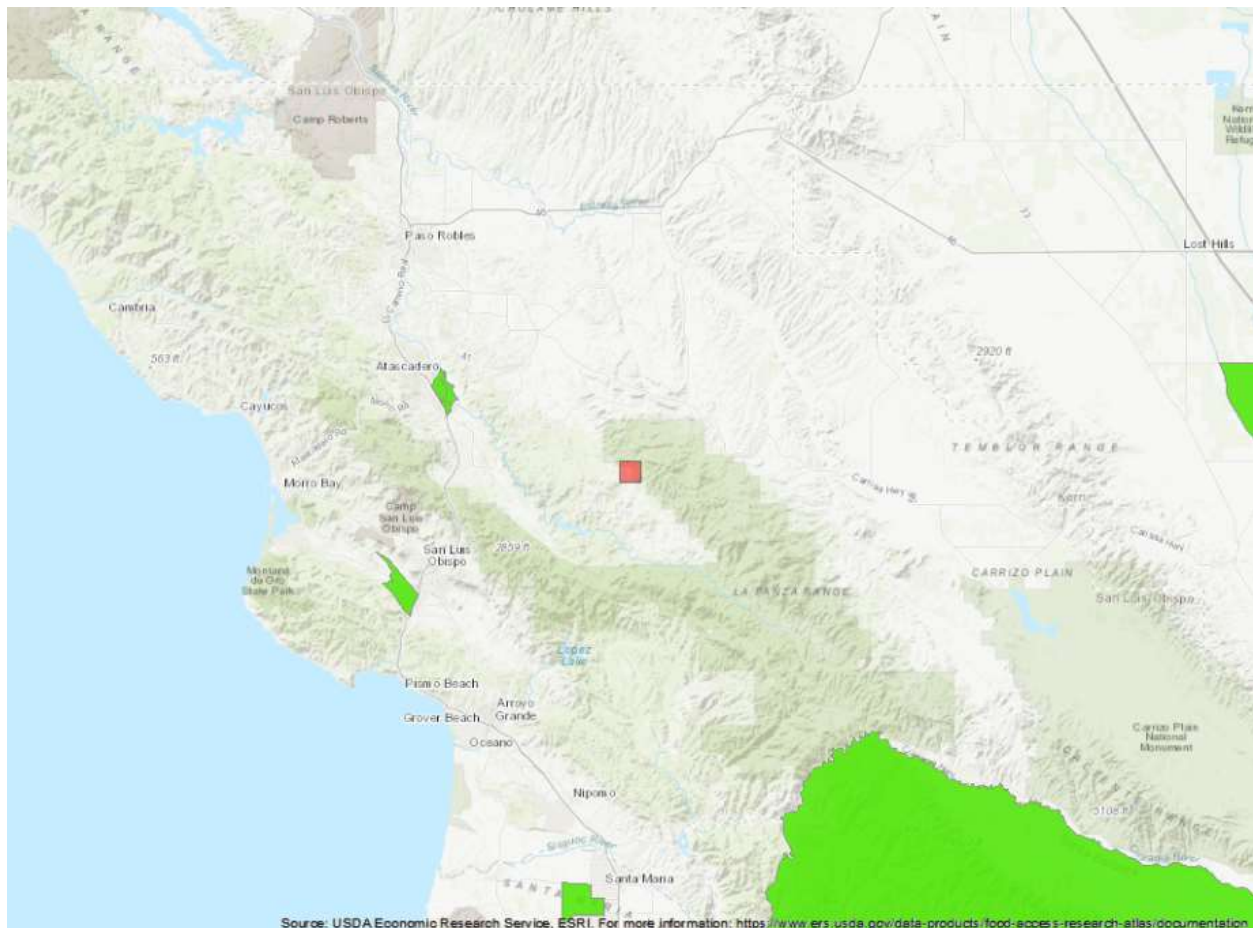
Lack of meaningful language access for individuals with limited English proficiency is a low priority contributing factor to Publicly Supported Housing. Federal guidance stipulates that providers of federal publicly supported housing are required to assess the need for language services in their community and provide those services in accordance with that assessment. In 2014, the County of San Luis Obispo entered into a voluntary compliance agreement (VCA) with HUD as a result of a compliance review that found possible violations of LEP requirements. The County worked successfully to fulfill the terms of the VCA. The Housing Authority of San Luis Obispo (HASLO) website is entirely in English. Though it has an option to translate the page using Google Translate, automatic translation services such as Google are not always able to translate industry-specific or nuanced terms to provide a contextually accurate translation. The Paso Robles Housing Authority website is also entirely in English and does not provide a translation option, though the phone system does provide an option to continue in Spanish. Both these housing authorities have bi-lingual staff persons and are able to translate their written material into Spanish. With the exception of Spanish, all other LEP languages represented in the County make up less than half of one percent of the population individually. Given these small populations, the lack of extensive translation materials by the housing authorities within the County does not appear to significantly impair access to services for those with limited English proficiency.

26. Lack of private investment in specific neighborhoods

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Lack of private investment in specific neighborhoods is not a significant contributing factor to Segregation, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs, and Publicly Supported Housing. One common measure of private investment is the presence of food deserts, or areas in which residents must travel over a mile in urban areas or over 10 miles in rural areas in order to access a grocery store. There are two food deserts located in the County of San Luis Obispo.

Map 6-1:



One food desert is located in Atascadero, in the area surrounding Atascadero State Hospital. The distance is 2.2 miles between the Hospital and Food For Less, which is the nearest full-sized grocery store. This food desert also overlaps with the single R/ECAP located in the County of San Luis Obispo. That this area is also the only R/ECAP in the county is significant and indicates some correlation between segregation and a lack of private investment.

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The second food desert is located within San Luis Obispo City, along Los Osos Valley Road. There are no patterns of segregation immediately evident in this neighborhood. The distance is 1.0 miles between the westerly city limit and Discount Grocery, which is the nearest full-sized grocery store.

Other indicators of a lack of private investment include a lack of pharmacies or banks. The R/ECAP in Atascadero contains both pharmacies and banks within its borders, as does the neighborhood described in Atascadero, indicating that private investment in these areas is not extremely low. Additionally, local governments can track patterns of private investment by comparing the number of building permits issued to different neighborhoods.

27. Lack of public investment in specific neighborhoods, including services or amenities

Lack of public investment in specific neighborhoods is not a contributing factor to Segregation, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs, and Publicly Supported Housing in the County of San Luis Obispo. A common indicator of public investment is the state of public infrastructure, such as roads and sidewalks in areas with heavy traffic. Potholes are a significant cause for concern in the county. Atascadero in particular faces improperly maintained roads due to a lack of funding for repairs. Although road conditions are poor throughout the county, road conditions are especially poor in Atascadero, Paso Robles, and Grover Beach.⁹⁸ The County of San Luis Obispo government has an online form which residents can use to report road conditions, and many local governments have similar systems.⁹⁹ County government is also involved in numerous projects across the county aimed at improving local infrastructure, including bridge improvements and roofing projects.¹⁰⁰

28. Lack of resources for fair housing agencies and organizations

Lack of resources for fair housing agencies and organizations is a significant contributing factor to Fair Housing Enforcement, Outreach Capacity, and Resources. Only the County provides funding or allocates resources to investigation of discrimination complaints or other fair housing enforcement activities. The nonprofit organizations that pick up the enforcement responsibilities are understaffed. With only five staff members, the FHCCC's ability to investigate and enforce in a meaningful way is limited. California Rural Legal Assistance (CRLA) has a local office with four staff members. But CRLA is limited in both who they are able to serve (only low-income clients, no undocumented clients), as well as how many people they can handle at a time due to staffing capacity. The office also has a difficult

⁹⁸ <https://www.sanluisobispo.com/news/local/article181184281.html>

⁹⁹ <https://www.slocity.org/government/department-directory/public-works/report-an-issue>

¹⁰⁰ <https://www.slocounty.ca.gov/Departments/Public-Works/Department-News.aspx>

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time attracting and retaining legal talent given the high cost of living in the area and the salaries the organization is able to pay. Additional funding and resources for CRLA would allow them to provide more outreach, training, and testing throughout the County, as well as provide a living wage to attract more legal staff to expand the case load the office is able to cover.

29. Lack of state or local fair housing laws

Lack of state and local Fair Housing Laws is a contributing factor to Fair Housing Enforcement, Outreach Capacity, and Resources. Although the California Fair Employment and Housing Act (FEHA) prohibits discrimination on the basis of source of income, its definition of “source of income” does not include Section 8 Housing Choice Vouchers (Section 8 HCVs), provided by Public Housing Agencies. Landlords are thus able to refuse to accept Section 8 HCVs on that basis alone. This fact, combined with conditions in the current housing market - rents higher than the Fair Market Rent paid by Section 8 HCVs, and low vacancy rates - make it exceedingly difficult for Section 8 HCV holders to find housing. This is a significant problem in the County of San Luis Obispo, as many service providers report that many landlords refuse to accept vouchers, and often deliberately price rents outside of what a voucher holder would be able to afford. The County of San Luis Obispo itself does not have any fair housing laws on the books. However, given the robust protections provided at the state level, the issue is not so much a lack of laws, but rather a lack of capacity to enforce.

30. Land use and zoning laws

Land use and zoning laws are a high priority contributing factor to Segregation, Disparities in Access to Opportunity, and Disproportionate Housing Needs in the County of San Luis Obispo. A variety of different city and county policies render it difficult to produce housing that would be more affordable to low-income households that are disproportionately comprised of racial and ethnic minorities and persons with disabilities. It is difficult to produce both publicly supported housing (which is often only viable where multi-family housing is permitted) and market-affordable housing (such as manufactured home parks).

The types of zoning and land use laws that exacerbate the lack of housing affordability include limited land zoned for multi-family housing, large minimum lot sizes for single-family structures, tight density restrictions on multi-family housing even where it is permitted, substantial parking requirements, and approval processes that lack clear, enforceable timelines. These issues are cross-cutting in both the unincorporated areas of the County of San Luis Obispo and its cities, though they are more pressing in the cities and in larger unincorporated census-designated places than they are in truly rural areas.

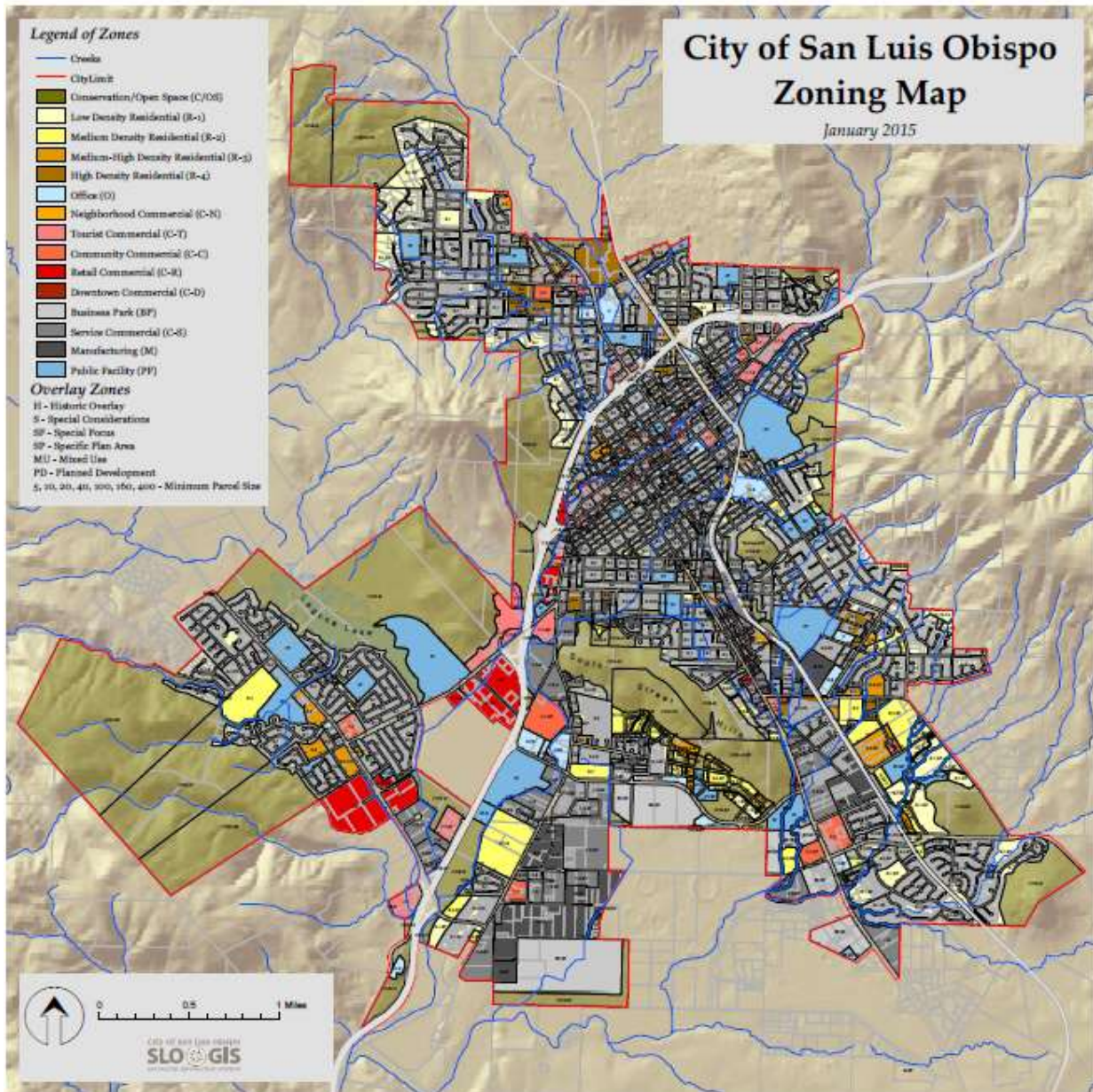
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Disproportionate cost burden and segregation result. Low-income Hispanic households have relatively few living options outside of the northern edge of the County (the northwest portion of Paso Robles and San Miguel) and the southern edge of the County (Oceano and Nipomo). Many individuals who work in the County of San Luis Obispo, including many Hispanic individuals, reside in heavily Hispanic Santa Maria in neighboring Santa Barbara County because of a lack of housing options in the County of San Luis Obispo.

City of San Luis Obispo

The zoning map of the City of San Luis Obispo is depicted below. The City of San Luis Obispo has relatively more permissive zoning and land use controls than are in place in much of the rest of the county. Areas with R-3 and R-4 zoning are relatively numerous and are scattered throughout the city rather than being concentrated in particular neighborhoods. R-1 zoning for single-family homes does not require large lots, allowing development on lots of just 6,000 square feet, with up to seven units per acre. R-2 zoning allows for duplexes and a slightly higher level of density of up to 12 units per acre. At the same time, it is still the case that R-1 zoning covers more land area within the city than do other more dense zoning classifications. Additionally, the maximum density of 24 units per acre in the R-4 multi-family district is quite low, particularly in the context of downtown locations that are closer to bus service. Height limitations in those areas of 35 feet may also stymie beneficial development. Infill lots may necessitate higher density for it to be practical to produce affordable housing, in particular. It may also be difficult to develop manufactured home parks, even though they are a permitted use in districts R-1 through R-4, because they are subject to generally applicable density restrictions. In the R-1 district, allowing only seven manufactured homes per acre in the context of a manufactured home park is likely to be prohibitive.

Map 6-2: City of San Luis Obispo Zoning Map

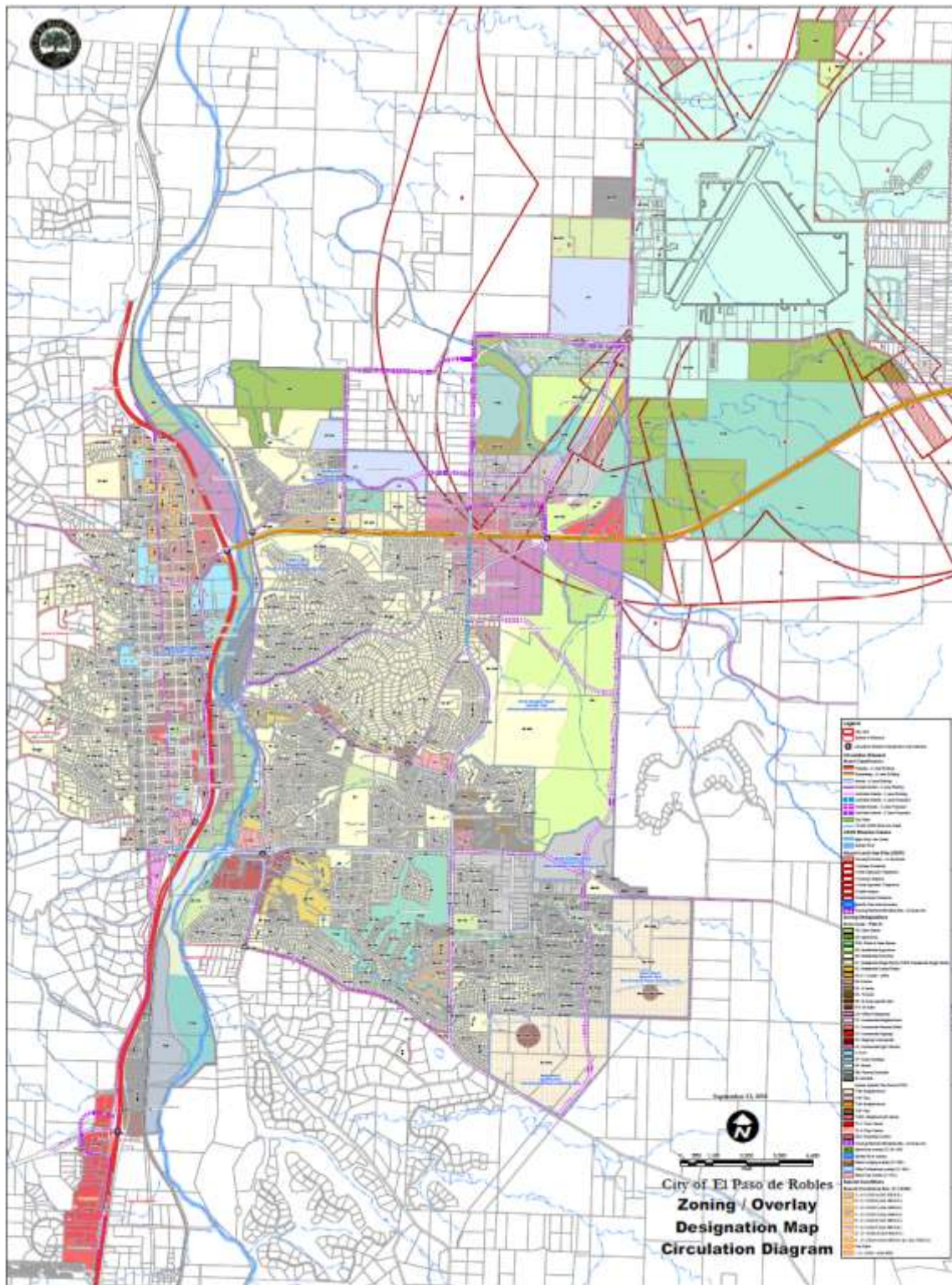


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Paso Robles

The zoning map for the City of Paso Robles is depicted below. Much less of the land in Paso Robles is zoned to allow multi-family housing than in San Luis Obispo, and much of the newly zoned resident multi-family zoned land is located in specific area plans that involve discretionary processes. Land zoned for multi-family housing is also more concentrated on the west side of the city rather than being distributed evenly throughout the city. Multi-family zoning districts are also subject to stringent density limitations, with only 20 units per acre allowed in the most intensive R-5 classification. Some single-family zoning districts are also less conducive to modestly priced homes with requirements such as the one-acre minimum lot size in the R-1, B-4 district. Mobile home parks are not as broadly permitted.

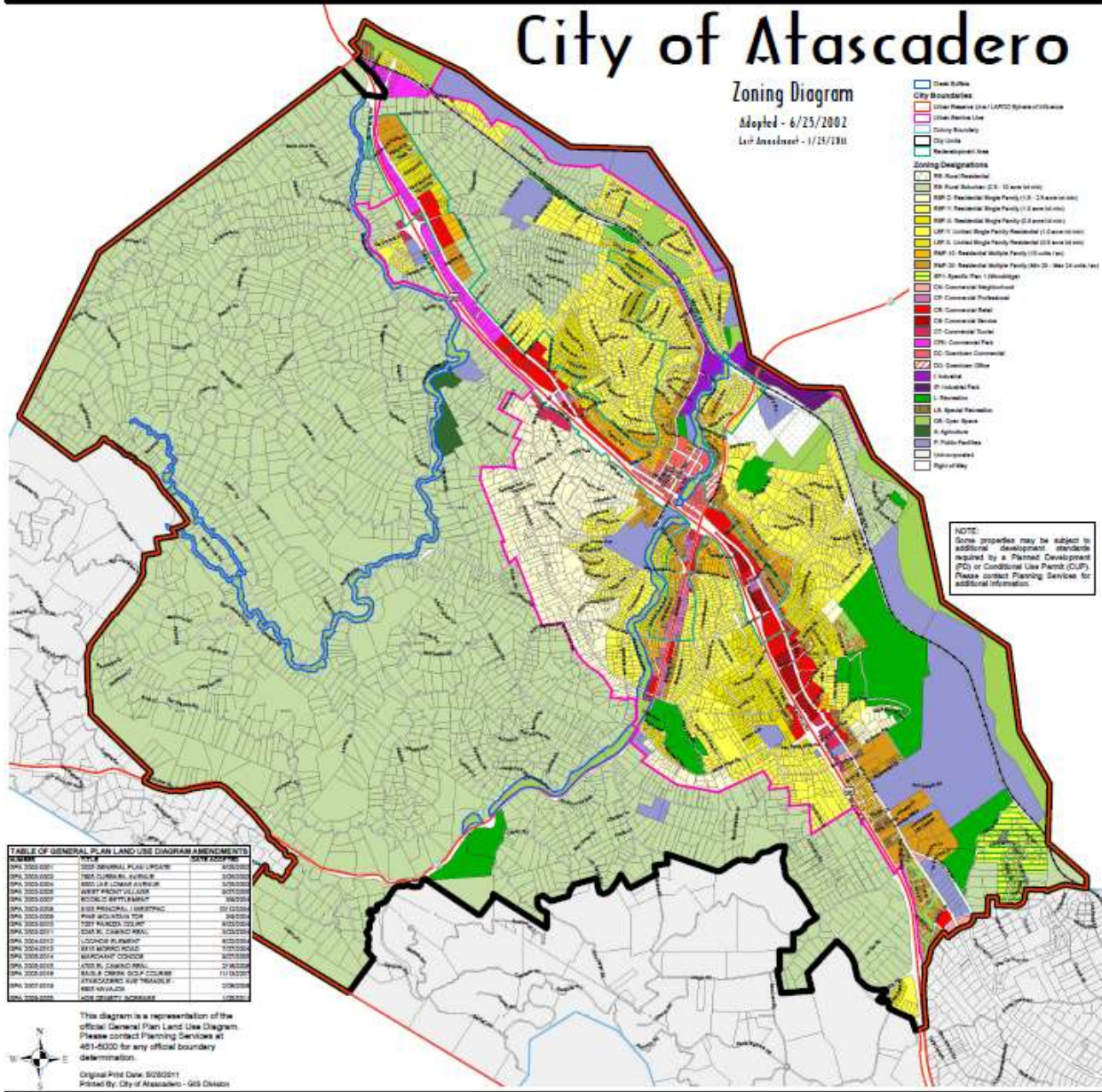
Map 6-3: City of Paso Robles Zoning Map



Atascadero

The zoning map for the City of Atascadero is depicted below. In Atascadero, relatively little land is zoned to allow multi-family housing and that land is concentrated near major roads. Large swaths of the city are zoned RS with a range of extremely restrictive minimum lot sizes from 2.5 to 10-acre minimums. As in the City of San Luis Obispo, the maximum density in the most intensive multi-family zoning district is just 24 units per acre. On infill lots near the historic core of Atascadero, higher density developments could clearly fit in with the existing fabric of the neighborhood. Manufactured homes can be placed on single-family lots if they meet certain requirements. Mobile home parks may be impractical to site because they are required to meet the underlying density restrictions of the residential districts in which they are located.

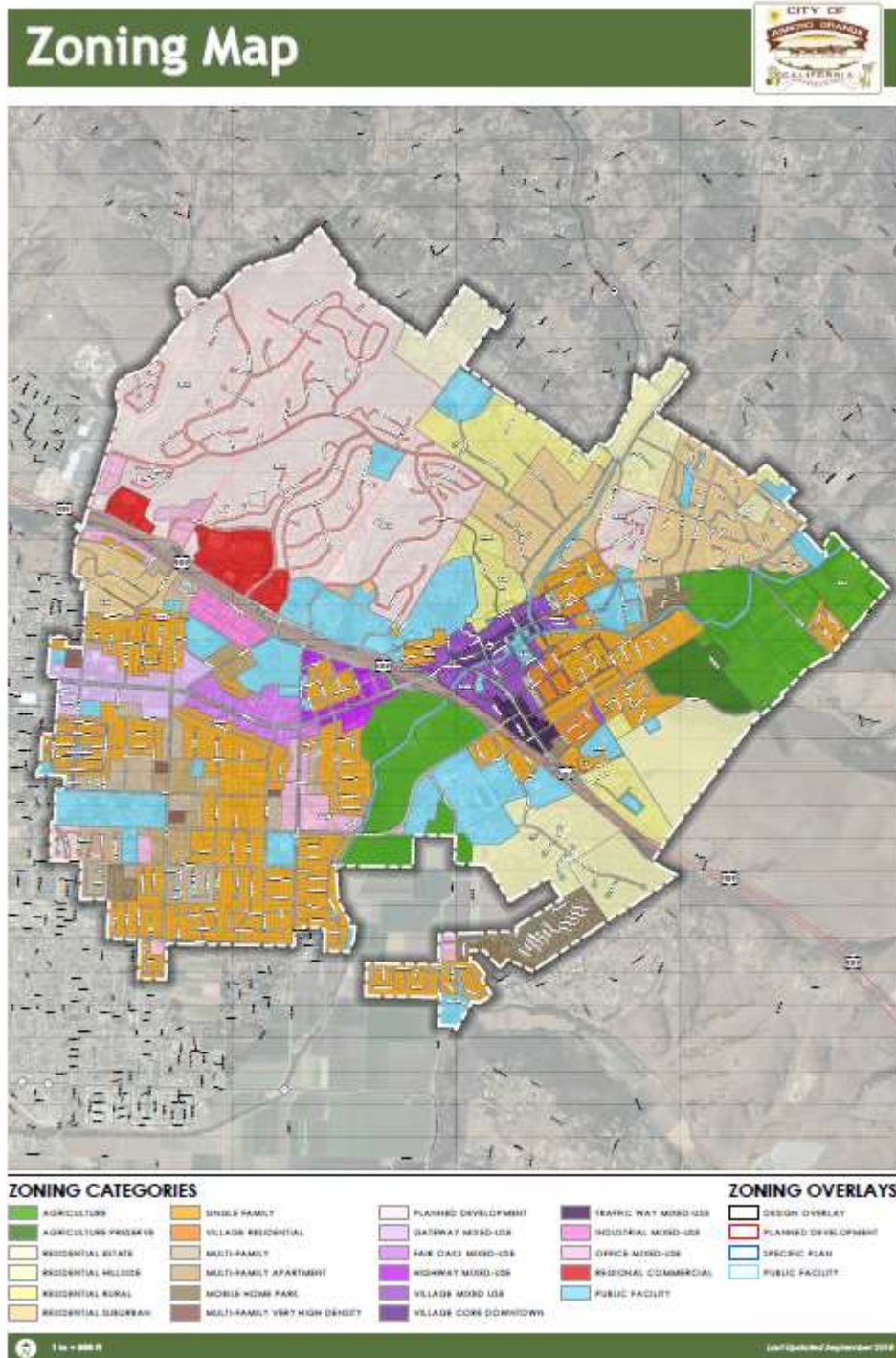
Map 6-4: City of Atascadero Zoning Map



Arroyo Grande

The zoning map for the City of Arroyo Grande is depicted below. The City has relatively little land zoned to allow multi-family housing as of right, although it has a substantial amount of land zoned for planned unit developments. These could, in theory, include multi-family housing but do not always in practice. Multi-family density restrictions are similar to those of other cities, with only 25 units per acre allowed in the densest district. There are multiple single-family zoning districts that have large minimum lot sizes of as much as 2.5 acres. Mobile home parks can theoretically be located across a range of residential districts, but typically require a conditional use permit. The City also has a designated zoning district for mobile home parks, with some sites zoned accordingly.

Map 6-5: City of Arroyo Grande Zoning Map

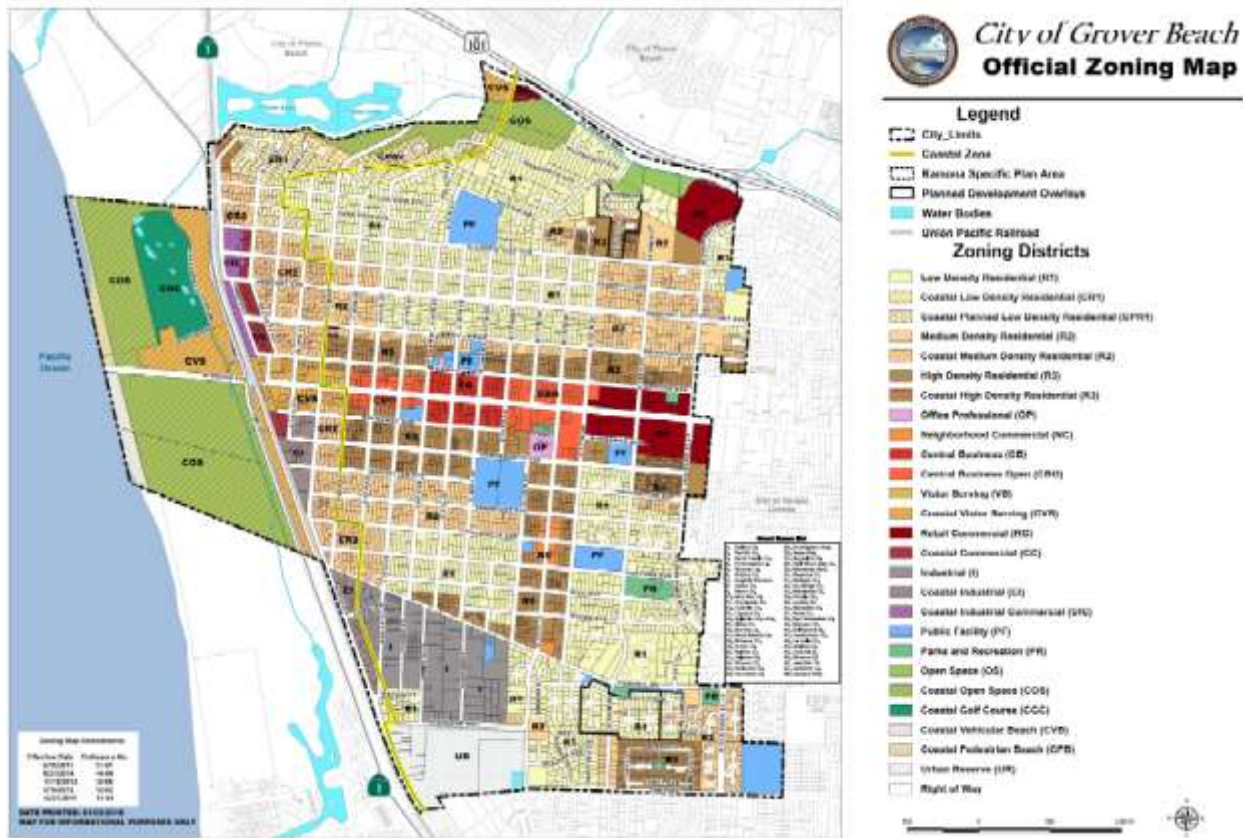


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Grover Beach

The zoning map for the City of Grover Beach is depicted below. A relatively higher proportion of the city is zoned to allow multi-family housing than is the case elsewhere in the County of San Luis Obispo. At the same time, the maximum density in the most intensive multi-family district is only 20 units per acre, which is lower than in most of the county's cities. Lot size requirements in single-family zoning districts are not onerous, with 6,000 square feet being the minimum lot size in the most restrictive district. There is no mobile home park district. Manufactured homes are allowed in single-family districts but must have a minimum size of 1,000 square feet, which limits the potential of manufactured homes to serve as a supply of affordable housing, particularly for small households.

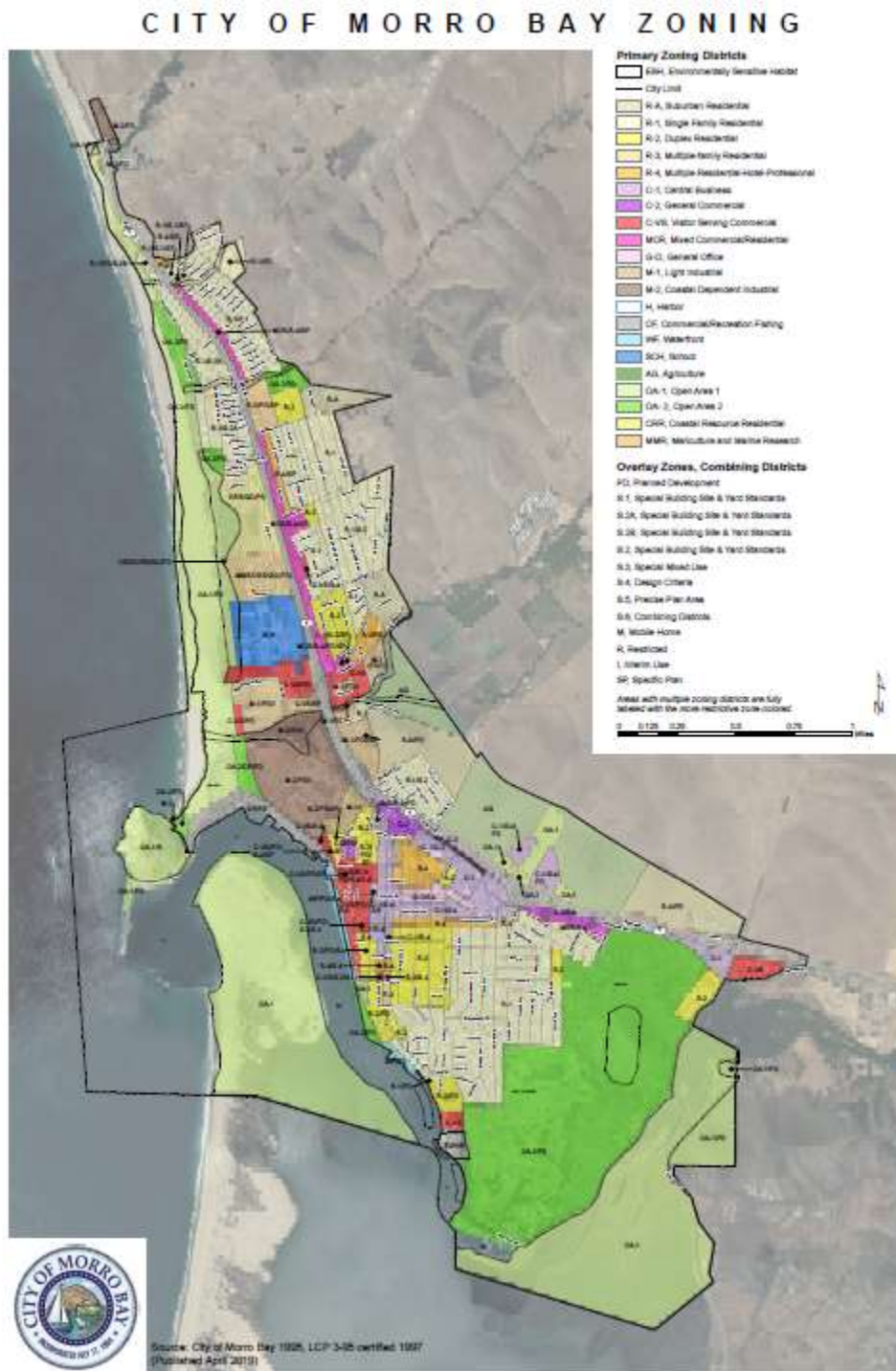
Map 6-6: City of Grover Beach Zoning Map



Morro Bay

The zoning map for the City of Morro Bay is depicted below. The amount of land zoned to allow multi-family housing is extremely limited in Morro Bay though it is not highly concentrated. Multi-family districts allow a range of 15-27 units per acre. Single-family minimum lot sizes are on neither extreme of those present in the county, with an effective minimum lot size of ½ acre in some locations. Manufactured homes are allowed on single-family lots if certain criteria are met. Mobile home parks can be located in residential districts other than R-1, the most restrictive single-family district.

Map 6-7: City of Morro Bay Zoning Map

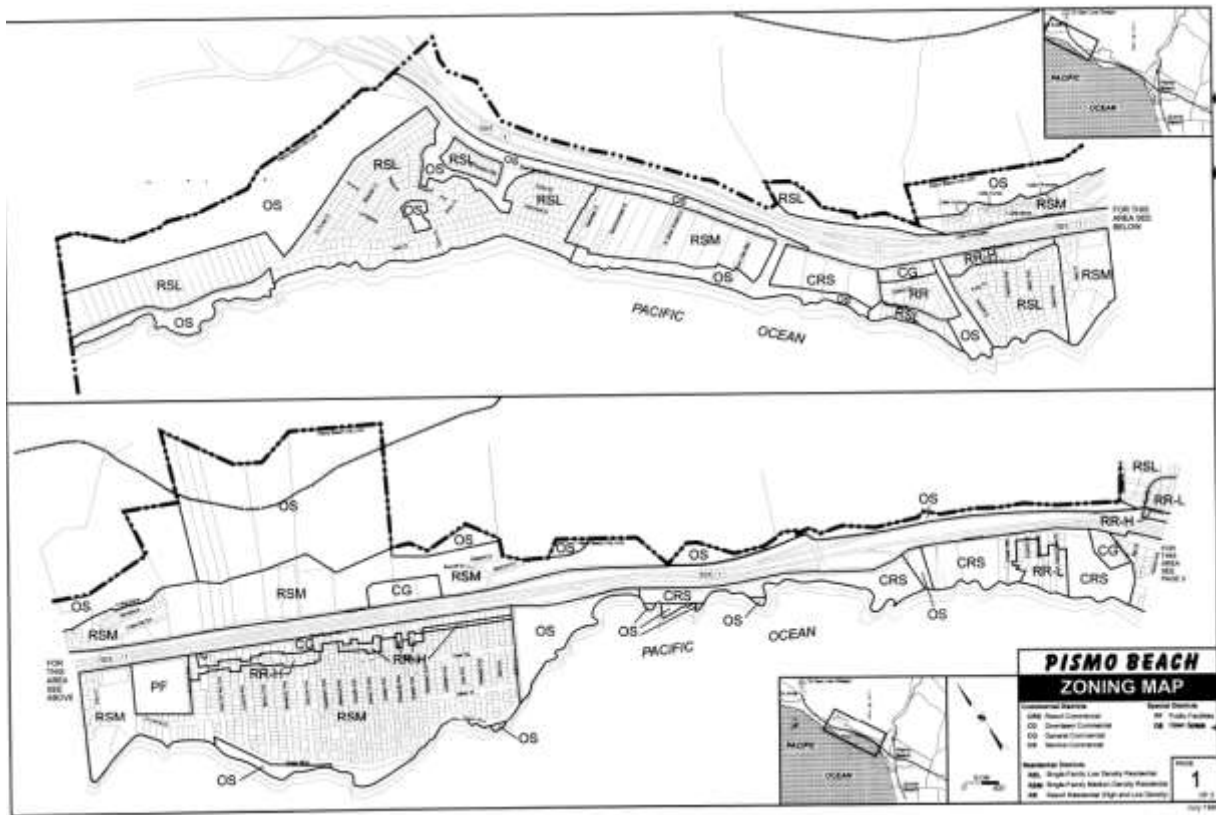


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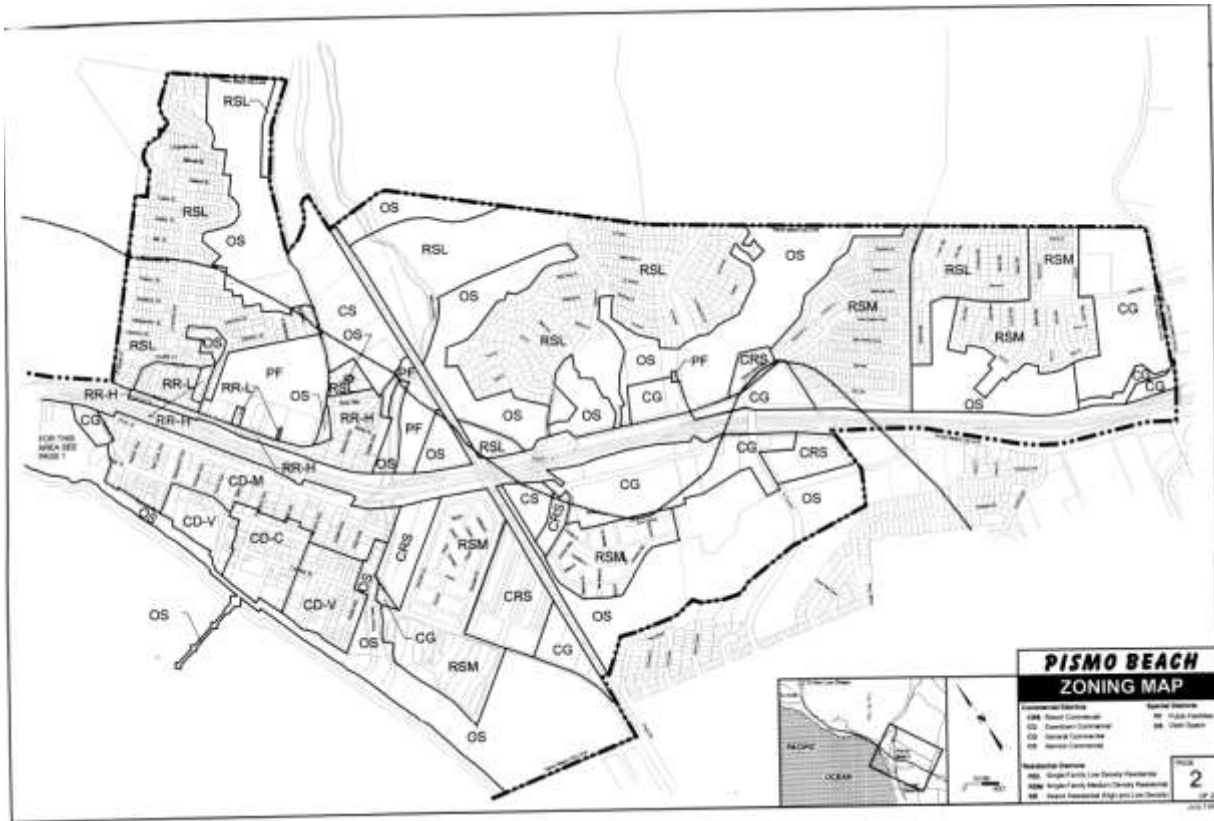
Pismo Beach

The zoning maps for the City of Pismo Beach are depicted below. Land zoned for multi-family housing through the RR classification is limited, but such land can reach a density of 30 units per acre, which is less restrictive than in other cities. Single-family zoning districts have modest lot size requirements of just 5,000 square feet. Manufactured homes can be sited in all residential zoning districts, while mobile home parks require a conditional use permit.

Map 6-8: City of Pismo Beach Zoning Map - 1



Map 6-9: City of Pismo Beach Zoning Map - 2



Unincorporated San Luis Obispo County

Because of the size of the County of San Luis Obispo and the number of its more highly populated unincorporated areas, it is not practical to include zoning maps of all such areas. In most such areas, there are some centrally located sites that are zoned to allow multi-family housing, but single-family zoning predominates. In the highest density residential zones, the County allows 24 units per acre. This is consistent with local cities but may be excessively restrictive in some areas. At the same time, because there is less infill potential in unincorporated areas than there is in cities, it is less likely that that maximum density impedes affordability in practice. With respect to single-family homes, minimum lot size requirements in low-density R-1 districts are reasonable at 6,000 square feet. Some single-family homes are restricted to much larger lots of five acres or more, but such a minimum lot size requirement may be well calibrated to avoid inducing luxury sprawl that excludes member of protected classes. Manufactured homes and mobile home parks are allowed in all residential zoning districts, although mobile home parks require a conditional use permit.

31. Lending discrimination

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Lending discrimination is a contributing factor to Segregation, R/ECAPs, and Disparities in Access to Opportunity throughout the County. Given the scarcity of affordable rental housing and the astronomical cost of living within the County of San Luis Obispo, loan opportunities for home improvement, purchase, and refinancing are important tools for moderate and low-income households. Using Home Mortgage Disclosure Act (HMDA) data, the tables below show the racial discrepancies in the likelihood that a person’s loan application, based on their race, will result in an originated loan or a denial.

San Luis Obispo County

Table 6-2: Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in San Luis Obispo County, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Purchase	Refinancing	Home Improvement
White, Not Hispanic	65.9%	57.4%	59.3%
Black, Not Hispanic	62.9%	53.6%	50%
Asian, Not Hispanic	64%	52.9%	52.6%
Hispanic/Latino	60.4%	49.5%	45.5%

Table 6-3: Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in San Luis Obispo County, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Purchase	Refinancing	Home Improvement
White, Not Hispanic	8.3%	15.9%	15.4%
Black, Not Hispanic	8.6%	23.7%	30%
Asian, Not Hispanic	10.1%	18.5%	36.8%
Hispanic/Latino	13.4%	23.5%	27.7%

Across all ethnic groups and loan types, White residents are the most likely to have their loan applications result in originated loans. For home purchase loans, the differences are minimal, however. Latinos are 5% less likely to have loans originate, but all racial groups fall between 60% and 65%. Similarly, the range across all ethnicities for denial of home purchase loan applications is only between 8.3% and 13.4%. In a county where 60% of housing units

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are owner occupied and the median price for a sold home is \$585,800,¹⁰¹ the lack of a significant disparity in loan origination for home purchase loans is promising.

More disparities emerge when looking at the other types of loans. Across refinancing and home improvement loan applications, Latinos are less likely to have a loan originate, and roughly 10% more likely to have a loan application denied. All ethnic groups are more likely than White residents to have their loan applications denied. Asian residents are 3% more likely to have a refinancing loan denied and both Black and Latino residents are roughly 8% more likely to have one denied. More drastic disparities appear for home improvement loans. Black residents are twice as likely to have a home improvement loan denied than White residents, Asian residents are 21% more likely, and Latino residents are 12% more likely.

In addition, the HMDA data indicates the rates at which certain races receive high-priced loans. In the County of San Luis Obispo, Asian borrowers are least likely to be given a high cost loan. White residents receive high cost loans just 2.7% of the time, yet Black and Latino borrowers are twice as likely to be given one at twice the rate (5.4% and 5.2%, respectively). Lack of access to loans, or loans that are not high-priced, for Black and Latino borrowers can often price these households out of owner-occupied single-family homes and increases the cost burden over time as rent continues to increase across the County.

Table 6-4: Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in San Luis Obispo County, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
White, Not Hispanic	19957	2.7%
Black, Not Hispanic	182	5.4%
Asian, Not Hispanic	504	1.7%
Hispanic/Latino	2009	5.2%

32. Location of accessible housing

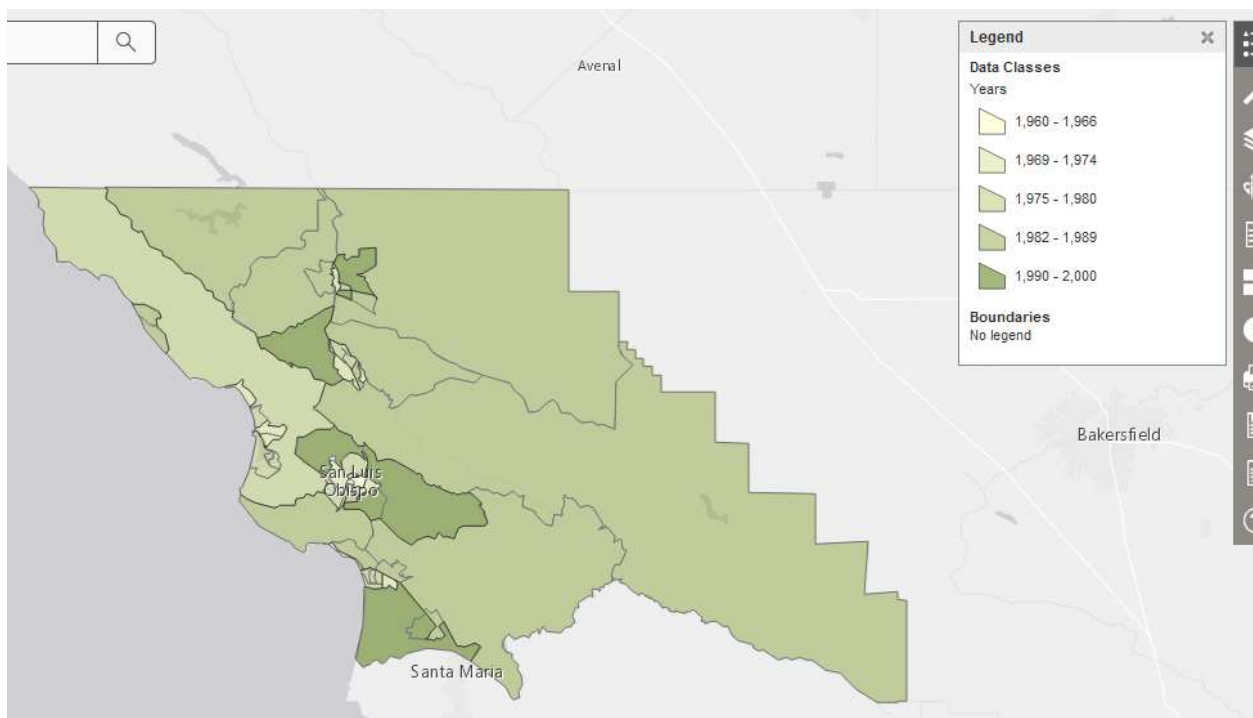
The location of accessible housing is a contributing factor to fair housing issues in San Luis Obispo. Although it is not possible to precisely map the location of accessible housing in the County, it tends to exist where there are concentrations of new, multi-family housing and

¹⁰¹ <https://www.zillow.com/san-luis-obispo-county-ca/home-values/>

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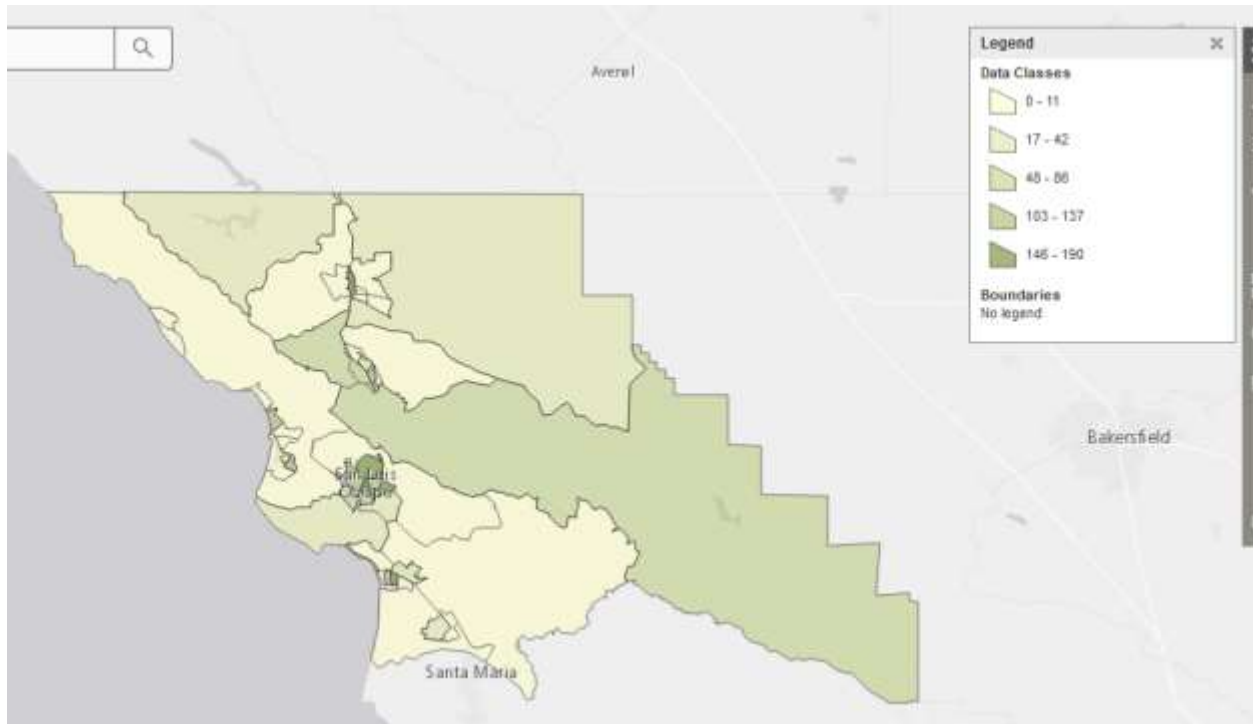
where there are concentrations of publicly supported housing. The American Community Survey does not facilitate the disaggregation of housing units by units in structure and year structure built together but does allow a look at those two data points separately. As the maps below reflect, these two data points tell a somewhat contradictory story. While new construction is concentrated in the suburbs of the City of San Luis Obispo and Atascadero, as well as the southernmost edge of the County, the largest multi-family developments are concentrated within the cities themselves. Publicly supported housing developments are also concentrated within the cities.

Map 6-10: Median Year Structure Built, San Luis Obispo



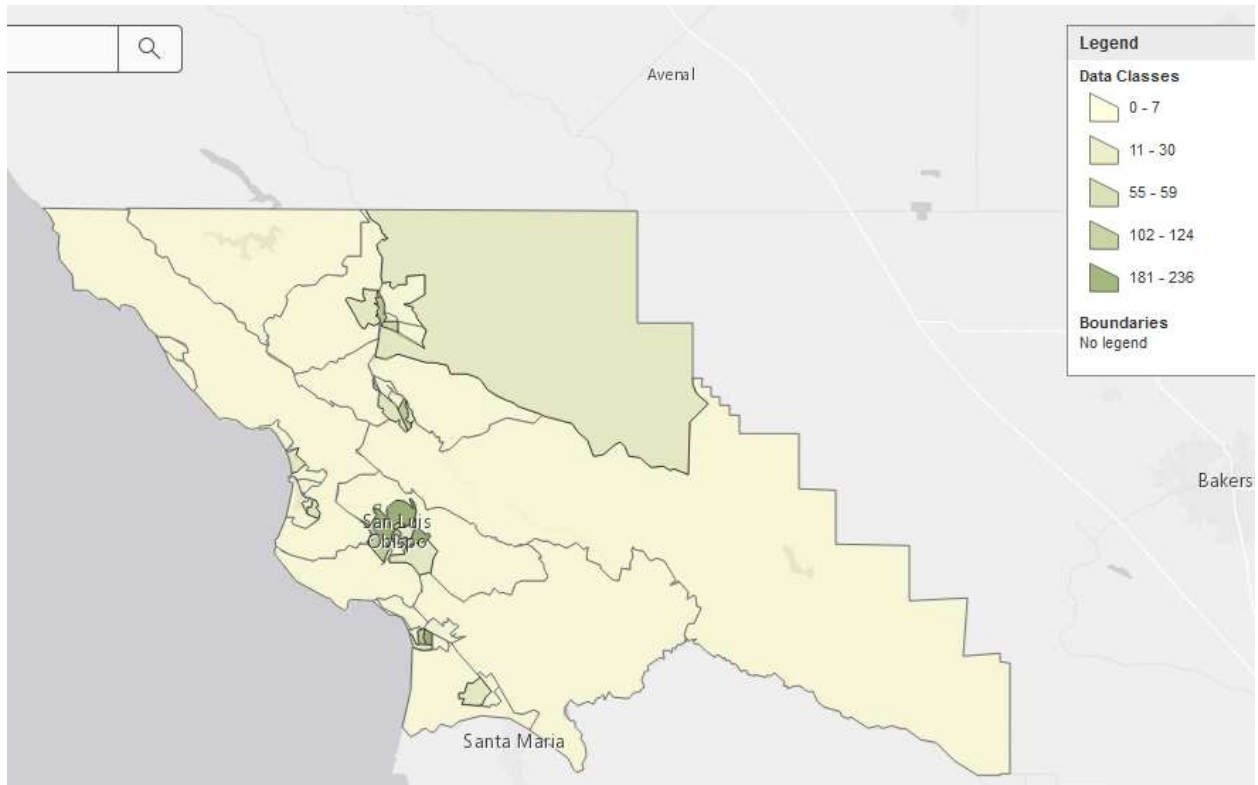
Analysis of Impediments to Fair Housing Choice – County of San Luis Obispo

Map 6-11: Units in Structure (20-49), San Luis Obispo

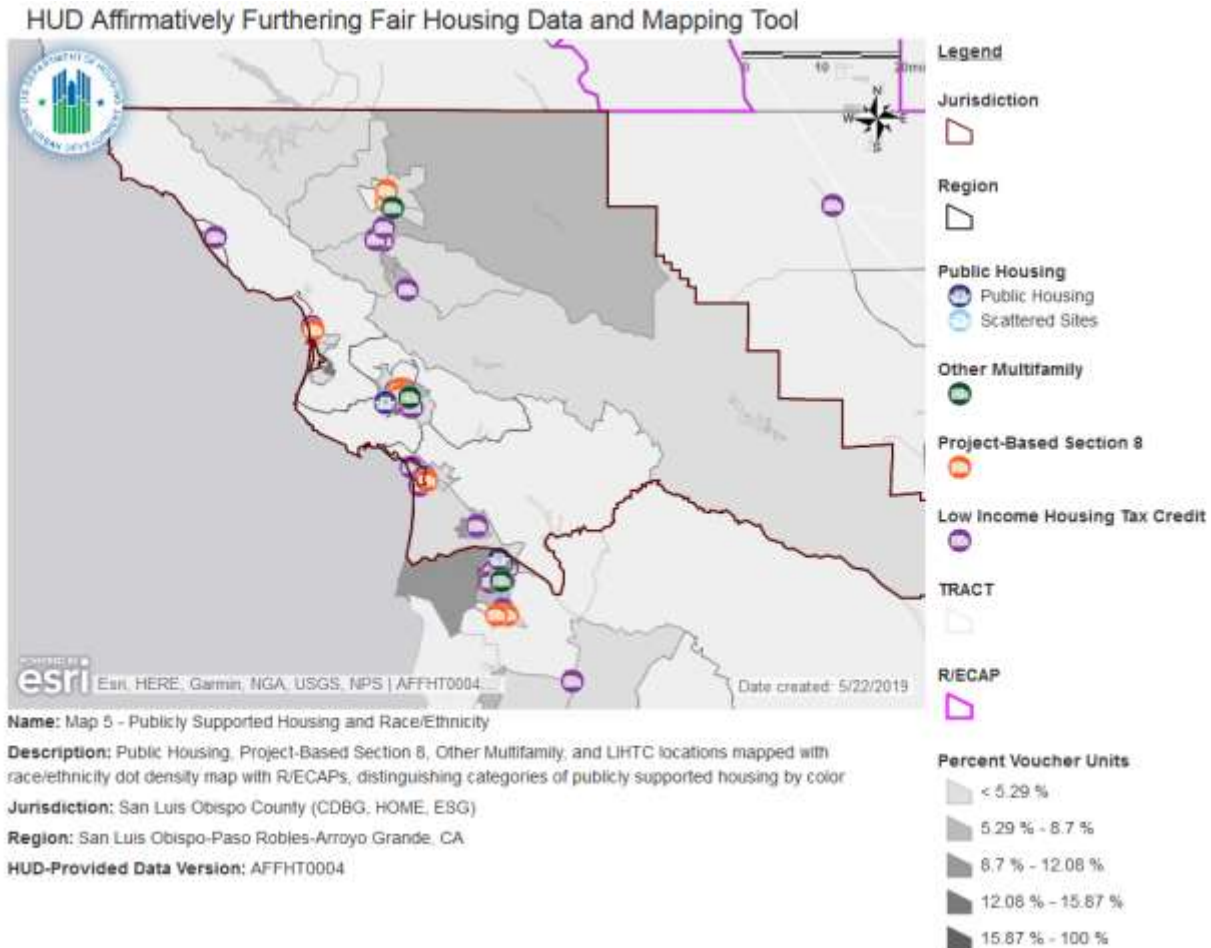


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Map 6-12: Units in Structure (50+), San Luis Obispo



Map 6-13: Publicly Supported Housing, San Luis Obispo



33. Location of employers

The location of employers is not a contributing factor to fair housing issues in San Luis Obispo. The highest job proximity scores according to the HUD Data and Mapping Tool are located along the coast and in the main cities of San Luis Obispo, Paso Robles, and Atascadero. Accordingly, the top employers in the area include California Polytechnic State University, the County of San Luis Obispo, the Department of State Hospitals–Atascadero, Pacific Gas & Electric, California Men’s Colony (correctional facility), Cal Poly Corp., and several healthcare centers and school districts throughout the County. As the Jobs Proximity Index reflects, there are no significant differences in access to job centers based on race and ethnicity, except for Black residents. Black residents have strong presences in these cities,

however, suggesting that the location of employers is not driving that index score. Nevertheless, it should still be noted that San Luis Obispo does not have a strong public transit system, so a lack of proximity to jobs can have an even stronger effect on low income residents, and especially low-income Black residents.

34. Location of environmental health hazards

The location of environmental health hazards is not a significant contributing factor to Disparities in Access to Opportunity. San Luis Obispo has only one superfund site, located 12 miles west of Paso Robles. The site marks the former entrance of mercury mines, and several longitudinal studies have been performed to assess its risks to the community. While it is a serious enough hazard to be placed on the National Priorities List, it is far away from any population centers, and mainly poses a risk to fishing in the area, as the water and soil may be contaminated. According to the HUD Data and Mapping Tool, the environmental health of San Luis Obispo is very good. While the lowest levels of environmental health are found in cities like San Luis Obispo, even those scores are in the 50s and 60s on the Environmental Health Index. Meanwhile, the vast majority of land in the County ranks in the 80s and 90s. To maintain its high environmental health levels, the County provides a variety of resources including information on well drilling, beach water quality monitoring, and stormwater pollution prevention.¹⁰²

35. Location of proficient schools and school assignment policies

The location of proficient schools and school assignment policies are a contributing factor to Disparities in Access to proficient schools in San Luis Obispo. School assignment is determined by basic geography, so zip code very much determines one's access and opportunities. In the Disparities in Access to Opportunity analysis, school proficiency demonstrated some of the most serious gaps across communities in the County. Particular gaps were observable when comparing the interior cities to suburban communities, sometimes occurring within the same school district. California state law allows for inter-district transfers, but the decision to participate and how many seats to make available to inter-district transferees is left up to the receiving school district. Nearly every school district in the County affirmatively states that they accept inter-district transfers. There is some limited school transportation available for students participating in inter-district transfer, specifically for Pacheco and Teach elementary School Open Enrollment students.¹⁰³ The service is available on a pay-per-student basis, with discounts and exemptions available based on student need. Beyond this transportation service, however, it can be even more

¹⁰² <https://www.slocounty.ca.gov/Departments/Health-Agency/Public-Health/eh.aspx>

¹⁰³ <http://www.slcsd.org/images/cms/files/OE%20Form2.%20Eng%20Web.pdf>

difficult for low-income students who would like to attend a more proficient school farther from home to be successful in the inter-district transfer process.

36. Location and type of affordable housing

The location and type of affordable housing is a contributing factor to Segregation, R/ECAPs, and Disparities in Access to Opportunity. Affordable housing developments are located throughout the County, but they are limited in the populations that they serve. Project-Based Section 8 developments are located in Arroyo Grande, Morro Bay, Paso Robles, and the City of San Luis Obispo. Low Income Housing Tax Credit (LIHTC) units are located in Arroyo Grande, Atascadero, Avila Beach, Cambria, Morro Bay, Nipomo, Oceano, Paso Robles, Pismo Beach, San Luis Obispo, and Templeton. There are 18 LIHTC developments devoted to families and 10 to seniors. Family housing can accommodate both families and seniors. Therefore, a disproportionate share of HUD-supported units of affordable housing are used as senior housing, which is less likely to contribute to integration than family-occupancy housing. The County should prioritize intergenerational family-occupancy housing in future affordable housing efforts.

Additionally, public housing units support a higher number of extremely low-income households than do LIHTC developments. Extremely low-income households have a greater representation of people of color. Therefore, public housing units are more likely to house Black and Hispanic households than are the LIHTC developments.

37. Loss of affordable housing

The loss of affordable housing is not a contributing factor to Segregation, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing, and Disability and Access. In the County and in three of its cities, rent control has been instituted for mobile homes, representing a significant source of unsubsidized affordable housing. On the flipside, lower-priced apartments that might represent another significant source of unsubsidized affordable housing remain vulnerable to Ellis Act evictions and conversions. The National Housing Preservation Database shows that there are ten properties out of a total 72 developments in the County with “inactive” subsidies. Other properties with active subsidies are at risk of the loss of affordability. Additionally, publicly supported housing developments whose owners choose not to renew subsidy contracts are often located in high opportunity areas and gentrifying neighborhoods as it is in those places that the greatest windfall profits can be made by increasing rents to market rates.

38. Occupancy codes and restrictions

Occupancy codes and restrictions are a contributing factor to Segregation, R/ECAPs, Disparities in Access to Opportunity, Publicly Supported Housing, and Disability and Access. The state of California has not adopted the Universal Building Code. Instead, they have enacted the California Building Code, which also incorporates the International Building Code. The California Building Code has a rather broad definition of family, in that it does not only limit a family to “an individual or two or more persons who are related by blood or marriage,” but expands the definition to any persons who “otherwise live together in a dwelling unit.”¹⁰⁴ This definition is not restrictive in a way that would negatively affect access to housing.

The County of San Luis Obispo, however, has a much more restrictive definition of family. According to the County’s Land Use Ordinance, a family is defined as “one person living alone or two or more persons related each to all others by blood, marriage, or legal adoption, or a group of no more than five unrelated persons living in a single dwelling.”¹⁰⁵ This definition is restrictive, as it limits the amount of unrelated persons who can live together in a unit, and it limits the amount of unrelated people who can live with a household of related persons. It has the potential to restrict group homes and shared living arrangements for persons with disabilities. It could also potentially restrict extended family members from living with a family, a practice common among minority communities to share in expenses and household/caretaking activities.

39. Private discrimination

Private discrimination is a significant contributing factor to Segregation, R/ECAPs, and Disparities in Access to Opportunity. A high demand for affordable housing coupled with a low vacancy rate allows landlords ample wiggle room to discriminate. Whether through rigorous screening processes or outright discrimination against certain groups, private discrimination is an issue in the County. For example, lack of protections for Section 8 voucher holders enable pervasive landlord discrimination. Many landlords refuse to accept Section 8 vouchers, and often deliberately price rents outside of what a voucher holder would be able to afford. Undocumented residents also face discrimination, and there is a lack of steady legal resources. California Rural Legal Assistance is unable to provide services to undocumented residents. Of the cases they do handle, 70% of cases were related to discrimination based on disability. Discrimination based on race made up 10%, discrimination based on sex made up 7.5%, discrimination based on disability and national origin comprised 5%, and discrimination based on familial status made up 2%. According to

¹⁰⁴ California Building Code, §202.

¹⁰⁵ San Luis Obispo County Municipal Code, §22.80.030 (F).

the Fair Housing Council of Central California, the majority of complaints the office receives are related to familial status. Our stakeholder engagement process also indicated discrimination based on familial status is an issue. Many stakeholders reported that landlords often do not want to rent to larger families and if they do, may often place restrictions on tenants, such as not allowing the children to play outside.

40. Quality of affordable housing information programs

The quality of affordable housing information programs is not a contributing factor to Publicly Supported Housing. There are no mobility counseling programs for Section 8 Housing Choice Voucher holders, excepting some limited housing counseling restricted to veterans. As a result, there are informational gaps that impede some residents of minority neighborhoods from utilizing their assistance to move to high opportunity areas. Ultimately, however, because residential segregation is not very strong in San Luis Obispo (at least, compared to other metropolitan areas in California), the lack of mobility counseling is a less significant reinforcement of segregation in that local context.

41. Regulatory barriers to providing housing and supportive services for persons with disabilities

Regulatory barriers to providing housing and supportive services for persons with disabilities are a low priority contributing factor to Segregation for persons with disabilities. In general, most cities in the County of San Luis Obispo do not impose restrictions or additional regulatory constraints on types of housing that are likely to serve persons with disabilities such as residential care facilities and supportive housing. There are a few notable exceptions. The City of Atascadero imposes a minimum lot size of 20,000 square feet for residential care facilities for seven or more residents. This may be difficult to justify and could make it prohibitively expensive to open such a facility. The City of Paso Robles requires conditional use permits for residential care facilities for seven or more residents and prohibits such facilities in RA-zoned districts. This is counter-intuitive and at odds with the City's large minimum lot size, which presumes that larger facilities should be on larger lots. The City of Arroyo Grande's zoning code is silent on such larger residential care facilities, leaving ambiguity about whether they are permitted. The City of Grover Beach has an outright prohibition on larger residential care facilities in some residential zones and allows them only as a conditional use in others. The City of Pismo Beach requires a conditional use permit for larger residential care facilities but does not prohibit them in any residential zone. The County of San Luis Obispo also requires a conditional use permit for large facilities. It is important to note that these larger facilities are less favored as a means for providing housing in the community for persons with disabilities than are smaller facilities and independent apartments. Nonetheless, for some individuals, larger facilities may offer some

benefits, particularly in comparison to institutional settings like nursing homes. In those instances where larger facilities have some additive value, the conditional use permit process can be a real barrier as it provides an opportunity for community opponents to mobilize. Local governments should be mindful of the need to provide reasonable accommodations that permit operators to bypass the conditional use permit process when necessary.

42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans (QAPs) and other programs, are not a contributing factor to Publicly Supported Housing except inasmuch as the emphasis on transit-oriented development works to exclude the entire County from meaningfully participating in the competitive process. The main policy-driven factor related to siting that contributes to segregation in the Region is the heavy focus of affordable housing development efforts (both LIHTC and state affordable housing funded through Cap and Trade) on transit-oriented development. This is problematic because San Luis Obispo does not have a strong public transit system. When real affordability is built into transit-oriented development, these investments may have a positive effect on stable integration in areas undergoing gentrification by arresting the process of displacement. Nonetheless, an overemphasis on transit-oriented development to the exclusion of efforts to build affordable housing in places that are not served by transit works to perpetuate segregation in some cases and exclude the entire County and any similar communities in the state from being competitive in the process in others. The California Tax Credit Allocation Committee's QAP heavily incentivizes family-occupancy Low Income Housing Tax Credit (LIHTC) development in what it terms "High Resource" or "Highest Resource" areas. These areas are generally high opportunity areas that are disproportionately White. In light of the significant incentives for LIHTC development in High Resource and Highest Resource areas, the QAP does not currently contribute to segregation as it applies to San Luis Obispo.

43. Source of income discrimination

Source of income discrimination is a high priority contributing factor to fair housing issues in the County of San Luis Obispo. Searches on Craigslist for rental housing listings with language indicating a discriminatory preference yielded several hits. In the County, as of July 8, 2019, there were 18 advertisements featuring the phrase "no Section 8." These advertised units were distributed throughout the County with a slightly higher concentration in Arroyo Grande, which is more heavily White than the county as a whole. Service providers also corroborated the difficulties that Section 8 Housing Choice Voucher holders face in utilizing their assistance, reporting that, in addition to the decision of some housing providers to

outright refuse to accept Section 8 vouchers, others set rent-to-income requirements that exclude voucher holders. Strict requirements that a tenant have, for example, three times the listed monthly rent in income are irrelevant to the creditworthiness of Section 8 voucher holders who are only responsible for a much smaller portion of the overall rent. Although discrimination against Section 8 Housing Choice Voucher holders is not directly prohibited under the California Fair Employment and Housing Act's ban on source of income discrimination, it often has a disparate impact on persons with disabilities and racial and ethnic minorities. 35.7% of persons residing in households assisted with Section 8 Housing Choice Vouchers in the County of San Luis Obispo are persons with disabilities. A growing number of municipalities in California, though none in the County of San Luis Obispo, have prohibited discrimination against voucher holders by local ordinance.

44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings

State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings are not a significant contributing factor to the segregation of people with disabilities. The primary state or local laws, policies, or practices that discourage people with disabilities from living in integrated settings are those that constrain the supply of affordable housing and fail to ensure that affordable units are accessible to people with disabilities. With new inclusionary zoning requirements, a multitude of publicly supported housing developments restricted to seniors, and a large number of LIHTC properties, San Luis Obispo's supply of affordable housing is not really constrained by any such policies. People with disabilities who live in institutional settings tend to have low incomes and, frequently, extremely low incomes and can only afford to live in affordable housing. LIHTC units and inclusionary zoning units have rent levels that may not be affordable to individuals who are at risk of institutionalization, but such units may be available within Fair Market Rent (FMR) limits for Section 8 Housing Choice Vouchers.

45. Unresolved violations of fair housing or civil rights law

Unresolved violations of fair housing or other civil rights laws are not a significant contributing factor to Fair Housing Enforcement, Outreach Capacity, and Resources. In the last year, just six of the fair housing cases handled by the San Luis Obispo office of California Rural Legal Assistance (CRLA) were related to interactions with public actors—five involving the Housing Authority of San Luis Obispo (HASLO), and one involving the Paso Robles Housing Authority. According to discussions with both the Directing Attorney of CRLA and HASLO staff, these disputes rarely escalate beyond a discussion and resolution devised in cooperation between both offices.

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Our research did not uncover any other unresolved violations of fair housing laws. The only pending civil rights claim is the aforementioned suit related to failure to provide adequate medical treatment in the County of San Luis Obispo Jail. The lawsuit is pending and the U.S. Department of Justice has also opened an investigation.