Appendix D: Affirmatively Furthering Fair Housing

A. Introduction and Overview of AB 686

Assembly Bill 686 passed in 2017 requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity[1] and a commitment to specific meaningful actions to affirmatively further fair housing.[2] AB 686 mandates that local governments identify meaningful goals to address the impacts of systemic issues such as residential segregation, housing cost burden, and unequal educational or employment opportunities to the extent these issues create and/or perpetuate discrimination against protected classes.[3] In addition, AB 686:

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

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

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

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

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

B. Affirmatively Furthering Fair Housing in Marin County

The Fair Housing Act (Title VIII of the Civil Rights Act of 1968) requires recipients of HUD funding to affirmatively further fair housing, which means, according to HUD, "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." Specifically, affirmatively furthering fair housing means taking meaningful actions that, when taken together,

- Addresses significant disparities in housing needs and in access to opportunities;
- Replaces segregated living patterns with truly integrated and balanced living patterns;
- Transforms racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Fosters and maintains compliance with civil rights and fair housing laws.

In an effort to attain this goal of affirmatively furthering fair housing, HUD requires Marin County as an entitlement jurisdiction to engage in fair housing planning. This planning process requires Marin County to:

1. Conduct and update an Analysis of Impediments to Fair Housing Choice (AI);
2. Develop appropriate actions to overcome the effects of the identified impediments; and
3. Develop a system for record keeping and monitoring the activities undertaken to reduce or overcome the identified impediments.

The purpose of the planning process is to identify and eliminate discrimination and segregation in housing on the basis of race, color, religion, sex, age disability, familial status or national origin and to expand housing choice for all residents in Marin. The most recent Marin County AI was completed in February 2020.

C. Analysis Requirements

An assessment of fair housing must consider the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs.[4] The analysis must address patterns at a regional and local level and trends in patterns over time. This analysis should compare the locality at a county level or even broader regional level such as a Council of Government,[5] where appropriate, for the purposes of promoting more inclusive communities.

> *For the purposes of this AFFH, "Regional Trends" describe trends in the Bay Area (the members of the Association of Bay Area Governments[6]) when data is available in the Data Needs Package or trends within the boundaries of Marin County. when ABAG-level data is not available. "Local Trends" describe trends specific to the unincorporated County and its unincorporated communities.*

1. Sources of Information

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

- Housing Needs Data Packet prepared by the Association of Bay Area Governments (ABAG), which rely on 2015-2019 American Community Survey (ACS) data by the U.S. Census Bureau for most characteristics.

    - Note: The ABAG Data Packets also referenced the U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) reports (based on the 2013-2017 ACS) \.

- U.S. Census Bureau's Decennial Census (referred to as "Census") and American Community Survey (ACS).
- Marin County Analysis of Impediments to Fair Housing Choice in January 2020 (2020 AI).
- AFFH Segregation Report (2022) for Unincorporated Marin prepared by ABAG and UC Merced.
- HCD's AFFH Data Viewer.
- Local Data and Knowledge.

Some of these sources provide data on the same topic, but because of different methodologies, the resulting data differ. For example, the decennial census and ACS report slightly different estimates for the total population, number of households, number

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

[5] Councils of Governments (COGs) are voluntary associations that represent member local governments, mainly cities and counties, that seek to provide cooperative planning, coordination, and technical assistance on issues of mutual concern that cross jurisdictional lines. For example, the Association of Bay Area Governments (ABAG) is a Council of Government in the Bay Area.

[6] Includes the Counties of: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma, and the City of San Francisco. For detailed member list see: https://abag.ca.gov/about-abag/what-we-do/our-members

of housing units, and household size. This is in part because the ACS provides estimates based on a small survey of the population taken over the course of the whole year.[7] Because of the survey size, some information provided by the ACS is less reliable. For this reason, the readers should keep in mind the margin of error when drawing conclusions based on the ACS data used in this chapter. The information is included because it provides an indication of possible trends. The analysis makes comparisons between data from the same source during the same time periods, using the ABAG Data Package as the first source since ABAG has provided data at different geographical levels for the required comparisons. As such, even though more recent ACS data may be available, 2014-2019 ACS reports are cited more frequently (and 2013-2017 for CHAS data).

The County also used findings and data from the 2020 Marin County Analysis of Impediments to Fair Housing Choice (2020 AI) for its local knowledge as it includes a variety of locally gathered and available information, such as a surveys, local history and events that have effected or are effecting fair housing choice. The County also used the HCD's 2020 Analysis of Impediments to Fair Housing Choice for its regional findings and data.

In addition, HCD has developed a statewide AFFH Data Viewer. The AFFH Data Viewer consists of map data layers from various data sources and provides options for addressing each of the components within the full scope of the assessment of fair housing. The data source and time frame used in the AFFH mapping tools may differ from the ACS data in the ABAG Data Package. The County tried to the best of their ability to ensure comparisons between the same time frames but in some instances, comparisons may have been made for different time frames (often different by one year). As explained earlier, the assessment is most useful in providing an indication of possible trends.

For clarity, this analysis will refer to various sections of the unincorporated County as North Marin, West Marin, Central Marin, and Southern Marin. These designations are shown in Figure D- 1 and include the following communities and jurisdictions:

- North Marin: Black Point-Green Point, Novato, Lucas Valley-Marinwood
- West Marin: Dillon Beach, Tomales, Inverness, Marshall, Point Reyes Station, Nicasio, Lagunitas-Forest Knolls, San Geronimo, Woodacre, Bolinas, Stinson Beach, Muir Beach
- Central Marin: Sleepy Hollow, Fairfax, San Anselmo, Ross, Santa Venetia, San Rafael, Kentfield, Larkspur, Corte Madera
- Southern Marin: Mill Valley, Tiburon, Strawberry, Tamalpais-Homestead Valley, Marin City, Belvedere, Sausalito

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[7] The American Community Survey is sent to approximately 250,000 addresses in the United States monthly (or 3 million per year). It regularly gathers information previously contained only in the long form of the decennial census. This information is then averaged to create an estimate reflecting a 1- or 5-year reporting period (referred to as a "5-year estimate"). 5-year estimates have a smaller margin of error due to the longer reporting period and are used throughout the AFFH.

2. Local Knowledge

In addition to using federal or state level data sources, local jurisdictions are also expected to use local data and knowledge to analyze local fair housing issues. Using point-in-time federal and state level data sets alone to identify areas may misrepresent areas that are experiencing more current and rapid changes or may be primed to do so in the near future. For these reasons, an additional screen of local data and knowledge is necessary. Local data and knowledge from stakeholders, community members, and County staff is interwoven within each section where data was available.

Figure D- 1: Marin County Communities
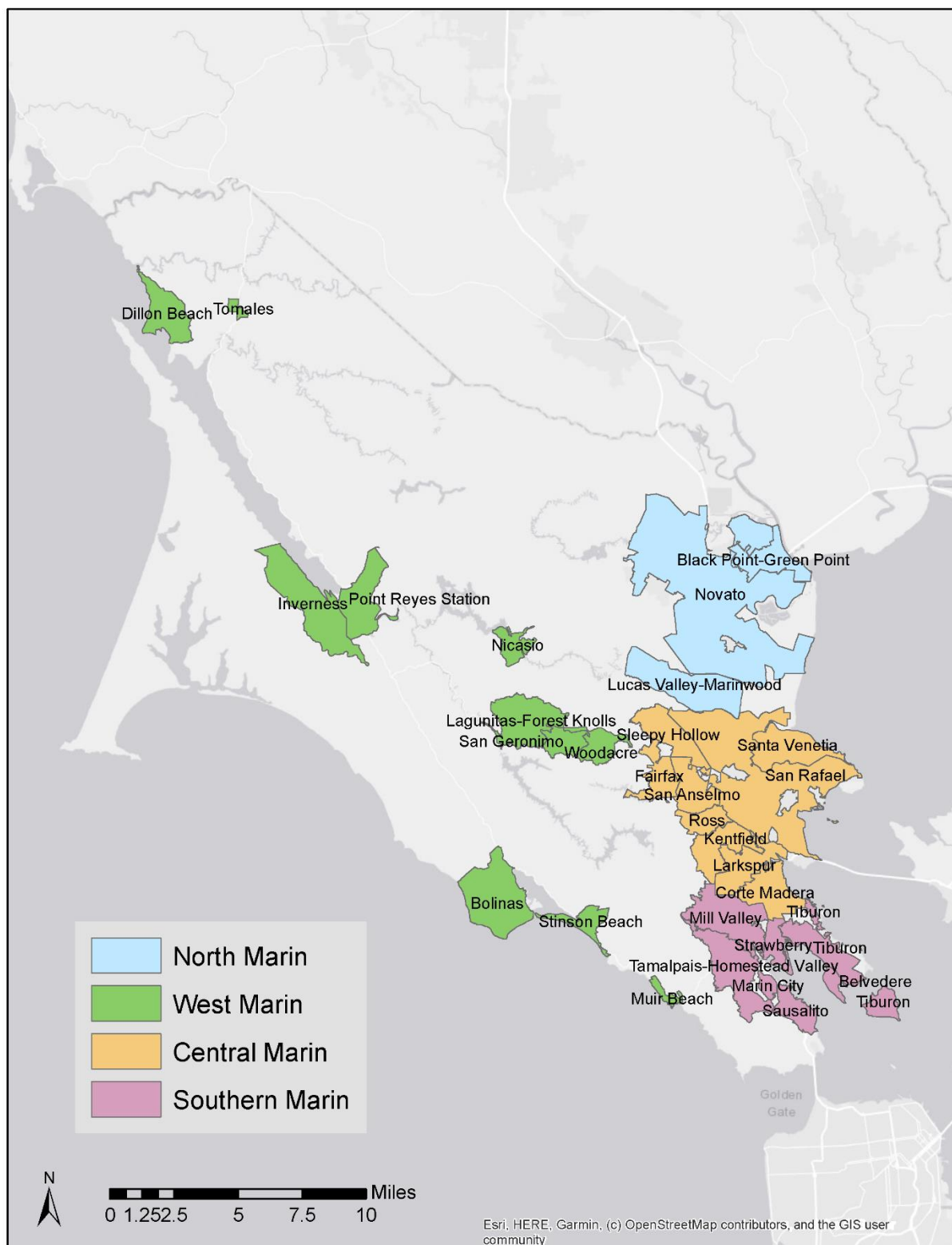
D. Assessment of Fair Housing Issues

1. Fair Housing Enforcement and Outreach

Enforcement capacity includes the ability to address compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing. The two primary state fair housing laws are the Fair Employment and Housing Act (FEHA) and the Unruh Civil Rights Act. These laws incorporate the same protected classes of persons as the federal Fair Housing Act, and also prohibit discrimination based on marital status, sexual orientation, source of income, ancestry, immigration status, citizenship, primary language and arbitrary factors such as age or occupation. Fair housing outreach capacity relates to the ability of a locality and fair housing entities to disseminate information related to fair housing and provide outreach and education to assure community members are well aware of fair housing laws and rights

Fair Housing Advocates of Northern California (FHANC) provides fair housing services, including fair housing counseling, complaint investigation, and discrimination complaint assistance, to Marin County residents. FHANC is a non-profit agency whose mission is to actively support and promote fair housing through education and advocacy. FHANC also provides fair housing workshops to educate tenants on fair housing law and include information on discriminatory practices, protections for immigrants, people with disabilities, and families with children, occupancy standards, and landlord-tenant laws. FHANC also provides educational workshops on home buying and affordable homeownership. In addition, FHANC hosts a fair housing conference in Marin County annually.

The County works in close partnership with the Fair Housing Advocates of Marin (FHAM) (a division of Fair Housing Advocates of Northern California, FHANC). FHAM is the only HUD-certified Housing Counseling Agency in the county, as well the only fair housing agency with a testing program in the county. Fair Housing Advocates of Marin (FHAM) provides free services to residents protected under federal and state fair housing laws. FHAM helps people address discrimination they have experienced, increasing housing access and opportunity through advocacy as well as requiring housing providers to make changes in discriminatory policies. FHAM provides the following services:

(1) Housing counseling for individual tenants and homeowners;
(2) Mediations and case investigations;
(3) Referral of and representation in complaints to state and federal enforcement agencies;
(4) Intervention for people with disabilities requesting reasonable accommodations and modifications;
(5) Fair housing training seminars for housing providers, community organizations, and interested individuals;
(6) Systemic discrimination investigations;
(7) Monitoring Craigslist for discriminatory advertising;
(8) Education and outreach activities to members of protected classes on fair housing laws;

(9) Affirmatively Furthering Fair Housing (AFFH) training and activities to promote fair housing for local jurisdictions and county programs;

(10) Pre-purchase counseling/education for people in protected classes who may be victims of predatory lending; and

(11) Foreclosure prevention.

Fair Housing Enforcement

Regional Trends

In late 2016, Marin County passed a local fair housing ordinance that established protections for renters based upon source of income, including renters using third-party housing subsidies such as Housing Choice Vouchers (HCVs). While California state law provided that it was unlawful to discriminate based upon one's source of income, at that time the definition was narrow and did not include third-party housing subsidies such as HCVs, Veterans Affairs Supportive Housing (VASH), Housing Opportunities for People with Aids (HOPWA), and Shelter Care Plus vouchers. The ordinance made it unlawful for housing providers in the unincorporated parts of Marin County to refuse to consider renters using housing subsidies, to offer different terms and conditions, such as higher security deposits, or to make discriminatory statements, such as "No Section 8."[8]

FHANC monitors advertisements online with potentially discriminatory statements and sends notification letters, sharing its fair housing concerns. Since the enactment of these local ordinances and SB329, FHANC has made concerted efforts to focus its education efforts on source of income protections, highlighting the change in the law and how income requirements work. The response from housing providers has varied from hostility to appreciation.

Discrimination complaints from both resident and prospective County tenants can be filed through FHANC, which refers complaints to the Department of Housing and Urban Development (HUD), or the Department of Fair Employment and Housing (DFEH). Complaints filed through HUD/DFEH from 2018-2019, included in the 2020 Analysis of Impediments to Fair Housing (2020 AI) are shown below in Table D- 1. More updated FHANC clients (2020-2021) are also included in Table D- 1. A total of 301 housing discrimination complaints were filed with FHANC from 2020 to 2021 and 14 were filed with HUD from 2018 to 2019. A majority of complaints, including 78 percent of complaints filed with FHANC and 57 percent of complaints filed with HUD, were related to disability status. This finding is consistent with federal and state trends. According to the 2020 State AI, 51 percent of housing-related complaints filed with DFEH between 2015 and 2019 were filed under disability claims, making disability the most common basis for a complaint. FHANC also received 38 complaints (13 percent) on the basis of national

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[8] In 2019, the California Legislature passed Senate Bill (SB) 329 that amended the Fair Employment and Housing Act (FEHA) to clarify that HCVs and other types of housing subsidies and third party rental assistance are included within the definition of source of income. Thus, source of income protections now apply to the entire state.

origin, 22 on the basis of race (seven percent), 19 (six percent) on the basis of gender, and 13 (4.3 percent) on the basis of familial status. Similarly, state trends show the same protected classes are among the most commonly discriminated against.

Protected Class	FHANC (2020-21)		HUD/DFEH (2018-19)	
	Complaints	Percent	Complaints	Percent
Disability	235	78.1%	8	57%
National Origin	38	12.6%	4	29%
Race	22	7.3%	3	21%
Gender	19	6.3%	2	14%
Familial Status	13	4.3%	1	7%
Source of Income	28	9.3%	--	--
Total	**301**	--	**14**	**--**

Table D- 1: Discrimination Complaints by Protected Class (2018-2021)

Notes:.1. A single complaint can be filed by a member of multiple protected classes so the totals per protected class does not add up to the 301 total complaints reported to FHANC. 2. HUD/DFEH complaints in AI reported to nearest whole number.
Sources: Marin County Analysis of Impediments to Fair Housing Choice, 2020; Fair Housing Advocates of Northern California (FHANC), 2020-2021.

A reasonable accommodation, as defined in the 2020 AI, "is a change or modification to a housing rule, policy, practice, or service that will allow a qualified tenant or applicant with a disability to participate fully in a housing program or to use and enjoy a dwelling, including public and common spaces." The 2020 AI reported that FHANC requested 35 reasonable accommodations for clients with disabilities between 2018 and 2019, 33 of which were approved. County staff also advises clients on reasonable accommodations requests. FHANC also provides funding for the Marin Center for Independent Living (MCIL). Since 2017, FHANC has provided funding for 13 MCIL modifications.

As described earlier, the County works with Fair Housing Advocates of Marin (FHAM) (a division of Fair Housing Advocates of Northern California, FHANC) to provide fair housing services to Marin residents. However, FHAM also provides services across a large service area that includes Marin County, Sonoma County, Santa Rosa, Fairfield, and Vallejo.

Historically, FHAM's fair housing services have been especially beneficial to Latinx, African-Americans, people with disabilities, immigrants, families with children, female-headed households (including survivors of domestic violence and sexual harassment), and senior citizens; approximately 90 percent of clients are low-income. FHAM's education services are also available to members of the housing, lending, and advertising industry. Providing industry professionals with information about their fair housing responsibilities is another means by which FHAM decreases incidences of discrimination and helps to protect the rights of members of protected classes.

From 2017 to 2018, the organization served 1,657 clients (tenants, homeowners, social service providers, and advocates), a 22 percent increase from the previous year; provided

counseling on 592 fair housing cases (a 26 percent increase), intervened for 89 reasonable accommodations granted (a 33 percent increase) of 97), represented 97 requests from people with disabilities (a 24 percent increase; funded eight (8) reasonable modification requests to improve accessibility for people with disabilities; investigated 71 rental properties for discriminatory practices, filed 15 administrative fair housing complaints and one (1) lawsuit; garnered $71,140 in settlements for clients and the agency; and counseled 71 distressed homeowners and assisted homeowners in acquiring $228,197 through Keep Your Home California programs to prevent foreclosure.

During Fiscal Year 2018 to 2019, FHAM counseled 393 tenants and homeowners in Marin County, screening clients for fair housing issues and providing referrals for non-fair housing clients or callers out of FHAM's service area. Of the households counseled, 211 alleged discrimination and were referred to an attorney or bilingual housing counselor for further assistance (e.g. receiving information on fair housing laws, interventions with housing providers requesting relief from discriminatory behavior, making 35 reasonable accommodation requests on behalf of disabled tenants, four referrals to HUD/DFEH and representation in administrative complaints).

Local Trends

FHANC provides Countywide enforcement activities described above but detailed information for the unincorporated data was unavailable for all types of activities. However, FHANC estimates that 43 percent of their services are located in "other" areas of the County (while the other 57 percent of services are provided in Novato and San Rafael).

Of the 301 complaints received by FHANC between 2020 and 2021 (Table D- 1), 68 were from unincorporated communities (Table D- 2Table D- 2:). Only residents from West Marin and Southern Marin reported discrimination complaints in the unincorporated county, with West and Southern Marin each making up about 50 percent of the complaints reported to FHANC. Within West Marin, residents of Point Reyes Station and Woodacre reported the highest number of complaints, while in Southern Marin, Marin City had the greatest number of complaints. Overall, Marin City had the highest incidence of reported discrimination complaints, making up about 45.6 percent of all the complaints in the unincorporated County.

Table D- 2: Discrimination Complaints by Unincorporated Community/Area (2020-2021)		
Community	Cases	% of Cases
North Marin	**0**	**0.0%**
West Marin	**36**	**52.9%**
Inverness	3	4.4%
Point Reyes Station	13	19.1%
Olema	1	1.5%
Nicasio	1	1.5%
Forest Knolls	2	2.9%
San Geronimo	1	1.5%
Woodacre	8	11.8%
Bolinas	4	5.9%
Stinson Beach	3	4.4%
Central Marin	**0**	**0.0%**
Southern Marin	**32**	**47.1%**
Marin City	31	45.6%
Strawberry/ Tiburon	1	1.5%
Total	**68**	**100.0%**
Notes: 1. A single complaint can be filed by a member of multiple protected classes so the totals per Source: Fair Housing Advocates of Northern California (FHANC), 2020-2021.		

The protected classes from the unincorporated area that made discrimination complaints were similar to those in the County and the state. Of the 68 complaints made to FHANC in the unincorporated area, 85 percent were made by persons with disabilities. Gender and race were the other top protected classes that made disclination complaints to FHANC (about nine percent of the cases).

Table D- 3: Discrimination Complaints by Protected Class (2020-2021)		
Protected Class	Cases	% of Cases
Disability	58	85.3%
Gender	6	8.8%
Race	6	8.8%
Sex	4	5.9%
National Origin	2	2.9%
Source of Income	2	2.9%
Age	1	1.5%
Familial Status	1	1.5%
Marital Status	1	1.5%
Religion	1	1.5%
Other	1	1.5%
Total Cases	68	--
Notes: 1. A single complaint can be filed by a member of multiple protected classes so the totals per Source: Fair Housing Advocates of Northern California (FHANC), 2020-2021.		

FHANC also tracks the discriminatory practices reported by complainants (Table D- 4). The most commonly reported discriminatory practice was denial of reasonable accommodation (62 percent of cases) followed by different terms and conditions, refusal to rent/sell, and harassment (nine percent of cases). As with the County and state trends, discrimination complaints and discriminatory practices are more commonly related to persons with disabilities and their special needs.

Table D- 4: Discrimination Complaints by Discriminatory Practice (2020-2021)		
Protected Class	Cases	% of Cases
Reasonable accommodation	42	61.8%
Different terms & conditions	6	8.8%
Refusal to rent/sale	6	8.8%
Harassment	6	8.8%
Intimidation, interference, coercion	5	7.4%
Otherwise make unavailable	5	7.4%
Other	5	7.4%
Advertising/discriminatory statements	3	4.4%
Retaliation	2	2.9%
Predatory Lending	2	2.9%
Reasonable modification	1	1.5%
Steering	1	1.5%
False denial of availability	1	1.5%
Total Cases	68	--
Notes: 1. A single complaint can be filed by a member of multiple protected classes so the totals per Source: Fair Housing Advocates of Northern California (FHANC), 2020-2021.		

Recent Complaint Trends

Since the beginning of COVID, FHANC has seen related housing hardships such as inability to pay rent/mortgage due to income loss; increased rents despite financial hardship; need for reasonable accommodations in order to protect from COVID infections and/or because of increases in stress; domestic violence exacerbated by quarantine/isolation; sexual harassment/exploitation of tenants unable to move/pay rent; neighbor-on neighbor harassment related to increases in stress/prolonged proximity; and harassment/discrimination based on stereotypes about which groups are likely to have COVID. FHANC has seen an overall decrease in eviction cases during the pandemic. For example, a client with an autoimmune disease and is considered high-risk with regard to COVID-19 reached out to FHANC to prevent her landlord from unnecessarily entering her unit during the COVID-19 pandemic. She had had repeated issues with the landlord entering her unit often and on short notice, without taking proper precautions to prevent the spread of COVID-19. FHANC sent a letter detailing her condition, with verification from her doctor, and requested that the landlord not enter the unit except in case of emergency or for significant repairs. The landlord agreed to the request, and the issue has not persisted since it was granted.

Fair Housing Testing

Initiated by the Department of Justice's Civil Rights Division in 1991, fair housing testing involves the use of an individual or individuals who pose as prospective renters for the purpose of determining whether a landlord is complying with local, state, and federal fair housing laws.

Regional Trends

In Fiscal Year 2018 to 2019, Fair Housing Advocates of Marin (FHAM) conducted systemic race discrimination investigations as well as complaint-based testing, with testing for race, national origin, disability, gender, and familial status discrimination. FHAM monitored Craigslist for discriminatory advertising, with the additional recently added protection for individuals using housing subsidies in unincorporated parts of Marin. FHAM notified 77 housing providers in Marin during the year regarding discriminatory language in their advertisements.

According to the 2020 AI, during the 2018 to 2019 Fiscal Year, FHANC conducted email testing, in-person site, and phone testing for the County. FHANC conducted 60 email tests (30 paired tests) to "test the assumption of what ethnicity or race the average person would associate with each of the names proposed" as well as source of income discrimination in jurisdictions in Marin County with local ordinances protecting tenants with housing subsidies. The results were as follows:

- Eight paired tests (27 percent) showed clear differential treatment favoring the White tester;
- 19 paired tests (63 percent) conducted in jurisdictions with local source of income ordinances showed discrimination based upon source of income; and,
- 3 paired tests revealed discrimination based upon both race and source of income.

- In 80 percent of tests (24 of 30 paired tests), there was some disadvantage for African American testers and/or testers receiving Housing Choice Vouchers (HCVs).[9]

In-person site and phone tests consisted of an African American tester and a White tester. Of the 10 paired in-person site and phone tests conducted, 50 percent showed differential treatment favoring the White tester, 60 percent showed discrepancies in treatment for HCV recipients, and 30 percent showed discrimination on the basis of race and source of income.

The conclusions of the fair housing tests included in the 2020 AI are as follows:

- Housing providers make exceptions for White Housing Choice Voucher recipients, particularly in high opportunity areas with low poverty.

- Email testing revealed significant evidence of discrimination, with 27 percent of tests showing clear differential treatment favoring the White tester and 63 percent of tests showing at least some level of discrimination based upon source of income.

- Phone/site testing also revealed significant instances of discrimination: 50 percent of discrimination based upon race and 60% based on source of income.

The 2020 State AI did not report any findings on fair housing testing. However, the AI concluded that community awareness of fair housing protections correlates with fair housing testing as testing is often complaint-based, like it is for FHAM in Marin County. According to the 2020 State AI, research indicates that persons with disabilities are more likely to request differential treatment to ensure equal access to housing, making them more likely to identify discrimination. The 2020 State AI highlighted the need for continued fair housing outreach, fair housing testing, and trainings to communities across California, to ensure the fair housing rights of residents are protected under federal and state law. The 2020 State AI recommended that the state support the increase of fair housing testing to identify housing discrimination.

The 2020 State AI also reported findings from the 2020 Community Needs Assessment Survey. Respondents felt that the primary bases for housing discrimination were source of income, followed by discriminatory landlord practices, and gender identity and familial status. These results differ from the most commonly cited reason for discrimination in complaints filed with DFEH and FHANC. The State survey also found that most (72

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[9] The Housing Choice Voucher (HCV) Program is the federal government's major program for assisting very low-income families, the elderly, and persons with disabilities to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments. Participants are free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. Participants issued a housing voucher are responsible for finding a suitable housing unit of their choice where the owner agrees to rent under the program. A housing subsidy is paid to the landlord directly by the local Public Housing Agency (PHA) on behalf of the participant. The participant then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Beginning on January 1, 2020, housing providers, such as landlords, cannot refuse to rent to someone, or otherwise discriminate against them, because they have a housing subsidy, such as a Housing Choice Voucher, that helps them to afford their rent.

percent) respondents who had felt discriminated against did "nothing" in response. According to the 2020 State AI, "fair housing education and enforcement through the complaint process are areas of opportunity to help ensure that those experiencing discrimination know when and how to seek help."

Local Trends

FHANC conducts systemic audit testing every year where they test a sample of landlords in each of their service areas to see how members of a particular protected class are being treated. Results from the most recent audit on race and income are expected in Summer/Fall 2022. The results will be incorporated into this analysis when they become available.

In the Audit Report for Fiscal Year 2019-2020, FHANC investigated discrimination against prospective renters who are Latinx and/or Housing Choice Voucher (HCV) holders in Marin, Sonoma, and Solano Counties. While discrimination on the basis of a renter's source of income has been illegal in California, until only recently have these protections extended to HCV holders, who are individuals who have historically experienced a number of barriers to housing opportunity.

FHANC conducted 139 individual investigations, 45 in Marin County. Tested properties were located in the cities of Fairfax, Larkspur, Mill Valley, Novato, San Anselmo, San Rafael, Sausalito, and Tiburon and unincorporated communities of Kentfield, Lagunitas, and Nicaso. According to FHANC, the investigation did not include the smaller unincorporated communities such as Inverness or Bolinas in Marin County because of the lack of available rental housing, particularly complexes with more than two to three units. In addition, some larger cities were not tested due to lack of eligible availabilities (for instance, the contract rent was significantly above the relevant payment standard). FHANC found that housing providers in Marin County discriminated on the basis of national origin and/or source of income in approximately 81 percent of the time (the lowest rate among the Tri-County area), either demonstrating an outright refusal to rent to HCV holders or requiring an improper application of the minimum income requirement (which effectively prohibits voucher holders from accessing housing) and/or providing inferior terms/conditions and general treatment to Latinx voucher holders as compared to non-Latinx White voucher holders. Of the investigations revealing discrimination, 57 percent were based on source of income, 24 percent were based on both source of income and national origin.

Between January and March 2021, FHANC investigated 111 rental properties in Marin, Sonoma and Solano counties for disability discrimination. FHANC chose properties with stated policies in their rental listings prohibiting or limiting animals on the property, such as "no pet" policies or policies restricting the type, breed or size of animals permitted. Testers posing as renters with disabilities called or emailed housing providers in response to such rental listings and asked if the provider would be willing to make an exception to their animal policy in order to accommodate an applicant who requires an emotional support animal because of a verified disability. In Marin County, tests were conducted at

properties located in San Rafael, Novato, Southern Marin[10], West Marin[11], and Central Marin.[12] Of the 32 investigations conducted in Marin County, 59 percent revealed evidence of a discriminatory policy or less favorable treatment toward persons with disabilities.

One of the most significant findings revealed by the investigation was the extremely high rate of discrimination uncovered at properties with less than 11 units (73 percent) versus the relatively low rate of discrimination at properties with more than 50 units (20 percent) for the Tri-County area combined. This points to a clear need for increased education and outreach to "mom and pop" landlords regarding their obligation to provide reasonable accommodations under fair housing laws.

Table D- 5 below shows a sample of the phone-based discriminating testing conducted in response to client complaints (or as follow up tests to previous tests) in the unincorporated County between 2017 and 2021.

Table D- 5: Complaint-Based Discrimination Phone Testing for Unincorporated Communities				
(2017-2021)				
Year	**Protected Class**	**Investigation Outcome**	**Property City**	**Test Summary**
2017	Disability; Familial Status	Clear Discrimination	Inverness	Landlord refused to let protected tester apply because she has a disability. He says there are stairs and it gets icy in the winter and he doesn't want the liability because she could fall.
2019	Disability	Some/ Potential Discrimination	Kentfield	Tester said she had an emotional support animal and agent said there would be no fees as long as it was a "certified service animal." Tester clarified that it was an ESA not a service animal many times but agent kept saying it had to be a service animal. Eventually agent said she would ask her superiors if there was a difference but she never got back to tester and never responded to her follow-up call.

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[10] Southern Marin includes the incorporated and/or unincorporated cities/ towns of Marin City, Sausalito, Mill Valley, Tiburon, and Belvedere

[11] West Marin includes the incorporated and/or unincorporated cities/ towns of Woodacre, San Geronimo, Lagunitas, Forest Knolls, Lucas Valley, Stinson Beach, Bolinas, and Point Reyes Station.

[12] Central Marin includes the incorporated and/or unincorporated cities/ towns of Corte Madera, Larkspur, Kentfield, Ross, San Anselmo, and Fairfax.

2020	Source of Income	Clear Discrimination	Greenbrae	Protected tester called the property posing as a renter and asked if they accept Section 8, to which the agent responded that they are "not currently entering into those contracts."
2021	Source of Income	Clear Discrimination	Greenbrae	A protected tester called and explained that she has a section 8 voucher. She was told by the property manager that they do not accept section 8 and that they "are not entering into any contracts." She was not allowed to get on the waitlist. Based on this investigation, FHANC has determined that the landlord likely discriminated on the basis of source of income and is considering bringing an agency complaint against the housing provider.
2021	Source of Income	Clear Discrimination	Greenbrae	Protected tester told that they would not accept section 8 vouchers.

Fair Housing Education and Outreach

Regional Trends

As stated earlier, the 2020 State AI has concluded that fair housing outreach and education is imperative to ensure that those experiencing discrimination know when and how to seek help. The County established a Fair Housing Community Advisory Group in 2016. The Community Advisory Group provides advice and feedback on citizen engagement and communication strategies to County staff, participates in inclusive discussions on fair housing topics, identifies fair housing issues and contributing factors, and assists in developing solutions to mitigate fair housing issues. The County also established a Fair Housing Steering Committee consisting of 20 members representing public housing, faith-based organizations, the Marin County Housing Authority, Asian communities, cities and towns, African American communities, business, persons with disabilities, children, legal aid, persons experiencing homelessness, Latino communities, and philanthropy. The Steering Community advises on citizen engagement strategies, identifies factors contributing to fair housing impediments, incorporates community input and feedback, and provides information on a variety of housing topics to inform actions and implementation plans.

In addition, FHANC, as the County Fair Housing Provider, organizes an annual fair housing conference and resource fair for housing providers and advocates. Housing rights workshops are offered to landlords, property managers, and community members. Information on federal and state fair housing laws, common forms of housing discrimination, protected characteristics, unlawful practices, and fair housing liability is presented to workshop participants. The Marin County Housing Authority website

includes the following information in English and Spanish languages, with the option to use google translate for over 100 languages:

- Public Housing, including reasonable accommodations, grievance procedures, transfer policies, Section 3, maintenance service charges, fraud and abuse, resident newsletters, forms and other resources;
- HCVs, including for landlords, participants, fraud and abuse and voucher payment standards;
- Waitlist information and updates;
- Resident Services, including the Supportive Housing Program and Resident Advisory Board;
- Homeownership including Below Market Rate Homeownership Program, Residential Rehab Loan Program, Mortgage Credit Certification Program and the Section 8 Homeownership Program;
- Announcements and news articles, Agency reports and calendar of events.

FHANC conducts the following educational and outreach activities to provide fair housing education, and for complaint solicitation, in an effort to reach protected classes, staff of service agencies, jurisdictional staff, elected officials, housing advocates, housing providers and the general public:

- FHANC provides training seminars to housing providers, tenants and staff of service organizations in English and Spanish (staff of service agencies serve Spanish speaking clients and members of protected classes). FHANC also provides conferences on Reasonable Accommodations for people with disabilities and a Fair Housing Conference annually. The events that are open to the public are marketed through e-blasts, social media posts, outreach to agency contacts (especially contacts in the Canal, Marin City, and agencies servicing protected classes), and through community partners. Some trainings and community presentations are arranged directly with a particular organization and are open to the organization's staff only. Due to the pandemic, most events were held online.
- FHANC is a HUD-certified Housing Counseling Agency and offers homebuying education for those interested in buying Below-Market Rate units in Marin County, and also provides foreclosure prevention education.
- FHANC conducts fair housing education through social media campaigns and email marketing, targeting different protected classes, in English and Spanish. FHANC also publishes newspaper ads in English and Spanish.
- FHANC distributes literature in four languages (English, Spanish, Vietnamese and Tagalog) to different protected classes, including postering through a postering service, and brochure distribution. FHANC literature includes a 40-page handbook available in English and Spanish with information and resources for tenants.

- FHANC provides expertise to jurisdictional and County of Marin staff and elected officials, on fair housing and AFFH matters.
- FHANC has information for tenants on fair housing rights on its website, in English, Spanish and Vietnamese, including fair housing literature, educational webinars, and an accessible intake procedure, so tenants can easily access FHANC's services.
- FHANC attends community meetings, webinars, conferences and other events for networking and outreach purposes and to provide input on fair housing matters.
- FHANC collaborates with community agencies to provide fair housing information to staff and clients. FHANC networks or holds meetings (sometimes on regular basis) with staff of other agencies to promote collaborations, referrals, and networking,

To educate the community on matters related to Fair Housing and Covid-19, FHANC created a training session and developed a flyer (in English and Spanish) with FAQ's, regarding Fair Housing and Covid-19. FHANC distributed the flyer to agencies in Marin County and posted it on FHANC's website. FHANC also hosted a Fair Housing in Times of Covid forum (details in the event list below).

During FY 2020-2021, FHANC engaged in education and outreach efforts to reach individuals most likely experience discrimination and least likely to contact FHANC though activities such as: engaging public and private providers to prevent discriminatory practices, fair housing training to public and private housing providers, presentations to service providers and tenant groups, fair housing ads and e-blasts/social media posts, and literature distribution. FHANC also conducted pre-purchase education workshops in Spanish and English in collaboration with Marin Housing Authority to promote homeownership to low-income residents, covering topics such as preparing to buy a home, taking steps to homeownership, obtaining a loan, affordable housing programs, and predatory lending. In addition, FHANC partnered with San Rafael High School to provide presentations on fair housing and the history of racial residential segregation in Marin to social studies classes. Additionally, FHANC annually produced and hosted successful virtual Reasonable Accommodations conferences and April Fair Housing Month conferences.

As an example of FHAM's outreach capacity, from 2017 to 2018, FHAM educated 221 prospective homebuyers; trained 201 housing providers on fair housing law and practice, reached 379 tenants and staff from service agencies through fair housing presentations and 227 community members through fair housing conferences, distributed 4,185 pieces of literature; had 100 children participate in the annual Fair Housing Poster Contest from 10 local schools and 16 students participate in our first Fair Housing Poetry Contest from 11 local schools; and offered Storytelling shows about diversity and acceptance to 2,698 children attending 18 Storytelling shows.

As of 2021, FHAM agency reaches those least likely to apply for services through the following:

- Translating most of its literature into Spanish and some in Vietnamese;

- Continuing to advertise all programs/services in all areas of Marin, including the Canal, Novato, and Marin City, areas where Latinx and African-American populations are concentrated and live in segregated neighborhoods;
- Maintaining a website with information translated into Spanish and Vietnamese;
- Maintaining bilingual staff: As of 2021, FHAM has three bilingual Spanish speakers who offer intake, counseling, education and outreach to monolingual Spanish speakers; in addition, they have one staff member who is bilingual in Mandarin and another in Portuguese;
- Maintaining a TTY/TDD line to assist in communication with clients who are deaf/hard of hearing· Offering translation services in other languages when needed;
- Conducting outreach and fair housing and pre-purchase presentations in English and Spanish;
- Collaborating with agencies providing services to all protected classes, providing fair housing education to staff and eliciting help to reach vulnerable populations – e.g. Legal Aid of Marin, the Asian Advocacy Project, Canal Alliance, ISOJI, MCIL, Sparkpoint, the District Attorney's Office, Office of Education, the Marin Housing Authority, and North Marin Community Services.

Local Trends

FHANC events are not for specific jurisdictions, rather they make an effort to reach underserved areas and protected classes. Pre-COVID FHANC did an average of 15-30 in person events, including fair housing trainings, presentations, conferences, pre-purchase workshops, foreclosure prevention workshops and forums. They were held all over the County, with the goal of reaching underserved communities including West Marin and Marin City. Post-COVID as of July 2022, the events are still being held virtually due to the uncertainty of COVID case numbers going down. If members of the protected classes do not have access to computers and/or the internet, FHANC makes every effort to have meetings in person. FHANC does not expect to change its programming, even during COVID they had 15-30 events a year.

Targeted outreach occurs when there are known violations in a geographic area. FHANC puts up posters, sends mailers and emails to people in the area advertising their services and sometimes has meetings to follow up. In addition, FHANC is constantly strategically planning who needs to be targeted for this work. They mainly use census data (block and tract) to find new and emerging populations of members of the protected classes to target. They work with CBOs in all of these geographic areas to make sure that the target audience is in attendance.

The outreach activities and capacities described in the Regional Trends section include the unincorporated County area, which represent about 43 percent of FHANC's geographic service area. According to FHANC's 2022/2024 CDBG Application to Marin County, FHANC stated it will undertake the following activities to Affirmatively Furthering Fair Housing:

- FHANC will maintain an accessible office where residents can come (once COVID restrictions are lifted and FHANC begins to provide services in person)
- FHANC will provide residents with materials on fair housing and equal opportunity, opportunities to participate in fair housing educational activities, and avenues to report or file complaints of suspected or perceived housing discrimination.
- FHANC will maintain its website and ensure that it details the advocacy, programs, complaint intake services, and counseling offered to residents by FHANC.
- FHANC will utilize its Spanish and Vietnamese language materials in the provision of all fair housing education/outreach services within the county and offer interpretative services to non-English speaking individuals who contact FHANC seeking assistance.
- FHANC will advertise, promote, and solicit responses from participants regarding the need for ASL and foreign language interpretation services in the provision of all fair housing education/outreach and enforcement services, and make ASL and foreign language interpretation services available at all events where prospective participants indicate a need for the interpretation services at least five days in advance of the event.
- FHANC will continue to implement its fair housing education and outreach program.
- FHANC will serve as an advocate and educational resource to local elected officials and municipal staff at all levels about the obligations of recipients of federal funds to affirmatively further fair housing.
- FHANC will make its staff available for guest speaker appearances on radio/television talk and feature programs, at conferences and workshops, when requested, and will disseminate fair housing literature through various methods as appropriate.
- FHANC will continue to monitor online housing advertisements and provide education and advocacy that discourages discriminatory advertising, statements, and practices in all forms.
- FHANC will counsel complainants who have encountered illegal discrimination about available options and provide assistance to complainants in filing administrative complaints as well as lawsuits, as appropriate FHANC will maintain its testing program in the County, conducting testing upon receiving complaints as appropriate and in audits for housing discrimination. FHANC will be an organizational complainant and initiate administrative complaints and/or lawsuits as appropriate, based upon evidence gathered from testing or other investigations.
- FHANC will be a proactive advocate for the effective enforcement and utilization of the federal Fair Housing Amendments Act, the California Fair Employment and Housing Act, and HUD Guidelines and Recommendations that exist to discourage and eliminate housing discrimination based on any protected class.
- FHANC will counsel homeowners and loan applicants who may have experienced lending discrimination in violation of the Fair Housing Amendments Act, and provide foreclosure prevention intervention services to residents at risk of

- foreclosure or who are facing the loss of their primary residence due to imminent foreclosure when appropriate, as resources allow.
- FHANC will provide pre-purchase counseling/education to homebuyers so they can better identify fair lending violations and avoid predatory loans, as resources allow.

According to FHANC, the above mentioned activities will help to overcome impediments to fair housing choice by safeguarding people in protected classes from discrimination in the housing market, increasing housing stability by fair housing advocacy and education for people from protected classes, and expanding housing options available to families by helping to ensure open, diverse, and equitable communities through continued outreach and enforcement.

Summary: Fair Housing Enforcement and Outreach Issues

Disability status is the most common basis for a complaint filed with FHANC, Marin's Fair Housing provider. Testing on the basis of disability in the County revealed that persons with disabilities are likely received less favorable treatment or be denied reasonable accommodation. Most importantly, testing revealed higher rates of discrimination on the basis on disability in properties with less than 11 units, indicating a need for increased fair housing education with "mom and pop" landowners.

The use of housing subsidies and HCV vouchers has recently become protected under California law though it has been protected in Marin County since 2016. Testing in Marin County has revealed discriminatory treatment for HCV holder, but higher rates for Latinx and Black HCV holders. Of note is the finding that landlords made exceptions of HCV holders for White residents in areas of high opportunity. This indicates a higher need for outreach education on Source of Income and Race in areas with high resources.

Overall, FHANC's testing has focused on disability status, race, and source of income, as disability status and race have the highest reporting rates and source of income has recently become protected. As such, fair housing outreach and education is imperative to ensure that those experiencing discrimination know when and how to seek help.

2. Integration and Segregation

Segregation is the separation of different demographic groups into different geographic locations or communities, meaning that groups are unevenly distributed across geographic space. ABAG/MTC[13] and UC Merced prepared AFFH Segregation Report to assist Bay Area jurisdictions with the Assessment of Fair Housing section of the Housing Element.

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[13] Metropolitan Transportation Commission

Race/Ethnicity

According to ABAG/MTC's Segregation Report, segregation has resulted in vastly unequal access to public goods such as quality schools, neighborhood services and amenities, parks and playgrounds, clean air and water, and public safety[14] This generational lack of access for many communities, particularly people of color and lower income residents, has often resulted in poor life outcomes, including lower educational attainment, higher morbidity rates, and higher mortality rates.[15]

To measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. Dissimilarity indices are used to measure the evenness with which two groups (frequently defined on racial or ethnic characteristics) are distributed across the geographic units, such as block groups within a community. The index ranges from zero (o) 0 to 100, with zero (0) denoting no segregation and 100 indicating complete segregation between the two groups. The index score can be understood as the percentage of one of the two groups that would need to move to produce an even distribution of racial/ethnic groups within the specified area. For example, if an index score above 60, 60 percent of people in the specified area would need to move to eliminate segregation.[16] The following shows how HUD views various levels of the index:

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

Regional Trends

Non-Hispanic Whites make up 71.2 percent of Marin County's population, a significantly larger share than in the Bay Area region,[17] where only 39 percent of the population is non-Hispanic White. The next largest racial/ethnic group in Marin County is Hispanic/Latino, making up 16 percent of the population, followed by Asian population (5.8 percent), and population of two or more races (3.8 percent) (Table D- 6). Black residents make up the fifth highest share of the population, with 2.1 percent of the County's residents identifying as African American/Black. Within the County, San Rafael has the most concentrated Hispanic population, where 31 percent of residents are Hispanic or Latino, while Belvedere has the smallest Hispanic population of only five percent (and inversely the largest White population of 92 percent). These trends differ from the Bay Area, where Asians make up the second largest share of the population (27 percent). While Asians

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[14] Trounstine 2015. See references in Unincorporated Marin Report
https://mtcdrive.app.box.com/s/d0kki6p26idiq81h5vxgqf77a5hsisdw/folder/157817334020https://mtcdrive.app.box.com/s/d0kki6p26idiq81h5vxgqf77a5hsisdw/folder/157817334020

[15] Chetty and Hendren 2018, Ananat 2011, Burch 2014, Cutler and Glaeser 1997, Sampson 2012, Sharkey 2013. See references in Unincorporated Marin Report
https://mtcdrive.app.box.com/s/d0kki6p26idiq81h5vxgqf77a5hsisdw/folder/157817334020
https://mtcdrive.app.box.com/s/d0kki6p26idiq81h5vxgqf77a5hsisdw/folder/157817334020

[16] Massey, D.S. and N.A. Denton. (1993). American Apartheid: Segregation and the Making of the Underclass. Cambridge, MA: Harvard University Press.

[17] The "Bay Area" data covers the members of the Association of Bay Area Governments (ABAG) which are the counties of: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma and the City of San Francisco.

make up the third largest share of the population in Marin County, they account for only six percent of the population.

Table D- 6: *Racial Composition in Neighboring Cities and County*

	Bay Area[1]	Marin County	Belvedere	Corte Madera	Fairfax	Larkspur	Mill Valley	Novato	Ross	San Anselmo	San Rafael	Tiburon
White, non-Hispanic	39.3%	71.2%	92.3%	78.5%	82.3%	77.9%	86.2%	63.5%	89.1%	85.9%	57.0%	86.7%
Black or African American, non-Hispanic	5.8%	2.1%	0.0%	2.3%	0.4%	0.7%	0.7%	3.4%	3.0%	0.8%	1.3%	0.9%
American Indian and Alaska Native, non-Hispanic	0.2%	0.2%	0.0%	0.0%	0.0%	0.4%	0.0%	0.2%	0.0%	0.0%	0.1%	0.2%
Asian, non-Hispanic	26.7%[1]	5.8%	2.0%	6.1%	4.3%	5.4%	5.0%	7.7%	3.8%	3.3%	6.7%	3.2%
Native Hawaiian and Other Pacific Islander, non-Hispanic	N/A	0.1%	0.0%	0.0%	0.4%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%
Some other race, non-Hispanic	N/A	0.9%	0.0%	1.6%	0.0%	0.5%	0.0%	2.3%	0.0%	0.3%	0.4%	0.6%
Two or more races, non-Hispanic	N/A	3.8%	0.6%	4.4%	3.2%	4.0%	3.8%	3.9%	0.5%	2.6%	3.4%	0.4%
Hispanic or Latino	23.5%	16.0%	5.1%	7.1%	9.4%	11.0%	4.2%	18.9%	3.5%	7.1%	31.0%	8.1%
Total	7,710,026	259,943	2,134	9,838	7,578	12,319	14,330	55,642	2,290	12,525	58,775	7,116

1. The "Bay Area" data covers the members of the Association of Bay Area Governments (ABAG) which are the counties of: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma.
2. Asian and Pacific Islander combined; ABAG Data Package presented data with some races combined.
Sources: American Community Survey, 2015-2019 (5-Year Estimates). ABAG Housing Needs Data Package.

As explained above, dissimilarity indices measures segregation, with higher indices signifying higher segregation. The dissimilarity index at the jurisdiction level can be interpreted as the share of one group that would have to move to a different tract to create perfect integration for these two groups.

In Marin County, all minority (non-White) residents are considered moderately segregated from White residents, with an index score of 42.6 in 2020 (Table D- 7). Since 1990, segregation between non-White (all non-white residents combined) and White residents has increased. Dissimilarity indices between Black, Hispanic, Asian/Pacific Islander, and White residents have also increased since 1990, indicating that Marin County has become increasingly racially segregated. Based on HUD's definition of the index, Black and White residents are highly segregated and Hispanic and White residents are moderately segregated, while segregation between Asian/Pacific Islander and White residents is considered low.

Table D- 7: Dissimilarity Indices for Marin County (1990-2020)				
	1990 Trend	2000 Trend	2010 Trend	Current
Marin County				
Non-White/White	31.63	34.08	35.21	42.61
Black/White	54.90	50.87	45.61	57.17
Hispanic/White	36.38	44.29	44.73	49.97
Asian or Pacific Islander/White	19.64	20.13	18.55	25.72
Sources: HUD Dissimilarity Index, 2020.				

The County is making efforts to reduce segregation patterns through its sites inventory. About 26 percent (940 units) of the County's sites inventory is located in tracts where minorities make up less than 20 percent of the population. These sites offer housing opportunities at various income levels, 452 are lower income, 218 are moderate income, and 270 are above moderate. This strategy reflects an effort to provide housing opportunities in areas with a low concentration of minorities to residents of all races and income levels.

According to the Othering and Belonging Institute located in Berkeley, CA, there were 3 counties in California that were more segregated in 2020 than they were in 2010 – Napa, Sonoma and Marin. And Marin County was the most segregated of all. While over 70% of White Marin residents own their homes, 71% of Latinx and 75% of African Americans rent. The high cost of housing, and its effects, are the main reasons why many people – particularly people of color move from Marin. Seniors, Latinx residents, African Americans, low-wage earners and families with children are the most financially burdened from the rising cost of housing and increasing rents are displacing residents to areas outside of Marin, which is further perpetuating racial segregation.

In California, based on the figures provided in the 2020 State AI, segregation levels between non-White and White populations were moderate in both entitlement and non-

entitlement areas[18]. However, segregation levels in non-entitlement areas are slightly higher with a value of 54.1, compared to 50.1 in entitlement areas. Segregation trends Statewide show an increase in segregation between non-White and White populations between 1990 and 2017 in both entitlement and non-entitlement areas. The 2020 State AI found that California's segregation levels have consistently been most severe between the Black and White populations, a trend paralleled trends in Marin County. Also, like Marin County, State trends show Asian or Pacific Islander and White residents are the least segregated when compared to other racial and ethnic groups, but levels are still increasing.

Figure D- 2 and Figure D- 3 below compare the concentration of minority populations in Marin County and the adjacent region by census block group[19] in 2010 and 2018. Since 2010, concentrations of racial/ethnic minority groups have increased in most block groups regionwide. In Marin County, non-White populations are most concentrated along the eastern County boundary, specifically in North and Central Marin in the cities of San Rafael, Novato, and the unincorporated communities of Marin City. Red block groups indicate that over 81 percent of the population in the tract is non-White. While non-White populations appear to be increasing across the Marin region, these groups are generally concentrated within the areas described above. However, minorities are more highly concentrated in North, Central, and Southern Marin. Most of the block groups along the San Pablo Bay and San Francisco Bay shores in Solano, Contra Costa, Alameda, and San Francisco County have higher concentrations of minorities (over 61 percent) compared to North Bay counties (Marin, Sonoma, and Napa).

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[18] Entitlement Area means a unit of general Local Government that has been designated by HUD to receive an allocation of HOME funds.

[19] Block groups (BGs) are the next level above census blocks in the geographic hierarchy (census blocks are the smallest geographic area for which the Bureau of the Census collects and tabulates decennial census data). A BG is a combination of census blocks that is a subdivision of a census tract or block numbering area (BNA). A county or its statistically equivalent entity contains either census tracts or BNAs; it cannot contain both. The BG is the smallest geographic entity for which the decennial census tabulates and publishes *sample* data.

Figure D- 2: Regional Racial/Ethnic Minority Concentrations by Block Group (2010)
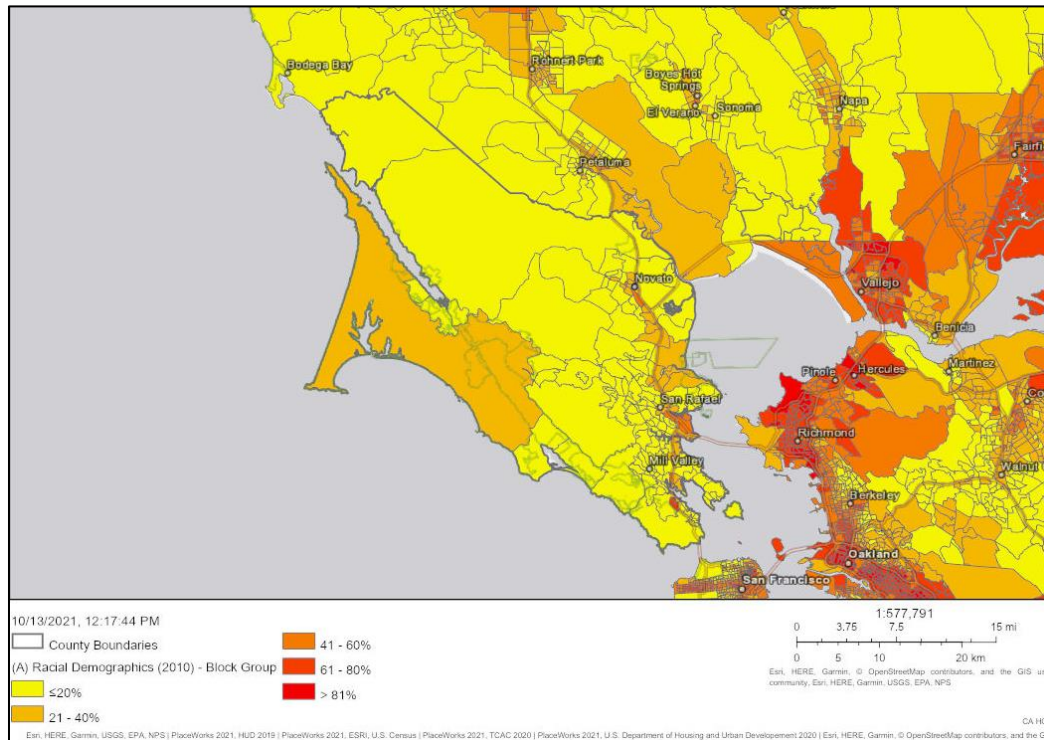

Figure D- 3 : Regional Racial/Ethnic Minority Concentrations by Block Group (2018)
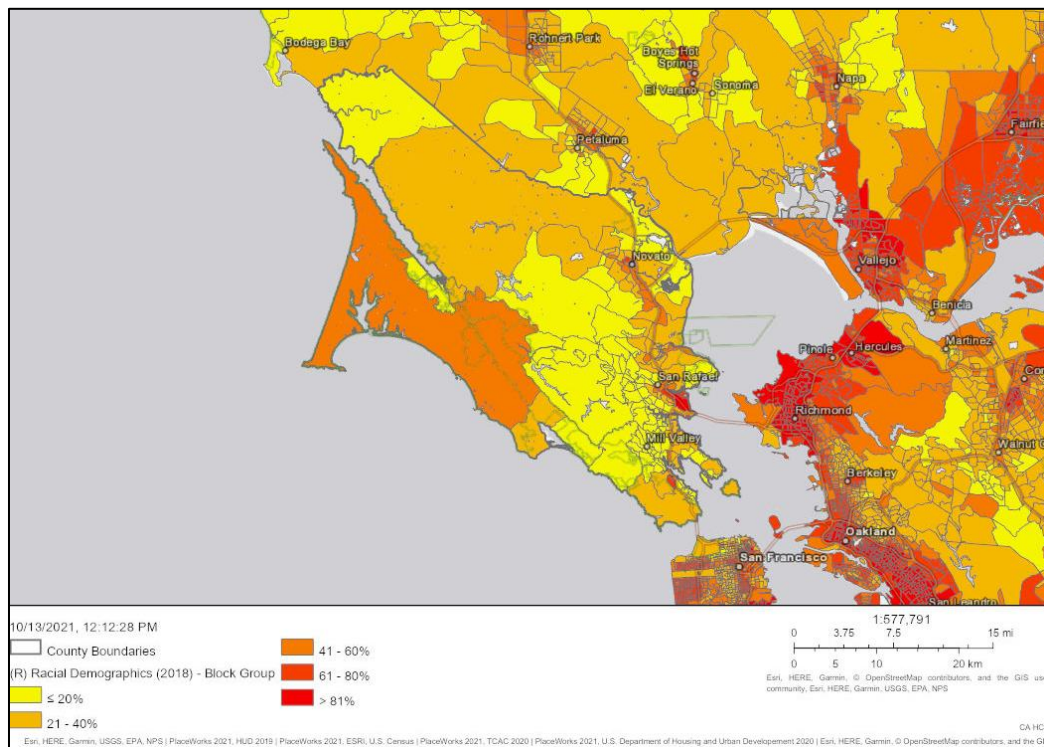
Figure D- 4 shows census tracts in Marin County and the neighboring region by predominant racial or ethnic groups. The intensity of the color indicates the population percentage gap between the majority racial/ethnic group and the next largest racial/ethnic group. The higher the intensity of the color, the higher the percentage gap between the predominant racial/ethnic group and the next largest racial/ethnic group. The darkest color indicator for each race indicates that over 50 percent of the population in that tract is of a particular race/ethnicity. Gray indicates a White predominant tract, green indicates a Hispanic predominant tract, purple indicates an Asian predominant tract, and red indicates a Black predominant tract. There are only four tracts in the County with non-White predominant populations. Three tracts in Central Marin and one tract in Southern Marin have predominant non-White populations. Two tracts in San Rafael have Hispanic predominant populations (green), one of which has a Hispanic population exceeding 50 percent (90 percent, darkest green) and the other covers predominantly the prison. In Southern Marin, one tract in unincorporated Marin City has a Black majority population (41 percent, red). In all other tracts countywide, Whites are the predominant race (grey). By comparison, many census tracts in Solano, Contra Costa, Alameda and San Francisco county have predominant minority populations (shades of purple, green, and red).

Figure D- 4: Regional Racial/Ethnic Majority Tracts (2018)
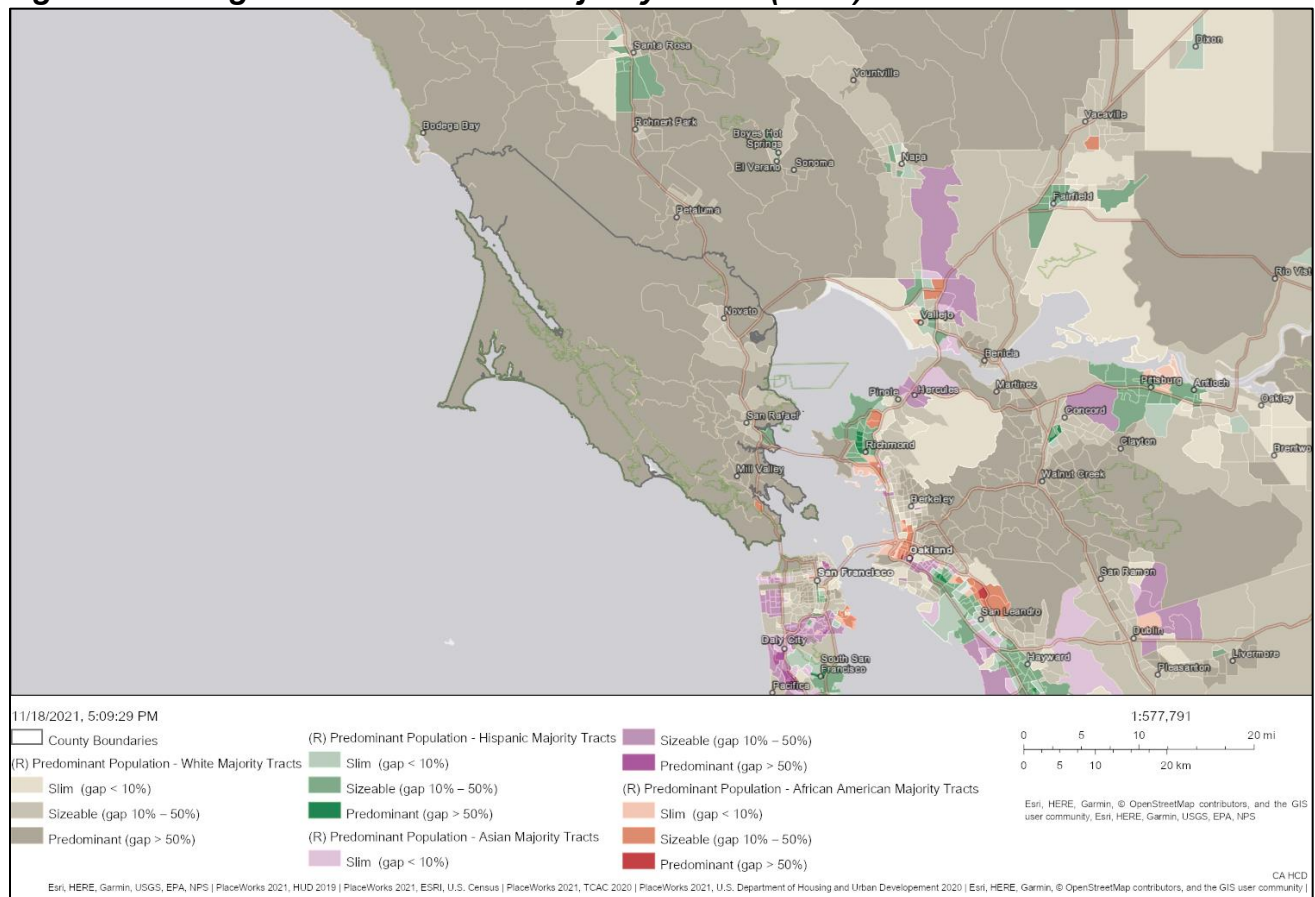
Local Trends

In the unincorporated area, Marin City has the largest proportion of Hispanic residents (25 percent) significantly greater than in the unincorporated County (10 percent) and Marin County as a whole (16 percent) (Table D- 8). All communities except Northern Coastal West Marin, the Valley, and Marinwood/Lucas Valley have a Hispanic population representing less than 10 percent of the total population.

Table D- 8: Population by Race, Unincorporated Marin County Communities

Community	American Indian or Alaska Native	Asian / API	Black or African American	White, Non-Hispanic	Other Race	Hispanic or Latinx	Total
Black Point-Greenpoint	0.0%	9.3%	0.0%	80.3%	3.2%	7.2%	1,622
Northern Costal West Marin	0.0%	4.9%	0.0%	84.9%	0.0%	10.1%	445
Central Coastal West Marin	0.0%	0.0%	0.0%	91.3%	0.9%	7.9%	1,385
The Valley	0.6%	0.8%	0.1%	85.9%	1.7%	10.9%	3,412
Southern Coastal West Marin	0.0%	0.8%	0.0%	89.2%	5.1%	4.9%	2,010
Marinwood/Lucas Valley	0.0%	6.0%	0.1%	73.6%	7.1%	13.3%	6,686
Santa Venetia/ Los Ranchitos	0.0%	10.1%	3.7%	71.2%	9.3%	5.7%	4,474
Kentfield/ Greenbrae	0.0%	4.0%	0.0%	86.7%	3.4%	5.9%	7,020
Strawberry	0.0%	13.2%	1.2%	73.3%	4.7%	7.7%	5,527
Tam Valley	0.0%	5.8%	1.3%	82.3%	5.0%	5.6%	11,689
Marin City	0.0%	6.9%	21.7%	32.9%	13.8%	24.8%	3,126
Unincorporated Marin	**0.3%**	**5.5%**	**3.0%**	**76.0%**	**5.0%**	**10.3%**	**68,252**

Note: For the purposes of this table, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.
"Other race" refers to persons that identified as,"some other race" or " two or more races" but not Hispanic/Latinx
Source: American Community Survey 5-Year Data (2015-2019), Table B03002.

Marin City, a historic African American enclave, is also home to the County's largest Black/African American population, (with the exception of San Quentin State Prison), at 22 percent, considerably higher than any other community in Marin County. Marin City was founded in 1942 as part of the wartime ship building efforts of World War II. In the early 1940s, many African American's migrated from the South for better wages and more consistent work. Over time federal and local policies prevented people of color, particularly the Black population of Marin City, from moving out. This included low interest rate loans offered to white families only. Additionally, restrictive covenants were an effective way to segregate neighborhoods and beginning in 1934, the Federal Housing

Authority recommended the inclusion of restrictive covenants in the deeds of homes it insured because of its belief that mixed-race neighborhoods lowered property values. These racially restrictive covenants made it illegal for African Americans to purchase, lease or rent homes in many white communities. Restrictive covenants were placed in most communities in Marin County, making it impossible for people of color to become homeowners. Restrictive covenants are no longer enforceable.

Today, Marin City has a sizable African American and low-income population, compared to surrounding communities, which are mostly affluent and white. The median income in Marin City is $65,958, with nearly 30 percent of residents living below the poverty line. The Marin City community has experienced significant gentrification pressures and displacement of lower-income Black/African American residents. An important trend not pictured in Figure D- 3 is that Marin City is experiencing significant declines in its African American population – in 2010, the community was about 40 percent and declined to 22 percent as of 2019, leading to concerns of displacement and gentrification. Gentrification and displacement is discussed at greater length in the Displacement Risk section in page 127.

Minority communities also have the greatest need for rental assistance in the unincorporated County. In 2021, Hispanic/Latinx populations represent about 16 percent of the County population, but 34 percent of Rental Assistance requests, while Black/African American residents represent about two percent of the County population, but 8.5 percent of Rental Assistance requests.

Figure D- 5 below shows that minority populations are focused along in North, Central, and Southern Marin. While the majority of block groups have a minority population of less than 20 percent, there are some block groups in Santa Venetia where minority population ranges from 21 to 60 percent. Meanwhile in Marin City, one block group has 74 percent minority population while the other block group within Marin City's boundaries has a minority population of 21 percent.

While there is no Dissimilarity Index data for the unincorporated County communities, the increasing segregation trends detected in the County (Table D- 7) also apply to the unincorporated communities. In the focus groups convened for the housing process, the County heard anecdotal evidence that Black and Asian residents in Corte Madera and Mill Valley did not feel welcome in many stores in the area. Mill Valley and Corte Madera are incorporated cities sin the County with a very small minority population. Thus it is likely that minority populations are concentrating in areas where there is already a minority concentration due to the sense of community in those areas. This means integration will pose greater challenges than just providing affordable housing in areas without a concentration of minorities.

-

Figure D- 5: Racial Demographics in the Unincorporated County (2018)
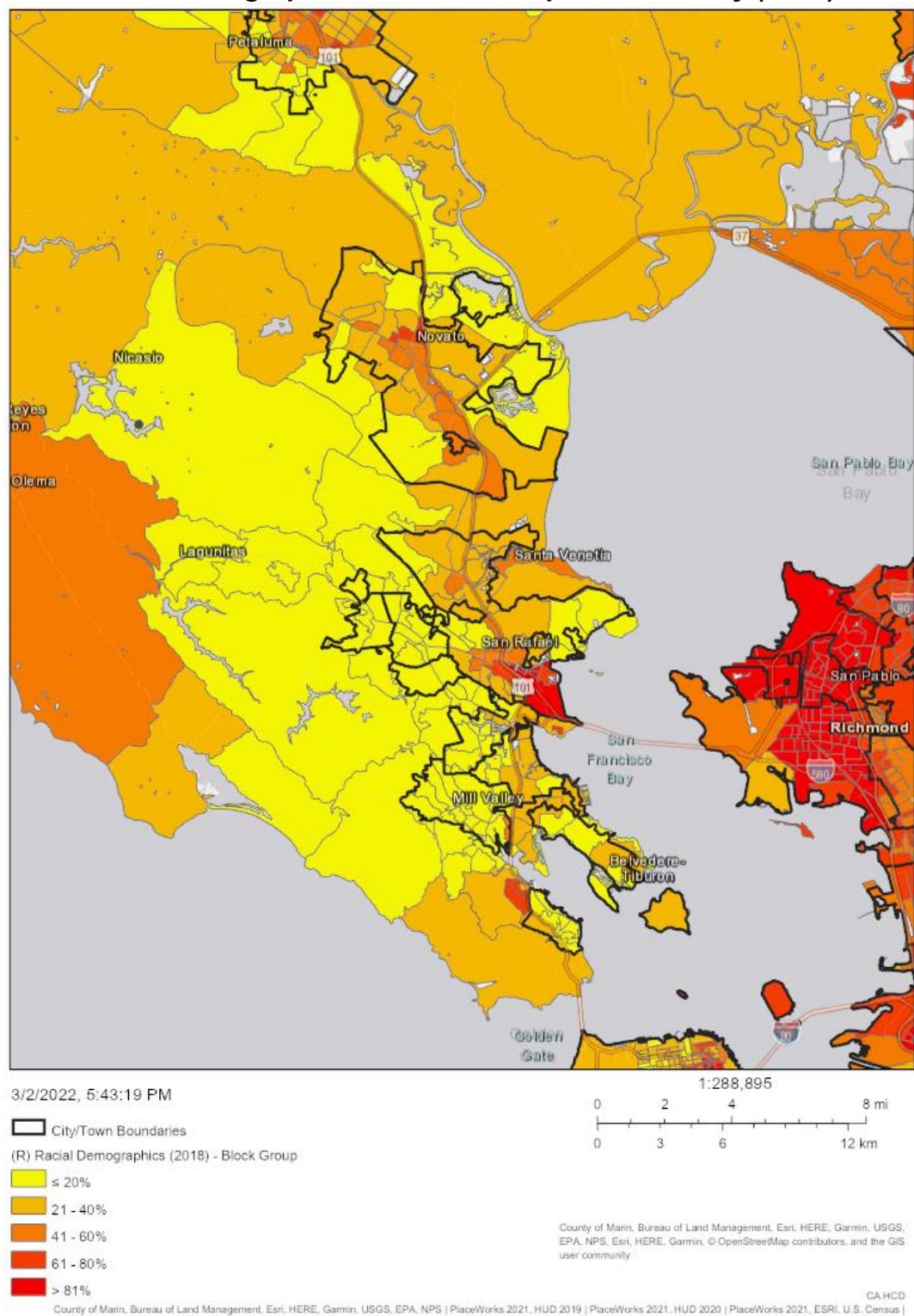
Marin's Native American Population

While Unincorporated Marin County's Native American population is less than one percent, the Native American population has roots in Marin County as its native inhabitants. According to U.S. Department of Interior, the Coast Miwok first settled the Tomales Bay area between 2,000 and 4,00 years ago. [20] Evidence of villages and smaller settlements along the Bay are concentrated within Point Reyes National Seashore. The Coast Miwok are believed to have located their settlements on coves along the bay and to live a semisedentary lifestyle. The Tomales Bay area and other areas in what is now Marin County was changed dramatically by the Spanish colonization and Missionaries. In the late 1700s, Coast Miwok were interned in four San Francisco Bay area missions and by the end of the Spanish occupation, Coast Miwok population had fallen from 3,000 to between 300 and 500.

Coast Miwoks were further excluded from their land during the Mexican California and Ranching Era in Marin County (1821-1848).During this time, "the Mexican government transformed Coast Miwok land into private property, and all the land surrounding Tomales Bay had been granted to Mexican citizens."[21] The Coast Miwok were forced into the Mexican economy as ranch laborers and cooks and maids.

In 1848s, Tomales Bay changed hands to the United States through the Treaty of Guadalupe Hidalgo and underwent a radical transformation as san Francisco became a metropolitan center. While the treaty "guaranteed certain rights to California Indians… the Coast Miwok were increasingly marginalized under American rule."[22] The government did not make any treaties with the Coast Miwok nor did they set aside a reservation for the group, probably due to the small number of survivors. There was an estimated only 218 Coast Miwoks in Marin County by 1852. The 1870 census only listed 32 Indians in Point Reyes and Tomales Townships and by 1920, only five remained.

In 1920, after the Lipps-Michaels Survey of Landless Indians (a congressional study) concluded that Native Americans in Marin and Sonoma County deserved their own reservation, the Bureau of Indian Affairs was unable to find land in the Tomales Bay for the Coast Miwok. According to the U.S. Department of the Interior "property owners were unwilling to sell land for an Indian reservation" and the government ended up purchasing a 15.5 acre parcel near Graton in Sonoma County- far from tadeonal Coast Miwok land. Some Coast Miwok moved to the site but the sites proved to be too small, steep, and lacked water and funds to build housing. Eventually the Coast Miwoks left the land as a community center and continued to pursue work elsewhere as farm workers or house keepers.

The Coast Miwok community also had ancestral land in Nicasio, Olompali, San Rafael, Corte Madera, Mill Valley, Strawberry, Tiburon, Angle Island, San Geronimo, Fairfax,

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[20] Avery, C. (2009). Tomales Bay environmental history and historic resource study- Point Reyes National Seashore. Pacific West Region National Park Service, U.S. Department of the Interior.
[21] Avery (2009). P. 31
[22] Avery (2009). P. 62

Belvedere, Sausalito, Larkspur, Marin City, Novato areas.[23]   In fact, Marin County's namesake comes from Chief Marin, a Miwok leader whose name was Huicmuse but was later given the name Marino by missionaries after he was baptized at Mission Dolores in 180.[24] San Geronimo is also rumored to be named after another Coast Miwok leader.[25] The San Geronimo Valley Historical Association reports that Coast Miwoks have thousands of years of history in the San Geronimo. Southern Popo people are also known to have inhabited Marin before colonization. Colonization and private property systems excluded the Coast Miwoks from home/land ownership and left them with limited choices to make a living.

In the 1990s, Coast Miwok descendants began to lobby for federal recognition as a tribe and in 1997, they were granted official status as the Federated Indians of Graton Rancheria- which in 2009 included 1,000 members of Coast Miwok and Southern Pomo descent. The group remined landless at the turn of the 21st century.

Today, Native American communities are represented Federated Indian of Graton Rancheria as well as by active organizations such as the Coast Miwok Tribal Council of Marin- a core group of lineal Marin Coast Miwok descendants and the Marin American Indian Alliance - longstanding Marin County 501c3 non-profit organization connecting American Indians living in Marin and the San Francisco Bay Area at large.

Persons with Disabilities

Persons with disabilities[26] have special housing needs and often higher health care costs associated with their disability. This general lack of accessible and affordable housing in Marin County makes the housing search even more difficult. In addition, many may be on fixed incomes that further limit their housing options. Persons with disabilities also tend to be more susceptible to housing discrimination due to their disability status and required accommodations associated with their disability.

Regional Trends

Marin County's population with a disability is similar to that in the Bay Area. As presented in Table D- 9 in Marin County, 9.1 percent of the population has a disability, compared to

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[23] Who We Are. Marin Coast Miwoks. https://www.marinmiwok.com/who-we-are

[24] Wilson, M.A. (2021, October 11). The story behind Marin County's namesake, "Chief Marin" — how the Coastal Miwok left a cultural and physical legacy that lingers today. Marin Magazine. https://marinmagazine.com/community/history/the-story-behind-marin-countys-namesake-chief-marin-and-how-the-coastal-miwok-left-a-cultural-and-physical-legacy-that-lingers-today/

[25] Clapp, O. (2020, November 6). How did the San Geronimo Valley get its name? A mystery rooted in the troubled history of Spanish missions and the Coast Miwok. Marin Magazine. https://marinmagazine.com/community/history/how-did-the-san-geronimo-valley-get-its-name-a-mystery-rooted-in-the-troubled-history-of-spanish-missions-and-the-coast-miwok/

[26] The American Community Survey asks about six disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.   Respondents who report anyone of the six disability types are considered to have a disability. For more information visit: https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html#:~:text=Physical%20Disability%20Conditions%20that%20substantially,reaching%2C%20lifting%2C%20or%20carrying. For more information visit: https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html#:~:text=Physical%20Disability%20Conditions%20that%20substantially,reaching%2C%20lifting%2C%20or%20carrying.

9.6 percent in the Bay Area. Black or African American, American Indian and Alaska Native, and non-Hispanic White populations experience disabilities at the highest rates in both the Bay Area and the County (16 percent, 18 percent, and 11 percent in the Bay Area and 15 percent, 12 percent, and 10 percent in Marin County, respectively). Nearly 37 percent of Marin County's population aged 75 and older and 14.6 percent aged 65 to 74 has one or more disability, lower shares than in the Bay Area. Ambulatory and independent living difficulties are the most common disability type in the County and Bay Area.

Table D- 9: Populations of Persons with Disabilities – Marin County	Bay Area	Marin County
	Percent with a Disability	Percent with a Disability
Civilian non-institutionalized population	9.6%	9.1%
Race/Ethnicity		
Black or African American alone	15.9%	14.8%
American Indian and Alaska Native alone	17.5%	12.1%
Asian alone	7.3%	7.3%
Native Hawaiian and Other Pacific Islander alone	9.3%	0.8%
Some other race alone	6.8%	4.7%
Two or more races	8.2%	8.9%
White alone, not Hispanic or Latino	11.3%	9.9%
Hispanic or Latino (of any race)	7.9%	6.1%
Age		
Under 5 years	0.6%	0.7%
5 to 17 years	3.8%	2.9%
18 to 34 years	4.6%	5.9%
35 to 64 years	8.0%	6.1%
65 to 74 years	19.6%	14.6%
75 years and over	47.8%	36.8%
Type		
Hearing difficulty	2.7%	3.0%
Vision difficulty	1.7%	1.5%
Cognitive difficulty	3.7%	3.2%
Ambulatory difficulty	4.8%	4.3%
Self-care difficulty	2.2%	2.0%
Independent living difficulty	3.9%	4.3%
1. The "Bay Area" data covers the members of the Association of Bay Area Governments (ABAG) which are the counties of: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma. **Sources: American Community Survey, 2015-2019 (5-Year Estimates).**		

According to the 2015-2019 ACS, populations of persons with disabilities in Marin County cities are generally consistent, ranging from 7.2 percent in Ross to 10 percent in Novato. Figure D- 6 shows that less than 20 percent of the population in all tracts in the County

has a disability. Persons with disabilities are generally not concentrated in one area in the region. Figure D- 6 also shows that only a few census tracts in the region have a population with a disability higher than 20 percent. However, multiple census tracts with a population with disabilities between 15 and 20 percent are concentrated along San Pablo Bay and San Francisco Bay in Napa, Contra Costa, and Contra Costa Valley.

Figure D- 6: Regional Populations of Persons with Disabilities by Tract (2019)

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County Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

30% - 40%

> 40%

1:577,791

0   3.75   7.5   15 mi

0   5   10   20 km

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community, Esri, HERE, Garmin, USGS, EPA, NPS

CA HCD

Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Local Trends

The unincorporated County's population with a disability is similar to that of the County and Bay Area. According to 2019 ACS data, approximately 9.2 percent of the unincorporated County's population has a disability of some kind, compared to 9.1 percent and 9.6 percent of Marin County and the Bay Area's population. Table D- 10 shows the rates at which different disabilities are present among residents of unincorporated Marin County and its community areas. Among the unincorporated County communities, the Valley, Marinwood/Lucas Valley, Santa Venetia/Los Ranchitos, and Marin City have a higher proportion of persons with a disability than the unincorporated County. However, across all communities, ambulatory difficulties are the most prominent.

Table D- 10: Persons with Disabilities by Disability Type							
Community	With Disability	With a Hearing Difficulty	With a Vision Difficulty	With a Cognitive Difficulty	With an Ambulatory Difficulty	With a Self-Care Difficulty	With an Independent Living Difficulty
Black Point-Green Point	9.4%	4.6%	0.6%	2.2%	4.3%	2.0%	4.0%
Northern Costal West Marin	5.8%	3.8%	2.0%	3.8%	5.8%	3.8%	3.8%
Central Coastal West Marin	10.3%	3.4%	2.2%	1.6%	4.3%	0.9%	1.6%
The Valley	11.2%	4.7%	2.8%	4.2%	7.2%	2.2%	2.6%
Southern Coastal West Marin	6.9%	3.1%	0.6%	2.1%	2.4%	0.0%	0.2%
Marinwood/Lucas Valley	12.0%	3.3%	1.4%	3.2%	6.8%	1.9%	6.7%
Santa Venetia/Los Ranchitos	16.0%	3.0%	4.7%	7.4%	8.1%	4.5%	9.5%
Kentfield/Greenbrae	7.1%	2.1%	0.5%	2.5%	2.9%	2.3%	3.6%
Strawberry	7.6%	2.2%	0.6%	2.0%	3.6%	2.1%	1.6%
Tam Valley	8.6%	3.0%	1.8%	2.5%	3.1%	1.8%	2.3%
Marin City	12.6%	0.4%	2.7%	6.1%	4.8%	1.9%	6.2%
Unincorporated	**9.2%**	**2.6%**	**1.4%**	**2.8%**	**4.0%**	**1.7%**	**3.0%**
Source: American Community Survey 5-Year Estimates, 2015-2019.							

Persons with developmental disabilities[27] also have specific housing needs and the increased risk of housing insecurity after an aging parent or family member is no longer

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[27] Senate Bill 812, which took effect January 2011, requires housing elements to include an analysis of the special housing needs of the developmentally disabled in accordance with Government Code Section 65583(e). Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old.

able to care for them. The total number of persons served in unincorporated County communities cannot be estimated because the Department of Developmental Services does not give exact number of consumers when fewer than 11 persons are served (Table II- 38). However, based on the September 2020 Quarterly Consumer Reports, the communities of Marinwood/Lucas Valley, Santa Venetia/Los Ranchitos, and Black-Point Greenpoint have the greater population of persons with developmental disabilities. Figure D- 7 shows this concentration of persons with disabilities in Central Coastal West Marin, the Valley, Lucas Valley and Marin City. About 10 to 20 percent of the population in these census tracts have a disability.

Figure D- 7: Persons with Disabilities- Unincorporated Communities

Familial Status

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

Local Trends

Within the unincorporated County, Marin City has the highest percentage of female-headed households (42 percent of all households are female-headed households) and female-headed households with children (11 percent) (Table D- 11). Marin City also has the highest poverty rates compared to all community areas and the unincorporated County; about 16 percent of all family households are living below the federal poverty line. Female-headed households also have higher rates of poverty (11 percent) in Marin City compared to other community areas. About six percent of all households in the Marin City are female-headed family household with children living below the poverty line.

Table D- 11: Female-Headed Households (FHH) - Unincorporated County Communities							
Community	Total households (HH)	Total FHH	FHH w/ children	Total Families	Total families under the poverty level	FHH under the poverty level	FHH w/ child
Black Point-Green Point	617	12.0%	0.0%	419	1.9%	0.0%	0.0%
Northern Costal West Marin	212	36.8%	0.0%	129	0.0%	0.0%	0.0%
Central Coastal West Marin	853	39.4%	0.0%	381	4.2%	1.6%	0.0%
The Valley	1,500	28.9%	2.4%	769	6.2%	0.0%	0.0%
Southern Coastal West Marin	1,026	32.0%	1.2%	451	4.7%	1.8%	0.0%
Marinwood/Lucas Valley	2,412	25.9%	2.0%	1,762	3.2%	1.0%	1.0%
Santa Venetia/Los Ranchitos	1,717	34.7%	1.2%	1,051	0.0%	0.0%	0.0%
Kentfield/Greenbrae	2,567	20.6%	3.7%	1,874	2.2%	0.6%	0.6%

Table D- 11: *Female-Headed Households (FHH) - Unincorporated County Communities*							
Community	Total households (HH)	Total FHH	FHH w/ children	Total Families	Total families under the poverty level	FHH under the poverty level	FHH w/ child
Strawberry	2,391	36.2%	7.2%	1,348	2.7%	0.9%	0.9%
Tam Valley	4,617	24.6%	3.9%	3,202	1.9%	0.0%	0.0%
Marin City	1,377	42.0%	10.5%	698	16.3%	10.5%	6.3%
Unincorporated	25,850	26.1%	3.1%	17,061	2.8%	0.9%	0.6%
FHH = Female-Headed Households							
Source: American Community Survey, 5-Year Estimates 2015-2019, Tables DP02 and B17012.							

This concentration of female-headed households is reflected in Table D- 11 which shows that between 40 and 60 percent of children in that tract live in single female-headed households. Additionally, the Southern Coastal West Marin census tracts (Stinson Beach and Bolinas CDPs) also have the highest concentration of children in single female-headed households (40 to 60 percent), although these families only account for 1.2 percent of households in the community.

Regional Trends

According to the 2019 ACS, there are slightly fewer households with children in Marin County than the Bay Area. About 27 percent of households in Marin County have children under the age of 18, with 21 percent married-couple households with children and six percent single-parent households (Figure D- 8). In the Bay Area, about 32 percent of households have children and as in the County, the majority of households with children are married-couple households. Within Marin County, the cities of Belvedere, Corte Madera, and Ross have the highest percentage of households with children (36 percent, 37 percent, and 41 percent, respectively). Corte Madera and San Rafael have concentrations of single-parent households exceeding the countywide average. Figure D- 9 shows the distribution of children in married households and single female headed households in the region. Census tracts with high concentrations of children living in married couple households are not concentrated in one area of Marin County. Most census tracts have over 60 percent of children living in married-persons households. Regionally, children in married-person households are more common in inland census tracts (away from the bay areas). The inverse trend is seen for children living in single-parent female-headed households, is shown in Figure D- 10. In most tracts countywide, less than 20 percent of children live in female-headed households. Between 20 and 40 percent of children live in female-headed households in two tracts: one in Southern Marin in the unincorporated community of Marin City and one in West Marin near the unincorporated community of Bolinas. Regionally, tracts with a higher percentage of children in married-persons households are found along the San Pablo and San Francisco bays.

Figure D- 8: Households with Children in Bay Area, Marin County, and Incorporated Cities
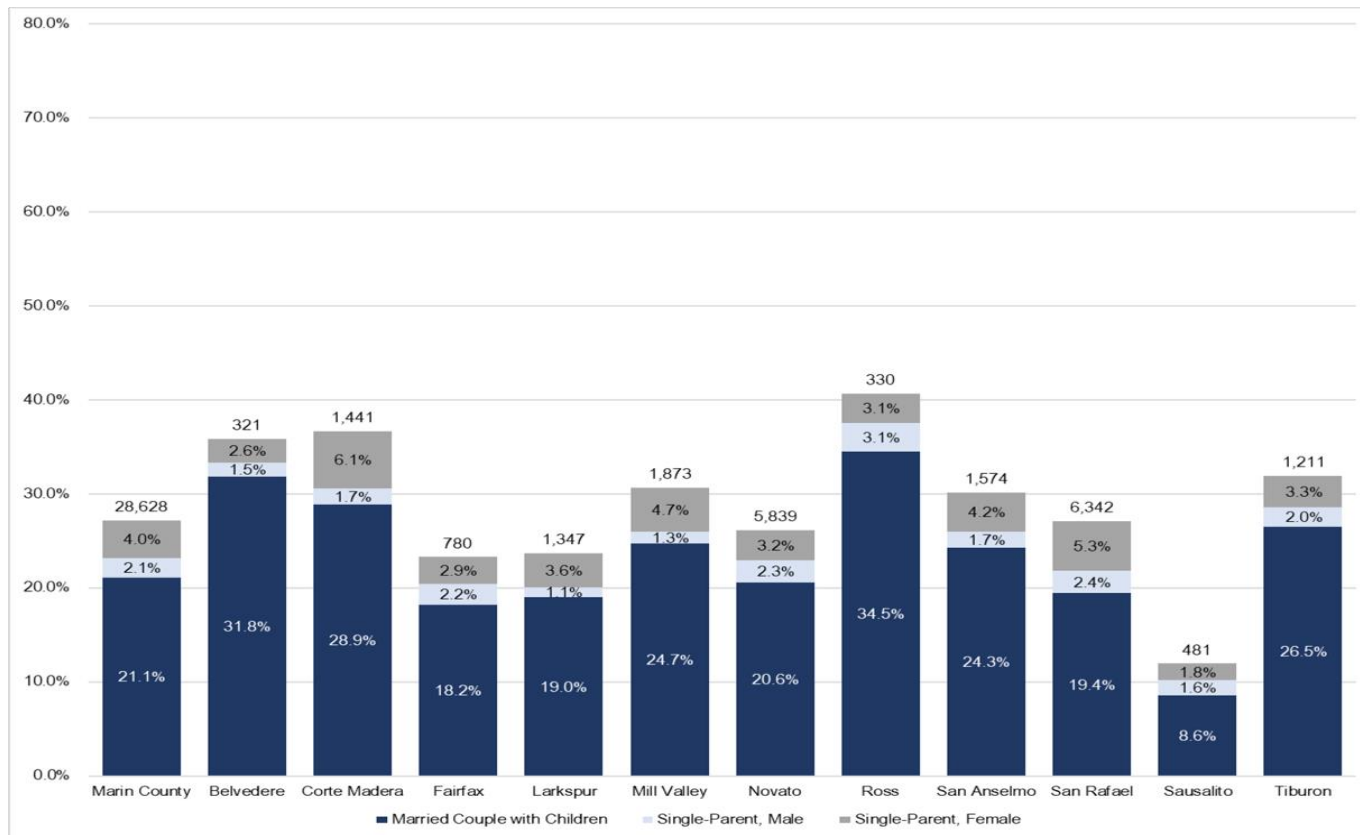
Source: American Community Survey, 2015-2019 ACS (5-Year Estimates)

Figure D- 9: Regional Percent of Children in Married Couple Households by Tract (2019)
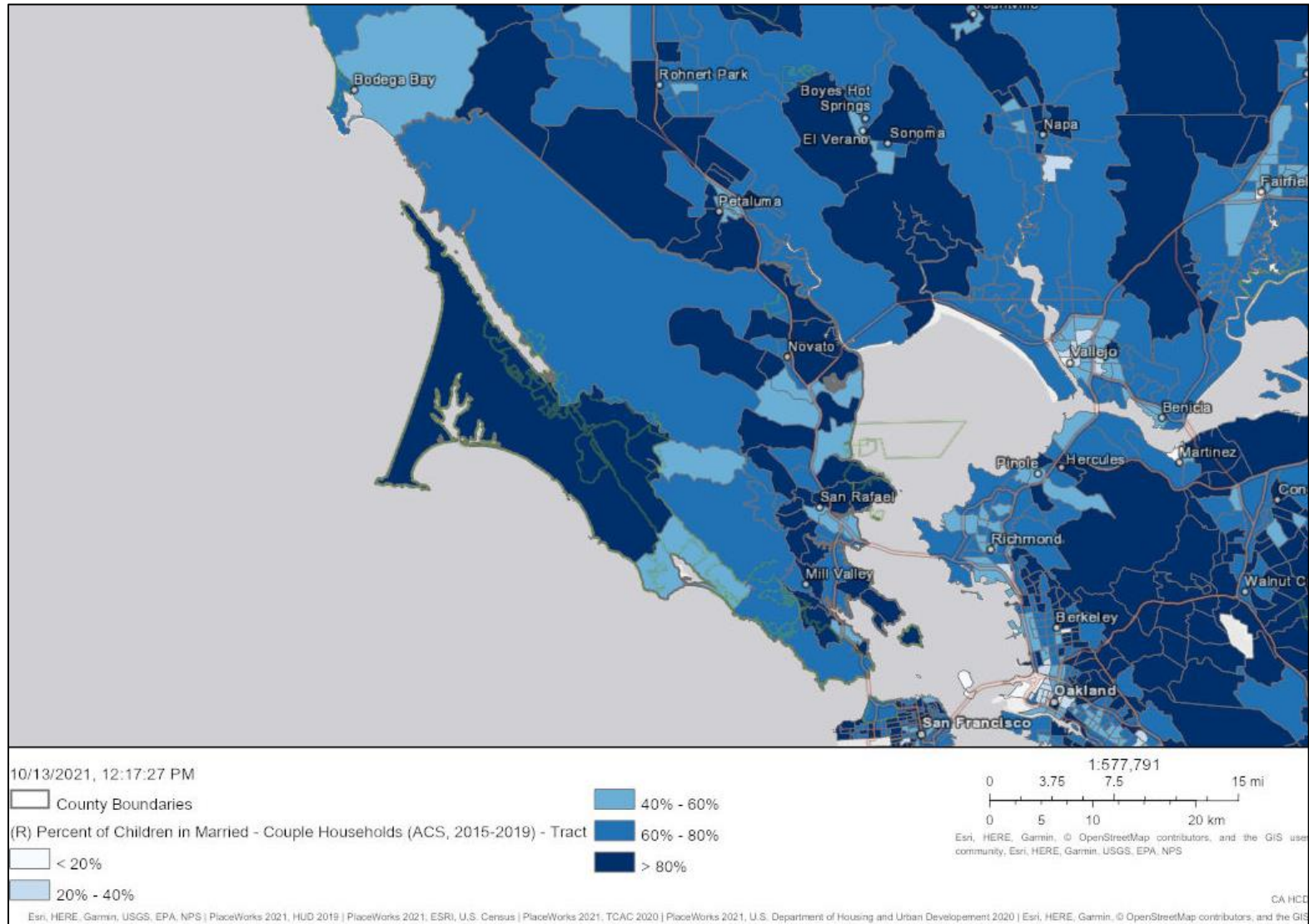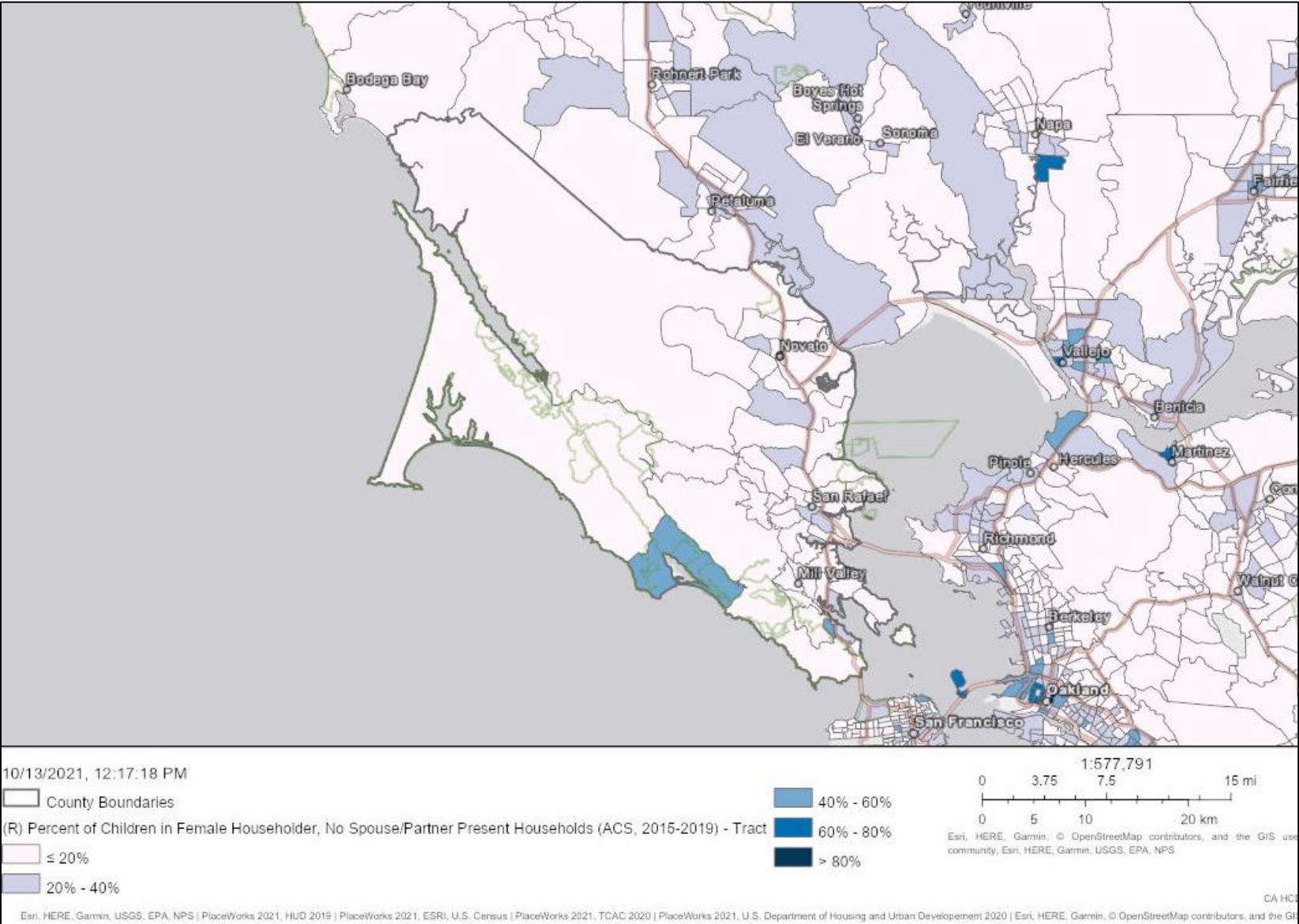
Figure D- 10 : Regional Percent of Children in Female-Headed Households by Tract (2019)

Income Level

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. A stable income is the means by which most individuals and families finance current consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population.

Households with lower incomes are limited in their ability to balance housing costs with other needs and often the ability to find housing of adequate size. While economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

For purposes of most housing and community development activities, HUD has established the four income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA). HUD income definitions differ from the State of California income definitions. Table D- 12 compares the HUD and State income categories. HUD defines a Low and Moderate Income (LMI) area as a census tract or block group where over 51 percent of the households earn extremely low, low, or moderate incomes (<81 percent AMI). This means LMI areas (<81 percent AMI) as defined by HUD, are lower income areas (extremely low, very low, and low), as defined by HCD. These terms may be used interchangeably.

Table D- 12: *Income Category Definitions*

HCD Definition		HDD Definition	
Extremely Low	0%-30% of AMI	Extremely Low	0%-30% of AMI
Very Low	31%-50% of AMI	Low	31%-50% of AMI
Low Income	51%-80% of AMI	Moderate	51%-80% of AMI
Moderate income	81-120% of AMI	Middle/Upper	> 81% of AMI
Above Moderate Income	>120% of AMI	--	--

Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas and uses San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties) for Marin County.

Regional Trends

According to Comprehensive Housing Affordability Strategy (CHAS)[28] data based on the 2017 ACS, 40.5 percent of Marin County households earning 80 percent or less than the area median income (AMI) and are considered lower income (Table D- 13Table D- 13:). A significantly larger proportion of renter households in Marin County are lower income.

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[28] Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households.

Nearly 60 percent of renter households are considered lower income compared to only 29.8 percent of owner households. Figure D- 11 shows that lower income populations (LMI areas[29]) are most concentrated in tracts in West Marin, North Marin (Novato), Central Marin (San Rafael), and the unincorporated communities of Marin City and Santa Venetia. Comparison to the Bay Area is not available as the ABAG Data Package does not provide CHAS data for the region as a whole.

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[29] LMI refers to an AREA where 51 percent or more of the households are earn low and moderate incomes (based on HUD definition) or lower incomes (based on HCD definition).
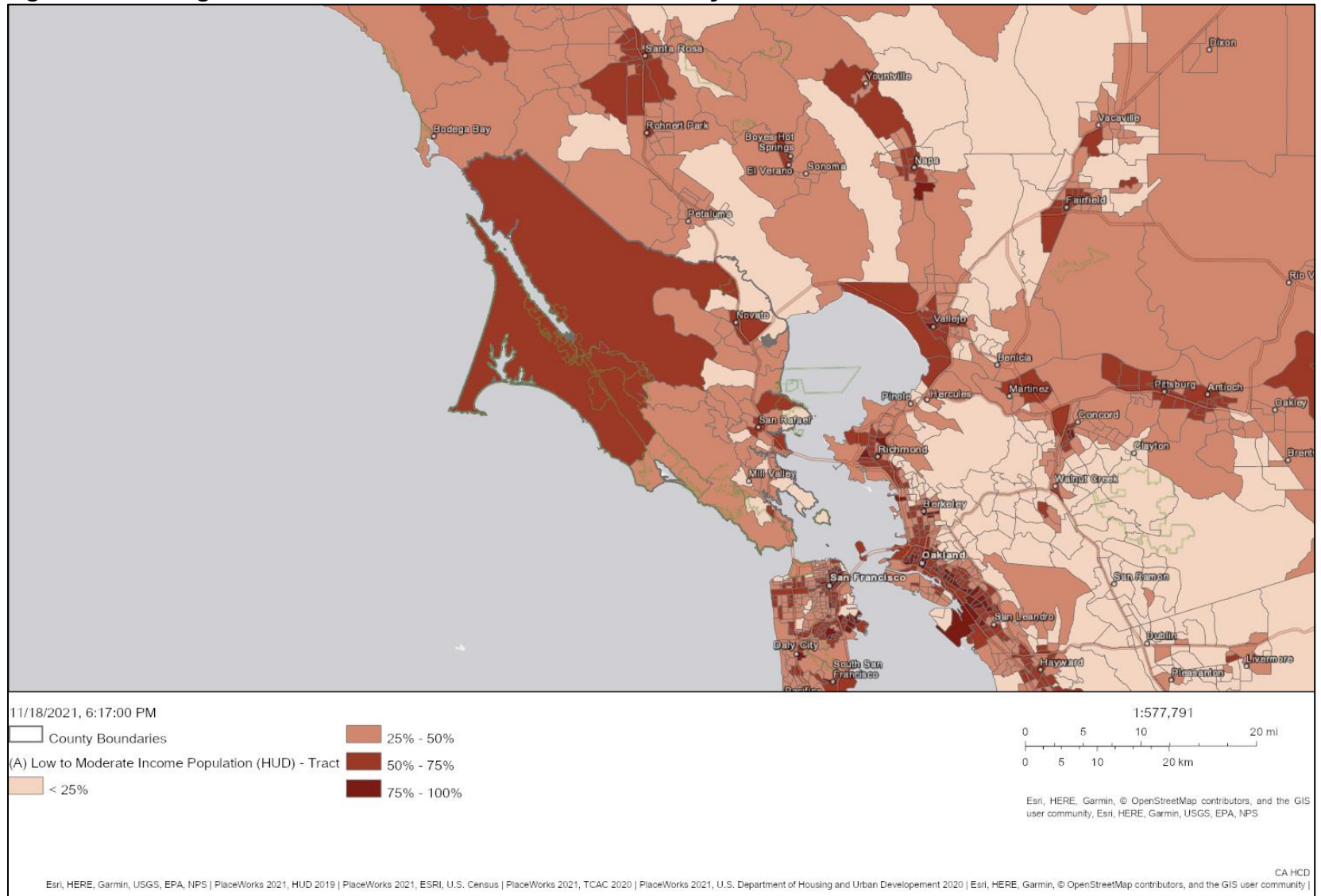
Table D- 13: *Marin County Households by Income Category and Tenure*

Income Category	Owner	Renter	Total
0%-30% of AMI	8.7%	26.0%	14.9%
31%-50% of AMI	8.5%	16.0%	11.2%
51%-80% of AMI	12.6%	17.6%	14.4%
81%-100% of AMI	8.4%	10.0%	8.9%
Greater than 100% of AMI	61.8%	30.4%	50.5%
Total	**67,295**	**37,550**	**104,845**

1. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas and uses San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties) for Marin County.
Sources: ABAG/MTC Housing Needs Data Workbook, 2021; HUD CHAS (based on 2013-2017 ACS), 2020.

Figure D- 11: Regional Concentrations of LMI Households by Tract

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County Boundaries

25% - 50%

(A) Low to Moderate Income Population (HUD) - Tract

50% - 75%

< 25%

75% - 100%

0   5   10   20 mi

0   5   10   20 km

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CA HCD

Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community |

Local Trends

For the unincorporated communities, Figure D- 12 illustrates many unincorporated communities have a higher percentage of LMI/lower income households than the entire unincorporated County (38 percent) and Marin County (41 percent). The communities of Central Coastal West Marin and Marin City have the highest percentages of LMI households (62 and 71 percent, respectively. In addition, both Central Coast West Marin and Marin City have the highest percent of extremely low income households (29 percent and 40 percent, respectively).

The concentration of lower income population in central and northwestern Marin coincides with the Inland-Rural Corridor. The Inland-Rural Corridor is designated primarily for agriculture and compatible uses, as well as for preservation of existing small communities. While less than 2 percent of Marin County's population lives in the Inland Rural Corridor, between 75 percent and 100 percent of that population is considered lower income (Figure D- 11). The population in this area also likely works in the agriculture industry, which has low paying wages. According to the Quarterly Census of Employment and Wages (QCEW) for the third quarter in 2021, average weekly pay for Agriculture, Forestry, Fishing & Hunting industries was $813 (with Cattle Ranching and Farming having even lower weekly incomes. Based on those averages, farmworkers in Marin County earn less than $43,000 per year, meaning they earn less than 30 percent the 2021 Area Median Income of $149,600, and are thus considered extremely low income.

In addition to earning extremely low incomes, farmworker populations are physically and linguistically isolated from County processes. Based on comments from Public outreach, linguistic barriers and fear due to being undocumented makes it hard to reach this population. County staff is working on bridging this gap by convening the Agricultural Worker Housing Collaborative, including the Marin Community Foundation, the Community Land Trust of West Marin, Marin Agricultural Land Trust, UC Cooperative Extension, West Marin Community Services, local ranchers, and ranch workers to address the needs of agricultural worker housing. The Agricultural Worker Housing Collaborative is expanding to include agricultural workers and their families, as well as representatives of the Park Service. The collaborative will continue its work to expand housing choices and quality of housing for agricultural workers and their families.

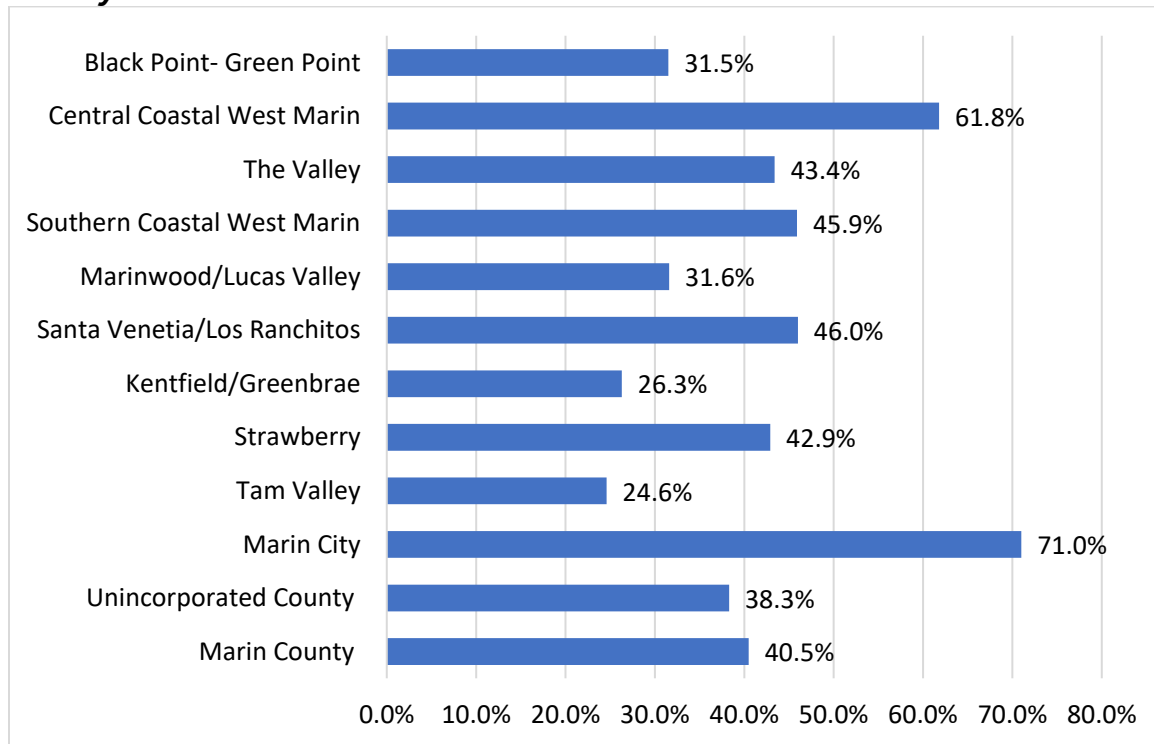*Figure D- 12: Percent Low and Moderate Income (LMI) Households: Unincorporated County*

Figure D- 13 shows LMI population concentration at a smaller scale- by block group. A Marin City block group has the highest concentration of LMI population, with over 75 percent of the population earning low incomes. Block groups adjacent to Marin City as well as in Santa Venetia and the Valley and Central Coastal West Marin (Point Reyes and Inverness) also have a high concentration of LMI persons. In these block groups between 50 and 75 percent of the population is LMI. Again, the concentration of LMI persons in West Marin likely reflects the extremely low income farmworker population in the area.

As explained earlier, a concentration in northern West Marin is likely due to the farmworker population in the area. Meanwhile, Marin City also has a concentration of African American population, minority populations, and lower income persons. It is important to note that Marin City has one of the largest concentration of public housing in the County. Since tenants in public housing are required to have lower incomes, analysis of concentration by income level reflects this concentration of lower income households.

Figure D- 13: LMI Population by Block Group- Unincorporated Communities
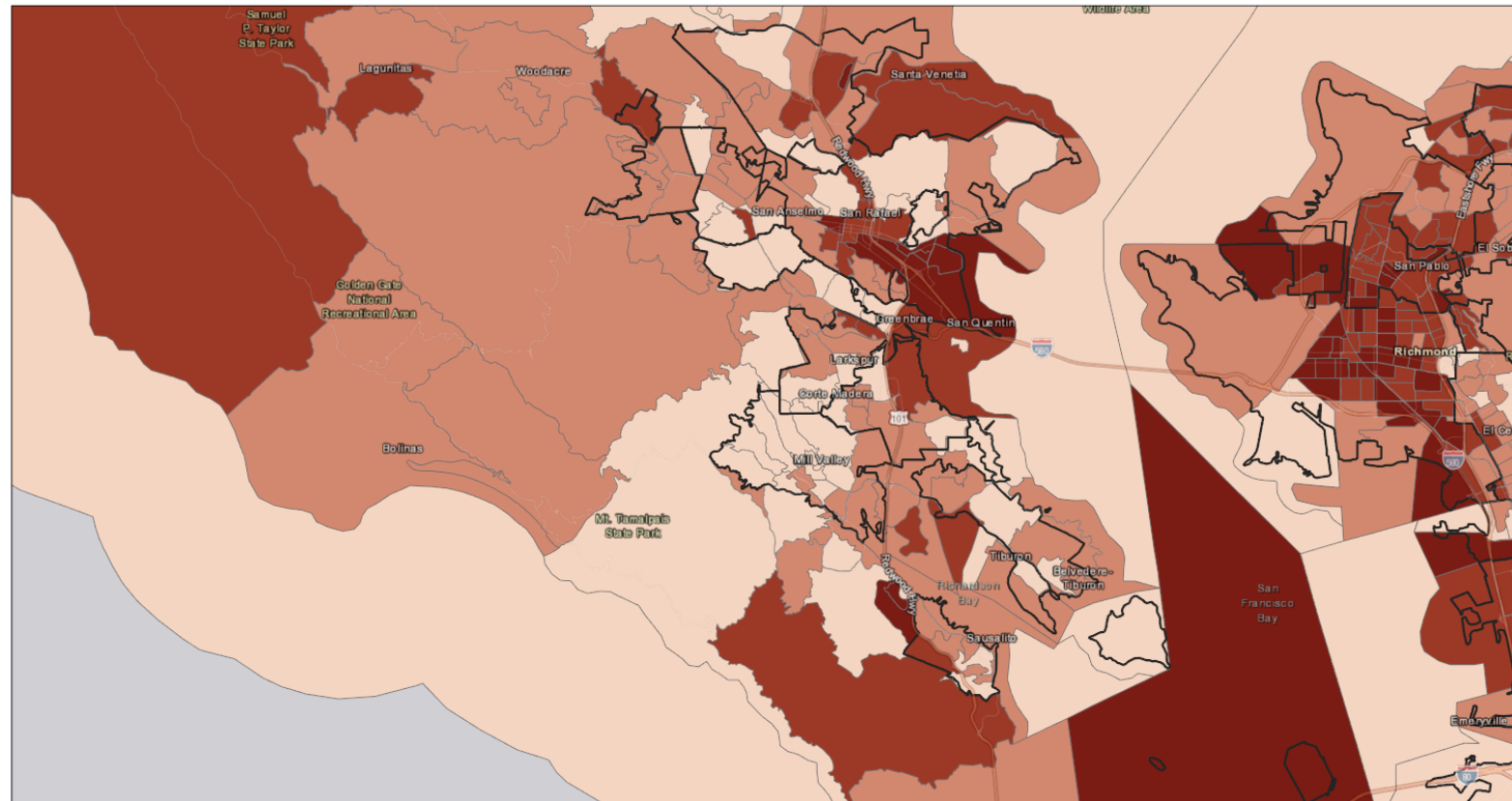
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☐ City/Town Boundaries

☐ 25% - 50%

(A) Low to Moderate Income Population (HUD) - Block Group

☐ 50% - 75%

☐ < 25%

☐ 75% - 100%

0   1.25   2.5   5 mi

0   2.25   4.5   9 km
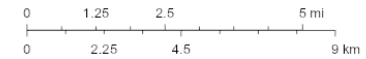
County of Marin, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD

County of Marin, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri,

ABAG/MTC's Segregation report provided an analysis of income segregation in the incorporated County based on isolation indices and dissimilarity indices. The isolation index values for all income groups in Unincorporated Marin County for the years 2010 and 2015 in Table D- 14 show Above Moderate income residents are the most isolated income group in Unincorporated Marin County. Unincorporated Marin County's isolation index of 51.0 for these residents means that the average Above Moderate income resident in Unincorporated Marin County lives in a neighborhood that is 51.0% Above Moderate income. Among all income groups, the Very Low income population's isolation index has changed the most over time, becoming more segregated from other income groups between 2010 and 2015.

Table D- 14: Income Group Isolation Index Values for Segregation within Unincorporated Marin County		
Income Category	**2010**	**2015**
Very Low Income (< 50% of AMI)	26.9	35.8
Low Income (50%-80% of AMI)	16.5	14.2
Moderate Income (80%-120% of AMI)	17.8	20.7
Above Moderate (>120% AMI)	54.0	51.0
Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data. **Sources: ABAG/MTC Segregation Report**		

Table D- 15Table D- 15: below provides the dissimilarity index values indicating the level of segregation in Unincorporated Marin County between residents who are lower-income (earning less than 80 percent of AMI) and those who are not lower-income (earning above 80 percent of AMI). This data aligns with the requirements described in HCD's AFFH Guidance Memo for identifying dissimilarity for lower-income households. Segregation in Unincorporated Marin County between lower-income residents and residents who are not lower-income has not substantively changed between 2010 and 2015. Additionally, Table D- 15 shows dissimilarity index values for the level of segregation between residents who are very low-income (earning less than 50 percent of AMI) and those who are above moderate-income (earning above 120 percent of AMI). This supplementary data point provides additional nuance to an analysis of income segregation, as this index value indicates the extent to which a jurisdiction's lowest and highest income residents live in separate neighborhoods.

Table D- 15: Income Group Dissimilarity Index Values for Segregation within Unincorporated Marin County		
Income Category	**2010**	**2015**
Below 80% AMI vs. Above 80% AMI	29.9	29.5
Below 50% AMI vs. Above 120% AMI	38.4	40.2
Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data. **Sources: ABAG/MTC Segregation Report**		

Housing Choice Vouchers (HCV)

An analysis of the trends in HCV concentration can be useful in examining the success of the program in improving the living conditions and quality of life of its holders. The HCV program aims to encourage participants to avoid high-poverty neighborhoods and promote the recruitment of landlords with rental properties in low poverty neighborhoods. HCV programs are managed by Public Housing Agencies (PHAs), and the programs assessment structure (SEMAPS) includes an "expanding housing opportunities" indicator that shows whether the PHA has adopted and implemented a written policy to encourage participation by owners of units located outside areas of poverty or minority concentration[30]. The County of Marin funds Marin Housing Authority's Landlord Partnership Program, which aims to expand rental opportunities for families holding housing choice vouchers by making landlord participation in the program more attractive and feasible, and by making the entire program more streamlined. The program also includes a requirement to include affirmative marketing.

A study prepared by HUD's Development Office of Policy Development and Research found a positive association between the HCV share of occupied housing and neighborhood poverty concentration and a negative association between rent and neighborhood poverty[31]. This means that HCV use was concentrated in areas of high poverty where rents tend to be lower. In areas where these patterns occur, the program has not succeeded in moving holders out of areas of poverty.

Regional Trends

As of December 2020, 2,100 Marin County households received HCV assistance from the Housing Authority of the County of Marin (MHA). The map in Figure D- 14 shows that HCV use is concentrated in tracts in North Marin (Hamilton and the intersection of Novato Boulevard and Indian Valley Road). In these tracts, between 15 and 30 percent of the renter households are HCV holders. In most Central Marin tracts and some Southern

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[30] For more information of Marin County's SEMAP indicators, see: the County's Administrative Plan for the HCV Program. https://irp.cdn-website.com/4e4dab0f/files/uploaded/Admin%20Plan%20Approved%20December%202021.pdf https://irp.cdn-website.com/4e4dab0f/files/uploaded/Admin%20Plan%20Approved%20December%202021.pdf

[31] Devine, D.J., Gray, R.W., Rubin, L., & Taghavi, L.B. (2003). *Housing choice voucher location patterns: Implications for participant and neighborhood welfare*. Prepared for the U.S. Department of Housing and Urban Development, Office of Policy Development and Research, Division of Program Monitoring and Research.

Marin tracts (which are more densely populated), between five and 15 percent of renters are HCV recipients. The correlation between low rents and a high concentration of HCV holders holds true in North Marin tracts where HCV use is the highest (Figure D- 15). Overall, patterns throughout most Marin County communities also show that where rents are lower, HCV use is higher.

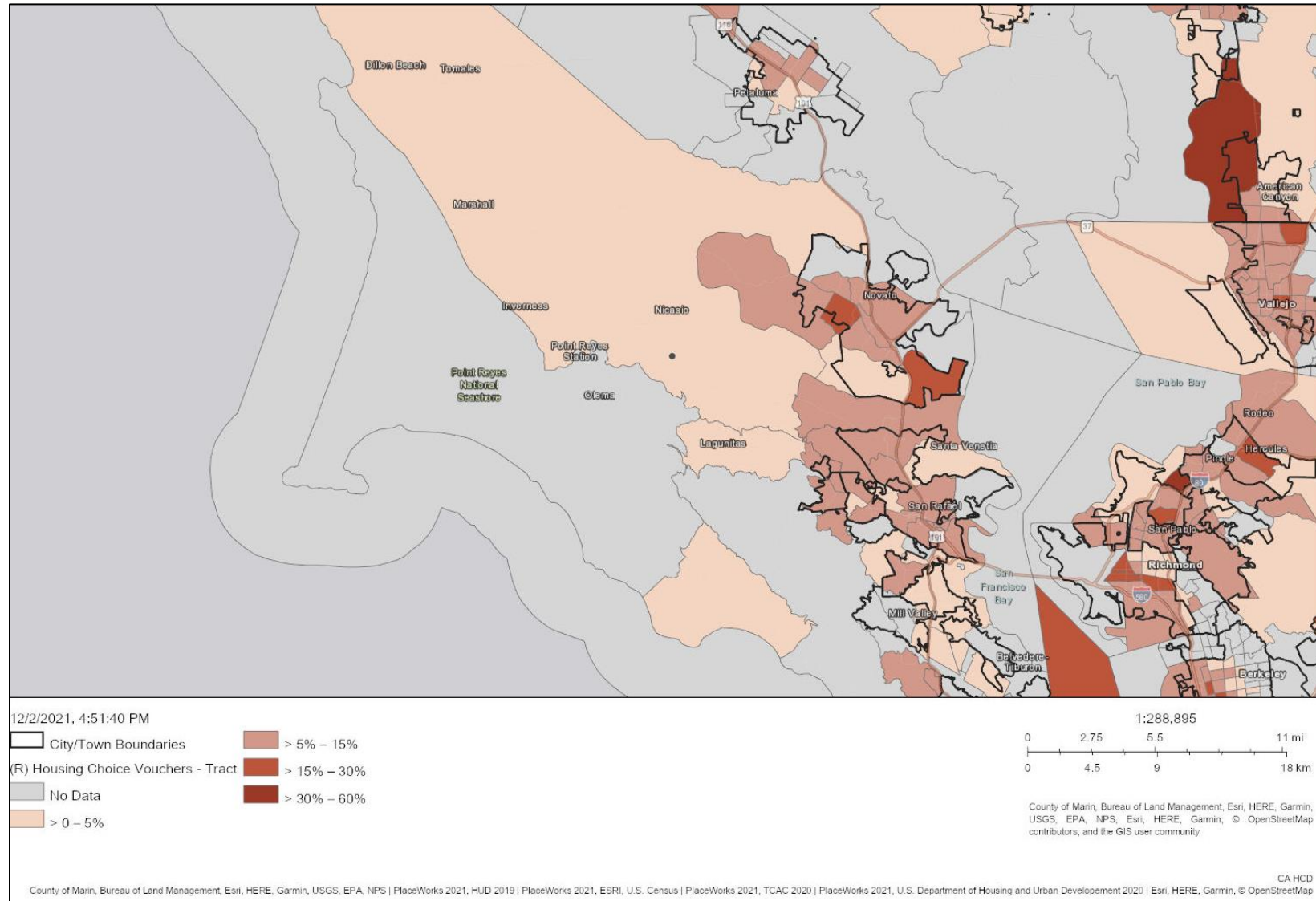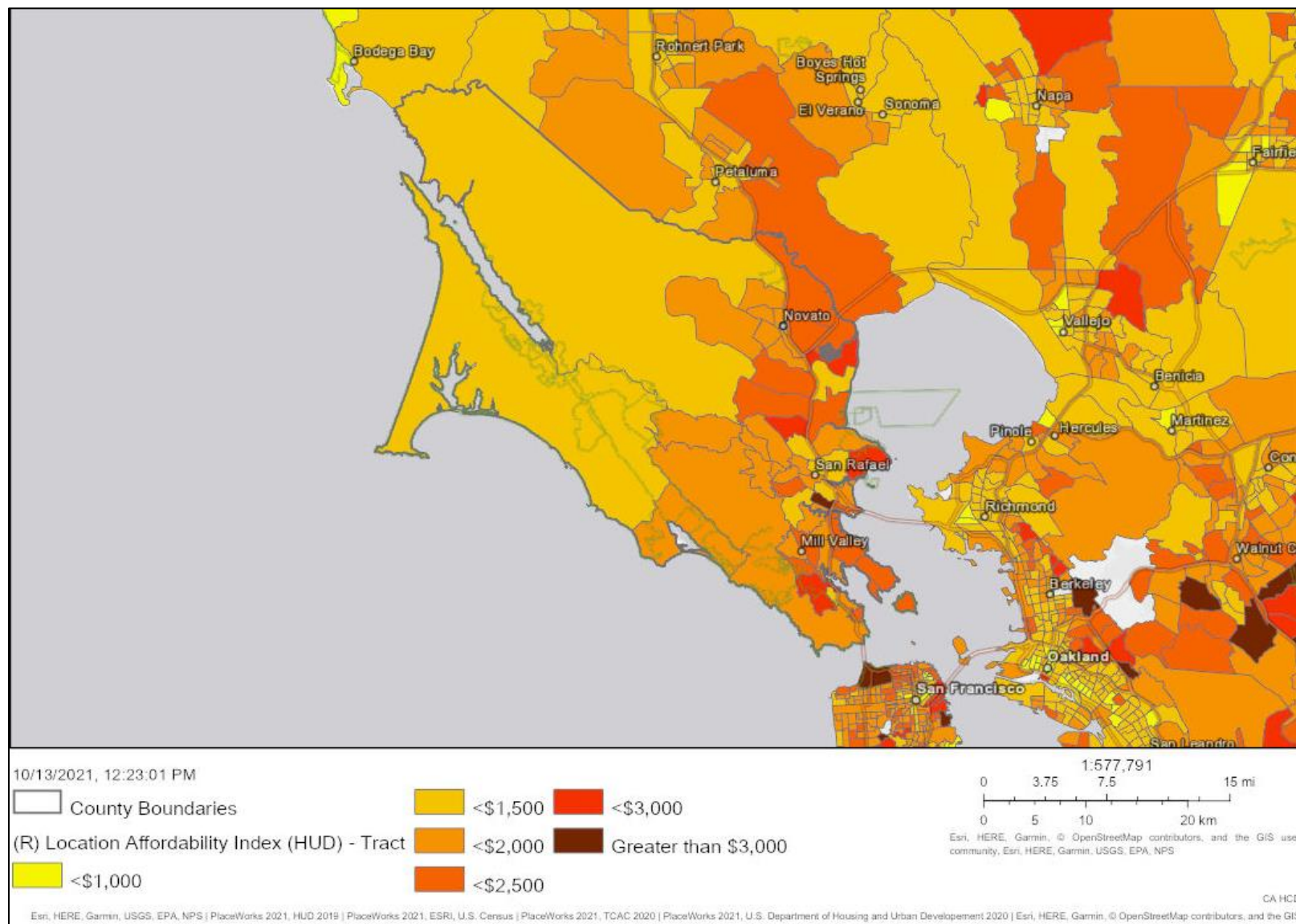**Figure D- 14 : Regional HCV Concentration by Tract**

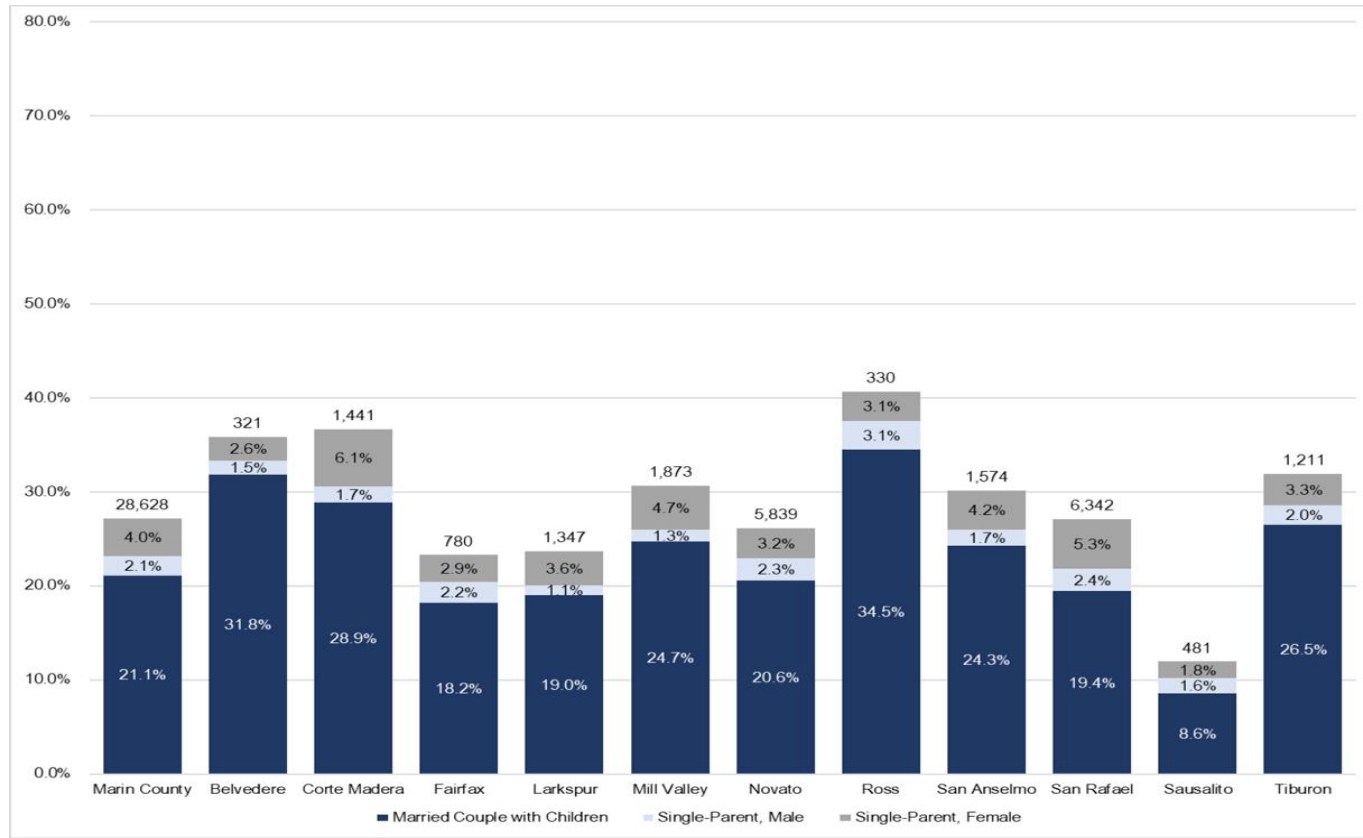**Figure D- 15 : Regional Median Gross Rent/Affordability Index by Tract**

Local Trends

Within the unincorporated County, the Lucas Valley-Marinwood and Marin City communities have the highest concentration of HCV use; between five and 15 percent of renters in those tracts are HCV users. Low gross rents (i.e. location affordability index) also coincide with high HCV use in both Marin City (<$1,500) and in Lucas Valley-Marinwood (<(<$2,000). As explained in the

Regional Trends

According to the 2019 ACS, there are slightly fewer households with children in Marin County than the Bay Area. About 27 percent of households in Marin County have children under the age of 18, with 21 percent married-couple households with children and six percent single-parent households (Figure D- 8). In the Bay Area, about 32 percent of households have children and as in the County, the majority of households with children are married-couple households. Within Marin County, the cities of Belvedere, Corte Madera, and Ross have the highest percentage of households with children (36 percent, 37 percent, and 41 percent, respectively). Corte Madera and San Rafael have concentrations of single-parent households exceeding the countywide average. Figure D-9 shows the distribution of children in married households and single female headed households in the region. Census tracts with high concentrations of children living in married couple households are not concentrated in one area of Marin County. Most census tracts have over 60 percent of children living in married-persons households. Regionally, children in married-person households are more common in inland census tracts (away from the bay areas). The inverse trend is seen for children living in single-parent female-headed households, is shown in Figure D- 10. In most tracts countywide, less than 20 percent of children live in female-headed households. Between 20 and 40 percent of children live in female-headed households in two tracts: one in Southern Marin in the unincorporated community of Marin City and one in West Marin near the unincorporated community of Bolinas. Regionally, tracts with a higher percentage of children in married-persons households are found along the San Pablo and San Francisco bays.

Figure D- 9: Regional Percent of Children in Married Couple Households by Tract (2019)

Figure D- 10 : Regional Percent of Children in Female-Headed Households by Tract (2019)

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County Boundaries

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

≤ 20%

20% - 40%

40% - 60%

60% - 80%

> 80%

1:577,791

0   3.75   7.5   15 mi

0   5   10   20 km

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Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Developement 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Income Level section of this analysis, Marin City also has a concentration of lower income persons due to the affordability of the areas as well as the concentration of public housing. In addition, Marin City is high concentration of multi-family housing , condos, and townhomes that offer one of the least expensive housing costs in the area, especially compared to surrounding communities of Mill Valley and Tam Valley, where gross rents are over $3,000 (compared to <1,500 in Marin City, Figure D- 15).

MHA has focused on insuring voucher recipients have access to housing in all parts of the County. Prior to the 2020 enactment of SB 329 Housing Opportunities Act of 2019, the State's law on housing discrimination based on source of income (California Government Code Section 12927) did not protect individuals or families with third party rental subsidies.

In addition, the MHA implements the Landlord Partnership Program[32] to expand rental opportunities for families holding housing choice vouchers by making landlord participation in the program more attractive and feasible, and by making the entire program more streamlined. Incentives include security deposit, loss mitigation, vacancy loss, building and planning permit fees waived, and access to a dedicated landlord liaison 24-hour hotline to address immediate issues as well as landlord workshops and training.

Summary: Integration and Segregation

Most communities in unincorporated Marin are predominantly white. However, protected groups appear to be segregated in the unincorporated community of Marin City. Marin City has the highest concentration of Black/African American and Hispanic/Latinx residents compared to other unincorporated communities. In addition, Marin City was identified as R/ECAP (see following section), indicating a concentration of minority population[33] and poverty. Marin City also has the highest concentration of persons with disabilities and single-female headed households with children compared to other unincorporated communities. This indicates a concentration of special needs populations within Marin City. Marin City is also dealing with a confluence of economic pressures (proximity to the Bay area, lower rents, multi-family and townhome/condo housing stock), which make it vulnerable to displacement. Integration efforts need to balance displacement pressures with preserving the existing resident population.

3. Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

In an effort to identify racially/ethnically-concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower.

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[32] For more details: https://www.marinhousing.org/landlord-partnership-program For more details: https://www.marinhousing.org/landlord-partnership-program
[33] Persons who are not non-Hispanic White

Regional Trends

The Othering and Belonging Institute at UC Berkley has published a report34 on Racial Segregation in the Bay Area and found that each of the nine counties as well as the two major "Metropolitan Statistical Areas" (MSAs) is marked by high levels of racial segregation. Most of the traditionally recognized "segregated neighborhoods," where people of color were historically restricted on account of redlining and other forms of housing discrimination, are typically found within the larger, broadly diverse municipalities such as San Francisco, Oakland, San Jose, and mid-sized cities such as Berkeley and Richmond. The displacement of many people of color from these communities and the corresponding in-migration of white families over the last twenty years has diversified the municipal populations in these cities, but has not always resulted in more integrated neighborhoods. Thus, although these cities are diverse in aggregate, they tend to contain some of the most racially segregated non-white neighborhoods in the Bay Area. The Institute also reported that the effects of racial segregation include negative life outcomes for all people in those communities, including rates of poverty, income, educational attainment, home values, and health outcomes.

They concluded that, "the most segregated cities in the Bay Area are those that are either historically places where people of color were permitted to live, when locked out of other places, or are highly exclusionary and heavily white mid-sized to smaller suburbs, exurbs or rural cities and towns in places like Marin and San Mateo counties." The section below expands on Racially Concentrated Areas of Affluence.

R/ECAPs in the Bay area are mostly concentrated in metropolitan areas- specifically in San Francisco, San Jose, and Oakland. There is one R/ECAP in Southern Marin located in Marin City west of State Highway 101 (Figure D- 16). Marin City is part of the unincorporated County area.

Local Trends

As shown in Table D- 8, the Marin City tract is characterized by a concentration of African American residents. Approximately 22 percent of Marin City's residents are African American- significantly higher than the County's and unincorporated County's African American population (two percent and three percent, respectively). Marin City residents also earn lower median incomes (less than $55,000) (Figure D- 18: Regional Median Income by Block Group (2019)Figure D- 18) especially compared to neighboring jurisdictions where median incomes are higher than $125,000. Marin City, where Marin County's only family public housing is located, also has the highest share of extremely low-income households in the County; about 40 percent of households earn less than 30 percent the Area Median Income, whereas only 14 percent of unincorporated County households are considered extremely low income.

The concentration of African American residents in Marin City is due to historic policies barred African American residents of Marin City from accessing housing in places with

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34 https://belonging.berkeley.edu/segregationinthebay

greater opportunities. Discriminatory policies like redlining, restrictive covenants, and exclusionary zoning promoted racial segregation – entrenching racial disparities in access to well-resourced neighborhoods. Marin City is considered a community vulnerable to displacement (see Displacement Risk section) due to increased housing costs as well interest in redevelopment and the continued pressures of being surrounded by affluent neighbors in one of the most exclusive counties in the country.

The County's zoning patterns have contributed to these areas of concentration. A significant number of properties across all seven Countywide Plan Planning Areas are designated within a zoning district intended for low density, single-unit uses. This is due in part to the early applications of low-density zoning and the constrained physical conditions that present a fundamental impediment to increased subdivision potential or density.   Additionally, as noted in the 2020 Marin County Analysis of Impediments to Fair Housing Choice, these zoning practices have also determined the type of housing within communities and who it is available to, where "exclusionary zoning practices, including those that limit where, how, or if affordable housing can be developed, can result in creating and maintaining segregated communities". Marin City has a disproportionately higher percentage of multi-unit zoned parcels within its community, representing 64 percent of all parcels, in contrast with 10 percent of parcels zoned multi-unit in the unincorporated regions of the County as a whole.

Figure D- 16: Regional Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)
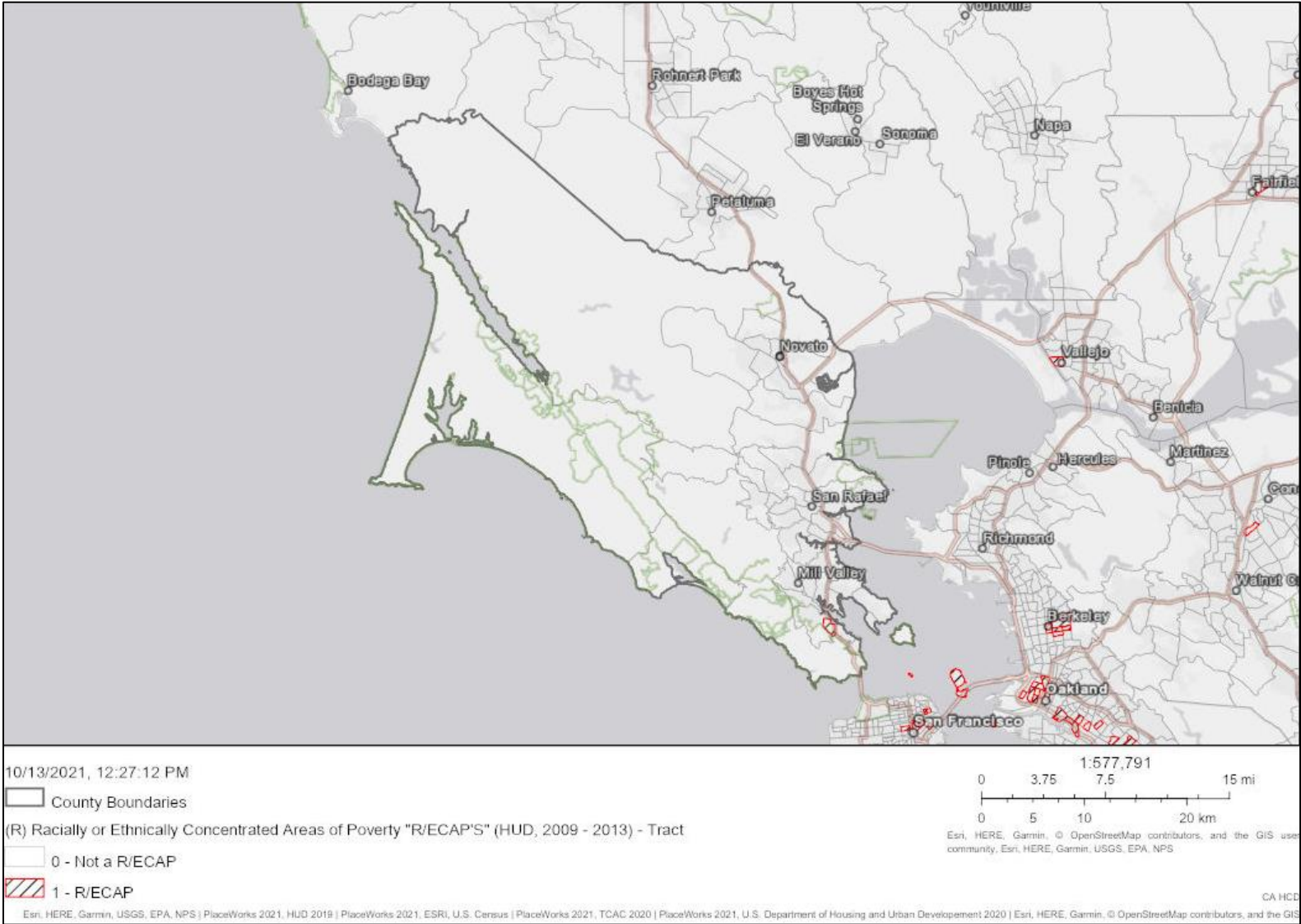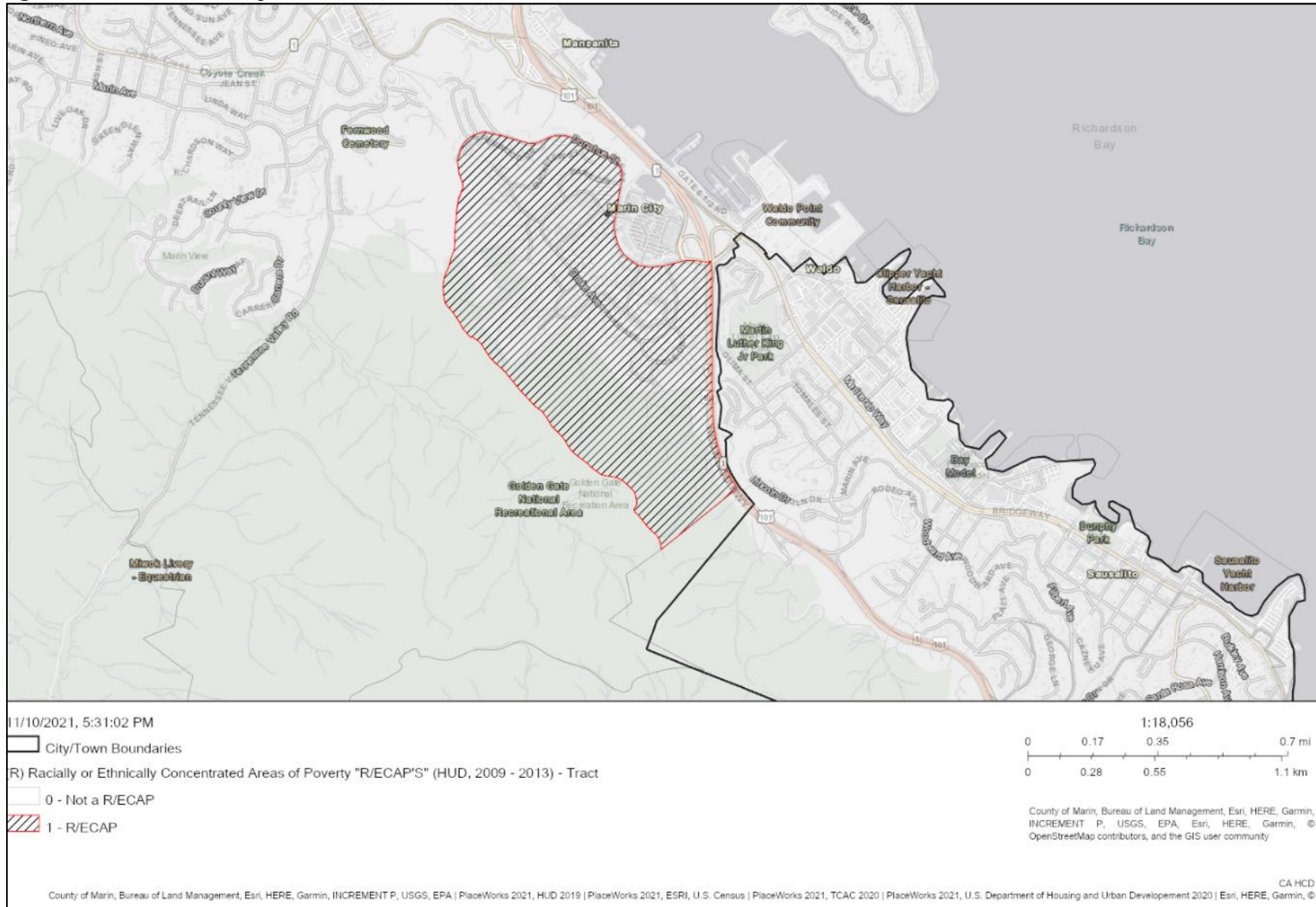
Figure D- 17: Marin City R/ECAP

## Racially Concentrated Areas of Affluence (RCAAs)

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

This analysis relies on the definition curated by the scholars at the University of Minnesota Humphrey School of Public Affairs cited in HCD's memo: "RCAAs are defined as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is $125,000 or greater (slightly more than double the national median household income in 2016) as well as the RCAA maps available through HCD's AFFH Data Viewer Tool

Regional Trends

According to ABAG/MTC's Segregation Report, across the San Francisco Bay Area, white residents and above moderate-income residents are significantly more segregated from other racial and income groups. Figure D- 3 and Figure D- 4 shows the concentration of minority/non-White population and majority populations across the region. In Figure D- 3, census tracts in yellow have less than 20 percent non-white population, indicating over 80 percent of the population is white. There are a number of tracts with over 80 percent non-Hispanic White population located throughout the County, especially in Southern Marin, parts of Central Marin, coastal North Marin, and central West Marin. The cities of Belvedere, Mill Valley, Fairfax, Ross, and some areas of San Rafael and Novato are also predominantly white. However, of all these predominantly white areas (incorporated jurisdictions and unincorporated communities), only Belvedere, the San Geronimo Valley, Tam Valley, Black Point- Green Point and the eastern tracts of Novato are census tracts with a median income over $125,000 (Figure D- 18). Although not all census tracts have the exact relationship of over 80 percent White and median income over $125,000 to qualify as "RCAAs," throughout the County tracts with higher White population tend to have greater median incomes.

Figure D- 18: Regional Median Income by Block Group (2019)
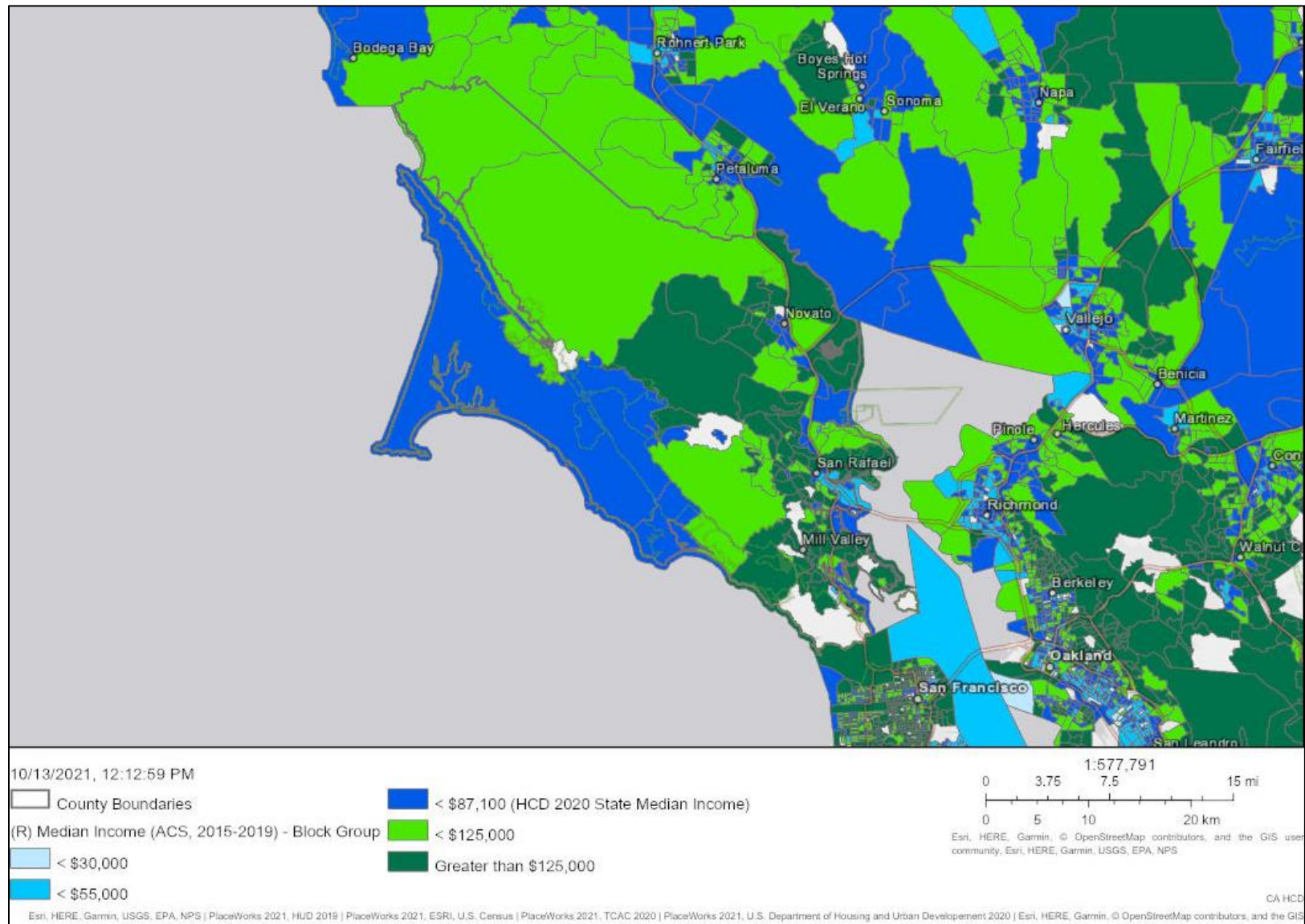
Local Trends

Within the Unincorporated County, all of the West Marin communities, Black Point- Green Point in North Marin, and Greenbrae in Central Marin have a white population over 80 percent (Table D- 5), though these concentrations are not represented in Figure D- 5, perhaps due to differences in geographical unit (block group versus the entire community). Median incomes exceeding $125,000 overlap with Muir Beach in West Marin and the Tamalpais-Homestead CDP in Southern Marin, making them the potential RCAAs in the unincorporated County (Figure D- 18). Of note is that Tamalpais- Homestead CDP is adjacent to Marin City, which was identified as a racially and ethnically concentrated area of poverty (R/ECAP).

On July 8, 2022, HCD released a map illustrating census tracts designated as RCAAS, in addition to an updated data methodology. A census tract is designated an RCAA if its proportions of non-Hispanic White residents and households earning above the region's area median income are overrepresented. The map in Figure D- 19 illustrates that a majority of Marin communities are designated as RCAAs, including many parts of unincorporated Marin such as Black Point-Green Point, Marinwood/Lucas Valley, Kentfield and Tam Valley. While areas of West Marin are not designated as RCAAs under this methodology, many of the census tracts in these communities follow similar trends for the data factors involved. For example, West Marin census tracts range from having a proportion of 81.2 percent (Northern Coastal West Marin) to 89.6 percent (Central Coastal West Marin) non-Hispanic White residents, as opposed to 40% in the overall Bay Area region. The census tracts are excluded from this designation due to lower reported median income than the region. The tracts range from $85,903 in Southern Coastal West Marin to $97,321 in the Valley, as opposed to $113,597 in the Bay Area and $115,246 in Marin County.

A contributing factor to these areas is a large proportion of the County's residentially zoned areas allow only single-unit development (and associated Accessory Dwelling Units). Only eleven percent of the parcels in the County are zoned with a zoning district intended for multi-unit housing, a pattern that prevents the wide-scale availability of multi-unit rental housing. Furthermore, the predominant land use patterns in the unincorporated county characterized by protected agricultural and park lands and single-unit zoning have limited the parcels available for a variety of multi-unit housing. Additionally, as noted in the 2020 Marin County Analysis of Impediments to Fair Housing Choice, these zoning practices have also determined the type of housing within communities and who it is available to, where "exclusionary zoning practices, including those that limit where, how, or if affordable housing can be developed, can result in creating and maintaining segregated communities".

The racial disparities within Marin and between Marin and other Bay Area counties are stark. While it may be difficult to find conclusive evidence that increasing rental housing will increase racial diversity, there are correlations between the percentage of multi-unit zoned properties in an area, the percentage of housing units that are renter-occupied, and the racial diversity of that area. This suggests that it may be possible to increase racial diversity by increasing the diversity of housing opportunities in areas currently dominated by detached single-unit residences.

To address these patterns, this Housing Element proposed to re-zone parcels as multifamily throughout the County, with a focus on areas of opportunity.

Figure D- 19: RCAAs- Marin County
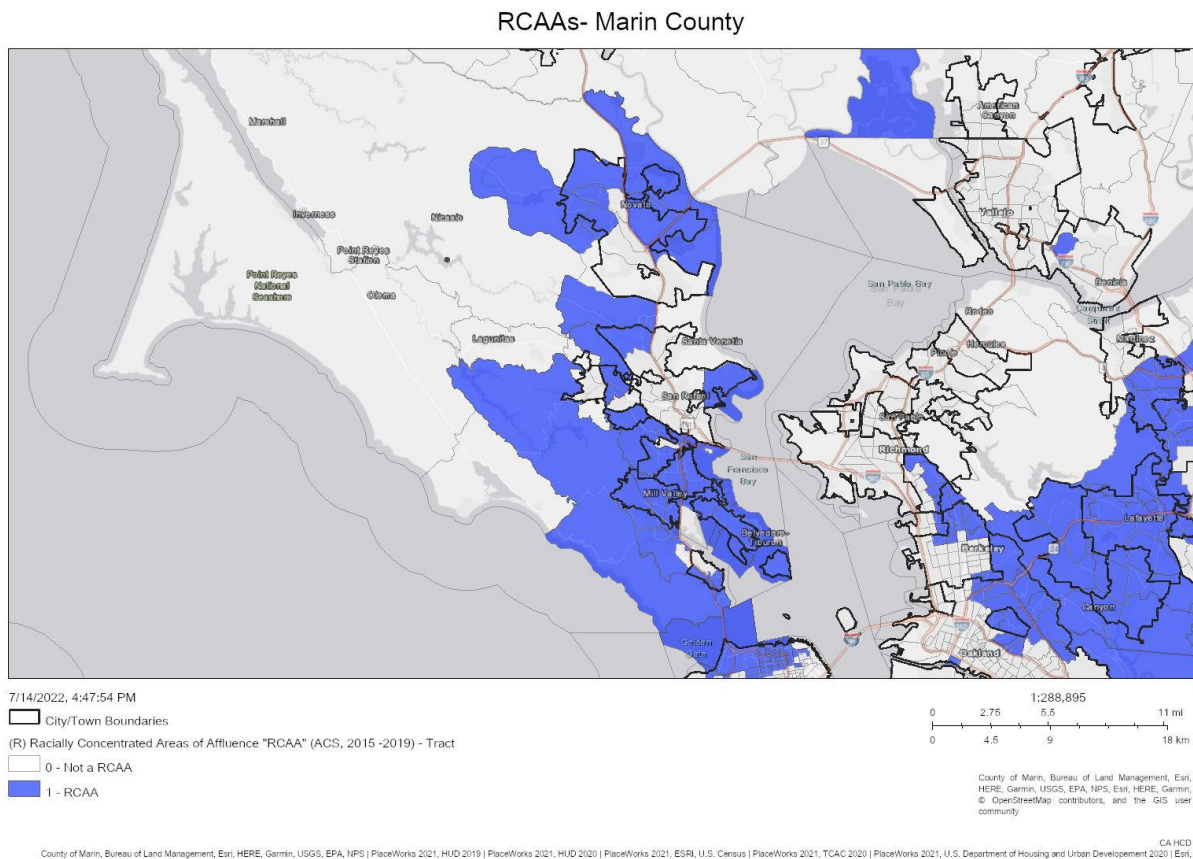
Summary: RECAPs/RCAAs

Not only are there areas of concentrated special needs populations and poverty concentrated in a single area- Marin City- but affluent and white populations are concentrated and segregated from these populations. Regional trends show that white residents and above moderate-income residents are significantly more segregated from other racial and income groups. This trend is also seen in unincorporated Marin County where above moderate-income residents are the most isolated income group while

very-low income communities have become more isolated (Table D- 14: and Table D-15:). As a result, segregation between very-low income communities and above moderate communities remains moderate (compared to slightly lower segregation indices between lower income residents and non-lower income residents).

The only RECAP identified in the entire County is in Marin City, a community with a historical concentration of minorities, specifically Black residents. Black residents settled in Marin City during the 1940s and later federal policies such as restrictive covenants and low interest loans for white residents in other communities maintained the concentration of Blacks in Marin City. Today, Marin City has a sizable (through decreasing) African American and low-income population, compared to surrounding communities, which are mostly affluent and white. An especially unique condition of Marin City is that it is next to some of the most affluent communities in the County- Tamalpais-Homestead CDP (Tam Valley) and Sausalito. In 2019, median income in Tam Valley and Sausalito exceeded $100,000 ($111,906 and $163,071, respectively), while Marin City's median income was only $45,841. White population also exceeded 80 percent in both Tam Valley and Sausalito, while it was only 33 percent in Marin City. Another unique characteristic of Marin City compared to other areas of with a concentration of minorities and lower income households (like San Rafael in Central Marin and Novato in Northern Marin) is its proximity to the Bay Area. As explained in later sections, this proximity to a jobs-rich center and its relatively cheaper home values and rents compared the Bay Area homes make this community vulnerable to displacement. Berkley's Urban Displacement Project's case study of Marin City noted that a "concern in this community is future displacement due to potential increases in population, interest in redevelopment and the continued pressures of being surrounded by affluent neighbors in one of the most exclusive counties in the country." [35]

This is important in formulating Housing Mobility Strategies to facilitate the movement of persons from areas with high concentration of special needs populations (especially Marin City) to other high resource areas. The County has already signed a voluntary agreement to avoid an overconcentration of affordable units in areas of minority concentration, including Marin City and the Canal neighborhood.

Racially concentrated areas of affluence are widespread in the County but are less prevalent in Central and Northern Marin. Specifically, all of the unincorporated communities in Central and Northern Marin are RCAAs. Black Point-Green Point, Lucas Marinwood, Ross, Kentfield, and Larkspur are all RCAAs. Tracts that are not RCAAs are located within the entitled jurisdictions of Novato and San Rafael. Two common features of some RCAAs are their higher ownership rates and high access to automobiles compared to other areas in the County (Figure D- 20 and Figure D- 21[36]). Green colors in

[35] https://www.urbandisplacement.org/wp-content/uploads/2021/08/marin_city_final.pdf
[36] The California Healthy Places Index, developed by the Public Health Alliance of Southern California and visualized by Axis Maps, is a powerful tool to help prioritize public and private investments, resources, and programs in neighborhoods where they are needed most. The HPI combines 25 community characteristics,

the maps indicate higher ownership and auto access and correspond with RCAAs. This pattern may be due to higher income households being less likely to need to rely on public transportation and can take advantage of housing opportunities away from transit, whereas lower income households tend to be closer to transit. This may present a challenge when creating housing opportunities for lower income households in RCAAs like Black Point-Green Point, or Lucas-Marinwood or other areas with higher resources since these areas require either automobile use or have lower access to transit. Homeownership opportunities need to balance avoiding concentration in areas where these is already a concentration of lower income households (near transit corridors) while also supporting smart growth and environmental goals.

Figure D- 20: HPI Index- Homeownership (2015-2019)
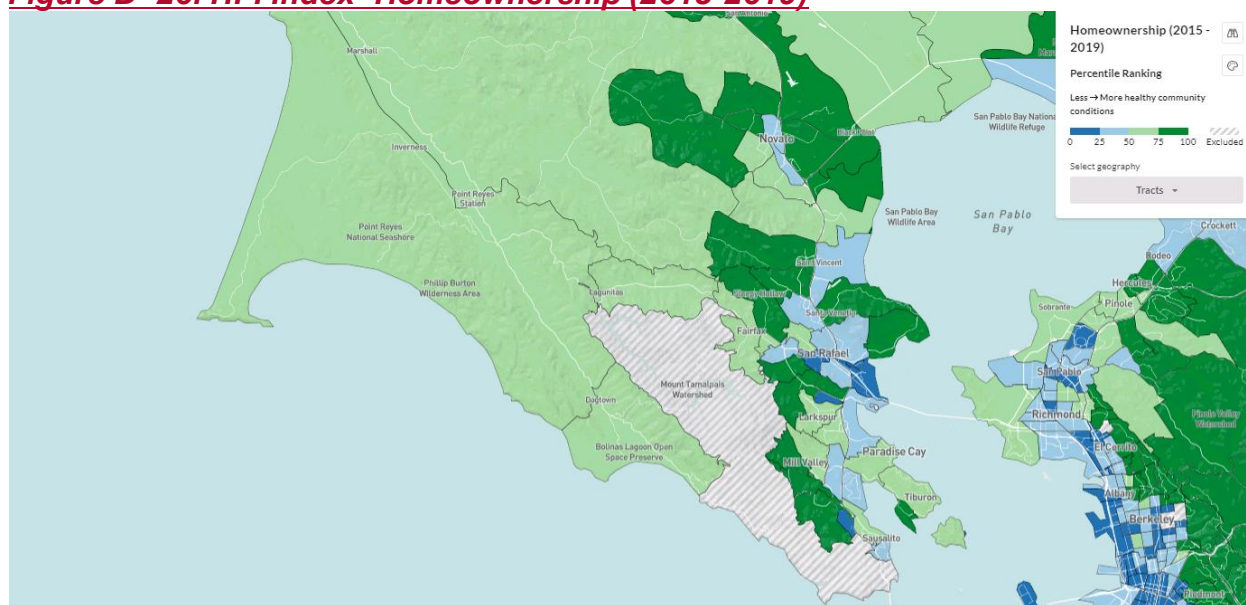
like access to healthcare, housing, education, and more, into a single indexed HPI score. The healthier a community, the higher the HPI score.

Figure D- 21: HPI Index- Automobile Access (2015-2019)
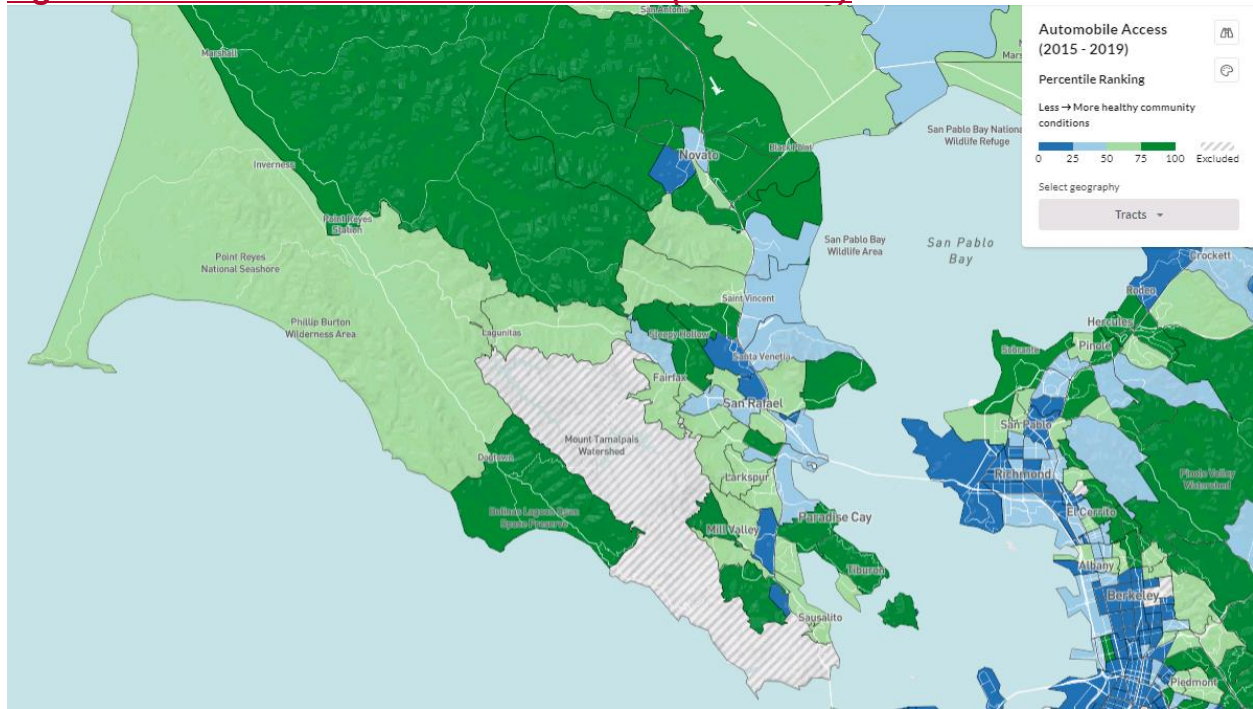
4. Access to Opportunities

Significant disparities in access to opportunity are defined by the AFFH Final Rule as "substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing."

TCAC Opportunity Maps

The Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task force to "provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/ departments to further the fair housing goals (as defined by HCD)." The Task Force has created Opportunity Maps to identify resources levels across the state "to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with nine percent Low Income Housing Tax Credits (LIHTCs)". These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table D- 16 shows the full list of indicators. The opportunity maps include a measure or "filter" to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

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

Table D- 16: Domains and List of Indicators for Opportunity Maps	
Domain	**Indicator**
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020	

TCAC/HCD assigns "scores" for each of the domains shown in Table D- 16 by census tracts as well as computing "composite" scores that are a combination of the three domains. Scores from each individual domain range from 0-1, where higher scores indicate higher "access" to the domain or higher "outcomes." Composite scores do not have a numerical value but rather rank census tracts by the level of resources (low, moderate, high, highest, and high poverty and segregation).

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

The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low resource areas and areas of high segregation and poverty and to encourage better access for low and moderate income and black, indigenous, and people of color (BIPOC) households to housing in high resource areas.

Regional Trends

As explained earlier, TCAC composite scores categorize the level of resources in each census tract. Categorization is based on percentile rankings for census tracts within the region. Counties in the region all have a mix of resource levels. The highest concentrations of highest resource areas are located in the counties of Sonoma and Contra Costa (Figure D- 22). Marin and San Francisco counties also have a concentration of high resource tracts. All counties along the San Pablo and San Francisco Bay area have at least one census tract considered an area of high segregation and poverty, though these tracts are most prevalent in the cities of San Francisco and Oakland.

There is only one census tract in Marin County considered an area of "high segregation and poverty" (Figure D- 23Figure D- 23). This census tract is located in Central Marin within the Canal neighborhood of the incorporated City of San Rafael. In the County, low resource areas (green) are concentrated in West Marin, from Dillon Beach to Nicasio. This area encompasses the communities of Tomales, Marshall, Inverness, and Point Reyes Station. In Central Marin, low resource areas are concentrated in San Rafael. As shown in Figure D- 23 all of Southern Marin is considered a highest resource area, with the exception of Marin City which is classified as moderate resource.

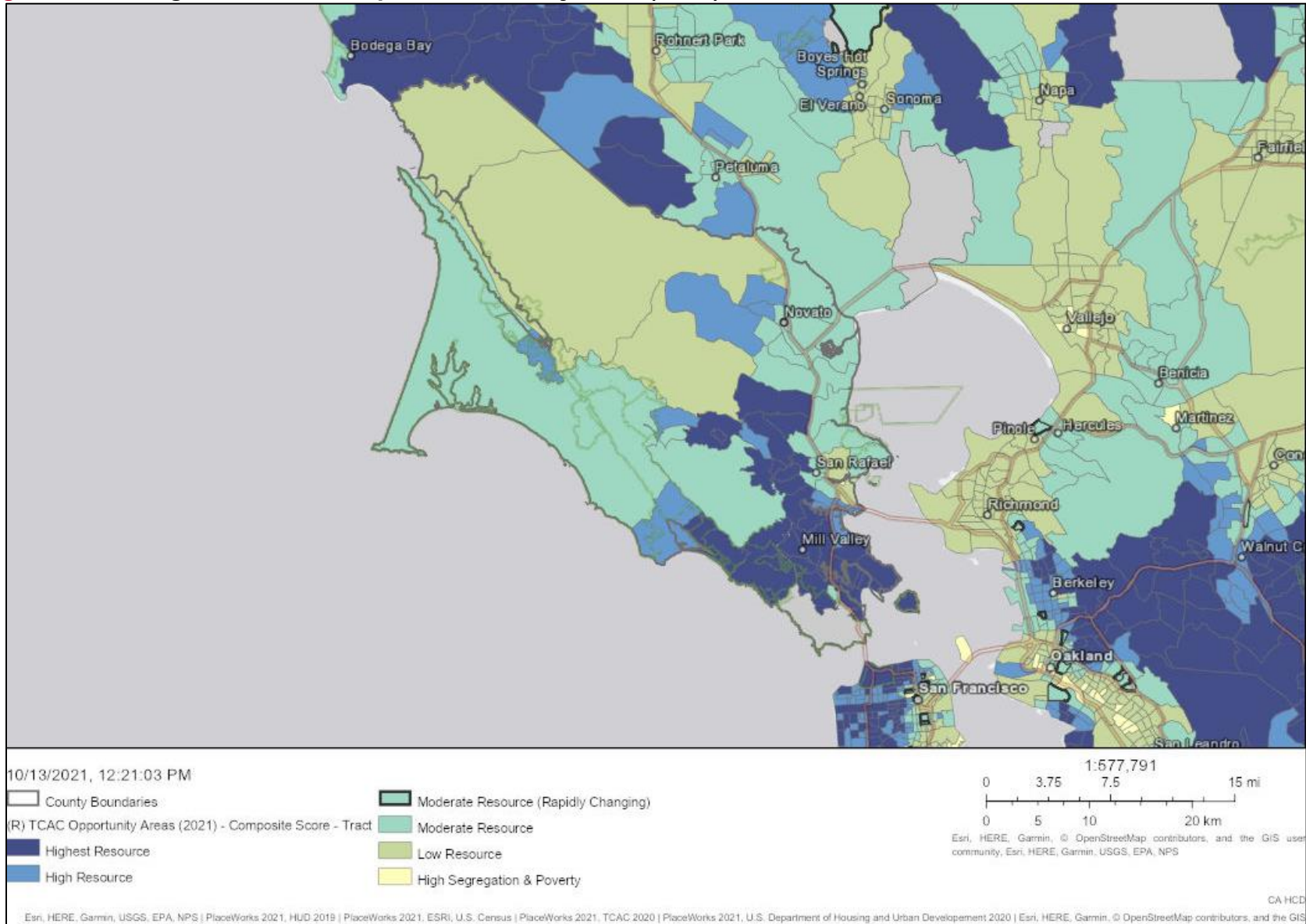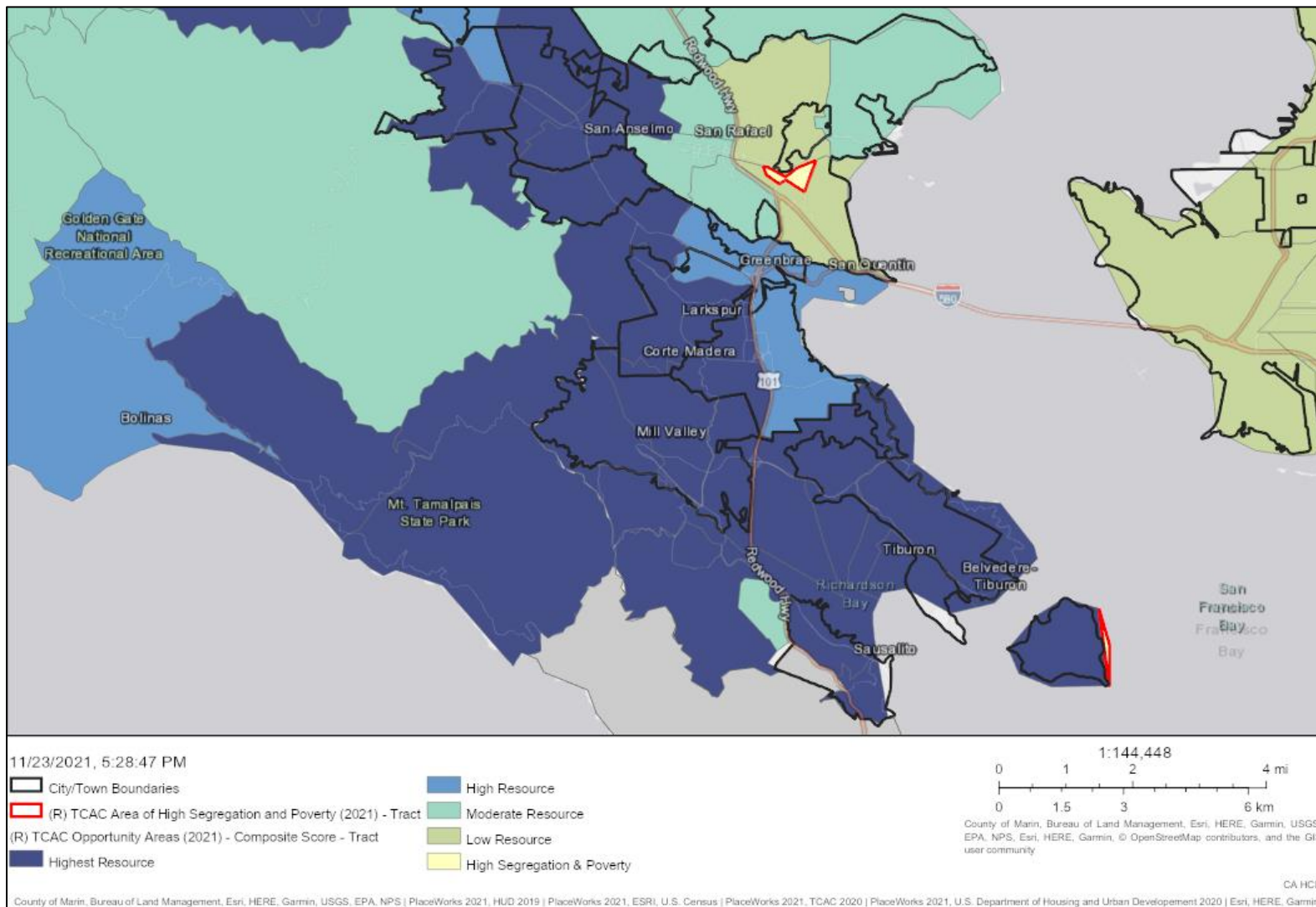**_Figure D- 22_**_: Regional TCAC Composite Scores by Tract (2021)_

Figure D- 23: *Local TCAC Areas of High Segregation and Poverty Areas (2021)*

Note: The area in outlined in red in Tiburon is Angel Island State Park (no residential).

Many unincorporated Marin communities have high and highest resource tracts, except for Northern Coastal and Central Coastal West Marin, where tracts have low resources (Table D- 17). Most unincorporated communities are classified as highest resource. Of note is that Marin City, which has been identified as a RECAP, is classified as having moderate and highest resources.   This apparent contradiction may reflect the gentrification forces occurring in that tract. Marin City has been identified as a "sensitive community" by the UC Berkley Urban Displacement project. Residents in sensitive communities may be particularly vulnerable to displacement in the context of rising property values and rents. Overall, the lower resources are located in areas further from the County's concentration of communities and development., which are farther from employment and community colleges. West Marin (especially Northern and Central Coastal) is far from the other communities where resources are concentrated.

Table D- 17: *TCAC Score by Community and CDPs*			
	Community Name	**CDP**	**TCAC Score**
North Marin			
	Black Point-Green Point	Black Point - Greenpoint	Moderate Resource
	Marinwood/Lucas Valley	Lucas Valley-Marinwood	Highest Resource
West Marin			
	Northern Costal West Marin	Dillon Beach	Low Resource
		Tomales	Low Resource
	Central Coastal West Marin	Point Reyes Station	Low Resource
		Inverness	Moderate Resource
	The Valley	Nicasio	Low Resource
		San Geronimo Valley	Highest Resource
		Woodacre	Highest Resource
		Lagunitas- Forest Knolls	High Resource
	Southern Coastal West Marin	Stinson Beach,	Highest Resource
		Bolinas	High Resource
		Muir Beach	Highest Resource
Central Marin			
	Santa Venetia/Los Ranchitos	Santa Venetia	Moderate Resource
	Kentfield/Greenbrae	Kentfield	High and Highest Resource
Southern Marin			
	Strawberry	Strawberry	Highest Resource
	Tam Valley	Tamalpais-Homestead Valley	Highest Resource
	Marin City	Marin City	Highest/Moderate Resource

Opportunity Indices

While the Federal Affirmatively Furthering Fair Housing (AFFH) Rule has been repealed, the data and mapping developed by HUD for the purpose of preparing the Assessment of Fair Housing (AFH) can still be useful in informing communities about segregation in their jurisdiction and region, as well as disparities in access to opportunity. This section presents the HUD-developed index scores based on nationally available data sources to assess Marin County residents' access to key opportunity assets by race/ethnicity and poverty level[37]. Table D- 18 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- **School Proficiency Index**: The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. *The higher the index value, the higher the school system quality is in a neighborhood.*

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

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

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

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

- **Environmental Health Index**: The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. *Therefore, the higher*

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[37] Index scores not available for unincorporated County or its communities.

the index value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

Table D- 18: *Opportunity Indices by Race/Ethnicity – Marin County*

	School Proficiency Index	Labor Market Index	Transit Trip Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Marin County						
Total Population						
White, Non-Hispanic	78.73	86.48	61.00	86.45	64.50	81.33
Black, Non-Hispanic	75.59	48.89	68.54	89.57	74.96	76.55
Hispanic	55.96	68.11	68.08	89.65	69.72	83.84
Asian or Pacific Islander, Non-Hispanic	74.41	82.57	64.24	87.81	66.89	81.01
Native American, Non-Hispanic	77.09	67.25	62.28	87.19	69.32	80.55
Population below federal poverty line						
White, Non-Hispanic	74.28	84.68	61.13	87.02	64.01	82.93
Black, Non-Hispanic	66.79	55.04	74.1	91.52	66.84	76.07
Hispanic	38.54	56.82	75.83	91.68	76.48	83.81
Asian or Pacific Islander, Non-Hispanic	68.97	82.89	67.01	89.11	71.69	78.95
Native American, Non-Hispanic	56.77	66.49	71.22	88.33	67.14	85.29

Note: American Community Survey Data are based on a sample and are subject to sampling variability. See page 79 for index score meanings. Table is comparing the total Marin County by race/ethnicity, to the County population living below the federal poverty line, also by race/ethnicity. No data is available for analysis at the unincorporated level.
Source: AFFHT Data Table 12; Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
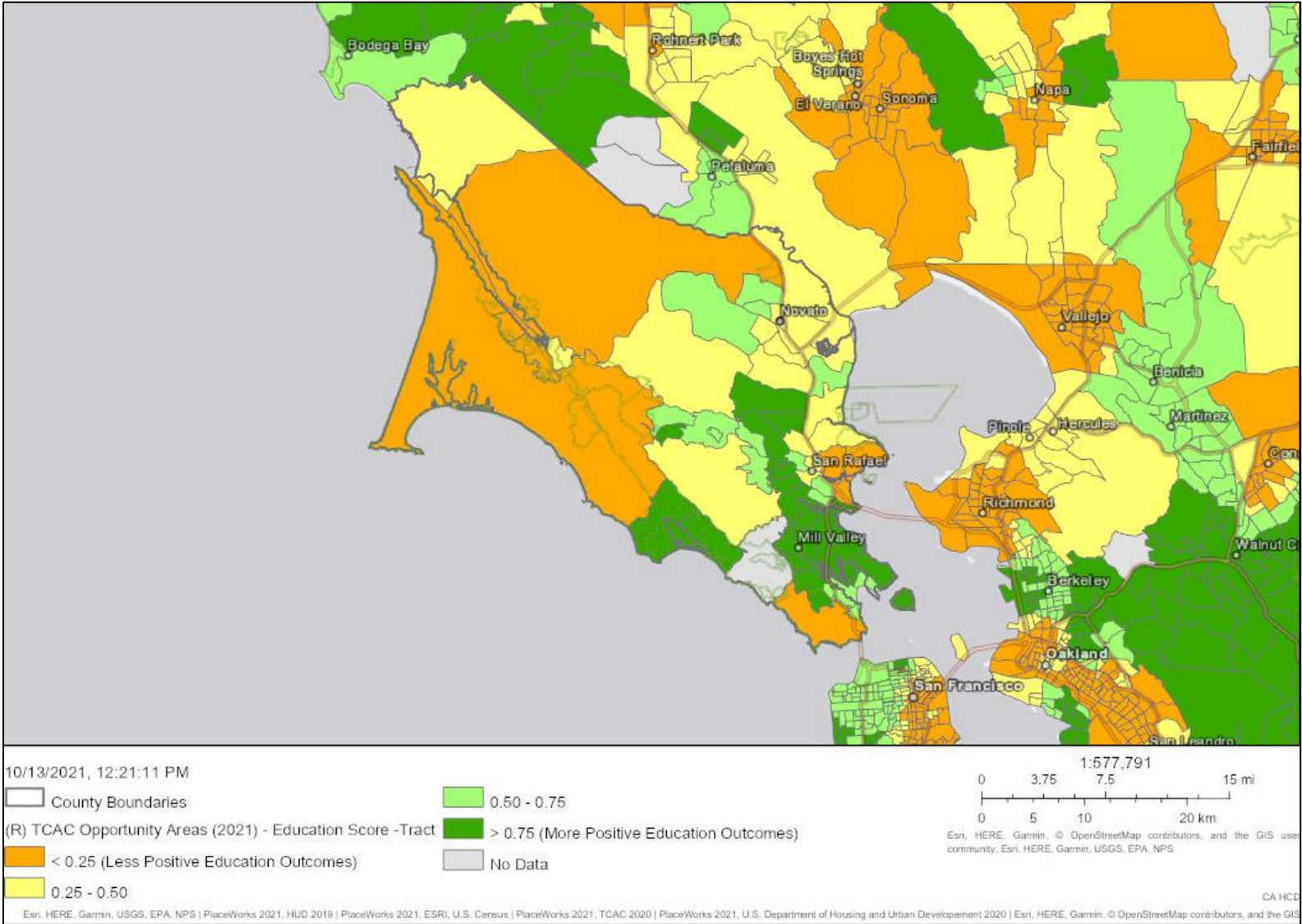
Education

Regional Trends

The school proficiency index is an indicator of school system quality, with higher index scores indicating access to higher school quality. In Marin County, Hispanic residents have access to lower quality schools (lowest index value of 56) compared all other residents (for all other racial or ethnic groups, index values ranged from 74 to 78, Table D- 18). For residents living below the federal poverty line, index values are lower for all races but are still lowest for Hispanic and Native American residents. White residents have the highest index values, indicating a greater access to high quality schools, regardless of poverty status.

The HCD/TCAC education scores for the region show the distribution of education quality based on education outcomes (Figure D- 24). As explained in Table D- 16, the Education domain score is based on a variety of indicators including math proficiency, reading proficiency, high School graduation rates, and student poverty rates. The education scores range from 0 to 1, with higher scores indicating more positive education outcomes. In the County, lower education scores are found in census tracts in all counties along the San Pablo Bay. In counties surrounding San Francisco Bay, there are concentrations of both low and high education scores. For example, in San Francisco County, the western coast has a concentration of high education scores while the eastern coast has a concentration of low education scores. In Marin County, low education scores are concentrated in Novato and San Rafael along San Pablo Bay and along the western coast.

According to Marin County's 2020 Analysis of Impediments to Fair Housing Choice [2020 AI], while the County's overall high school graduation rates are among the highest in the nation, Marin County, "has the greatest educational achievement gap in California." According to data from Marin Promise, a nonprofit of education and nonprofit leaders, from 2017 – 2018:

- 78 percent of White students in Marin met or exceeded common core standards for 3rd Grade Literacy, while only 42 percent of students of color met or exceeded those standards;
- 71 percent of White students met or exceeded common core standards for 8th grade math, while only 37 percent of students of color met or exceeded those standards;
- 64 percent of White students met or exceeded the college readiness standards, defined as completing course requirements for California public universities, while only 40 percent of students of color met or exceeded those requirements.

Figure D- 24: *TCAC Education Scores- Region*

Local Trends

There is a Countywide pattern of lower education scores in Northern Marin and highest in Southern Marin (Figure D- 24Figure D- 24:). This pattern also applies to unincorporated communities in these areas. Low education scores are found in Black Point-Green Point and Santa Venetia in the North Marin. However, the TCAC education score for the community does not solely reflect the demographics of the community itself. Rather, data factors for this category are calculated based on the nearest 1-3 schools, which are shared more broadly. While Black Point-Green Point's education score is low, only 8.0%of the community is aged 18 or under, in comparison to 20.2% in the overall County and 18.7 percent in Novato, the nearest jurisdiction. Furthermore, while about 90% of the community identifies as non-Hispanic White, about 40%of students at the nearest school (Olive Elementary) identify as Hispanic/Latin. There are no schools located within the boundaries of the community.

Higher education scores are prominent in Central and Southern Marin areas including the unincorporated communities of Kentfield, Strawberry, and Tam Valley. In West Marin, education scores are among the lowest. Northern and Central Coast West Marin (Dillon Beach, Tomales, Inverness, and Point Reyes Station) have education scores of less than 0.25 (Figure D- 24). The Countywide pattern of higher education scores in the south and lower education scores in the north correlate with the location of schools throughout the unincorporated County. Figure D- 25 shows that most schools are concentrated in North, Central, and Southern Marin along major highways (Highway 101 and Shoreline Highway), with few schools in West Marin.

Marin County has 17 school districts, with 78 public schools. Table D- 19 shows a list of the 13 elementary school districts, two joint union districts, and two high school districts in Marin County. District boundaries do not separate incorporated areas from unincorporated areas, though some do serve unincorporated communities only (Figure D- 26). For example, Shoreline Unified School District only serves Northern and Central Coastal West Marin, which are all unincorporated communities.

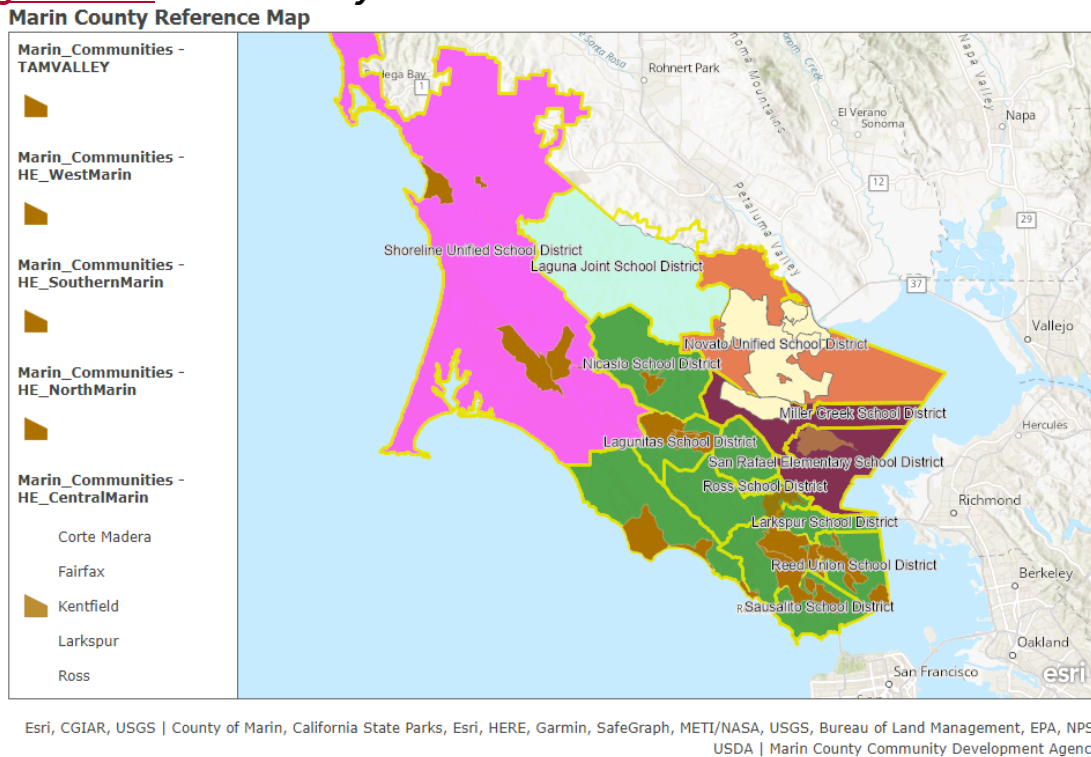**_Figure D- 25_: Marin County Schools**

Table D- 19: **Marin County School Districts by Communities Served**	
District Name	**Unincorporated Community Served**
Marin County Elementary School Districts	
Bolinas-Stinson Union (Elementary)[1]	Southern Coastal West Marin
Kentfield Elementary[1]	Kentfield
Laguna Joint Elementary	N/A- Petaluma
Lagunitas Elementary[1]	The Valley- Lagunitas-Forest Knolls, San Geronimo, Woodacre
Larkspur-Corte Madera[1]	N/A
Mill Valley Elementary[1]	Tam Valley/Strawberry
Miller Creek Elementary [2]	Lucas Valley
Nicasio Elementary[1]	Nicasio
Reed Union Elementary[1]	N/A
Ross Elementary[1]	N/A
Ross Valley Elementary	N/A
San Rafael City Elementary[2]	Santa Venetia
Sausalito Marin City[1]	Marin City, Sausalito
High School Districts	
Tamalpais Union High	West and South Marin
San Rafael City High	Santa Venetia-Lucas Valley
Unified School Districts	
Novato Unified	Black Point- Green Point
Shoreline Unified	Northern and Central Coastal West Marin
Notes: 1. Students attend Tamalpais Union High School District. 2. Students served by San Rafael City High School District. Source: Marin County Office of Education, February 2022.	

Figure D- 26: Marin County School District Boundaries

Esri, CGIAR, USGS | County of Marin, California State Parks, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA | Marin County Community Development Agency

Marin Promise Partnership publishes district-level Progress Reports showing data along six key indicators from Cradle to Career. The Cradle to Career indicators show a set of six key milestones outcomes along a student's educational journey: Kindergarten Readiness, 3rd Grade Literacy, 8th Grade Math, College & Career Readiness, College & Career Program Enrollment, and College and Career Completion. The Progress Reports summarized in Table D- 20 also highlight racial disparity gaps. Disparity gaps occur for all indicators and in all districts, with a greater proportion of white students meeting milestones than students of color.

According to Table D- 20, kindergarten readiness is similar across each school district and all Marin County districts combined. Tamalpais Unified School District, which serves West and Southern Marin, had the highest proportion of its entire student population meeting each milestone as well as the smallest gaps between White students and students of color. By contrast, San Rafael City Schools, which serve Lucas Valley and Santa Venetia students, had the lowest proportion of students meeting all milestones (except college completion) and often the largest gaps. For example, while 32 percent of all students reached 3rd Grade Literacy, the proportion of White students reaching this milestone far exceeded this (76 percent) while only 17 percent of students of color reached 3rd Grade Literacy. It appears that student performance is more likely affected by

school resources rather than proximity to schools given that Tamalpais Unified District only has a few schools over a large geographical area [38] (Figure D- 25 and Figure D- 26).

Table D- 20: *Educational Progress Report for School Districts Serving Unincorporated Communities*					
Indicator	**Students Meeting Milestones**	**All Marin County Districts**	**San Rafael City Schools**	**Shoreline Unified School**	**Tamalpais Unified**
Kindergarten Readiness[1]	All Students	54%	54%	54%	54%
	White Students	59%	N/A	N/A	N/A
	Students of Color	33%	N/A	N/A	N/A
	Gap	36%	N/A	N/A	N/A
3rd Grade Literacy[2]	All Students	50%	32%	37%	75%
	White Students	74%	76%		79%
	Students of Color	30%	19%	27%	51%
	Gap	44%	57%		28%
8th Grade Math[2]	All Students	41%	20%	42%	62%
	White Students	59%	49%		65%
	Students of Color	24%	12%	29%	41%
	Gap	35%	37%		24%
College & Career Readiness[3]	All Students	52%	39%	45%	67%
	White Students	65%	73%	67%	70%
	Students of Color	33%	22%	28%	55%
	Gap	32%	51%	39%	15%
College & Career Program Enrollment[4]	All Students	73%	69%	58%	77%
	White Students	77%	83%	< 10 students	79%
	Students of Color	71%	67%	68%	72%
	Gap	6%	16%	68%	7%
College and Career Completion[5]	All Students	56%	45%	33%	68%
	White Students	67%	71%	50%	74%
	Students of Color	40%	32%	17%	49%
	Gap	27%	39%	33%	25%
Notes: 1. Received "Ready to Go" Kindergarten Student Entrance Profile (KSEP) score. 2. Met or exceeded Common Core Standard. 3. Placed in the "prepared" level by California School Dashboard* C- or better in all UC/CSU prep courses. 4. Enroll in a postsecondary program **by** Fall after **graduation** 5. Complete a postsecondary program within 6 six years. Source; Marin Promise Partnership, January 2022. https://www.marinpromisepartnership.org/progress-reports-race/# https://www.marinpromisepartnership.org/progress-reports-race/# GreatSchools provided data comparisons by the School Districts shown. Tamalpais Unified is only made up of high schools while San Rafael Schools and Shoreline Unified Districts have a variety of school levels. This table provides context on the educational progress and disparities in access to education and is being used to identify trends.					

[38] Often proximity to schools is used a proxy for educational outcomes or access.

Of special note in Marin County is the California State Justice Department's finding in 2019 that the Sausalito Marin City School District, which serves the unincorporated communities of Marin City and Tam Valley, and nearby Town of Sausalito, as having "knowingly and intentionally maintained and exacerbated" existing racial segregation and deliberately established a segregated school and diverted County staff and resources to Willow Creek School while depriving the students at Bayside MLK an equal educational opportunity.

There are two K-8 elementary schools in the Sausalito Marin City School District (SMCSD): Bayside Martin Luther King Jr. Academy, located in Marin City which is the only public school in the District, and Willow Creek Academy, a charter school located in nearby Sausalito. The majority of students from both Bayside MLK and Willow Creek attend Tamalpais High School in nearby Mill Valley. The combined enrollment of both schools is just under 500 students. The two communities SMCSD serves while geographically adjacent, have very different demographic profiles and histories, with large disparities in racial/ethnic representation and economic diversity. While less than two miles apart, both schools replicate and reinforce these patterns of segregation.

In the case of the Sausalito Marin City School District (SMCSD), the asymmetrical dynamics between both communities combined with the implementation of biased educational policies further exacerbated the harm of segregation. Black and Latinx students were limited from accessing educational opportunities. Segregation separates students of color from power, opportunity, and supportive spaces that honor and value their identities. According to the 2020 AI, students of color from Marin City who attend Tamalpais High School in Mill Valley consistently report not feeling welcomed or included, and as reported in 2016, zero percent of African American students in Marin felt connected to their school.

 As a result of the State Justice Department's finding in 2019, Sausalito Marin City School District prepared an Integration Generation Plan which would include reparations to graduates in the form of long-term academic and career counseling and support higher education applications and skilled workforce employment. The Plan was adopted in June 2021. [39] Unification of the two schools in the district, Bayside MLK and WCA into one single school was one of the most expedient ways to achieve the goals of integration and the benefits of diverse classrooms for all students in the district. The District opened a single unified TK-8 grade school on August 23rd, 2021 and was considered a successful process – retaining over 92% of Willow Creek families and 99% of Bayside MLK families. As of April 2022, the District has met all 5 -10 and 15-year benchmarks of the settlement agreement and is in a monitoring stage.

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[39]   https://www.smcsd.org/documents/About-Us/Strategic%20Plan/Comprehensive-Education-Plan-Revised-6_17_2021.pdf   https://www.smcsd.org/documents/About-Us/Strategic%20Plan/Comprehensive-Education-Plan-Revised-6_17_2021.pdf

Transportation

Regional Trends

According to ABAG's Plan Bay Area 2040, regional mismatch between employment growth relative to the housing supply has resulted in a disconnect between where people live and work. Overall, the Bay Area has added nearly two jobs for every housing unit built since 1990. The deficit in housing production has been particularly severe in terms of housing affordable to lower- and middle wage workers, especially in many of the jobs-rich, high-income communities along the Peninsula and in Silicon Valley. As a result, there have been record levels of freeway congestion and, before the COVID pandemic, historic crowding on transit systems like Bay Area Rapid Transit (BART), Caltrain and San Francisco's Municipal Railway (Muni).

HUD's opportunity indicators can provide a picture of transit use and access in Marin County through the transit index [40] and low transportation cost.[41] Index values can range from zero to 100 and are reported per race so that differences in access to transportation can be evaluated based on race. In the County, transit index values range from 61 to 69, with White residents scoring lower and Black and Hispanic residents scoring highest. Given that higher the transit trips index, the more likely residents utilize public transit, Black and Hispanics are more likely to use public transit. For residents living below the poverty line, the index values have a larger range from 61 for White residents to 75 for Hispanic residents. Regardless of income, White residents have lower index values- and thus a lower likelihood of using transit.

Low transportation cost index values have a larger range than transit index values from 65 to 75 across all races and were similar for residents living below the poverty line. Black and Hispanic residents have the highest low transportation cost index values, regardless of poverty status. Considering a higher "low transportation cost" index value indicates a lower cost of transportation, public transit is less costly for Black and Hispanics than other groups in the County.

Transit patterns in Figure D- 27 show that transit is concentrated throughout North, Central, and Southern Marin along the City Centered Corridor from Novato to Marin City/Sausalito. In addition, there are connections eastbound; San Rafael connects 101 North/South and 580 Richmond Bridge going East (Contra Costa County) and Novato connects 101 North/South and 37 going East towards Vallejo (Solano County) Internally, public transit along Sir Francis Drake Blvd connects from Olema to Greenbrae.

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

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

Figure D- 27: Public Transit
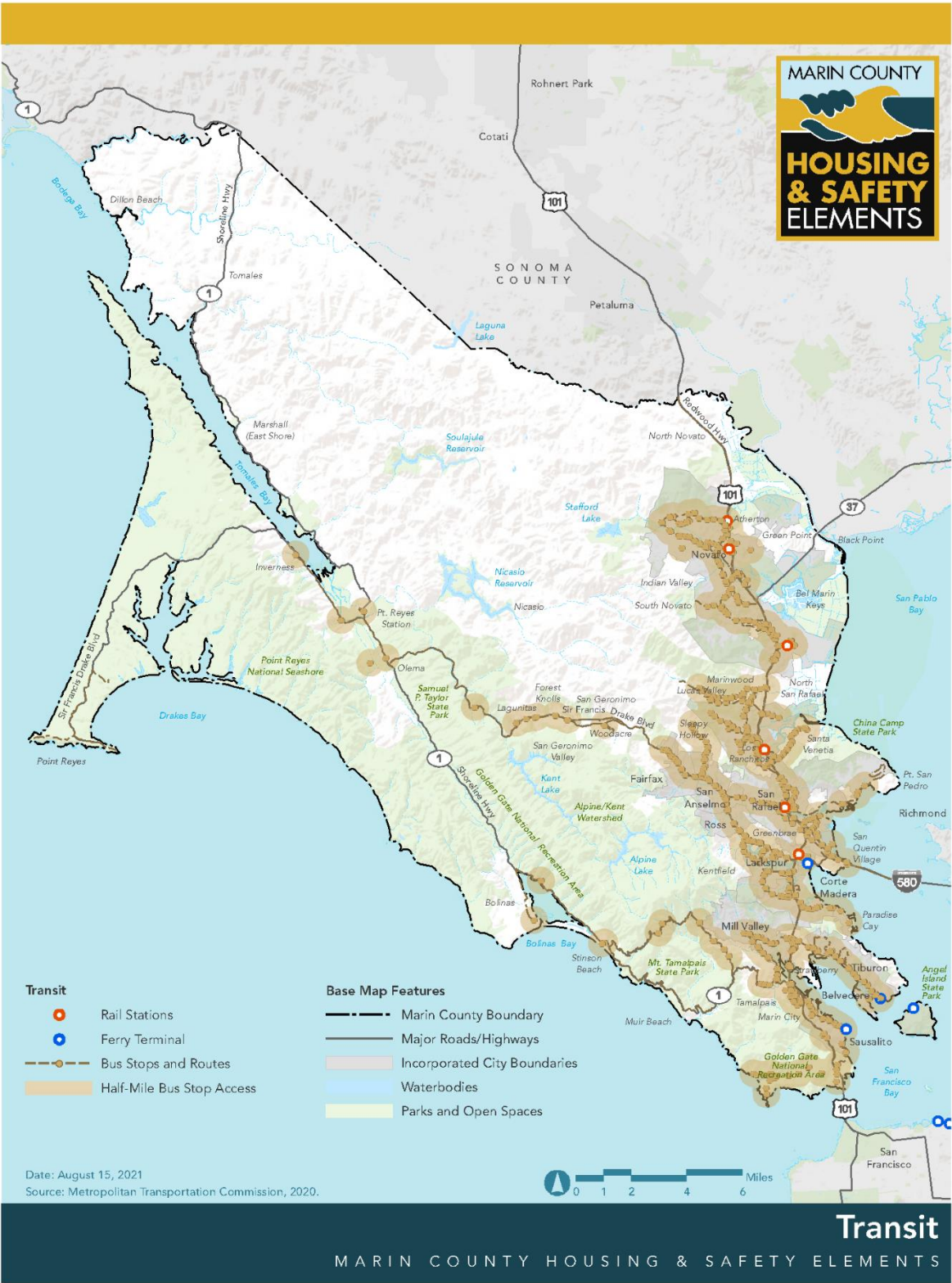
All nine Bay Areas counties are connected via public transportation. Marin Transit Authority (MTA) operates all bus routes that begin and end in the County. Golden Gate Transit provides connections from Marin to San Francisco, Sonoma and Contra Costa County. In 2017, MTA conducted an onboard survey of their ridership and identified the Canal District of San Rafael as having a high rating of a "typical" transit rider". That typical rider was described as, "42 percent of households have annual income of less than $25,000, 90 percent of individuals identify as Hispanic or Latino, 19 percent of households have no vehicle, 17 percent have three or more workers in their homes, 30 percent have five or more workers living with them, and Spanish is spoken in 84 percent of households."[42] According to the survey, residents in the Canal area had the highest percentage of trips that began or ended in routes provided by Marin Transit.

In addition to its fixed routes, MTA offers several other transportation options and some that are available for specific populations:

- Novato Dial-A-Ride - designed to fill gaps in Novato's local transit service and connects service with Marin Transit and Golden Gate Transit bus routes.
- ADA Paratransit Service – provides transportation for people unable to ride regular bus and trains due to a disability. It serves and operates in the same areas, same days and hours as public transit.
- Discount Taxi Program – called Marin-Catch-A-Ride, it offers discount rides by taxi and other licensed vehicles if you are at least 80 years old; or are 60 and unable to drive; or you are eligible for ADA Paratransit Service.
- West Marin Stage – provides public bus service from West Marin to Highway 101 corridor which connects with Marin Transit and Golden Gate Transit bus routes.
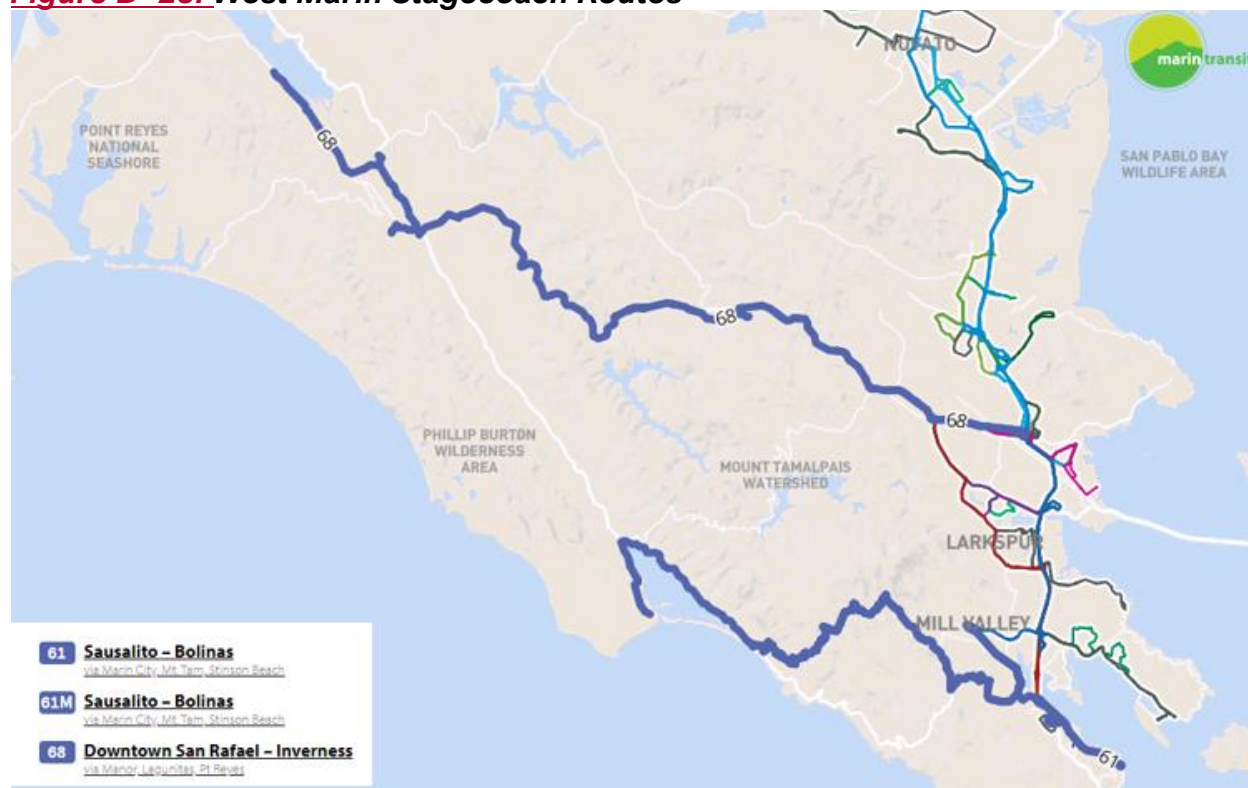
Local Trends

There are no opportunity indices at the unincorporated County level. However, regional trends show a need for connecting West Marin to the transportation hubs in North, Central, and South Marin. For this reason, MTA operates the West Marin Stagecoach which consists of two regularly operating bus routes between central and West Marin. Route 61 goes to Marin City, Mill Valley, and Stinson Beach. Route 68 goes to San Rafael, San Anselmo, Point Reyes and Inverness (Figure D- 28). The Stagecoach also connects with Marin Transit and Golden Gate Transit bus routes. However, the Northern Coastal West Marin area does not have any public transit connection to the south. Bus transit (brown dots in Figure D- 27 and routes 61 and 86 of Stagecoach Figure D- 28) only connect as far north as Inverness. This lack of transit connection affects the minority populations and the persons with disabilities concentrated in the west part of the County (Figure D- 3 and Figure D- 7). The lack of infrastructure as far as Northern Coastal West Marin is due to its low population density. Overall, West Marin has historically been rural with a focus on agriculture, open space preservation, and park lands. The population of West Marin is approximately 16,000 people, or about 6.5 percent of the population of

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[42] From the 2020 County of Marin Analysis of Impediments to Fair Housing Choice

Marin County, residing in more than half the land area of the county. While the overall density of the community is very low, residents cluster in towns and villages, with the vast areas of designated open space in West Marin being virtually uninhabited. Further impacting the area is the Coastal Act, which preserves access to the coast and promotes visitor serving uses over uses for local residents.

Together these factors have resulted in less access to infrastructure such as public transportation, which likely resulted in the areas' low TCAC Opportunity scores as well. Due to the small widely distributed population, community services such as grocery stores and health clinics are also absent in much of the area.

Figure D- 28: *West Marin Stagecoach Routes*

Economic Development

Regional Trends

The Bay Area has a regi0nalregi0malregi0mal economy which has grown to be the fourth largest metropolitan region in the United States today, with over 7.7 million people residing in the nine-county, 7,000 square-mile area. In recent years, the Bay Area economy has experienced record employment levels during a tech expansion surpassing the "dot-com" era of the late 1990s. The latest boom has extended not only to the South Bay and Peninsula — the traditional hubs of Silicon Valley — but also to neighborhoods in San Francisco and cities in the East Bay, most notably Oakland. The rapidly growing and changing economy has also created significant housing and transportation challenges due to job-housing imbalances.

HUD's opportunity indicators provide values for labor market index[43] and jobs proximity index[44] that can be measures for economic development in Marin County. Like the other HUD opportunity indicators, scores range from 0 to 100 and are published by race and poverty level to identify differences in the relevant "opportunity" (in this case economic opportunity). The labor market index value is based on the level of employment, labor force participation, and educational attainment in a census tract- a higher score means higher labor force participation and human capital in a neighborhood. Marin County's labor market index values have a significant range from 49 to 86, with Black residents scoring lowest and White residents scoring highest. Scores for Marin County residents living below the poverty line drop notably for Hispanic residents (from 68 to 57), increase for Black residents (from 49 to 55) and remain the same for all other races. These values indicate that Black and Hispanic residents living in poverty have the lowest labor force participation and human capital in the County.

HUD's jobs proximity index quantifies the accessibility of a neighborhood to jobs in the region. Index values can range from 0 to 100 and a higher index value indicate better the access to employment opportunities for residents in a neighborhood. County jobs proximity index values range from 65 to 75 and are highest for Hispanic and Black residents. The jobs proximity value map in Figure D- 29 shows the distribution of scores in the region. Regionally, tracts along the northern San Pablo Bay shore and northern San Francisco Bay shore (Oakland and San Francisco) have the highest job proximity scores

In Marin County, the highest values are in Central Marin at the intersection of Highway 101 and Highway 580 from south San Rafael to Corte Madera. Some census tracts in North and Southern Marin along Highway 101 also have high jobs proximity values, specifically in south Novato and Sausalito. The Town of Tiburon in Southern Marin also has the highest scoring census tracts. Western North and Central Marin and some West Marin tracts, including the unincorporated Valley community (west of Highway 101) have the lowest jobs proximity scores.

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[43] Labor Market Engagement Index: The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.
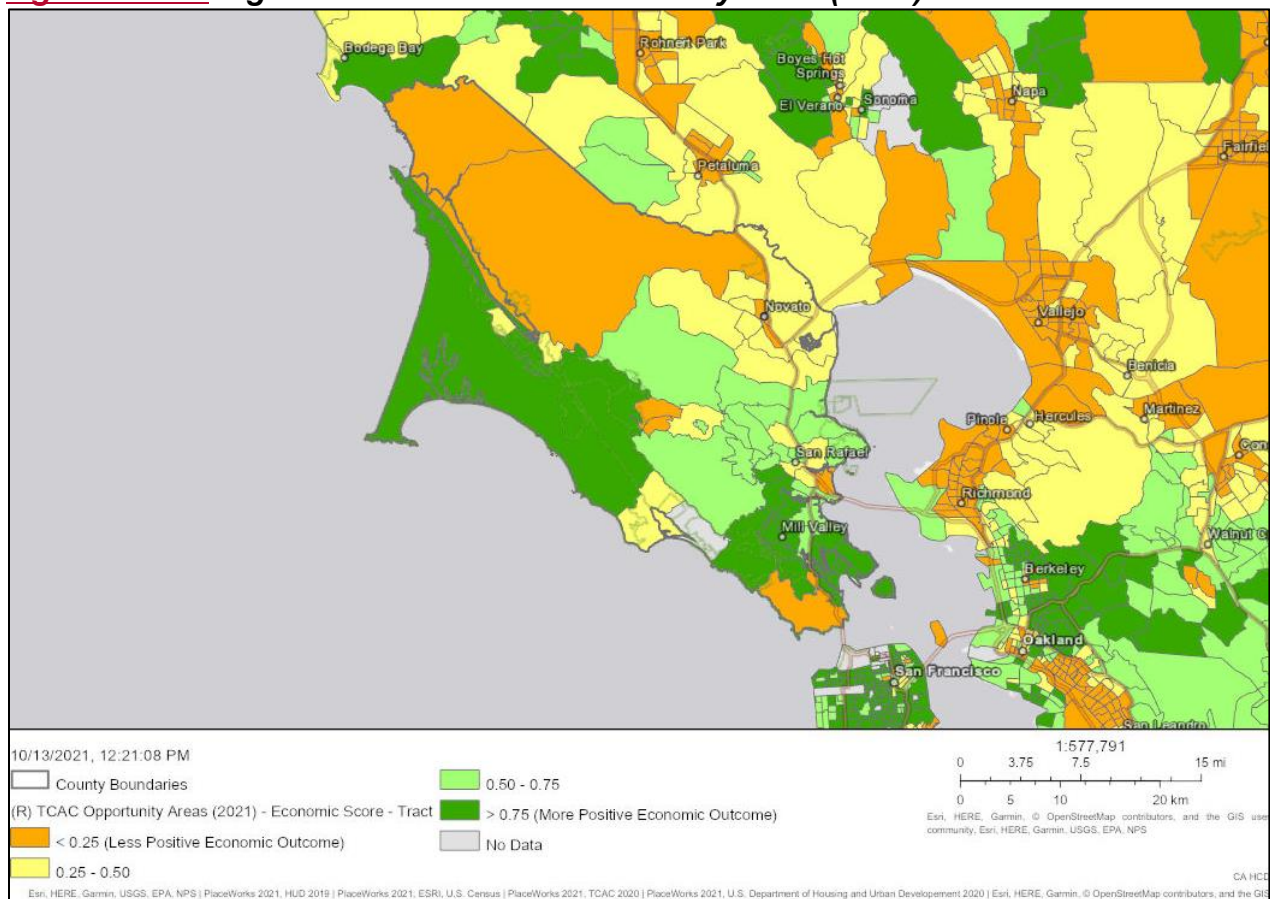[44] Jobs Proximity Index: The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

Figure D- 29: Regional Jobs Proximity Index by Block Group (2017)
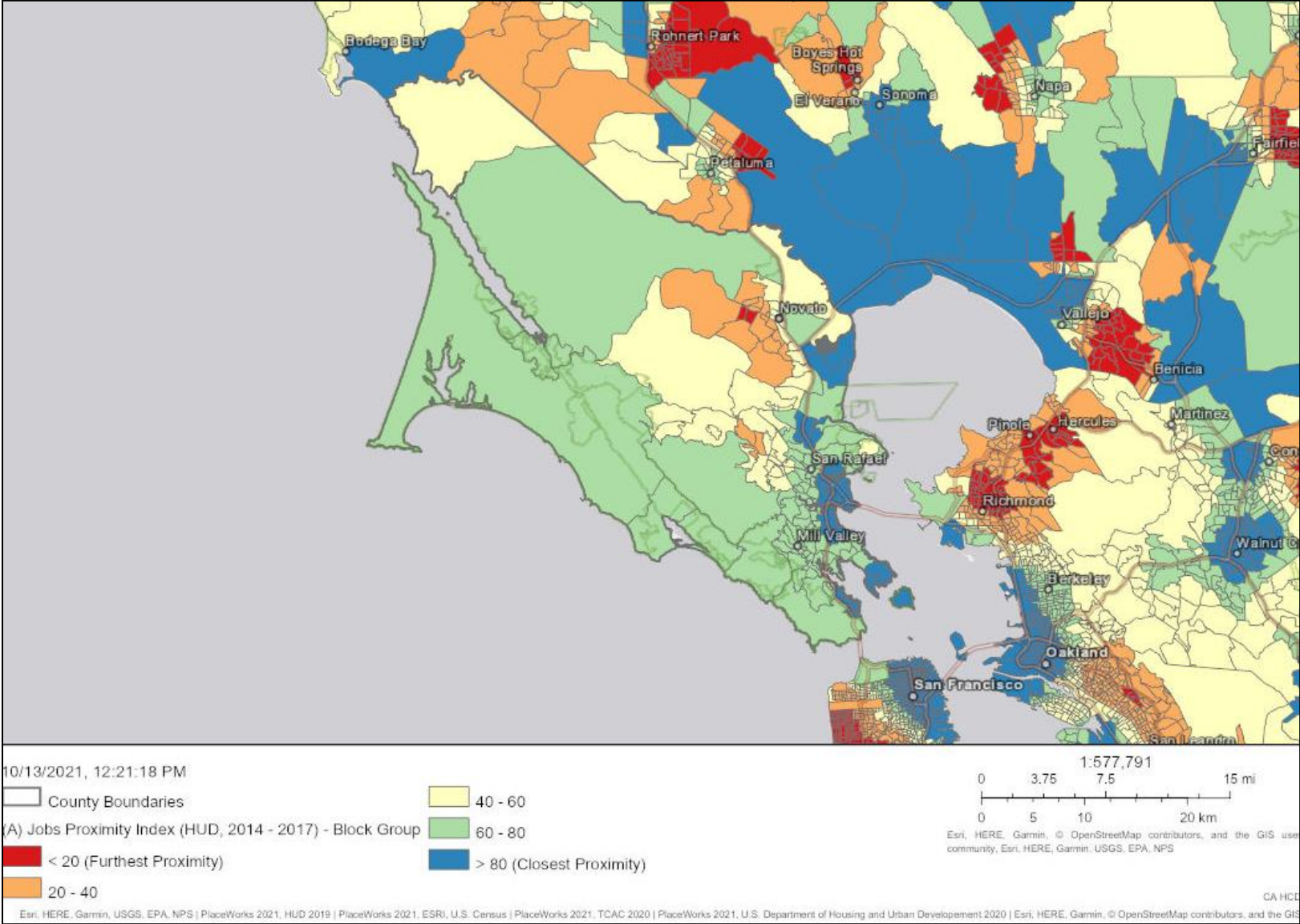
The TCAC Economic Scores are a composite of jobs proximity index values as well as poverty, adult education, employment, and median home value characteristics.[45] TCAC economic scores range from 0 to 1, where higher values indicate more positive economic outcomes. The map in Figure D- 30 shows that the lowest economic scores are located along the northern San Pablo shores as well as many census tracts in North and West Marin, southern Sonoma County, Solano, and Contra Costa County. In Marin County, the lowest economic scores are located in northern West Marin and North Marin, as well as some census tracts in Central Marin and at the southern tip of the County (Marin Headlands). The highest TCAC economic scores are located along coastal West Marin communities, Southern Marin, and parts of Central Marin including the cites of Larkspur, Mill Valley, Corte Madera, Sausalito, and Tiburon.

Figure D- 30: *Regional TCAC Economic Score by Tract (2021)*

Local Trends

Related to the location of the transportation hubs in Central and Southern Marin, jobs proximity index scores[46] are also highest in these areas, especially in the incorporated cities of San Rafael and Corte Madera (Figure D- 29). This means that the unincorporated communities in southern West Marin as well as Santa Venetia, Strawberry, Kentfield, and Tam Valley, while not having the highest index values, are closest to these job hubs, compared to Northern West Marin and Coastal West Marin. By contrast, the incorporated communities in the Valley, Northern Coastal West Marin, Lucas-Valley, and Black Point-Green Point have the lowest job proximity index values (40 to 60).

Again, as with regional trends, proximity to jobs does not always reflect positive economic outcomes for the residents of that area. The TCAC Economic scores are a metric for poverty, adult education, employment, median home value, and jobs proximity for the population in a census tract. While the Valley had the lowest proximity index, its TCAC Economic score is amongst the highest (Figure D- 30). Overall, the highest economic resources are located in the Central Coastal West Marin, Santa Venetia, Lucas Valley, Kentfield, Strawberry, and Tam Valley, while the lowest economic scores are located in Black-Point Green Point, Marin City, Northern Coastal West Marin, and Central Coastal West Marin . Of important note then are Marin City- an area close to jobs but with a low economic score, and Black Point- Green Point and Northern Coastal West Marin, which scored low on both proximity to jobs and economic scores.

Marin City's lower TCAC composite score (compared to its neighboring areas) can be attributed to its lower economic score. The TCAC Economic Score is a combination of poverty, median home values, adult education, employment and jobs proximity (Table D-16) The past discriminatory practices that affected Marin City's Black residents continue to have had an impact in the economic outcome of this community.

The history of Marin City and its contribution to Marin County is a local example of how historic government policies and practices helped create the segregated communities that continue to exist today. In 1942, Kenneth Bechtel, an industrial builder, signed a contract with the U.S. government to construct transport vessels or the U.S. Navy. It created Marinship, which during World War II built nearly 100 liberty ships and tankers. The Bechtel Company was also given permission to develop a community to house some of its workers, and the unincorporated community of Marin City was constructed as a temporary housing facility.

Since Marinship faced a shortfall in local, available workers, Bechtel overlooked the workplace exclusions that were standard at the time and recruited African Americans from southern states such as Louisiana, Arkansas, Texas and Oklahoma. At its peak in 1944,

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

Marinship employed 22,000 workers from every state in the Union, and Marin City had a population of 6,500 people, including over 1,000 school-aged children, and was home to Midwestern Whites (85 percent), southern Blacks (10 percent), and Chinese immigrants (five percent).Marin City was the country's first integrated Federal housing project, and eventually would be hailed as a model city for the company's workers and a bold social experiment in race relations. During an era when segregation was widely practiced in California as well as across the country, Marin City was a diverse, racially integrated community.

At the end of the war, military veterans returned in droves. Housing was in short supply and families were doubling up. With a large civilian housing shortage, the National Housing Act of 1949 was created.

Under the National Housing Act, the Federal Housing Administration (FHA) guaranteed bank loans to housing developments that were designed to move Whites out of integrated, urban areas into all-White subdivisions in the suburbs. FHA loan guarantees were made to developers on the condition that homes could be sold only to Whites. Racially restrictive covenants were used to prevent people of color from purchasing homes in White communities in Marin, and the Federal Housing Administration's Underwriting Manual recommended the use of restrictive covenants to "provide the surest protection against undesirable encroachment and inharmonious use." While the Civil Rights Act of 1969 prohibited such transactions, many of these covenants still remain in property deeds in Marin., although they are unenforceable.

White veterans and their families returning from World War II were able to purchase homes with mortgages that were guaranteed by the Federal Government. Many homes in Marin in the late 1940s were selling for $7,000 to $8,000 and families often got mortgages with 0 percent to five percent down payments. In some cases, the monthly cost to purchase a home was less than what a family would pay for rent in public housing.

Today's wealth inequality was created, in part, after World War II when explicit policies and programs of the Federal government provided Whites the opportunities for home ownership with very affordable prices and financing, while African Americans were prohibited from participating in the same programs. Today, the home equity appreciation for families who were able to purchase homes after the war has allowed those families to use their accumulated wealth to finance college educations, fund retirement, bequeath money, and to support their children's home ownership. For generations, African Americans have not had those same opportunities.

Environment

Regional Trends

Environmental conditions residents live in can be affected by past and current land uses like landfills or proximity to freeways The TCAC Environmental Score shown in Figure D-31 is based on CalEnviroScreen 3.0 scores. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and

hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. TCAC Environmental Scores range from 0 to 1, where higher scores indicate a more positive environmental outcome (better environmental quality)

Regionally, TCAC environmental scores are lowest in the tracts along the San Pablo and San Francisco Bay shores, except for the coastal communities of San Rafael and Mill Valley in Marin County. Inland tracts in Contra Costa and Solano County also have low environmental scores. In Marin County, TCAC Environmental scores are lowest in the West Marin areas of the unincorporated County from Dillon Beach in the north to Muir Beach in the South, east of Tomales Bay and Shoreline Highway. In addition, census tracts in Black Point-Green Point, Novato, and southern San Rafael (Canal and California Park) have "less positive environmental outcomes." More positive environmental outcomes are located in tracts in the City-Centered Corridor along Highway 101, from North Novato to Sausalito (Figure D- 31).

Figure D- 31 shows the TCAC Environmental Score based on CalEnviroScreen 3.0. However, the Office of Environmental Health Hazard Assessment has released updated scored in February 2020 (CalEnviroScreen 4.0). The CalEnviroScreen 4.o scores in Figure D- 32 are based on percentiles and show that the Canal and California Park Communities in San Rafael and Marin City have the highest percentile and are disproportionately burdened by multiple sources of pollution.

HUD's opportunity index for "environmental health" summarizes potential exposure to harmful toxins at a neighborhood level. Index values range from 0 to 100 and the higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group. In Marin County, environmental health index values range from 77 for Blacks to 83 for Hispanics (Table D- 18). The range is similar for the population living below the federal poverty line, with Black residents living in poverty still scoring lowest (76) but Native American residents living in poverty scoring highest among all races (85) and higher than the entire County Native American population (86 and 81, respectively). Environmental health indices for White population falls within the range of that of minority populations 81 for all White population and 83 for White population under the federal poverty line.

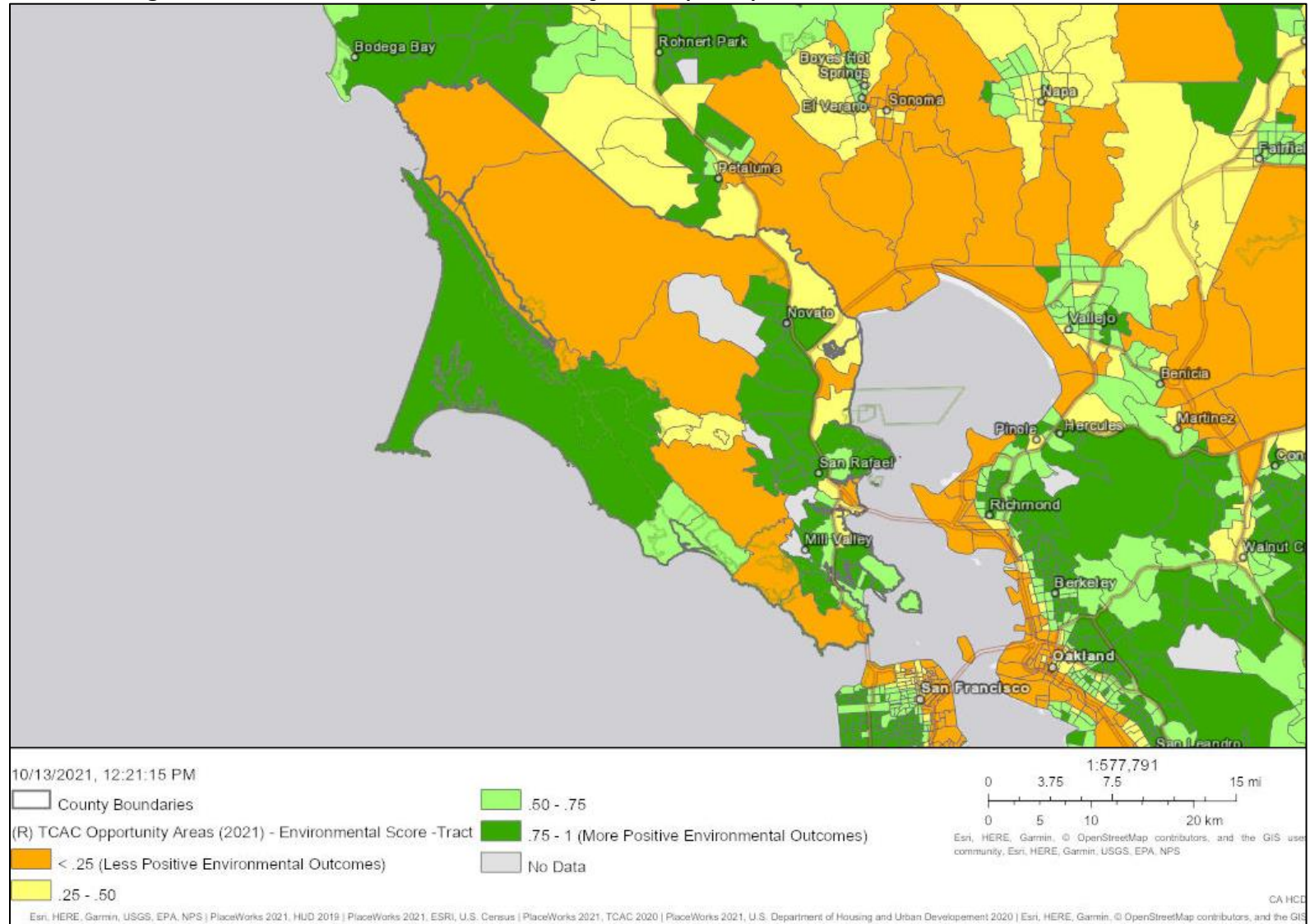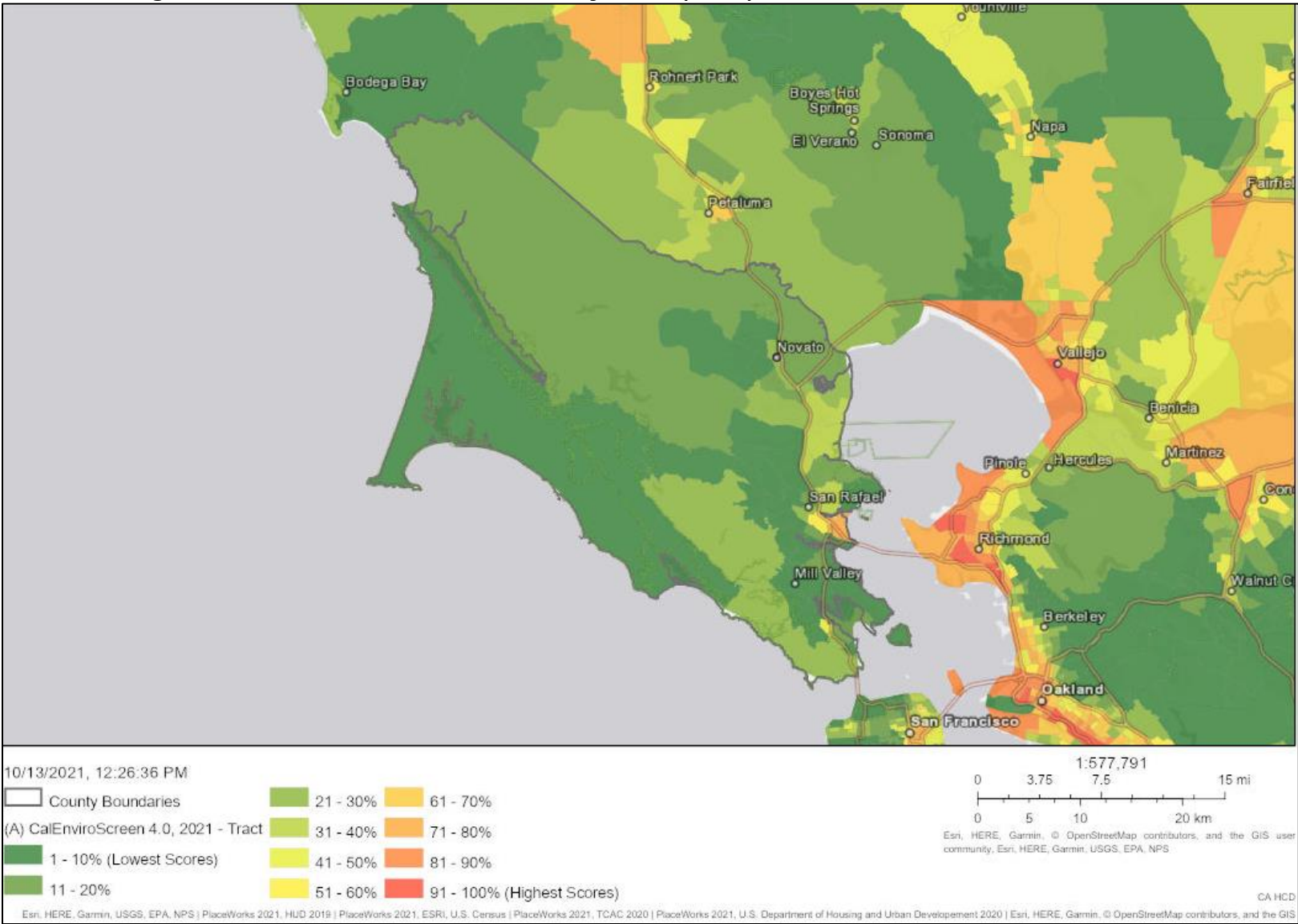**Figure D- 31:** *Regional TCAC Environmental Score by Tract (2021)*

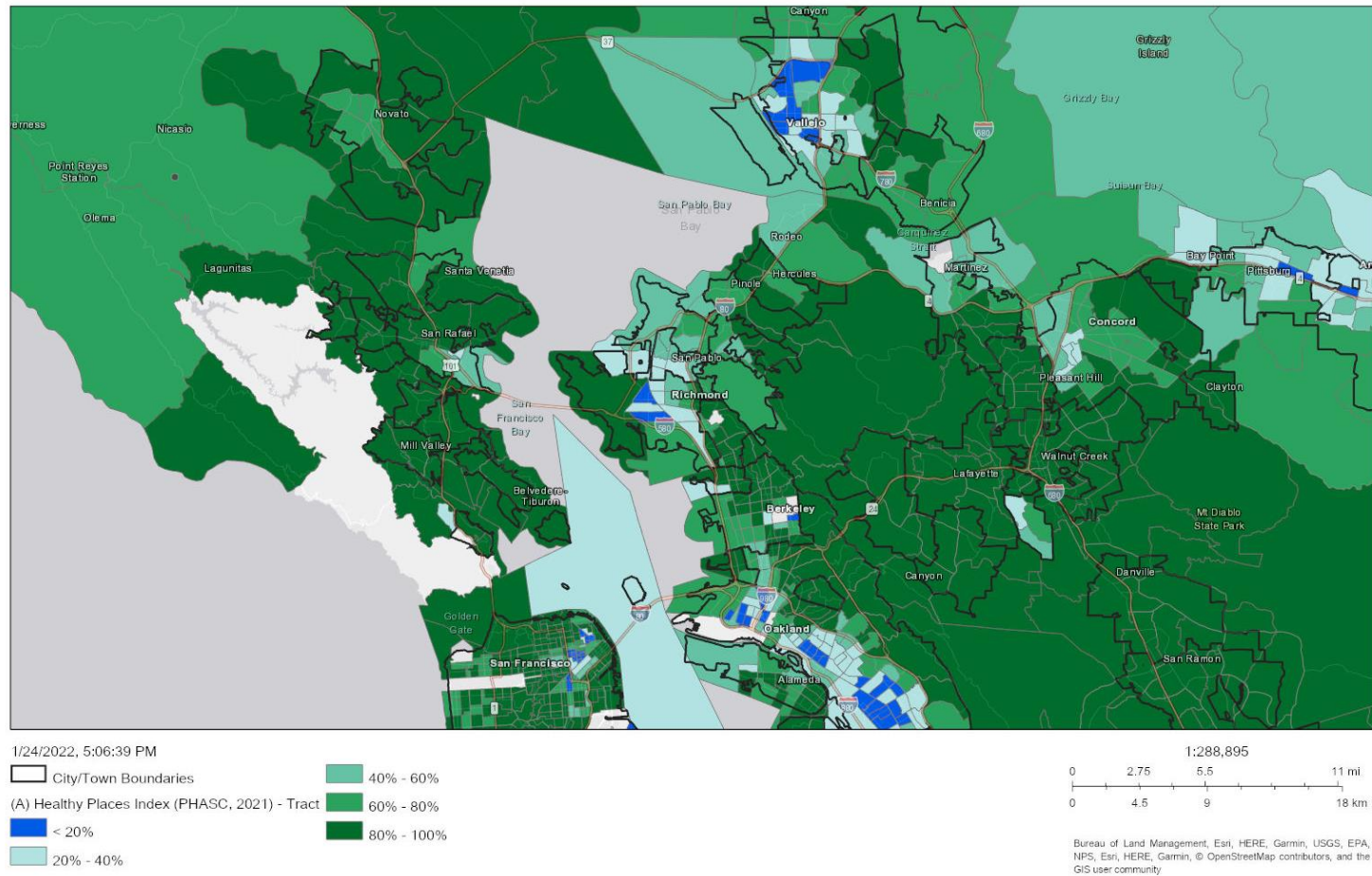**Figure D- 32:** *Regional CalEnviroScreen 4.0 Scores by Tract (2021)*

Local Trends

It is important to note that CalEnviroScreen scores (and thus TCAC environmental scores) measure not only environmental factors and sources of pollution but also takes into consideration socioeconomic factors that makes residents more sensitive to pollution to identify disproportionately burdened communities.

For this reason, CalEnviroScreen scores are used to identify SB 535 Disadvantaged Communities. Disadvantaged communities in California are specifically targeted for investment of proceeds from the state's Cap-and-Trade Program. These investments are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities, and at the same time, reducing pollution that causes climate change. The investments are authorized by the California Global Warming Solutions Act of 2006 (Assembly Bill 32, Nunez, 2016). Figure D- 33Figure D- 33 shows the disadvantaged communities designated by CalEPA for the purpose of SB 535. These areas represent the 25 percent highest scoring census tracts in CalEnviroScreen 4.0, census tracts previously identified in the top 25 percent in CalEnviroScreen 3.0, census tracts with high amounts of pollution and low populations, and federally recognized tribal areas as identified by the Census in the 2021 American Indian Areas Related National Geodatabase. There are no disadvantaged communities in Marin County.

Despite Figure D- 32 (CalEnviroScreen 4.0) and Figure D- 33 (SB 35 disadvantaged communities) do not identify any communities in Marin County as being disproportionately burdened by pollution, Figure D- 31 (based on CalEnviroscreen 3.0 scores) do show that among the unincorporated county communities, the lowest TCAC Environmental scores are located in West Marin and Black Point-Green Point (Figure D- 31). These lower Environmental scores are likely due to the socioeconomic characteristics of these areas, such as health outcomes, education, housing burdens, poverty, and unemployment.

_Figure D- 33__: SB 535 Disadvantaged Communities – Marin County_

SB 535

Healthy Places

Regional Trends

Residents should have the opportunity to live a healthy life and live in healthy communities. The Healthy Places Index (HPI) is a new tool that allows local officials to diagnose and change community conditions that affect health outcomes and the wellbeing of residents. The HPI tool was developed by the Public Health Alliance of Southern California to assist in comparing community conditions across the state and combined 25 community characteristics such as housing, education, economic, and social factors into a single indexed HPI Percentile Score, where lower percentiles indicate lower conditions. Figure D- 34 shows the HPI percentile score distributions in the Region tend to be above 60 percent except in some concentrated areas in the cities of Vallejo, Richmond, Berkeley, Oakland, and San Francisco- each county along the bays have at least one cluster of tracts with an HPI below 60 (blue).

Local Trends

All of the tracts within the unincorporated county areas scored above the 60th percentile of the Healthy Place Index Scores except for Marin City. All of Marin City scored in the lower 40th percentile. Marin City has also been identified as having low access to healthy foods in the 2020 AI.

Figure D- 34: *Regional Healthy Places Index by Tract (2021)*

Open Space and Recreation.

Regional Trends

According to Plan Bay Area 2040, a strong regional movement emerged during the latter half of the 20th century to protect farmland and open space. Local governments adopted urban growth boundaries and helped lead a "focused growth" strategy with support from environmental groups and regional agencies to limit sprawl, expand recreational opportunities, and preserve scenic and natural resources. However, this protection has strained the region's ability to build the housing needed for a growing population. In addition, maintaining the existing open space does not ensure equal access to it.

In Marin County, the Marin County Parks and Open Space Department operates a system that includes regional and community parks, neighborhood parks, and 34 open space preserves that encompass 19,300 acres and 190 miles of unpaved public trails. In 2007, 500 Marin County residents participated in a telephone survey, and more than 60 percent of interviewees perceived parks and open space agencies favorably, regardless of geographic area, age, ethnicity, or income. However, in 2019, the Parks Department conducted a Community Survey and identified the cost of entrance and fees to be obstacles for access to County parks. As a result, in July of 2019, entry fees were reduced from $10 to $5 for three popular parks in the County, and admission to McNears Beach Park pool, located in San Rafael, was free beginning on August 1, 2019.

Local Trends

Despite the large acreage of open spaces throughout the County, there are still some communities that lack access to open space and recreation (Figure D- 35). Northern Coastal West Marin appear to be furthest from federal and state open spaces/parks. Northern Coastal West Marin also lacks public transportation to the south to the nearest open spaces. In the more densely populated areas of the County (North, Central, and South Marin) open space and recreation areas are limited and mostly concentrated east of Highway 101. Despite this limited open space, most unincorporated county communities have at least County park access

As stated before, Marin City is a community with a disproportionate concentration of minorities and low income residents. From 1990 to 2015, Marin City, which had the highest African American population in the County and according to the Marin Food Policy Council, one of the highest obesity rates, did not have an outdoor recreational space. In 2015, the Trust for Public Land, in collaboration with the Marin City Community Services District, designed and opened Rocky Graham Park in Marin City. According to the 2020 AI, while the park contains "a tree-house-themed play structure, drought-resistant turf lawn, adult fitness areas, and a mural showcasing scenes from Marin City's history," Marin City continues to have limited access to surrounding open spaces and hiking trails.

Figure D- 35: *Marin County Open Space*
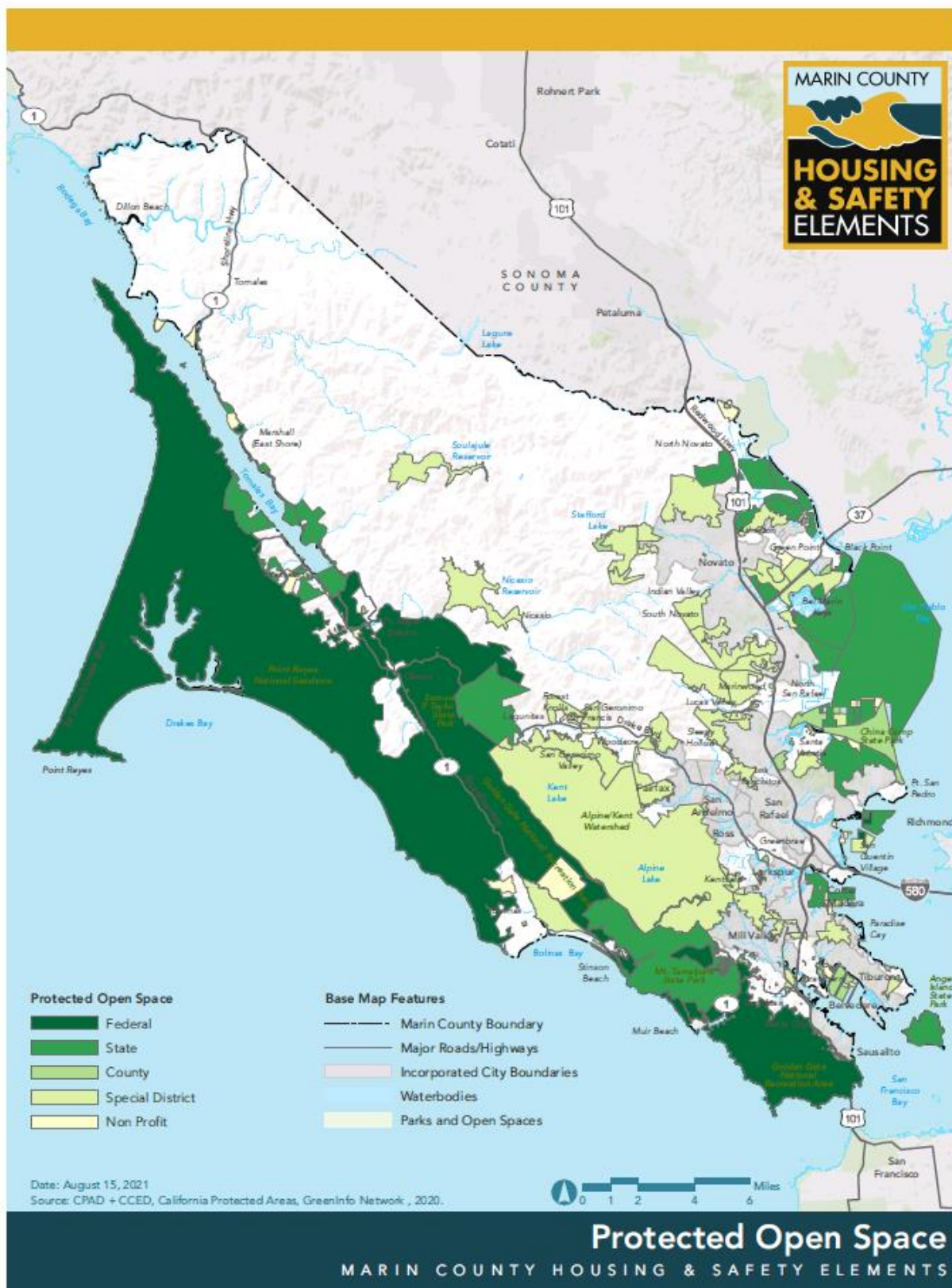
Home Loans

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the continued impacts of the lending/credit crisis called the Great Recession. In the past, credit market distortions and discriminatory practices such as "redlining" were prevalent and prevented some groups from having equal access to credit.   The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants.

Regional Trends

The 2020 Marin County Analysis of Impediments to Fair Housing Choice examined lending practices across Marin County. According to HMDA, in 2017, there were a total of 11,688 loans originated for Marin properties. Of the 11,688 original loan applications, 6,534 loans were approved, representing 56 percent of all applications, 1,320 loans denied, representing 11 percent of the total applications, and there were 1,555 applicants who withdrew their applications, which represents 13 percent of all applications (Table D-21). Hispanic and Black/African American residents were approved at lower rates and denied at higher rates than all applicants in the County.

Table D- 21: Loan Approval, Denial, and Withdrawal by Race

	All Applicants	White	Asian	Hispanic/ Latinx	Black/African American
Loans approved	55.9%	60.0%	59.0%	50.0%	48.0%
Loans denied	11.3%	12.0%	16.0%	18.0%	19.0%
Loans withdrawn by applicant	13.3%	14.0%	13.0%	19.0%	14.0%

Source: 2017 HMDA, as presented in 2020 Marin County AI.
Note: Data did not add up to 100% in source.

According to the 2020 AI, there were several categories for reasons loans were denied. Under the category, "Loan Denial Reason: insufficient cash - down payment and closing costs," African Americans were denied 0.7 percent more than White applicants. Denial of loans due to credit history significantly affected Asian applicants more than others; and under the category of "Loan Denial Reason: Other", the numbers are starkly higher for African American applicants.   Other reasons may include: debt-to-income ratio; employment history; credit history; collateral; insufficient cash; unverifiable information; credit application incomplete; mortgage insurance denied.

The AI also identified that many residents who lived in Marin City during the Marinship years[47] were not allowed to move from Marin City to other parts of the County because of discriminatory housing and lending policies and practices. For those residents, Marin City has been the only place where they have felt welcomed and safe in the County.

Based on the identified disparities of lending patterns for residents of color and a history of discriminatory lending practices, the AI recommended further fair lending investigations/testing into the disparities identified through the HMDA data analysis. More generally, it recommended that HMDA data for Marin County should be monitored on an ongoing basis to analyze overall lending patterns in the County. In addition, lending patterns of individual lenders should be analyzed, to gauge how effective the Community Reinvestment Act (CRA) programs of individual lenders are in reaching all communities to ensure that people of all races and ethnicities have equal access to loans.

Local Trends

As the 2020 AI found, disparities in lending practices disproportionately affect people of color in the County, especially African Americans in Marin City. In December 2021, FHANC and a Marin City couple sued a San Rafael appraiser in federal court for alleged race discrimination after they were given an appraisal in February 2020 $455,000 less than an appraisal done in March 2019. The couple sought to refinance their home and thought the February 2020 appraisal of $995,000 was very low. To test their assumption of discrimination, they asked for a third appraisal and removed any indicators of their race-including removing pictures- and asked a white friend to meet the appraiser. The third appraisal valued the house at $1,482,500. According to the Marin Independent Journal, their suit argues that "'Marin City has a long history of undervaluation based on stereotypes, redlining, discriminatory appraisal standards, and actual or perceived racial demographics. Choosing to use comps located in Marin City means that the valuation is dictated by these past sale prices, which were the direct product of racial discrimination."[48] More details on this case can be found in the press release from FHANC found in Figure D- 36. This suit is an example of how the approach used to generate appraisal values (years of past sales reviewed and radius of search) can exacerbate past discriminatory practices and continue to disproportionately affect Marin City residents. Monitoring lending practices as recommended by the 2020 AI should consider these practices in its analyses.

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[47] Marinship is a community of workers created by the Bechtel Company which during World War II built nearly 100 liberty ships and tankers. Since Marinship faced a shortfall in local, available workers, Bechtel overlooked the workplace exclusions that were standard at the time and recruited African Americans from southern states such as Louisiana, Arkansas, Texas and Oklahoma. A thorough history if Marin City and Marinship is found in the local knowledge section.

[48] Halstead, Richard. (December 6, 2021). "Marin appraiser sued for alleged race discrimination", *Marin Independent Journal.* https://www.marinij.com/2021/12/06/marin-appraiser-sued-for-alleged-race-discrimination/ https://www.marinij.com/2021/12/06/marin-appraiser-sued-for-alleged-race-discrimination/

Figure D- 36: *FHANC Press Release- Austin Case*

Fair Housing Advocates of Northern California

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December 2, 2021

FOR IMMEDIATE RELEASE

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Discrimination Lawsuits Filed Alleging Race Discrimination in Home Appraisal Process

San Rafael, CA – Today, Fair Housing Advocates of Northern California (FHANC), Tenisha Tate-Austin, and Paul Austin announce the filing of a fair housing lawsuit in federal district court alleging housing discrimination due to race in the appraisal process. The named defendants are Janette Miller, a licensed real estate appraiser; Miller and Perotti Real Estate Appraisals, Inc.; and AMC Links LLC, an appraisal management company. The complaint can be found here.

In December 2016, Tenisha Tate-Austin and Paul Austin, a Black couple, purchased a house in Marin County, California and moved into their house with their children. After spending thousands of dollars on renovations that increased the square footage of the house and upgraded many features, and beginning renovations on an accessory dwelling unit, they decided to refinance their mortgage in 2020.

Janette Miller was hired through AMC Links LLC to inspect the Austins' house and prepare an appraisal report. She appraised the Austins' house at $995,000. Suspecting that their race and the racial demographics of the unincorporated area known as Marin City – where their house is located – played a role in the appraiser's surprisingly low estimate of value, the Austins had a second appraisal completed three weeks after the first appraisal inspection by a different appraiser. In this appraisal, the Austins erased any evidence of their racial identities inside their house, removing family photos and African-themed art. Their white friend, who replaced the Austins' family photos with photos of her own family, was the only person present during the second inspection. That appraisal came back with a value of $1,482,500, nearly half a million dollars higher than Ms. Miller's estimate.

"We believe that Ms. Miller valued our house at a lower rate because of our race and because of the current and historical racial demographics of where our house is located," said Paul Austin. "The sales comps that the appraiser chose to use were unsuitable and were guaranteed to lower the value of our house."

A local non-profit helping communities eliminate housing discrimination

TDD: CALIFORNIA RELAY SERVICE FOR THE HEARING OR SPEECH IMPAIRED: (800) 735-2922
SE HABLA ESPAÑOL - NÊU CÂN GÍUP ĐỖ BẰNG TIẾNG VIỆT NAM XIN LIÊN LẠC SỐ: (415) 847-2747

MEMBER, NATIONAL FAIR HOUSING ALLIANCE

"Unfortunately, the Austins are not alone in their experience," said Caroline Peattie, Executive Director of FHANC. "Discrimination in the appraisal process is something we've been seeing more frequently, probably because there has been more attention paid to this issue, and more homeowners of color are coming forward when they receive an unfair appraisal, particularly when it results in their loan being denied. There are studies that show that Black and Latinx applicants are more likely than white applicants to receive an appraisal value lower than the contract price of a home. These studies show that appraisers choose comparisons (comps) of other property sales located substantially closer to the property being appraised if it's located in a Black or Latinx census tract than if it's located in a white census tract – so we know that appraisers still view neighborhoods, and relevant comps, based on racial demographics. We believe that this is exactly what happened with the Austins' appraisal."

The complaint maintains that using comparisons of other property sales located exclusively or primarily in Marin City results in a skewed and race-based valuation of the property, because selecting comps from areas that have been historically devalued by discrimination perpetuates and exacerbates the undervaluation of Black-owned homes in Black neighborhoods.

In order to reach an unbiased estimate of value, the complaint asserts, it is necessary to look outside of Marin City, particularly because Marin City has a very small number of property sales every year – most of which were not comparable to the Austins' house. In addition, the complaint asserts that it was improper and discriminatory for Miller to decrease her estimated value of the Austins' house based solely on its location in Marin City.

Additionally, Ms. Miller's market analysis of Marin City speaks only to market trends before the 2007 recession and ends at 2008, with no analysis of recent trends. Her appraisal notes that "during 2008… many communities in the Bay Area began to feel the effects of tightening credit and deteriorating economic conditions." However, she uses a different period of time for her market analysis of Sausalito, noting increasing home values in the city since 2014. She writes, "values [in the City of Sausalito] have increased since 2014 with a recent stabilization of values as evidenced by MLS year-end data for all residential properties sold." These outdated analyses of market trends resulted in, or improperly justified, a lower estimated value for the Austin's house than was warranted.

Ms. Miller's analysis relies heavily on Marin City comps – three of the five were from Marin City – even though one was a bank-owned property sold in foreclosure two years before and another was an attached dwelling that was contained within a planned unit development. In contrast, eight properties were chosen as comps for the second appraisal three weeks later, of which only two were located in Marin City, while the other six were located in the City of Sausalito, which shares a school district with Marin City. The complaint maintains that Ms. Miller's choices of comps indicate racial bias and point to a deeper and more systemic issue in the appraisal process – the practice of considering demographic characteristics of a neighborhood rather than relying only on physical home and neighborhood characteristics other than race. This disproportionately and negatively affects Black people, the complaint asserts, because neighborhoods of color have been historically undervalued due to deliberate racist housing policies, such as redlining.

Marin City is an unincorporated community located in Marin County, situated between the cities of Sausalito to the south and Mill Valley to the north. Properties located in Marin City have a Sausalito mailing address. According to the U.S. Census, as of July 2019, Marin County's population was 85.3% white, 2.8% Black, 6.6% Asian, and 16.3% Latino. The County's Black residents are overwhelmingly concentrated in two census tracts, one of which is in Marin City, and Black residents still accounted for approximately 35.95% of Marin City's population as of 2019, while the City of Sausalito is 92.2% white, and Blacks comprise only 0.9% of Sausalito's population.

Workforce housing was built in Marin City during World War II to house workers who came to the area from around the country to work in the shipyards as part of the war effort. Though the housing was integrated, after

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the war, many white residents moved away. Black families were blocked from doing so because of discriminatory practices such as redlining and restrictive covenants.

"Home buyers generally cannot obtain a mortgage, and homeowners cannot refinance a mortgage, without getting an appraisal," said Caroline Peattie. "Yet neighborhoods of color have been historically undervalued due to deliberate racist housing policies, such as redlining. This ongoing undervaluation of homes in Black neighborhoods is, in effect, present-day redlining, and continues to widen the wealth gap between Black and white families."

The Austins succeeded in getting a loan based on the second appraisal in March 2020, but the damage was done – they were not able to refinance on the favorable terms that had been available a month earlier. "We missed out on a better interest rate because of the unfair appraisal we received. And to prove that our civil rights had been violated, we had to erase who we were, by having our white friend pose as the homeowner and hiding the things in our home that represent who we are." said Tenisha Tate-Austin. "Even worse, these discriminatory practices have the effect of lowering property values in Marin City which harms us and harms our community."

"I really hope that this lawsuit makes appraisers and lenders start to look more carefully at their practices and policies," said Paul Austin. "And I really want people to know that there are organizations that can help support them if they have a discrimination complaint. We feel that litigating this case is not only important for us but for our community as well."

The Austins and FHANC are represented by counsel Julia Howard-Gibbon of FHANC and Liza Cristol-Deman of Brancart & Brancart.

If you feel you may have been discriminated against in a recent home appraisal, contact FHANC's office to complete an interview. Contact FHANC at fhanc@fairhousingnorcal.org or 415-457-5025 x101.

Fair Housing Advocates of Northern California is a non-profit organization serving several Bay Area counties that provides free counseling, enforcement, mediation, and legal or administrative referrals to persons experiencing housing discrimination. Fair Housing Advocates of Northern California also offers foreclosure prevention counseling, pre-purchase education, seminars to help housing providers fully understand fair housing law, and education programs for tenants and the community at large. Fair Housing Advocates of Northern California is a HUD-Certified Housing Counseling Agency. Please call Fair Housing Advocates of Northern California at (415) 457-5025 or TDD: (800) 735-2922 for more information. Note: This material is based on work supported by the Department of Housing and Urban Development (HUD) under FHIP PEI Grant FPEI190035. Any opinion, findings, and conclusions or recommendations expressed in this material are those of the author(s) and do not necessarily reflect the views of HUD.

3

Summary: Access to Opportunity Issues

The analysis of access to opportunities revealed disproportionate access in three different communities: Northern Coastal West, Black Point-Greenpoint, and Marin City. Northern Coastal West Marin is not well connected by transportation to the rest of the County, and perhaps due to a lack of connection, also has low jobs proximity and economic scores. , since the County's economic center is located in Central and Southern Marin. Northern Coastal West Marin also had low education outcomes. Shoreline School District (which serves Northern Coastal West Marin) had higher Educational Report than San Rafael School District but lower than Tamalpais Union School District. Specifically, students of color and White students in Shoreline Unified District had large gaps in their educational outcomes and all Shoreline students had the lowest College enrollment and college competition rates.

Marin City, which has already been identified as a RECAP and a community with a concentration of special needs population had mixed resources (moderate and high) but lower economic scores despite being close to the County's economic center. Marin City also ranked low in its Healthy Place Index and has seen issues of home loan discrimination that are attributed to past discriminatory practices such as redlining and undervaluation due to it concentration of Black/African American residents. Residents of Marin City also have limited access to protected open space.

Overall, Black Point-Green Point was classified as Moderate Resources and also had lower economic scores, lower jobs proximity scores, and lower education scores. However, the categorization of this community as Moderate Resource is almost exclusively derived from data points relating to the characteristics of the community, rather than its residents. Black Point-Green Point's lower jobs proximity score is likely due to the community's relative isolation in the north east corner of Marin and distance from the nearest jobs (the area's major retail corridors are located in the Vintage Oaks shopping Center, about 4-5 miles to the south east, and downtown Novato). Until the SMART train was fully implemented in 2017, the area was not served by transit and experienced a disconnect from the rest of the area. The nearest SMART train station (Novato San Marin) is located directly adjacent to the 101 freeway, and about 3 miles from the community. The 2016 Black Point-Green Point Community Plan notes the suggestion of a shuttle service linking the community to the station. The area is predominately residential and does not have any local serving commercial use, except for a small deli and storage facility. The nearest grocery store is in the Hamilton area of Novato, about 5-6 miles south. There is no school within the community's boundaries; children from the community must travel to other parts of Novato for school. Though these characteristics would often yield special needs or lack of resources, the area is not known regionally as such. The residents in Greenpoint – Black Point are predominantly rich, non-Hispanic white, and well-educated, and. it is likely that the TCAC methodology does not account for the unique characteristics of Black Point- Green Point

5. Disproportionate Needs

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

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

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

According to CHAS data based on the 2013-2017 ACS, approximately 40 percent of Marin County households experience housing problems, compared to 35 percent of households in unincorporated Marin County. In both the County and unincorporated County, renters are more likely to be affected by housing problems than owners.

Cost Burden

Regional Trends

As presented in Table D- 22, in Marin County, approximately 38 percent of households experience cost burdens. Renters experience cost burdens at higher rates than owners (48 percent compared to 32 percent), regardless of race. Among renters, American Indian and Pacific Islander households experience the highest rates of cost burdens (63 percent and 86 percent, respectively). Geographically, cost burdened renter households are concentrated in census tracts in North and Central Marin in Novato and San Rafael (Figure D- 37). In these tracts, between 60 and 80 percent of renter households experience cost burdens. Throughout the incorporated County census tracts, between 40 and 60 percent of renter households are experiencing cost burdens. Cost-burdened owner households are concentrated in West Marin in the census tract surrounding Bolinas Bay and in Southern Marin within Sausalito (Figure D- 38).

Table D- 22: *Housing Problems and Cost Burden by Race/Ethnicity – Marin County*

	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	All
With Housing Problem							
Owner-Occupied	31.8%	41.1%	30.7%	37.5%	0.0%	52.7%	32.9%
Renter-Occupied	47.9%	59.5%	51.2%	62.5%	85.7%	73.7%	53.2%
All Households	36.6%	54.5%	38.7%	43.8%	54.5%	67.5%	40.2%
With Cost Burden							
Owner-Occupied	31.2%	41.1%	29.0%	37.5%	0.0%	49.4%	32.2%
Renter-Occupied	45.1%	57.5%	41.5%	62.5%	85.7%	58.9%	47.7%
All Households	35.4%	53.1%	33.9%	43.8%	54.5%	56.1%	37.7%

Note: Used CHAS data based on 2013-2017 ACS despite more recent data being available because the ABAG Housing Data Needs Package presented CHAS data for the unincorporated County for this time frame
Source: HUD CHAS Data (based on 2013-2017 ACS).

Figure D- 37: *Regional Cost Burdened Renter Households by Tract (2019)*
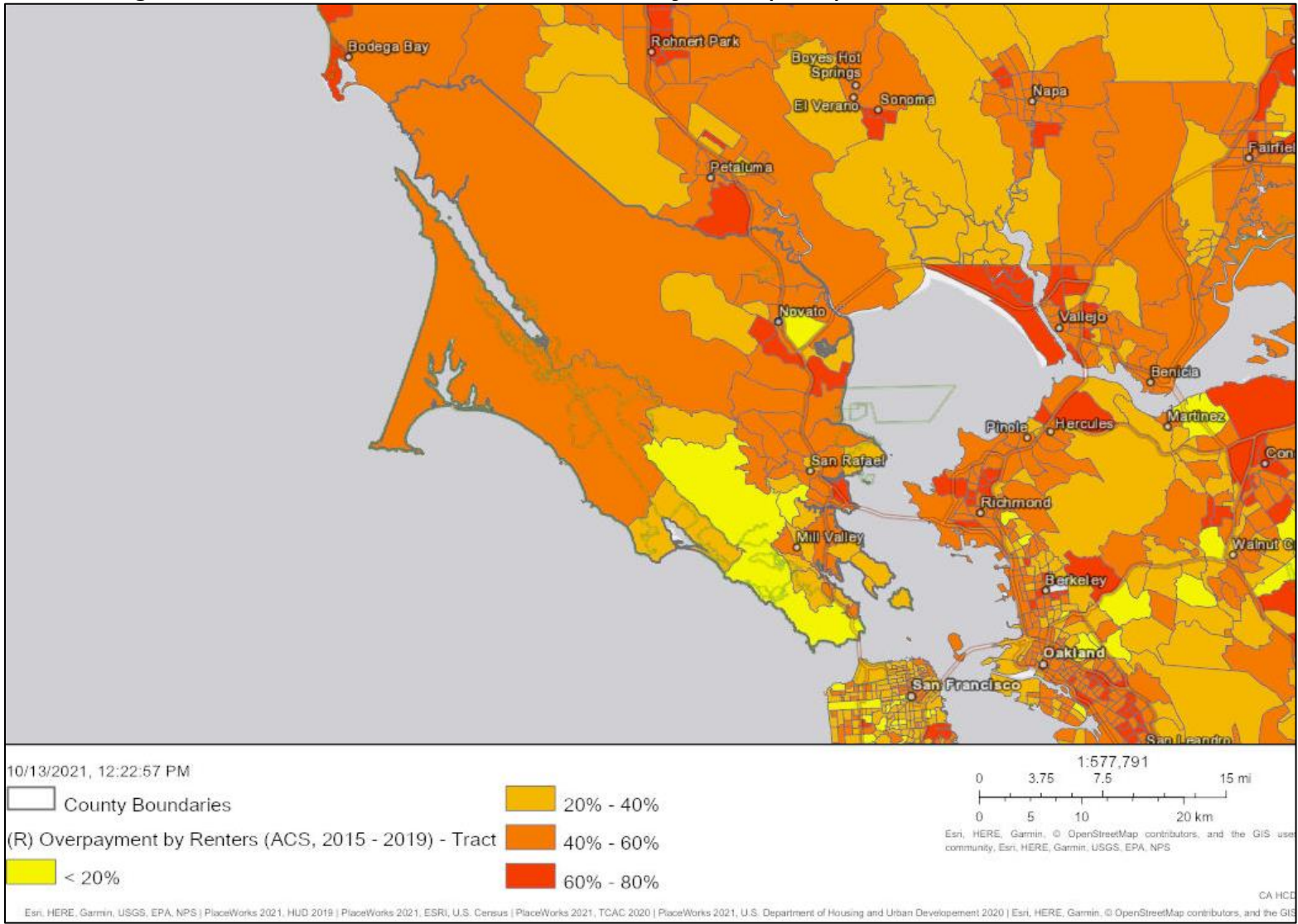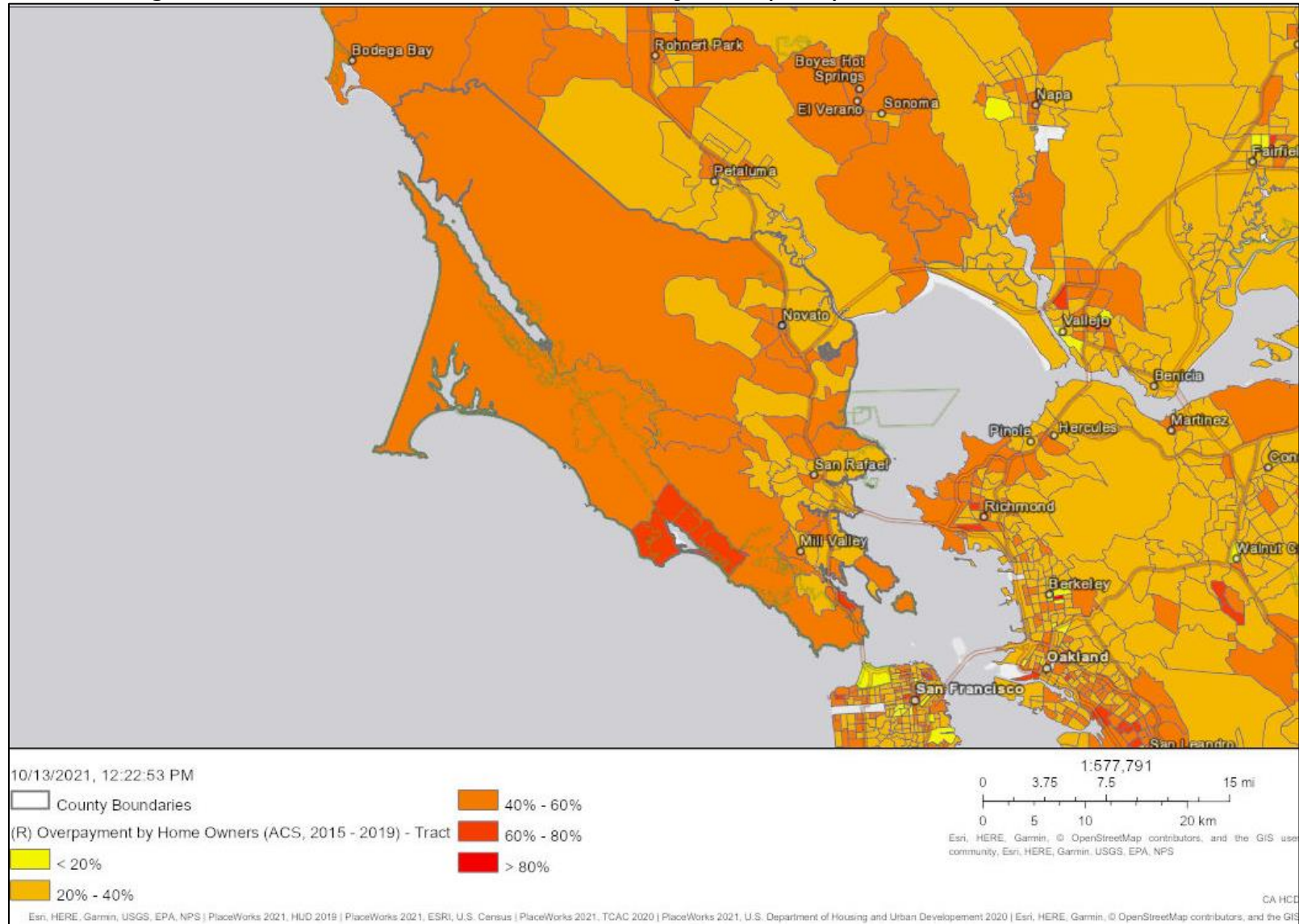
Figure D- 38: *Regional Cost Burdened Owner Households by Tract (2019)*

Housing problems and cost burdens can also affect special needs populations disproportionately. Table D- 23 shows that renter elderly and large households experience housing problems and cost burdens at higher rates than all renters, all households, and their owner counterparts.

Table D- 23: Housing Problems, Elderly and Large Households – Marin County							
	Owner-Occupied			Renter-Occupied			All HH
	Elderly	Large HH	All Owner	Elderly	Large HH	All Renters	
Any Housing Problem	34.0%	30.2%	32.9%	59.3%	74.0%	53.2%	34.0%
Cost Burden > 30%	33.6%	26.7%	32.2%	55.9%	50.0%	47.7%	33.6%
Source: HUD CHAS, (2013-2017).							

Local Trends

Housing problem and cost burden rates are lower in the unincorporated County (35 percent and 34 percent, respectively, Table D- 24) than in the County overall (40 and 38 percent). However, trends of disproportionate housing problems and cost burdens for Black and Hispanic residents persist in the unincorporated County. About two-thirds of all Black and Hispanic households experience housing problems. Like in the County, owner households experience housing problems and cost burdens at lower rates than renter households in unincorporated areas... Also, owner housing problems and cost burden rates are similar for White, Black, and Asian owners, but higher for Hispanic households. This means that Hispanic households experience housing problems and cost burdens at the highest rates regardless of tenure.

Table D- 24: Housing Problems and Cost Burden by Race/Ethnicity – Unincorporated Marin County

	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	All
With Housing Problem							
Owner-Occupied	30.5%	32.1%	24.9%	N/A	N/A	52.3%	30.2%
Renter-Occupied	45.1%	67.9%	42.8%	N/A	N/A	69.5%	45.9%
All Households	34.4%	57.7%	31.5%	N/A	N/A	62.2%	35.0%
With Cost Burden							
Owner-Occupied	30.0%	27.4%	23.7%	N/A	N/A	52.3%	29.6%
Renter-Occupied	42.1%	67.9%	39.7%	N/A	N/A	57.6%	42.2%
All Households	33.2%	56.3%	29.7%	N/A	N/A	55.4%	33.5%
Note: Used CHAS data based on 2013-2017 ACS despite more recent data being available because the ABAG Housing Data Needs Package presented CHAS data for the unincorporated County for this time frame. Unincorporated County data was calculated by aggregating the values for all the CDPs in the unincorporated county communities as follows: Black Point-Green Point, Bolinas, Dillon, Inverness, Kentfield, Lagunitas-Forest Knolls, Lucas Valley-Marinwood, Marin City, Muir Beach, Nicasio, Point Reyes Station, San Geronimo Santa Venetia, Sleepy Hollow, California, Stinson Beach, Strawberry, Tamalpais-Homestead Valley, Tomales, and Woodacre							
Source: HUD CHAS Data (based on 2013-2017 ACS).							

As shown in Figure D- 37, the percentage of cost-burdened renter households varies across the unincorporated area. Southern Coastal West Marin, the Valley, Tam Valley, and Kentfield have the lowest concentration of cost-burdened renters. In these communities, fewer than 40 percent of renter households are cost burdened. Cost burdened renters are concentrated in Black Point-Green Point, Santa Venetia, and Marin City. In these tracts between 40 and 60 percent of owners are cost-burdened.

Smaller communities like Black Point-Green Point, Lucas Valley, Kentfield, and Tam Valley have lower shares of owner households experiencing cost-burdens (Figure D- 38). In these tracts, between 20 and 40 percent of owners pay more than 30 percent of their income in rent. The majority of the unincorporated County census tracts have between 40 to 60 percent of owner households experiencing cost-burdens except for Southern Coastal West Marin. Southern Coastal West Marin stands out as the tract with the highest concentration of cost-burdened owners. While the map in Figure D- 38 shows that between 60 and 60 percent of owner households are cost-burdened, the actual percentage of cost-burdened owners is 61 percent, making the rates similar to the rest of the unincorporated County tracts.

As in the County as a whole, owner special needs populations like the elderly and large households in the unincorporated communities do not experience housing problems or

cost burdens disproportionately compared to all owners and all households in the unincorporated county (Table D- 25). About one-third of these special needs owner households experience housing problems- similar to all owners (31 percent) and lower than all households (36 percent). By contrast, renter elderly households and large households experience housing problems at similar rates than renter households but higher rates than all households in the unincorporated County. Overall, renter elderly households and renter large households are the most affected by housing problems- but different types. Whereas the share of elderly renter households experiencing housing problems and cost burdens is similar (46 percent and 42percent, respectively), there is a large gap in the share of renter large households experiencing any housing problem (42 percent) and cost burdens (26 percent). This means that 19 percent of the large renter households experiencing housing problems live in units with physical defects (lacking complete kitchen or bathroom or are living in overcrowded conditions.

Table D- 25: *Housing Problems, Elderly and Large Households – Unincorporated County*

	Owner-Occupied			Renter-Occupied			All HH
	Elderly	**Large HH**	**All Owners**	**Elderly**	**Large HH**	**All Renters**	
Any Housing Problem	34.1%	26.9%	31.3%	45.8%	45.2%	47.6%	36.3%
Cost Burden > 30%	24.1%	30.6%	34.5%	42.1%	25.8%	43.4%	34.5%

Note: Used CHAS data based on 2013-2017 ACS despite more recent data being available because the ABAG Housing Data Needs Package presented CHAS data for the unincorporated County for this time frame. Unincorporated County data was calculated by aggregating the values for all the CDPs in the unincorporated county communities as follows: Black Point-Green Point, Bolinas, Dillon, Inverness, Kentfield, Lagunitas-Forest Knolls ,Lucas Valley-Marinwood, Marin City, Muir Beach, Nicasio, Point Reyes Station, San Geronimo Santa Venetia, Sleepy Hollow, California, Stinson Beach, Strawberry, Tamalpais-Homestead Valley, Tomales, and Woodacre
Source: HUD CHAS Data (based on 2013-2017 ACS).

Overcrowded Households

Regional Trends

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2017 five-year ACS estimates, about 6.5 percent of households in the Bay Area region are living in overcrowded conditions (Table D- 26). About 11 percent of renter households are living in overcrowded conditions in the region, compared to three percent of owner households. Overcrowding rates in Marin County are lower than the Bay Area (four percent and 6.5 percent, respectively) and like regional trends, in Marin County a higher proportion of renters experience overcrowded conditions compared to renters. Overcrowded households in the region are concentrated in Richmond, Oakland, and San Francisco (Figure D- 39). At the County level, overcrowded households are concentrated North and Central Marin, specifically in downtown Novato and the southeastern tracts of San Rafael (Canal).

While the ACS data shows that overcrowding is not a significant problem, it is likely that this data is an undercount, especially with families who may have undocumented members. It is also likely that agricultural worker housing is overcrowded and undercounted.

While the lack of affordable housing exists throughout the County, the challenges of housing permanent, agricultural workers is further complicated because housing is often provided on-site by employers/ranchers and ties the workers' housing to their employment with the owner/rancher. Similar to other low-income populations in the County, the lack of affordable housing options may force many agricultural families to live in compromised conditions, including substandard housing units and overcrowded living situations.

Table D- 26: Overcrowded Households – Bay Area and Marin County		
	Bay Area	**Marin County**
Owner-Occupied	3.0%	0.8%
Renter Occupied	10.9%	9.4%
All HH	6.5%	3.9%
Note: Overcrowding means more than one person per household.		
Source: American Community Survey, 2014-2017. Table B25014.		

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**Figure D- 39:** *Regional Overcrowded Households by Tract*
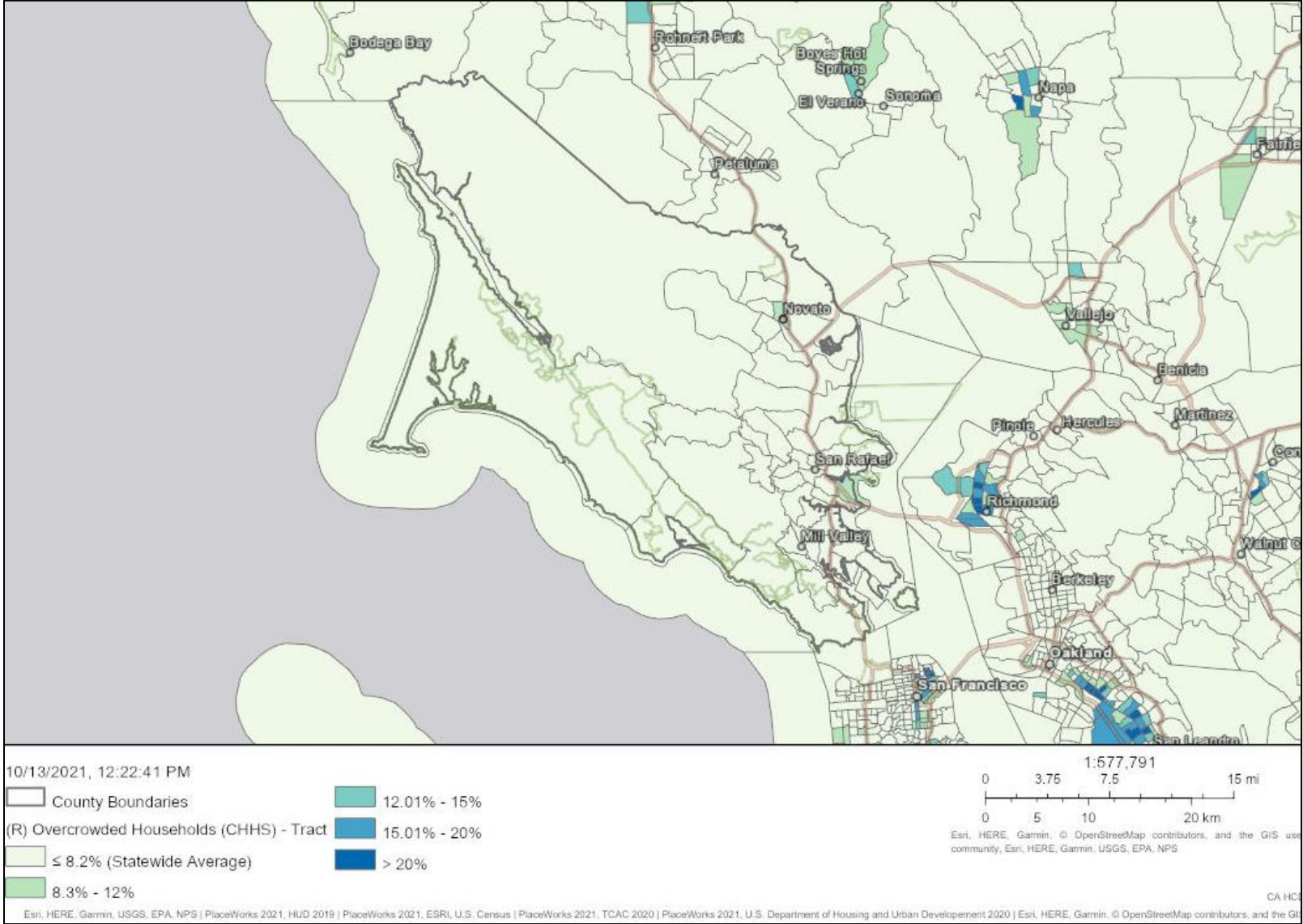
Local Trends

While Figure D- 39 shows that overcrowding rates are similar across all census tracts in the county, the map shows overcrowding rates for renters and owners combined. Within the unincorporated County, renter households are affected by overcrowding at significantly higher rates than owner households (Table D- 27). Marin City renter households experience high rates of overcrowding- about one in five renter households are reported to be living in overcrowded conditions. Renter households in the Valley have the second highest overcrowding rate in the unincorporated County. For owner households, Southern Coastal West Marin and Santa Venetia renter households experience overcrowding disproportionately compared to all other owner households in the unincorporated County.

Table D- 27: Overcrowding Rates by Unincorporated County Community		
Community	Owner	Renter
Black Point-Green Point	1.8%	0.0%
Northern Costal West Marin	0.0%	0.0%
Central Coastal West Marin	0.0%	0.0%
The Valley	1.1%	9.0%
Southern Coastal West Marin	5.0%	1.4%
Marinwood/Lucas Valley	1.8%	0.0%
Santa Venetia/Los Ranchitos	4.4%	0.0%
Kentfield/Greenbrae	1.2%	1.8%
Strawberry	0.0%	3.3%
Tam Valley	0.2%	0.9%
Marin City	0.0%	12.0%
Unincorporated County	0.9%	13.4%
Source: U.S. Census American Community Survey, 2015-2019, Table B25014.		

According to 2014-2019 ACS estimates, Hispanic/Latinx households are disproportionally affected by overcrowded conditions. About 15 percent of Hispanic/Latinx households are overcrowded, compared to four percent of Asian households and two percent of White non-Hispanic households. [49] Overcrowding also affects extremely low income households more than any other income group (Figure D- 40). In fact, overcrowding rates generally decrease as income level increases.

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[49] Overcrowding estimates were zero percent for American Indian/Alaska Natives and Black/ African American, and nine percent for other race or multiple races. Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25014, from ABAG Data Package.

Figure D- 40: **Overcrowding by Income Level**
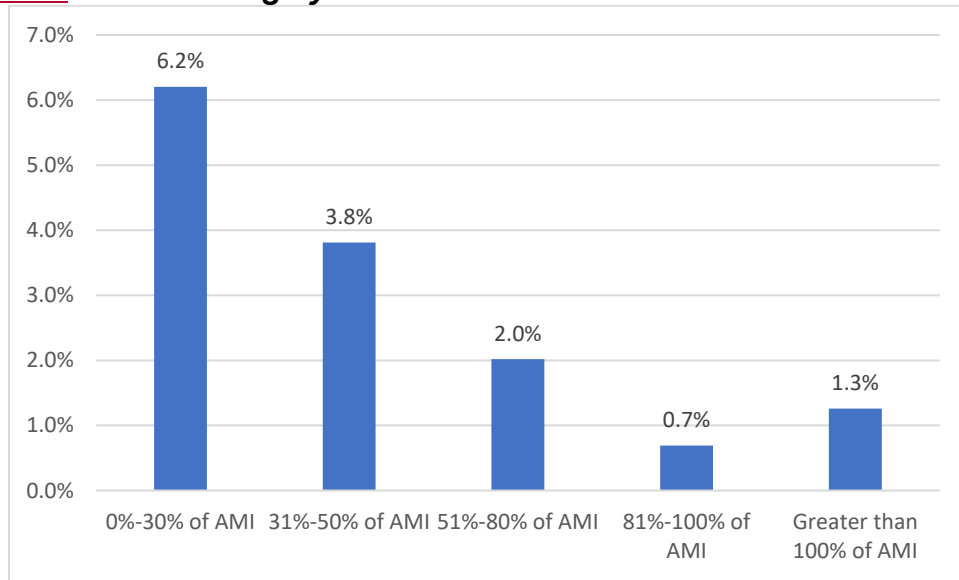
Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens). Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release. From the ABAG Data Package.

Substandard Conditions

Regional Trends

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

According 2015-2019 ACS estimates, shown in Table D- 28,only about one percent of households in the Bay Area and Marin County lack complete kitchen and plumbing facilities. Incomplete kitchen facilities are more common in both the Bay area and Marin County and affect renter households more than renter households. In Marin County, one percent of households lack complete kitchen facilities and 0.4 percent lack complete plumbing facilities.[50] More than 2 percent of renters lack complete kitchen facilities compared to less than one percent of renter households lacking plumbing facilities.

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[50] JADUs may not be visible from the street as a separate unit or require a separate address. Given that number of JADUs and the American Community Survey (ACS) data is based on a small sample, it is unlikely that JADUs would impact the data in any significant manner.

**Table D- 28:** *Substandard Housing Conditions –Bay Area and Marin County*

	Bay Area		Marin County	
	Lacking complete kitchen facilities	Lacking complete plumbing facilities	Lacking complete kitchen facilities	Lacking complete plumbing facilities
Owner	0.3%	0.2%	0.2%	0.3%
Renter	2.6%	1.1%	2.4%	0.6%
All Households	1.3%	0.6%	1.0%	0.4%
Source: American Community Survey, 2015-2019 (5-Year Estimates).				

Like overcrowding, ACS data may not reflect the reality of substandard housing conditions in the County. Staff has heard code enforcement complaints on substandard conditions relating to lack of landlord upkeep/care like moldy carpets, delay in getting hot water back, especially from the Hispanic/Latin community.

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. As stated above, structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation. In the County, 86 percent of the housing stock was built prior to 1990, including 58 percent built prior to 1970. Figure D- 41 shows median housing age for Marin County cities and unincorporated communities Central and Southern Marin, specifically the cities of Ross, Fairfax, and San Anselmo, have the oldest housing while Novato, Black Point-Green Point, Nicasio, Muir Beach, and Marin City have the most recently built housing.

Figure D- 41: **Median Housing Age by Marin County Cities and Unincorporated Communities**
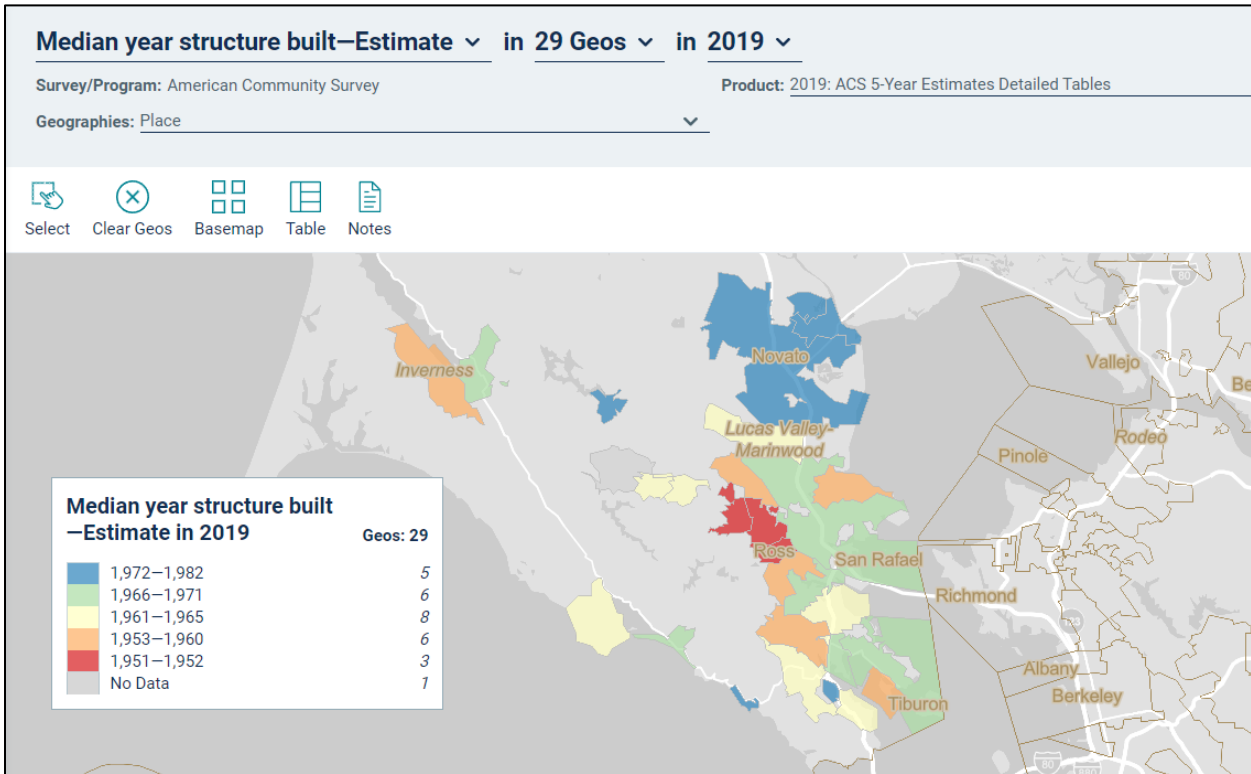
Source: 2015-2019 ACS (5-Year Estimates).

Local Trends

As in the County as a whole, unincorporated County communities are more likely to lack complete kitchen and plumbing facilities in renter households at higher rates than owner households (Table D- 29). Similar to the County as a whole, rates of substandard housing conditions are less than two percent regardless of tenure.

Table D- 29: **Substandard Housing Issues in Unincorporated County**

| Building Amenity	Kitchen	Plumbing
Owner	0.2%	0.3%
Renter	1.4%	0.8%
Notes: Per HCD guidance, this data should be supplemented by local estimates of units needing to be rehabilitated or replaced based on recent windshield surveys, local building department data, knowledgeable builders/developers in the community, or nonprofit housing developers or organizations. Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25053, Table B25043, Table B25049. From ABAG Data Package.		

Estimating the number of substandard units in the County is difficult since code enforcement is complaint driven (for the County's Code Enforcement agency) and inspection of multi-family units (3+) is voluntary through the Environmental Health Services (EHS). According to County Code Enforcement, most of the complaints related to substandard housing are from neighbors related to animal or insect infestation that's

perceived to come from another unit or home. In most cases, these complaints are not substantiated. Therefore, the County does not have any standardized count of substandard units.

EHS inspects all buildings that are have three or more units every other year. However, this inspection is voluntary and requires tenant authorization. Of the units EHS inspects, only a "handful" were considered substandard. However, there are several 3+ unit buildings that seem very much substandard that EHS has not been authorized to inspect, especially in West Marin. Marin Housing Authority conducts inspections at a more regular basis as part of Housing Quality Standard inspections of units receiving housing choice vouchers. Fail rates between 2017 and 2021 ranged from 28 percent to 31 percent. However, data was not provided by community/area. Units fail if they don't meet HUD's Housing Quality Standards "HQS" for decent, safe and sanitary housing. Examples of reasons for failing include: Missing or inoperable smoke detectors; appliances not working; windows or doors not locking or operating as designed; electrical hazards; and unsafe conditions interior or exterior.

Within the unincorporated County, the Valley, Southern Coastal Western Marin, and Tam Valley have the largest proportion of housing build before 1990 (Figure D- 42). More than 90 percent of housing units in these communities are more than 30 years old. By contrast, Black Point-Green Point, Central Coastal West Marin, and Marin City have the largest percentage of housing stock build after 1990. About 20 percent of housing units in these communities is less than 30 years old.

Figure D- 42: Age of Housing by Unincorporated Community
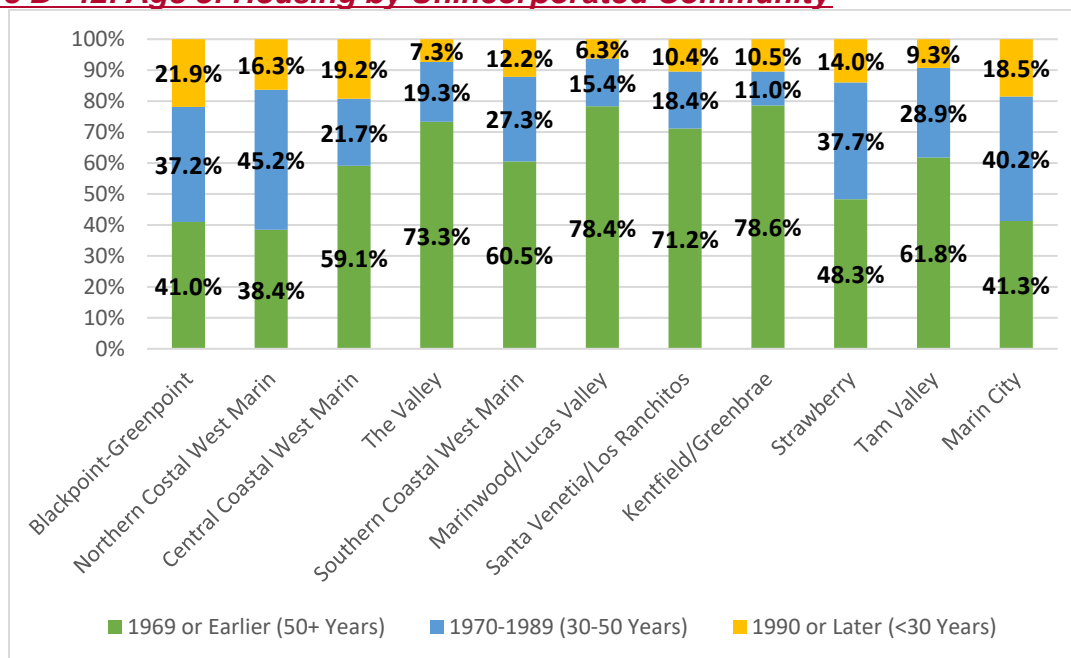
Homelessness[51]

Categories of housing needs include not only such factors as cost burden, overcrowding, and substandard housing conditions but also homelessness.

Protected Groups

Homelessness in the County has a disparate impact on protected classes. According to the data collected during the 2019 Point in Time[52] count and the needs assessment conducted to inform the Marin County 2020-2024 Consolidated Plan, the populations being impacted disproportionately by homelessness include African American individuals, families, individuals with mental and physical disabilities, and older adults in the very low and low income range.

The 2019 PIT count found that Black or African American individuals were overrepresented in the homeless population (Table D- 30). While Black residents made up 5% of the general population in the County, they made up 17% of the homeless population in 2019. Black or African American individuals were also overrepresented in homeless subpopulations- they represented about 22% of homeless individuals in families and 15% of the older (over 60 years old) homeless population.

Table D- 30: General County Population vs County Homeless Population by Race /Ethnicity (2019)

Race/Ethnicity	General Population	Homeless Population
White	71.2%	66.0%
Black/African American	2.1%	17.0%
Multi-Race/Other	4.7%	11.0%
American Indian/Alaska Native	0.2%	3.0%
Asian	5.9%	2.0%
Latinx/Hispanic	16.0%	19.0%
Sources: 2019 Marin County Homeless County and Survey Comprehensive Report ; 2015-2019 American Community Survey		

National data from 2018 suggest that 33% of all people experiencing homelessness are persons in families.[53] In Marin County, 15 percent of persons experiencing homelessness in the 2019 PIT count were persons in families. The 2019 PIT count also reported that nationally, the majority of families experiencing homelessness are households headed by single women and families with children under the age of six. The 2019 report did not

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[51] Analysis of disparate impacts on protected classes only available at County level (not unincorporated county level) because the 2019 Marin County Homeless County and Survey Comprehensive Report provides population character tics for the entire County population surveyed.

[52] While the PIT Count is normally conducted every two years, the 2021 count was delayed to 2022 due to the COVID-19 pandemic. Only preliminary results of Marin County's 2022 PIT Count have been released as of November 2022 and do not include survey results or characteristics of the homeless population. The 2019 PIT results are used for this analysis,

[53] U.S. Department of Housing and Urban Development. (2018). The 2018 Annual Assessment Report (AHAR) to Congress. Retrieved 2019 from https://www.hudexchange.info/resources/documents/2018-AHAR-Part-1.pdf as cited by the 2019 Marin County Homeless County and Survey Comprehensive Report.

provide data on the family type for families experiencing homelessness. However, given that single female-headed households with children have the highest rates of poverty in the County(15.4 percent, Table D- 31) and poverty is a risk factor for homelessness, single female-headed households with children may be disproportionately impacted by homelessness in the County.

Table D- 31: Poverty Rates for Families- Marin County (2019)

Family/Household Type	Total	# in Poverty[1]	% in Poverty
All Families	66,052	2,477	3.8%
All Families with children	29,767	1,568	5.3%
Single- Female Headed	8,102	1,000	12.3%
Single- Female Headed with children	4,825	744	15.4%
Note: 1. Income in the past 12 months below federal poverty level			
Source: 2015-2019 American Community Survey, Table B17012			

Persons with disabilities are also disproportionately affected by homelessness in the County as health conditions affect the housing stability or employment. In 2019, 38% of respondents reported having a disabling condition that prevented them from working or maintaining stable housing. Two-thirds (66%) of respondents reported experiencing at least one health condition, with 42% reporting a psychiatric or emotional condition, 35% reporting Post-Traumatic Stress Disorder, and 29% reporting chronic health problems. About 25% of respondents also reported having a physical disability. Thus, it is important to consider accessibility to the location of homeless services.

Older adults have the compounding factors of having lower incomes and disabilities that put them at higher risk of homelessness. The number of older adults experiencing homelessness has risen in accordance with the overall growth of the older adult population in the County. While homeless older adults have not been identified as a specific subpopulation of interest by the federal government, Marin County recognized the growing trend and initiated an effort to gather additional information on the population in the 2019 PIT. Older adults and those under age 60 identified similar causes of homelessness. For both populations, economic issues such as job loss and eviction was the primary reason for homelessness. Fifty-eight percent (58%) of older adults cited economic issues, 30% cited personal relationship issues, and 16% reported mental health issues as the primary cause of their homelessness.

A key divergence between persons under 60 and over 60 experiencing homelessness is in the length of homelessness. Older adults were almost twice as likely to be likely to be homeless for 11 years or more than those under age 60, (29% and 15%, respectively). Eighty-six percent (86%) of older adults reported being homeless for one year or more compared to 77% of those under age 60.

Access to Services

According to the 2019 PIT Count, North Marin and Central Marin had the highest share of the population experiencing homelessness (Table D- 32). In 2019, about 30% and 36% of the homeless population resided in North and Central Marin. Among the

unincorporated County areas, West Marin had the highest concentration of homeless population, with 13.5% of the County's total homeless population. West Marin also had the highest percentage change between 2017 and 2019. In 2017, only 8.9% of the County's homeless population resided in West Marin while in 2019, 13.5% of the County's homeless population was counted in West Marin. This represented a 41 percent increase in the homeless population in West Marin from 99 to 140 persons. The share of homeless population in North and Central Marin actually decreased between 2017 and 2019. The data indicates the need to continue to provide services in North and Central Marin and the growing need in West Marin.

Table D- 32: County Homeless Population by Jurisdiction (2017, 2019)					
	2017		2019		Percentage Change
	#	%	#	%	
North Marin	350	31.3%	310	30.0%	-1.4%
Novato	350	31.3%	310	30.0%	-1.4%
Central Marin	389	34.8%	371	35.9%	1.1%
San Anselmo	2	0.2%	20	1.9%	1.8%
San Rafael	318	28.5%	255	24.7%	-3.8%
Corte Madera	26	2.3%	39	3.8%	1.4%
Fairfax	13	1.2%	5	0.5%	-0.7%
Larkspur	2	0.2%	28	2.7%	2.5%
Mill Valley	11	1.0%	8	0.8%	-0.2%
Unincorporated Central Marin	17	1.5%	16	1.5%	0.0%
South Marin	136	12.2%	144	13.9%	1.8%
Sausalito	36	3.2%	25	2.4%	-0.8%
Richardson Bay Anchor Outs	86	7.7%	103	10.0%	2.3%
Belvedere	0	0.0%	0	0.0%	0.0%
Unincorporated South Marin	14	1.3%	16	1.5%	0.3%
West Marin	99	8.9%	140	13.5%	4.7%
Unincorporated West Marin	99	8.9%	140	13.5%	4.7%
Other	143	12.8%	69	6.7%	-6.1%
Domestic Violence Shelter	89	8.0%	69	6.7%	-1.3%
Rotating Shelter	54	4.8%	0	0.0%	-4.8%
Unincorporated Total	*85*	*7.6%*	*172*	*16.6%*	*9.0%*
County Total	**1117**	**100%**	**1,034**	**1,034**	--
Source: 2019 Marin County Homeless County and Survey Comprehensive Report					

When asked what services they would most like to access in the 2019 PIT County, 42% of respondents requested housing placement assistance, followed by free meals (38%), bus passes (38%), and emergency shelter (34%).

In addition, there are numerous community-based services and programs made available to individuals experiencing homelessness. These services range from day shelters and meal programs to job training and healthcare. Figure D- 43Figure D- 31: shows the

location of homeless services that appear through a Google search in Marin County. Most service locations appear to be along major transportation corridors, such as Highway 101. Figure D- 43 in the Transportation section above shows that transit routes mirror the location of homeless services. On July 1, 2020 Marin Transit introduced an expanded Low-Income Fare Assistance (LIFA) program. Eligible riders can receive $20 of credit per month to use for trips on local Paratransit, Pt. Reyes Dial-A-Ride, Dillon Beach Dial-A-Ride, and the base fare for Catch-A-Ride. Eligible riders can opt-in to receive a free pass to use on Marin Transit local bus service.

Community Action Marin, a non-profit social service agency, also has Community Alternative Response (CARE) homeless outreach teams, through which vital support and assistance to unhoused people throughout Marin County is provided. CARE teams are often the first point of contact for people experiencing homelessness. CARE teams find people in need of service and help them in simple ways like wellness checks, bringing people food, socks or sleeping bags, or transportation to a detox center, homeless shelter or hospital, until they are receptive to accessing services.

The mobile CARE (Community Alternative Response Engagement) Teams can be contacted across Marin County by the geography they cover:
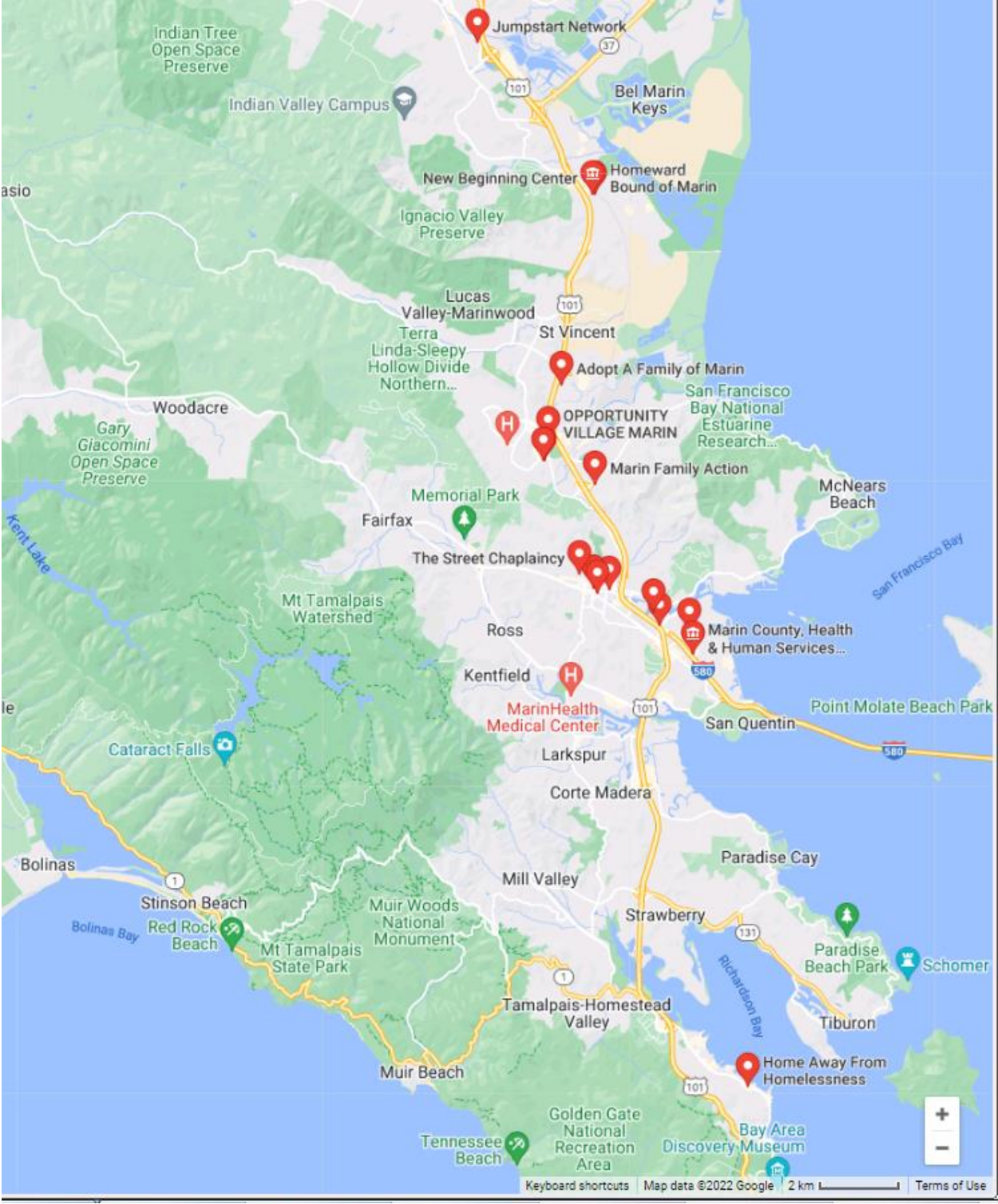
CARE I – All Marin County: 415.847.1266

CARE II – Downtown San Rafael: 415.847.6798

CARE III – Novato: 415.302.0753

CARE IV – All Marin County: 415.599.5200

**Figure D- 43: Homeless Services in Marin County**

Displacement Risk

Regional Trends

UC Berkley's Urban Displacement project defines residential displacement as "the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control." As part of this project, the research has identified populations vulnerable to displacement (named "sensitive communities") in the event of increased redevelopment and increased housing costs. They defined vulnerability based on the share of low income residents per tract and other criteria including: share of renters is above 40 percent, share of people of color is more than 50 percent, share of low income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps. Using this methodology, sensitive communities in the Bay Area region were identified in the coastal census tracts of Contra Costa, Alameda, and San Francisco County, specifically in the cities of Vallejo, Richmond, Berkeley, Oakland, and San Francisco (Figure D- 44). In Marin County, sensitive communities were identified in the cites of Novato and San Rafael, and the unincorporated areas of Marin City, Strawberry, Northern and Central Coastal West Marin and Nicasio in the Valley.

Figure D- 44: *Regional Sensitive Communities At Risk of Displacement by Tract (2021)*
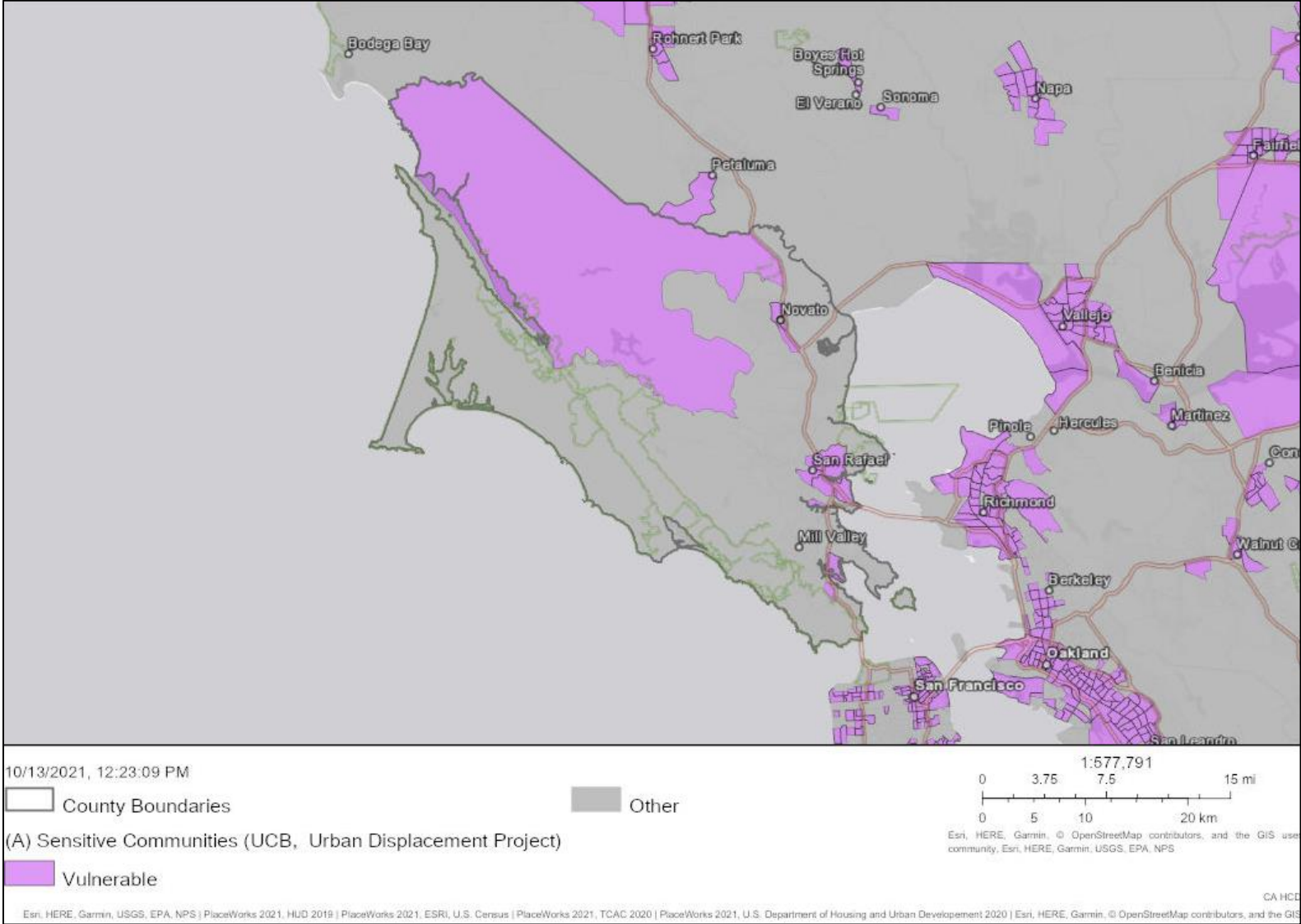
Local Trends

As stated above, the sensitive communities identified in the unincorporated county are located in Marin City, Strawberry, Northern and Central Coastal West Marin and Nicasio in the Valley. These communities have also been identified in earlier sections as having disproportionate housing needs, especially Marin City.

Marin City has a confluence of factors that make its residents susceptible to displacement. In addition, the displacement pressures appear to be disproportionately affecting African American residents. As discussed in earlier sections, Marin City has a high concentration of African American residents though this share has been decreasing since the 1980s. In Marin City, permanent low-income housing is allowing many residents to stay in Marin and in an area where African Americans feel comfortable living. While many residents wish to stay in their community, many African American residents are leaving Marin City due to lack of affordable housing in Marin City or in Marin in general. In 1980, 75 percent of Marin City residents were African American compared to 23 percent in 2019. Marin City is one of the most affordable areas with a large concentration of multifamily housing and more affordable housing stock (condos and townhomes) for the workforce in both Marin County and San Francisco's commuting workforce. UC Berkley's Urban Displacement Project has published a case study on gentrification and displacement pressures in Marin City.[54] According to the study, "concern in this community is future displacement due to potential increases in population, interest in redevelopment and the continued pressures of being surrounded by affluent neighbors in one of the most exclusive counties in the country."

On a broader scale, West Marin is also feeling the effects of the growing divide between wealth and poverty in the Bay Area. Increasing home prices, increased short-term rentals and second home-owners are forcing people to move further from their areas of employment. Undocumented immigrants who work in agriculture and are often isolated by living conditions, language and culture are severely affected by the lack of low-income housing which put workers in vulnerable positions. "With housing so difficult to find, many residents don't complain about substandard conditions or report them to authorities, for fear of finding themselves with no housing at all." These workers who are the foundation of the economy both in agriculture and the service sectors cannot afford to live near their jobs and are forced to have long commutes as the tourist industry continues to grow.

Short-Term Rentals

Online platforms for rental of private homes as commercial visitor accommodations have become a popular amenity for travelers and property owners. The services have also created a multitude of challenges for communities everywhere, most notably around neighborhood disruption, service needs, and housing supply and affordability.

Community discussions connected with the Housing Element effort have indicated that STR uses may be affecting the supply and affordability of housing, particularly in West Marin communities which have become increasingly attractive to homebuyers and where

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[54] https://www.urbandisplacement.org/wp-content/uploads/2021/08/marin_city_final.pdf

there are relatively small numbers of homes. Overall, it appears that in the context of labor shortages, increased costs, and demand, STRs are increasingly impacting the health and safety of local communities, especially in the West Marin Area. Table D- 33 shows the concentration of STRs in West Marin. About 70 percent of the County's STR properties (476) are located in West Main. Within West Marin, Dillon Beach, Muir Beach, Stinson Beach, and Marshall have the highest concentration of STRs. More than 20 percent of these communities' housing stock are registered as STRs.

Table D- 33: Short Term Rental Distribution on West Marin

	# of STR properties [1]	# of residential properties with at least 1 living unit [2]	Proportion of STRs
Bolinas	39	625	6.2%
Dillon Beach	97	394	24.6%
Inverness	65	892	7.3%
Lagunitas-Forest Knolls	8	592	1.4%
Muir Beach	14	40	35.0%
Nicasio	9	239	3.8%
Point Reyes Station	41	397	10.3%
San Geronimo	5	224	2.2%
Stinson Beach	148	703	21.1%
Tomales	13	139	9.4%
Woodacre	6	577	1.0%
Marshall	27	106	25.5%
Olema	4	32	12.5%
Total West Marin/ Measure W Area	476	4,960	9.6%
Marin County	677	82,043	0.8%

[1] Marin County Department of Finance Business License, www.marincounty.org/bl, Retrieved 01/24/22.

[2] 2021 Marin County Assessor-Recorder Secured Roll Data File

Housing shortages and prices are affected by the use of homes as STRs instead of residences. Of the approximately 5,250 residentially developed parcels in West Marin, 551 are currently registered with a valid Business License and Transient Occupancy Tax Certificates, the two required licenses currently needed to legally operate an STR. In some cases existing housing is converted to STR use, and in other cases newly constructed units or ADUs are used as STRs rather than adding to the County's housing supply. A

significant proportion of the housing in some communities has been converted to commercial use in the form of STRs; for example, 20 percent of all housing units in Marshall and 22 percent in Stinson Beach are registered as STRs.

In addition, only 2,251 of the approximately 5,250 developed lots in the West Marin area receive the Primary Home Tax Exemption, indicating that 2,999 properties may not be in use as full-time homes. While all are not currently operating as STRs, the flexibility and the income generated by STRs, where nightly rates can range up to over $1,000/night, in comparison to that earned with a long term rental is likely an incentive for property owners to seek STR use serving visitors rather than traditional rental housing for a community of residents. This condition has led to growing concerns in West Marin communities about impacts of STRs on the availability of housing for workforce, families, and community members.

On August 7, 2018, the Marin County Board of Supervisors adopted the County's first STR ordinance (Ordinance No. 3695) with a limited, two-year term. The ordinance requires neighbor notification of STRs, requires renters be provided with "good neighbor" house rules, and establishes a short-term rental hotline for complaints (which is currently operated by Host Compliance, the County's third party STR monitor). Additionally, the Ordinance requires STR operators register for a Business License and TOT Certificate, providing accountability and payment of taxes and fees commensurate with the commercial use.

On May 2022, the County Board of Supervisors adopted an urgency ordinance establishing a moratorium on new short-term rental registration in the West Marin Area, also known as the Measure W or West Marin Transient Occupancy Tax (TOT) Area, to maintain stability in housing supply while County staff evaluates policies and contemplated zoning proposals to improve the availability of middle- and lower-income housing in the West Marin Area, while maintaining existing coastal access.

Santa Venetia's Housing Needs

Santa Venetia's racial composition has changed significantly in the past decade, notably that of the Hispanic/Latin community. In 2010, about 24.0 percent of the community identified as Hispanic/Latin, as opposed to 5.7 percent in 2019. The County has been engaging with the Santa Venetia community through a committed County-led initiative called "Community Conversations". These meetings have been occurring monthly or bi-monthly since Fall 2021 and are led in Spanish with English interpretation. Through this initiative, the County has learned about the needs of this community, and the specific housing needs of the Hispanic/Latin community. These meetings are hosted by the Venetia Valley K-8 school, whose students are 86.4 percent Hispanic/Latin (2021-22 California Department of Education). The following topics were brought up by the community and representatives were invited to speak directly to community members and answer questions:

- Need for more affordable housing – participants ask about location of available affordable units in the County and are actively looking to apply to remain housed.
- Specific interest in Section 8 housing – representative from MHA came to talk about it to address questions/interest from the community from previous meetings. Interested in learning if any vouchers are available and how to apply and access.
- Habitability – representative from County's Environmental Health Services EHS) Multi-Family Inspection Program came to discuss how to report habitability issues. Explained tenants' rights when experiencing this issue. Questions that were addressed include: how to request inspection; how/when to involve landlord; fears around retaliation (confirmation that landlord will not be notified without tenant permission)
- Rental Assistance – first meeting was held in Fall 2021 and impacts of COVID were still being acutely experienced by the community. Per suggestion from Venetia Valley school staff, the County asked representatives from the County's Rental Assistance program to set up a table and answer questions/search applications.
- Tenant Legal Assistance – representative from Legal Aid of Marin came to discuss tenants' rights and landlord responsibilities

Based on this engagement process that County has included actions in its Housing Plan to address the needs of Santa Venetia residents.

Summary: Disproportionate Needs

Disproportionate needs in unincorporated County communities were more apparent by income level, tenure, and race. As a result, some areas with concentrations of these populations also had disproportionate housing needs. Black and Hispanic renters tended to have the highest rates of cost burdens compared to other races and owners. While more than 50 percent of all Black and Hispanic households experience cost burdens, cost burden rates for Black or Hispanic renters are even higher (about 60 percent). Geographically, tracts in Northern Coastal west Marin, Black Point-Green Point, and Marin City had the highest rates of cost burdened renters.

Overcrowding and substandard conditions rates were low overall in unincorporated communities but renters in Marin City and the Valley had disproportionately high rates of overcrowding compared to other communities. Of note is that both Marin City and the Valley have significant shares of renter households, 73 percent and 24 percent, respectively. In addition, lower income households were more likely to live in overcrowded conditions.

Not only are residents in Northern Coastal West Marin and Marin City experiencing housing problems at higher rates than other communities in the region, these communities have also been identified as being at risk of displacement. This indicates a need to increase the availability of affordable housing within these communities as well as outside to facilitate the mobility of residents out of these areas and to protect existing residents from displacement when place-based strategies and investments improve the

conditions of the area. Some actions to ameliorate displacement risk include Measure W and the identification of RHNA sites of mixed-income in these areas.

E. Site Inventory

HCD requires the City's sites inventory used to meet the RHNA affirmatively furthers fair housing. This includes ensuring RHNA units, especially lower income units, are not disproportionately concentrated in areas with populations such as racial/ethnic minority groups, persons with disabilities, R/ECAPs, cost burdened renters, etc. For the purposes of analyzing the City's RHNA strategy through the lens of Affirmatively Furthering Fair Housing, the sites inventory is shown at the tract level by Community (Table D- 34).

Table D- 34: Unincorporated County CDPs by Community	
Community Name	**CDPs Included**
North Marin	
Black Point-Greenpoint	Black Point – Green Point
Marinwood/ Lucas Valley	Lucas Valley-Marinwood
West Marin	
Northern Costal West Marin	Dillon Beach, Tomales
Central Coastal West Marin	Point Reyes Station, Inverness
The Valley	Nicasio, San Geronimo Valley, Woodacre, Lagunitas, Forest Knolls
Southern Coastal West Marin	Stinson Beach, Bolinas, Muir Beach
Central Marin	
Santa Venetia/ Los Ranchitos	Santa Venetia
Kentfield/Greenbrae	Kentfield
Southern Marin	
Strawberry	Strawberry
Tam Valley	Tamalpais-Homestead Valley
Marin City	Marin City

Table D-35: *Marin County RHNA Distribution by Unincorporated Community and Census Tract*

Tract by Community	Tract Total HH	Total RHNA	Lower	Mod	AM	TCAC Score	% Non-White	% LMI Pop	% Ovcrd HH	% CB Renter	% CB Owner
North Marin											
Black Point-Green Point	*1,186*	111	0	0	111		30.7	52.6	5.9	20.0	35.0
01200	1,186	111	0	0	111	Moderate	30.7	52.6	5.9	20.0	35.0
Marinwood/ Lucas Valley	**2,426**	**305**	**263**	**42**	**0**		**25.9**	**20.0**	**5.4**	**49.0**	**39.0**
07000	2,426	305	263	42	0	Highest	25.9	20.0	5.4	49.0	39.0
Other- North Marin	**2,386**	**396**	**109**	**38**	**249**		**30.6**	**52.9**	**3.2**	**27.7**	**39.7**
33000*	1,200	249	0	0	249	Low	30.3	53.3	5.9	43.0	49.0
01200*	1,186	147	109	38	0						
Total North Marin		*812*	*372*	*80*	*360*		*28.3*	*36.4*	*4.7*	*37.1*	*38.6*
West Marin											
Northern Coastal West Marin	**1,200**	**60**	**0**	**13**	**47**		**18.5**	**53.3**	**5.9**	**43.0**	**49.0**
33000	1,200	60	0	13	47	Low	18.5	53.3	5.9	43.0	49.0
Central Coastal West Marin	**1,200**	**156**	**149**	**3**	**4**		**18.7**	**52.4**	**2.0**	**46.0**	**48.0**
33000	1,200	156	149	3	4	Low	25.4	53.3	2.3	43.0	49.0
Southern Coastal West Marin	**913**	**26**	**13**	**0**	**13**		**17.2**	**49.4**	**5.9**	**38.0**	**61.0**
32100	913	26	13	0	13	High	17.2	49.4	5.9	38.0	61.0
The Valley	**2,685**	**97**	**48**	**35**	**14**		**15.6**	**49.5**	**3.4**	**39.7**	**49.0**
13000	1,485	81	32	35	14	Highest	15.2	48.7	2.8	39.0	49.0
33000	1,200	16	16	0	0	Low	17.7	53.3	5.9	43.0	49.0
Other-West Marin	**2,074**	**114**	**64**	**45**	**5**		**31.4**	**52.5**	**3.8**	**45.7**	**48.1**
32200	874	56	20	31	5	Moderate	46.8	51.6	1.3	49.0	47.0

33000	1,200	58	44	14	0	Low	18.5	53.3	5.9	43.0	49.0
Total West Marin		453	274	96	83		20.3	51.7	3.8	43.2	50.0
Central Marin											
Kentfield/Greenbrae	**3,076**	**225**	**130**	**92**	**3**		**13.5**	**26.1**	**2.2**	**21.6**	**33.0**
19100	1,874	222	130	92	0	Highest	13.5	25.1	2.0	20.0	33.0
19201	1,202	3	0	0	3	High	15.4	48.3	5.9	56.0	32.0
Santa Venetia/Los Ranchitos	**4,373**	**861**	**561**	**13**	**287**		**35.2**	**55.5**	**2.4**	**40.0**	**49.3**
06001	2,138	680	440	0	240	Moderate	34.0	48.9	1.5	40.0	48.0
06002	2,235	181	121	13	47	Moderate	35.8	59.1	3.0	40.0	50.0
Other-Central Marin	**12,622**	**539**	**247**	**119**	**173**		**42.2**	**40.5**	**3.9**	**53.2**	**35.9**
07000	2,426	26	0	0	26	Highest	13.7	20.0	5.9	49.0	39.0
09002	1,735	67	13	0	54	Highest	14.7	34.2	3.3	46.0	40.0
12100	1,881	119	26	0	93	Moderate	63.6	48.5	5.5	57.0	33.0
14200	1,440	36	36	0	0	High	18.8	37.3	1.0	48.0	43.0
15000	2,668	61	57	4	0	Highest	13.7	25.2	0.7	50.0	40.0
21200	2,472	230	115	115	0	High	34.9	34.3	0.4	56.0	27.0
Total Central Marin		**1,625**	938	224	463		30.3	40.0	2.9	38.4	38.9
Southern Marin											
Marin City	**4,092**	**286**	**94**	**117**	**75**		**49.6**	**38.1**	**3.4**	**43.0**	**41.5**
28100	2,863	145	20	50	75	Highest	20.5	20.1	2.4	30.0	36.0
29000	1,229	141	74	67	0	Moderate	78.7	56.2	4.3	56.0	47.0
Strawberry	**4,162**	**354**	**100**	**8**	**246**		**29.5**	**32.8**	**3.5**	**52.8**	**40.5**
24100	2,287	59	0	8	51	Highest	23.5	21.2	3.4	34.0	38.0
25000	1,875	295	100	0	195	Highest	30.8	35.3	3.5	57.0	41.0
Tam Valley	**7,276**	**130**	**72**	**12**	**46**		**16.3**	**26.0**	**0.3**	**29.8**	**46.0**
28100	2,863	12	0	12	0	Highest	20.5	20.1	0.4	30.0	36.0
28200	1,918	82	72	0	10	Highest	17.4	25.0	0.5	31.0	42.0
30202	2,495	36	0	0	36	Highest	9.9	33.7	0.0	27.0	64.0
Other-Southern Marin	**2,345**	**32**	**0**	**0**	**32**		**22.8**	**21.2**	**0.6**	**34.8**	**40.3**

24100	2,287	32	0	0	32	Highest	23.5	21.2	0.8	34.0	38.0
Total Southern Marin		802	266	137	399		*31.1*	*31.1*	*2.5*	*43.9*	*41.6*
Grand Total		**3,692**	**1,850**	**537**	**1,305**		**26.8**	**42.3**	**3.3**	**40.7**	**43.0**

	Low	Moderate	AM	Total
North Marin	**20.1%**	**14.9%**	**27.6%**	**22.0%**
Black Point-Green Point	0.0%	0.0%	8.5%	3.0%
Marinwood-Lucas Valley	14.2%	7.8%	0.0%	8.3%
Other	5.9%	7.1%	19.1%	10.7%
West Marin	**14.8%**	**17.9%**	**6.4%**	**12.3%**
Northern Coastal West Marin	0.0%	2.4%	3.6%	1.6%
Central Coastal West Marin	8.1%	0.6%	0.3%	4.2%
Southern Coastal West Marin	0.7%	0.0%	1.0%	0.7%
The Valley	2.6%	6.5%	1.1%	2.6%
Other	3.5%	8.4%	0.4%	3.1%
Central Marin	**50.7%**	**41.7%**	**35.5%**	**44.0%**
Kentfield/Greenbrae	7.0%	17.1%	0.2%	6.1%
Santa Venetia/Los Ranchitos	30.3%	2.4%	22.0%	23.3%
Other	13.4%	22.2%	13.3%	14.6%
Southern Marin	**14.4%**	**25.5%**	**30.6%**	**21.7%**
Marin City	5.1%	21.8%	5.7%	7.7%
Strawberry	5.4%	1.5%	18.9%	9.6%
Tam Valley	3.9%	2.2%	3.5%	3.5%
Other	0.0%	0.0%	2.5%	0.9%
Grand Total	**1,850**	**537**	**1,305**	**3,692**

6. North Marin

North Marin is made up of the unincorporated communities of Black Point-Green Point and Lucas Valley-Marinwood. As shown in Table D- 35, 812 total RHNA units (22 percent) are distributed in the North Marin communities of Black Point-Green Point, Lucas Valley-Marinwood, and other areas in North Marin not associated with either CDP. The County has allocated 111 above-moderate income units in Black Point-Green Point. Black Point-Green Point is made up of moderate resource tracts with an average minority population of 31 percent and LMI population of 53 percent.

The adjacent community of Lucas Valley-Marinwood is considered Highest Resource and has nonwhite population of 26 percent and LMI population of 20 percent. The County has allocated 305 lower and moderate income units in Lucas Valley. This unit distribution is intended to improve the availability of affordable housing in a high resource area. Cost burdens in Lucas Valley-Marinwood is highest between the two North Marin communities (49 percent for renters and 39 percent for owners). Lower income housing can also improve cost burdens in the area by increasing the availability of lower income housing for renters.

7. West Marin

West Marin covers the coastal areas of the County as well as the Valley in the middle of the County. Northern Coastal West Marin is a low resource area, also considered an LMI area, with high shares of cost burdens for renters (43 percent) and owners (49 percent). The County has allocated 60 RHNA moderate and above-moderate income units in this community. Lower income units were not allocated here to avoid placing housing in an area that has low infrastructure and connectivity of the County's economic center and services.

Central Coastal West Marin has a tract with moderate resources (for the CDPs along the coast) and low resources (for the CDPs in the Valley). Both tracts in Central Coastal West Marin have similar shares of LMI population and cost burdens for both renters and owners. The County has allocated 156 RHNA units of all income levels in this community- 149 lower income, three moderate income, and four above moderate. All 149 lower income units are located in Point Reyes Station- within a low resource tract. However, many of the sites in Point Reyes are vacant and public sites and are more likely to develop affordable housing than in surrounding underutilized sites.

Southern Coastal West Marin is considered a high resource tract. This tract has less than 1,000 units and the County has allocated 26 mixed income RHNA units in this area. Units are both in Stinson Beach and Bolinas, but the 13 lower income units in the area are located in Bolinas as part of Credit projects. These units increase the availability of affordable units in an area with high resources.

The Valley is located inland in the County, and has tracts with a mixture of resources-Highest in the Lagunitas, Woodacre, San Geronimo area and low in isolated Nicasio. Despite their differences in resources, the tract's population characteristics are similar for nonminority concentration, LMI population, and owner cost burdens. However, overcrowding and renter cost burden is higher in tract 33000. The County has allocated

a total of 97 RHNA units in The Valley, with the majority (81) in the tract with the highest resources. Of the 48 combined lower income units in both of the tracts, 32 are in the tract with highest resources. This should increase the availability of low income housing in high resource areas in the Valley community.

Overall, 453 RHNA units (12 percent) were distributed in West Marin, which has one of the lowest population densities in the County but the largest land area. The County took care to distribute units in a way to both increase housing availability of all incomes as well as allocating lower income units in areas with high resources and/or with access to infrastructure. About 60 percent of the units in sites in West Marin are lower income (274), and most (109) are in Central Coastal West Marin.

8. Central Marin

Central Marin is one of the most densely populated areas in the County, but the majority of the land area is made up of incorporated cities. Kentfield/Greenbrae and Santa Venetia/ Los Ranchitos are the only unincorporated communities in the area. However, these two communities are located at opposite ends of Central Marin and have differing levels of resources. Kentfield/Greenbrae is made up of high/highest resource tracts while Santa Venetia/Los Ranchitos has lower resources. There are also large areas of unincorporated land not belonging to either community where the County has allocated 539 RHNA units. Of the 1,625 total RHNA units in Central Marin, 225 are located in Kentfield/Greenbrae. About half of the units in Kentfield/Greenbrae (130) are on sites suitable for lower income households- thus providing affordable housing in an area with high resources. In Santa Venetia/Los Ranchitos, where resources are moderate, most of the units (561 of 861) are lower income units. Most of these units are designated for the St Vincent's site and have a high probability of being developed as lower income housing due to incentives for lower income housing development on religious sites.

The remaining 539 RHNA units in Central Marin are spread out in areas not within Kentfield/Greenbrae or Santa Venetia/Los Ranchitos. These areas range in resources from Highest to Moderate. However, the majority of these units are located in the northern end of the County (near Fairfax,California Park, Lucas Valley, and Sleepy Hollow). Most of the sites designated for lower income units (221 of 247) located in "other" areas of Central Marin are in High and Highest resource tracts.

9. Southern Marin

Southern Marin is made up of a mixture of unincorporated communities- Marin City, Strawberry, Tam Valley, as well as -incorporated cities:- Mill Valley, Sausalito, Tiburon, and Belvedere. Southern Marin, while predominantly High and Highest resource, also has Marin City, which has been identified as being a racially and ethnically segregated area of Poverty (RECAP), has a higher share of single-female headed households with children and persons with disabilities than other unincorporated communities, has disproportionate access to opportunities and disproportionate needs, and is a historically Black/African American community that has been impacted by discriminatory policies, redlining, and even was even the subject of discriminatory home lending headlines in 2021.

About 22 percent of the unincorporated County's RHNA (802 units) is located in Southern Marin- 266 lower income, 137 moderate income, and 399 above moderate income. Of these 802 units, 286 are located in Marin City. In an effort to avoid the concentration of lower income units in an area already with a concentration of LMI population, yet with a need for affordable housing units (about 30 to 56 percent of renters are cost burdened), the County allocated 94 lower income units in Marin City, while the rest are Moderate and Above Moderate income. Most of these lower income units (74) are located in the tract with the highest percentage of cost burdened renters. The existing residents are also vulnerable to displacement so the County has included considerations for more robust tenant protections in its 6th Cycle Housing Element Programs.

In Strawberry, where resources are "highest", the County has allocated 354 RHNA units, split across all income levels . Despite both tracts being considered highest resource, one tract (25000) has a considerably higher concentration of LMI population, and cost burdened renters and owners (57 percent and 41 percent, respectively). All lower income units in Strawberry are within the tract with the highest concentration of cost burdened households. This strategy helps increase the availability of affordable housing in an area with disproportionate needs but highest resources.

The County allocated 130 RHNA units in Tam Valley, split between lower, moderate and above moderate income. This community has one of the highest concentration of cost burdened owners in Southern Marin and all of Marin County in Tract 30202 (64 percent). Above Moderate units in this tract can help improve conditions for owner households by increasing the supply of housing.

 though Figure D- 55: and Table D- 37 through Table D- 47 under section F. RHNA Unit Distribution by Fair Housing Characteristics show the distribution of RHNA units relative to a variety of characteristics that impact fair housing choice.

F. Identification and Prioritization of Contributing Factors

Table D- 36 below shows a Summary Issues and Identification and Prioritization of Contributing Factors based on the analysis presented above. Meaningful actions to address these issues are described in detail in the Housing Element's Program Section.

*Table D- 36: **Summary Issues and Identification and Prioritization of Contributing Factors***

Issue/Justification	Contributing Factor	Priority	Program
Fair Housing Outreach and Education Disability status is the most common basis for discrimination complaints. Testing on the basis of disability in the County revealed that persons with disabilities most to have received less favorable treatment or more likely to be denied reasonable accommodations. Most importantly, testing revealed higher rates of discrimination on the basis of disability in properties with less than 11 units, indicating a need for increased fair housing education with "mom and pop" landowners. Source of Income Protection has been protected since 2017 in the County and has become protected under California Law since 2020.Testing in Marin County has also revealed discriminatory treatment for all HCV holders, but higher rates for Latinx and Black HCV holders. Of note is the finding that landlords made exceptions of HCV holders for White residents in areas of high opportunity. This indicates a higher need for outreach education on Source of Income and Race in areas with high resources. Information about all protected classes as well as source of income protection needs to be disseminated to both landlords and residents. *Because discrimination in the private market is higher for landlords with buildings with a lower number of units, the County is placing high priority on education to landlords- particularly landlords of smaller buildings (townhomes, condos, ADUs).* *Because testing is complaint-based, the County is placing moderate priority to extending education to residents. Residents need to know the fair housing resources available and their fair housing rights. For this*	Higher discrimination in private small landlord market Lack of property owner/landlord education.		
	Lack of property owner/landlord education.	High	30
	Testing is complaint-based and discrimination based on disability is more apparent. Reporting based on disability may be an overrepresentation of the discrimination activity occurring. Residents need to know their fair housing rights.	Moderate	30,32

reason the County is prioritizing outreach and education, both to residents and realtors.			
Integration and Segregation Most communities in unincorporated Marin are predominantly white. Marin City has the highest concentration of Black/African American and Hispanic/Latinx residents compared to other unincorporated communities. In addition, Marin City was identified as R/ECAP, indicating a concentration of minority population and poverty. Marin City also has the highest concentration of persons with disabilities and single-female headed households with children compared to other unincorporated communities. This indicates a concentration of special needs populations within Marin City. Not only are there areas of concentrated special needs populations and poverty, but affluent and white populations also appear to be concentrated and segregated from these populations. Regional trends show that white residents and above moderate-income residents are significantly more segregated from other racial and income groups. This trend is also seen in unincorporated Marin County where Above Moderate-income residents are the most isolated income group while very-low income communities have become more isolated. As a result, very-low income communities and above moderate communities remain moderately segregated (compared to slightly lower segregation indices between lower income residents and non-lower income residents). *The County is placing a high priority on housing mobility strategies to facilitate the movement of persons from areas with high concentration of special needs populations (especially Marin City) to other high resource areas and on facilitating affordable housing production. Actions include considering concessions/incentives for universal design, facilitating ADU construction, an SB9 mapping tool, efficient use of multi-family land, by-right approval in reuse sites for lower income units and streamlining approval, and addressing infrastructure constraints to residential development. On the other hand, the County has signed a voluntary agreement with HUD to not invest in any more affordable housing in Marin City to avoid the overconcentration of low income housing.*	Concentration of low income housing (associated with special needs populations and minority population) in the Marin City attributed to historical settlements, discriminatory practices, and land use policies.	High	10, 12, 27, 29
	Lack of opportunities for residents to obtain housing in areas of higher opportunities .	High	2,4, 5, 6, 14, 24

The County is placing a high priority on Place-Based strategies to improve the condition of Marin City. This includes objective design standards for off-site improvements to streamline timelines and improve certainty across all unincorporated communities as well as increasing investment in Marin City neighborhood improvement.			
Access to Opportunities The analysis of access to opportunities revealed disproportionate access in three different communities: Northern Coastal West, Black Point-Greenpoint, and Marin City. Northern Coastal West Marin is not well connected by transportation to the rest of the County, and perhaps due to a lack of connection, also has low jobs proximity and economic scores. The County's economic center is located in Central and Southern Marin. Northern Coastal West Marin also had low educational outcomes.	Development patterns and land use policies isolating West Marin, especially Northern Coastal West Marin, from areas of high opportunity	Low	
	Lack of opportunities for residents to obtain housing in higher opportunity areas	High	1, 4, 5, 24
Marin City, which has already been identified as a RECAP and a community with a concentration of special needs population, was classified as being predominantly moderate resource. Marin City's lower TCAC composite score (compared to its neighboring areas) is due to its lower economic score. Since the TCAC score is a combination of poverty, adult education, employment, job proximity, and median home value, but Marin City is close to the County's employment centers, the resources most necessary in the area are related to improving the human capital- poverty, education, employment, as well as neighborhood improvements to increase home values. Home values are also directly linked to past discriminatory practices that did not allow Black residents to move to other areas and remain in Marin City. As early as 2021, Marin City also has seen complaints of home loan discrimination. Residents of Marin City also have limited access to protected open space. Black Point- Green Point in North Marin also had moderate TCAC resource scores accompanied by lower education scores and lower jobs proximity and lower economic scores. However, this area is not known regionally to lack resources or have special needs. The population in the area is White, affluent, and well educated.	Low opportunities and resources in Marin City due to lack of human capital and home values	High	10,12,27, 29

West Marin has historically been rural with a focus on agriculture, open space preservation, and park lands. Northern Coastal West Marin is not well connected to the rest of the County where there are more job opportunities and higher overall resources. Further impacting the area is the Coastal Act, which preserves access to the coast and promotes visitor serving uses over uses for local residents. Since overall population density is low in these areas and residential development in these areas are limited by the Coastal Act, the County is placing low priority in addressing the land use patterns in West MarinMCCDC) and improve neighborhood through community planning. The first community plan for the 6th Planning Cycle for Marin City has already secured funding through ABAG.			
Disproportionate Needs Disproportionate needs in unincorporated County communities were more apparent by income level, tenure, and race. As a result, some areas with concentrations of these populations also had disproportionate housing needs. Black and Hispanic renters tended to have the highest rates of cost burdens compared to other races and owners. While more than 50 percent of all Black and Hispanic households experiences cost burdens, cost burden rates increased to 60 percent for Black or Hispanic renters. Geographically, tracts in Northern Coastal West Marin, Black Point-Green Point, and Marin City had the highest rates of cost burdened renters. Overcrowding and substandard conditions rates were low overall in unincorporated communities but renters in Marin City and the San Geronimo Valley had disproportionately high rates of overcrowding compared to other communities. Of note is that both Marin City and the San Geronimo Valley have the significant shares of renter households, 73 percent and 24 percent, respectively. In addition, lower income households were more likely to live in overcrowded conditions. Not only are residents in Northern Coastal West Marin and Marin City experiencing housing problems at higher rates than other communities, these communities have also been identified as being at risk of displacement. This indicates a need to increase the availability of affordable housing within these communities as well as outside to facilitate the mobility of residents out of these areas and to Protecting	Lack of affordable housing due to due to constraints to residential development	High	7, 14, 10, 17
	Lack of affordable housing due to short-term rentals	Moderate	18, 19
	Lack of housing condition inspection and monitoring in the majority of the unincorporated County's housing stock (single family housing)	Moderate	20
	Lack of renter protections, especially in communities with high displacement risk (Marin City and Northern Coastal West Marin)	High	31

existing residents from displacement when place-based strategies and investments improve the conditions of the area. *Many issues affect housing needs- constraints to production, lack of incentives for production, and short-term rentals affect the availability and cost of housing. Meanwhile, a lack of monitoring for housing condition may lead to substandard conditions, particularly for renters. Marin County is addressing most of these issues but higher priority is being given to incentivizing new housing production.* *Because cost burden is related to housing availability, the County is placing a high priority on incentivizing and facilitating affordable housing production throughout the unincorporated communities. Part of the strategy includes reducing the concentration of affordable housing in Marin City and facilitating it in areas with higher resources.* *Because short-term rentals reduce housing availability which can increase the demand for housing and inflate housing prices, especially in West Marin and its coastal communities, exploring options for limiting short-term rentals is considered a moderate priority. Higher priority is being given to incentivizing new housing production.* *The majority of the incorporated County housing stock is single units dwellings. Inspections for substandard conditions are currently only done in buildings with 3 or more units. Because renters are experiencing housing problems – substandard conditions- in single unit dwellings, the County is placing moderate priority on expanding the inspection program to single-unit dwellings/homeowners. .* *The combined forces of increased housing cost as well as the production of unaffordable housing is creating displacement risk for Marin City and Northern Coastal West Marin. The County is placing a high priority on exploring tenant protection options such as rent stabilization, just cause for eviction, relocation assistance, tenant commissions, right to purchase, and right to return.*			

G. RHNA Unit Distribution by Fair Housing Characteristics

1. Integration and Segregation

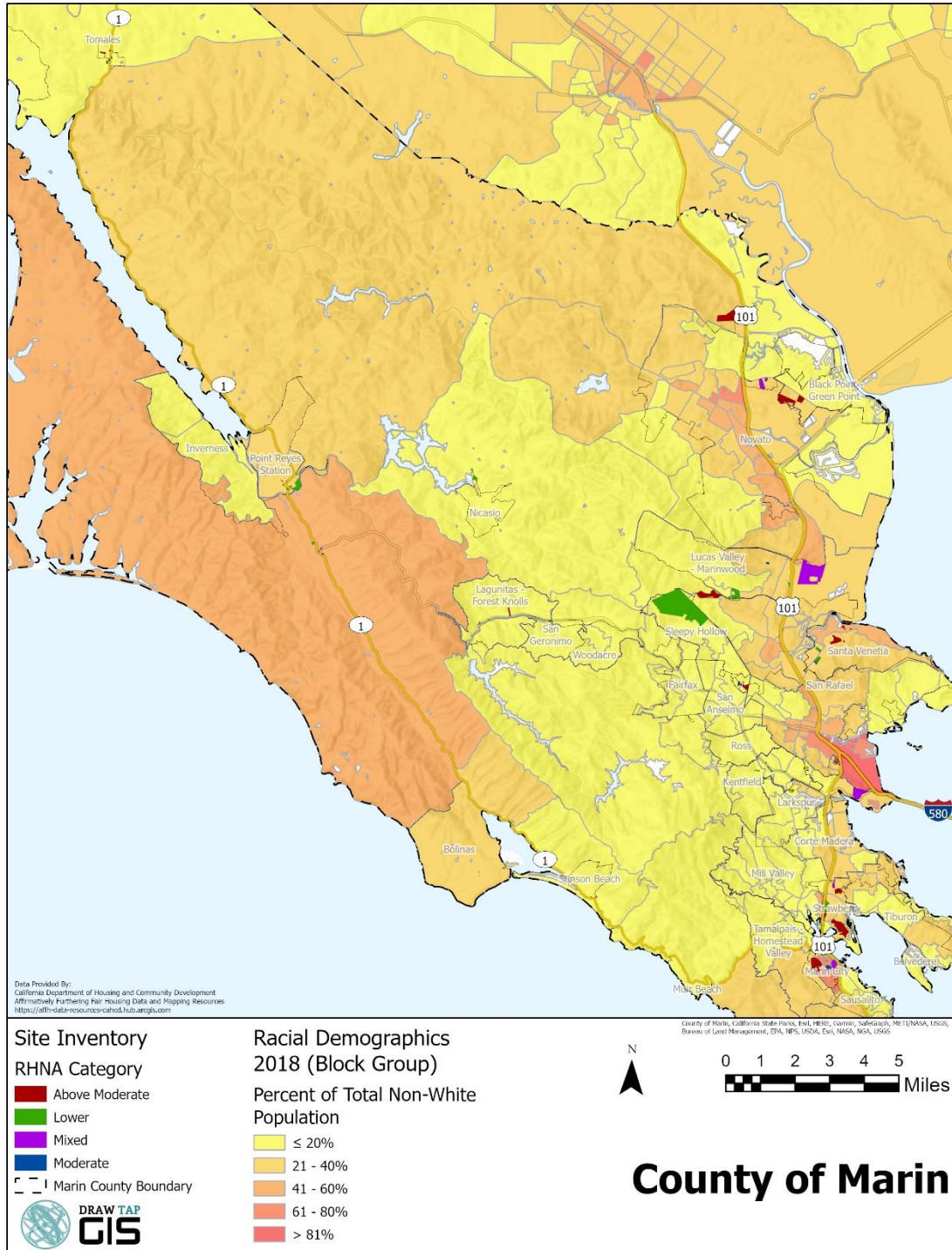*Figure D- 45*: *RHNA Unit Distribution by % Non-White Population in Tract*

Table D- 37: RHNA Unit Distribution by % Non-White Population in Tract

	Lower	Moderate	Above Moderate	Total RHNA Units
<20 %	25.8%	43.6%	21.3%	26.7%
21 - 40%	67.7%	37.0%	69.1%	64.0%
41 - 60%	1.1%	6.1%	3.1%	2.5%
61 - 80%	5.4%	13.3%	6.5%	6.9%
> 81%	0.0%	0.0%	0.0%	0.0%
Total Units	1,850	505	1,305	3,660

Figure D- 46: *RHNA Unit Distribution by % Population with a Disability in Tract*
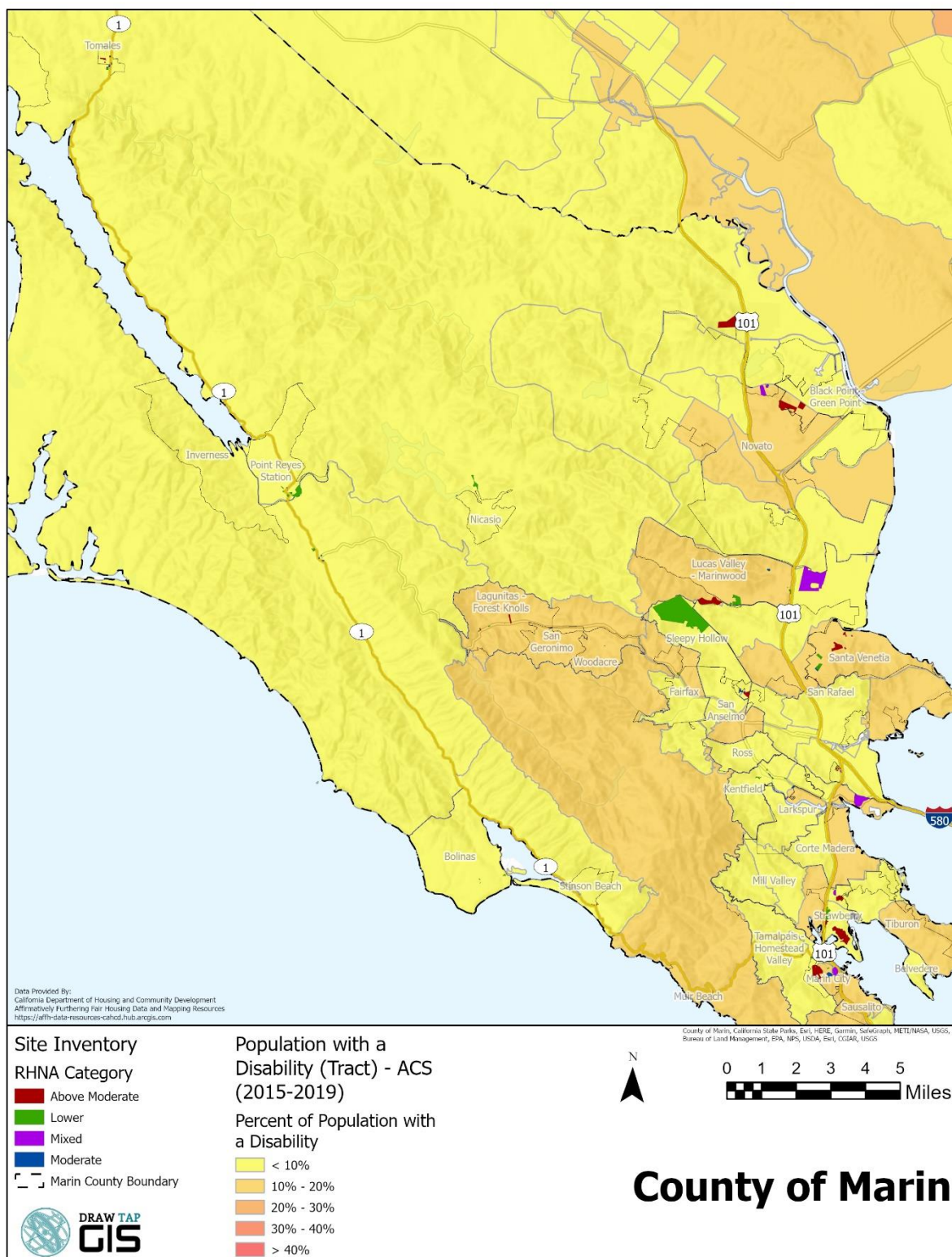
Table D- 38: *RHNA Unit Distribution by % Population with a Disability in Tract*

	Lower	Moderate	Above Moderate	Total RHNA Units
<10%	59.5%	45.0%	81.8%	65.4%
10 - 20%	40.5%	55.0%	18.2%	34.6%
Total Units	1,850	505	1,305	3,660

_Figure D- 47__: RHNA Unit Distribution by % Children in Married-Couple Households in Tract_
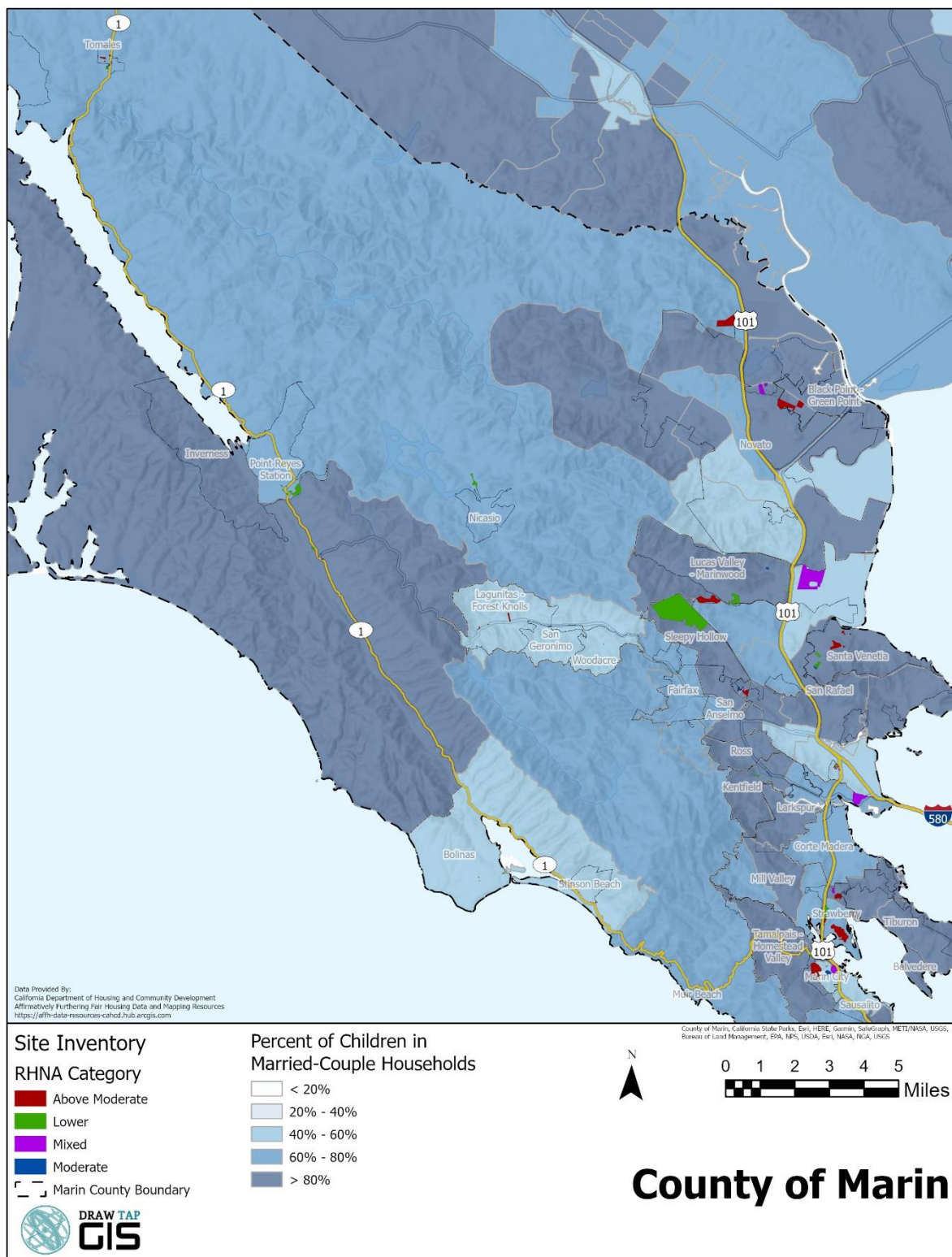
Table D- 39: *RHNA Unit Distribution by % Children in Married-Couple Households in Tract*

	Lower	Moderate	Above Moderate	Total RHNA Units
0 - 20%	0.0%	0.0%	0.0%	0.0%
20 - 40%	0.0%	0.0%	0.0%	0.0%
40 - 60%	31.6%	20.2%	30.3%	29.6%
60 - 80%	24.9%	28.7%	38.2%	30.1%
> 80%	43.5%	51.1%	31.5%	40.3%
Total Units	1,850	505	1,305	3,660

Figure D- 48: *RHNA Unit Distribution by % Children in Single Female-Headed Households in Tract*
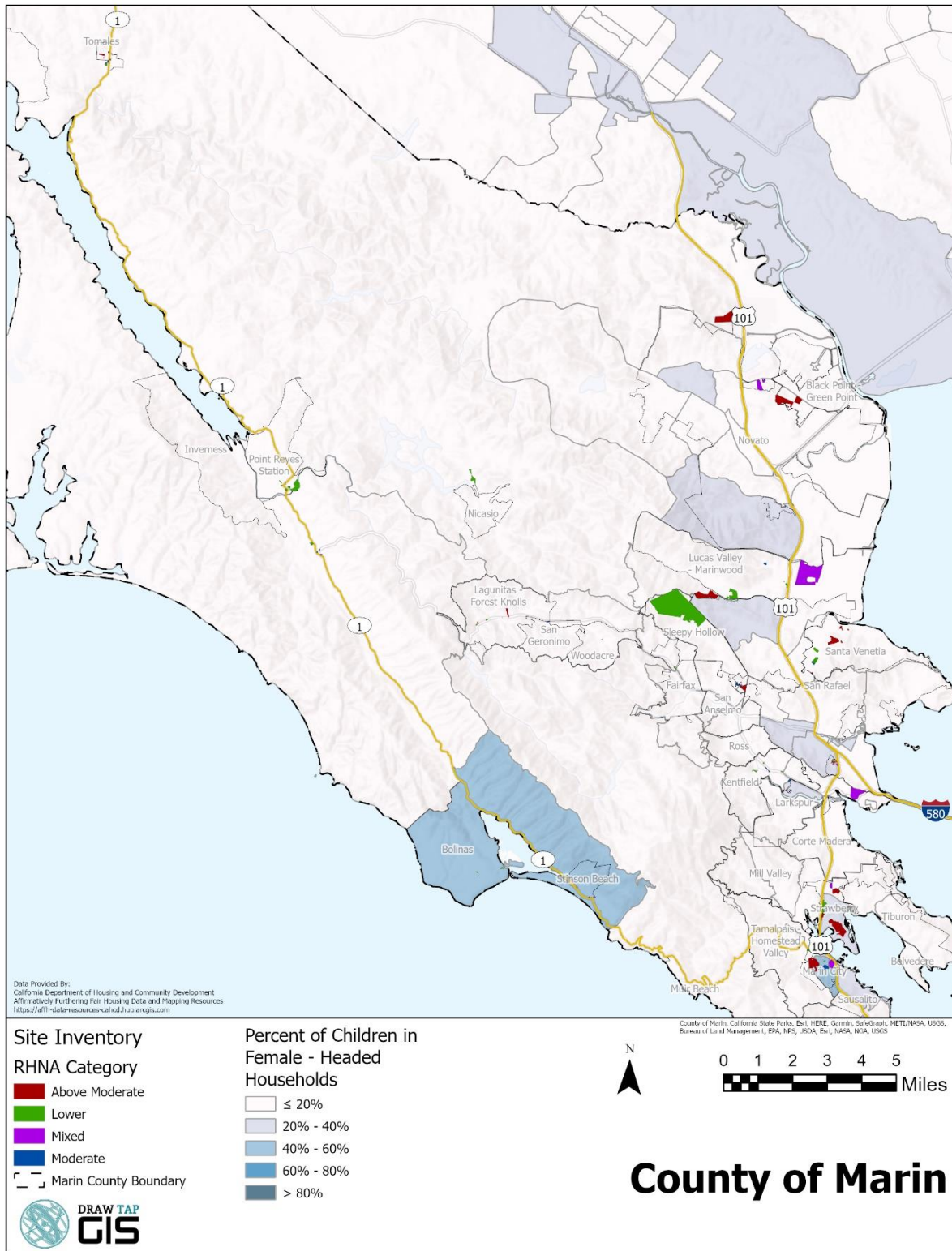
Table D- 40: *RHNA Unit Distribution by % Children in Single Female-Headed Households in Tract*

	Lower	Moderate	Above Moderate	Total RHNA Units
0 - 20%	88.5%	86.7%	73.9%	83.1%
20 - 40%	6.8%	0.0%	25.1%	12.3%
40 - 60%	4.7%	13.3%	1.0%	4.6%
60 - 80%	0.0%	0.0%	0.0%	0.0%
> 80%	0.0%	0.0%	0.0%	0.0%
Total Units	1,850	505	1,305	3,660

Figure D- 49: *RHNA Unit Distribution by % LMI Population in Tract*
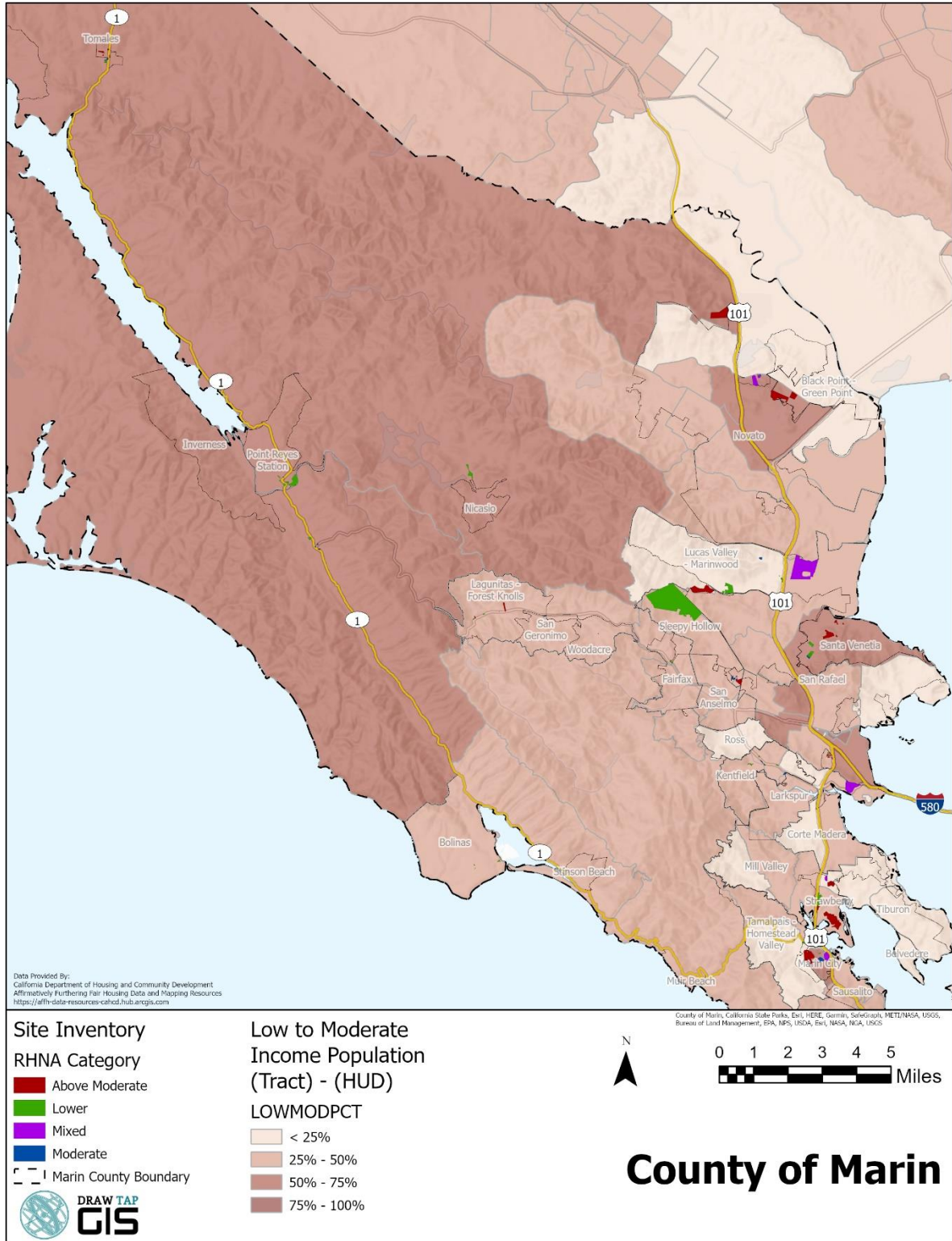
Table D- 41: **RHNA Unit Distribution by % LMI Population in Tract**

	Lower	Moderate	Above Moderate	Total RHNA Units
< 25%	0.0%	0.0%	0.0%	0.0%
25 - 50%	4.8%	0.0%	2.0%	3.1%
50 - 75%	66.3%	49.3%	57.7%	60.9%
> 75%	23.5%	37.4%	33.8%	29.1%
Total Units	5.4%	13.3%	6.5%	6.9%

_Figure D- 50__: RHNA Unit Distribution by R/ECAPs_
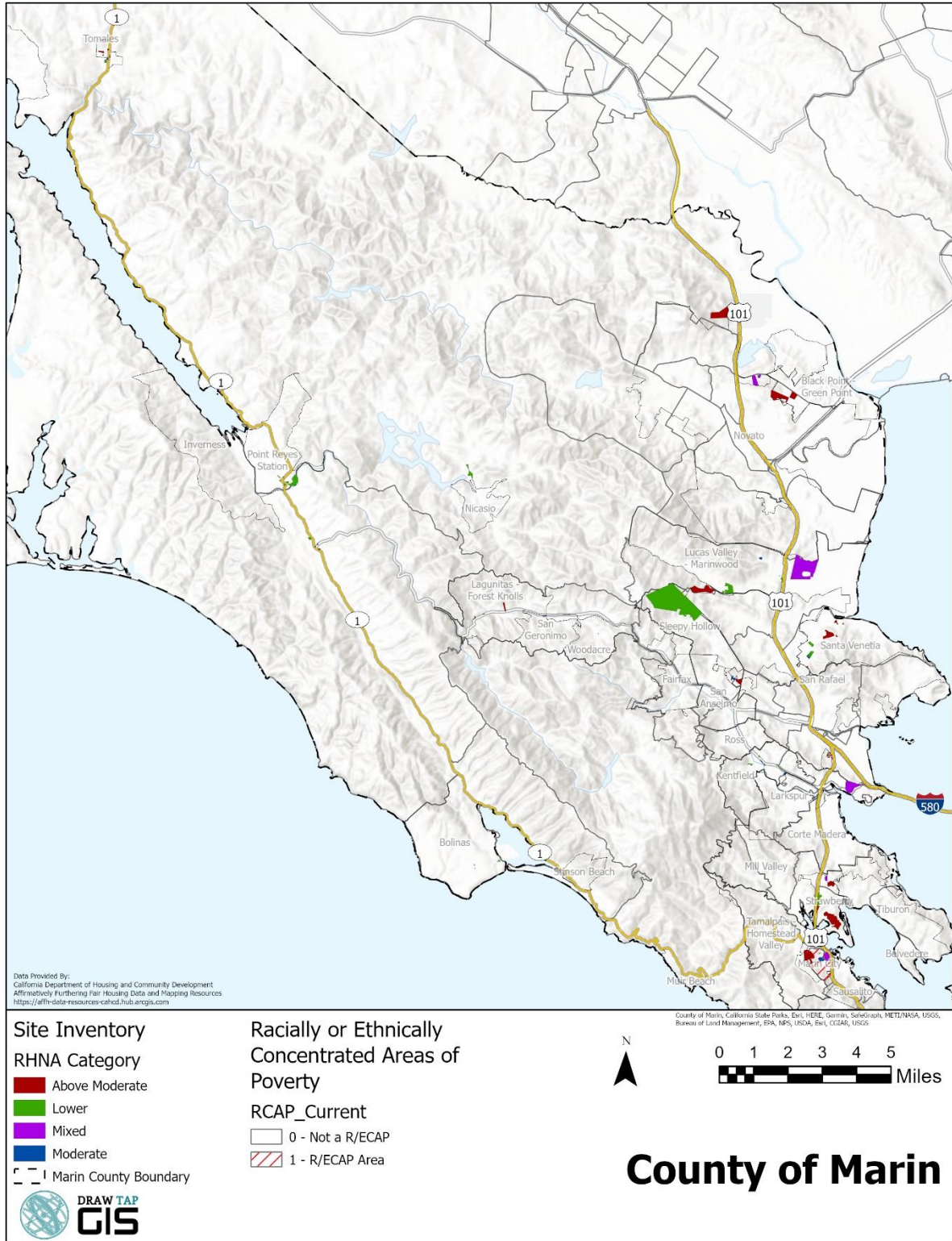
*Table D- 42: **RHNA Unit Distribution by R/ECAPs***

	Lower	Moderate	Above Moderate	Total RHNA Units
No RECAP	96.0%	86.7%	100.0%	96.1%
R/ECAP	4.0%	13.3%	0.0%	3.9%
Total Units	1,850	505	1,305	3,660

2. Access to Opportunities

Figure D- 51: RHNA Unit Distribution by TCAC Opportunity Areas
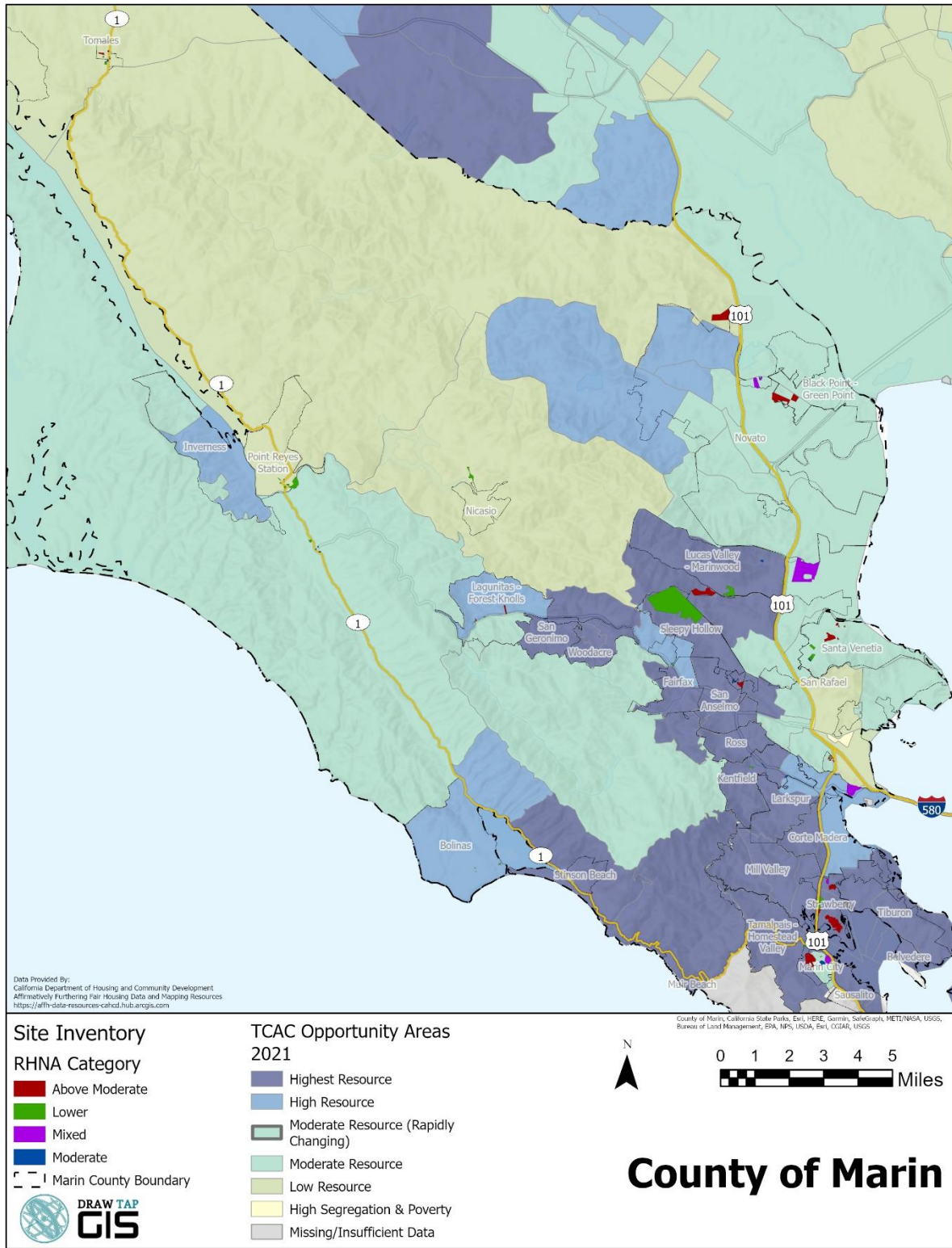
Table D- 43: **RHNA Unit Distribution by TCAC Opportunity Areas**

	Lower	Moderate	Above Moderate	Total RHNA Units
Low Resource	11.3%	5.9%	23.0%	14.7%
Moderate Resource	42.7%	29.5%	39.9%	39.9%
High Resource	10.6%	24.8%	1.3%	9.2%
Highest Resource	35.4%	39.8%	35.8%	36.1%
Total Units	1,850	537	1,305	3,692

Figure D- 52: *RHNA Unit Distribution by CalEnviroScreen 4.0 Score*
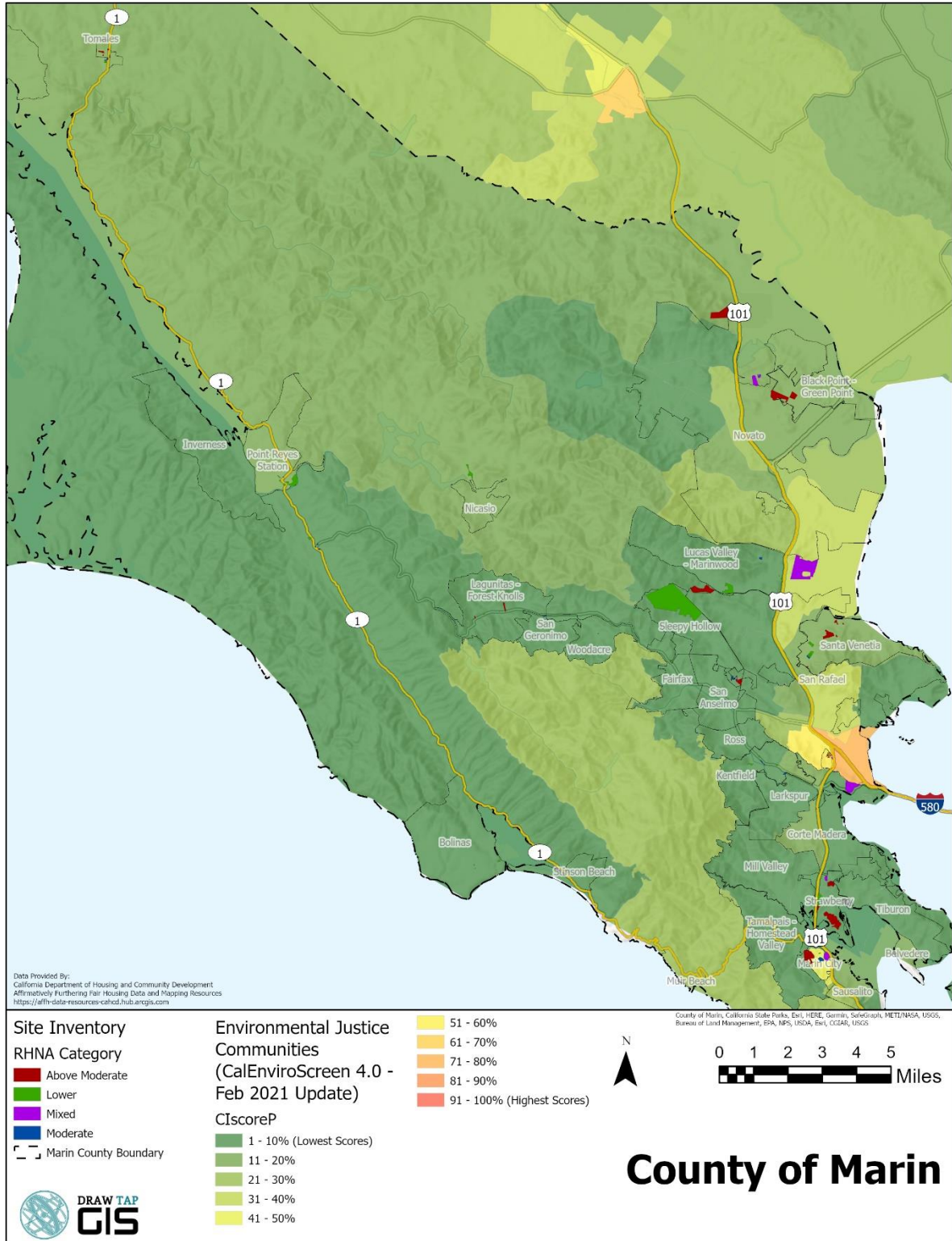
Table D- 44: **RHNA Unit Distribution by CalEnviroScreen 4.0 Score**

	Lower	Moderate	Above Moderate	Total RHNA Units
1 - 10% (Lowest Score)	47.1%	70.7%	36.6%	46.6%
11 - 20%	23.7%	16.0%	37.9%	27.7%
21 - 30%	0.0%	0.0%	0.0%	0.0%
31 - 40%	27.8%	13.3%	18.4%	22.4%
41 - 50%	0.0%	0.0%	0.0%	0.0%
51 - 60%	1.4%	0.0%	7.1%	3.3%
61 - 70%	0.0%	0.0%	0.0%	0.0%
71 - 80%	0.0%	0.0%	0.0%	0.0%
81 - 90% (Highest Score)	0.0%	0.0%	0.0%	0.0%
Total Units	1,850	505	1,305	3,660

3. Disproportionate Needs

Figure D- 53: RHNA Unit Distribution by % Cost-Burdened Renters in Tract
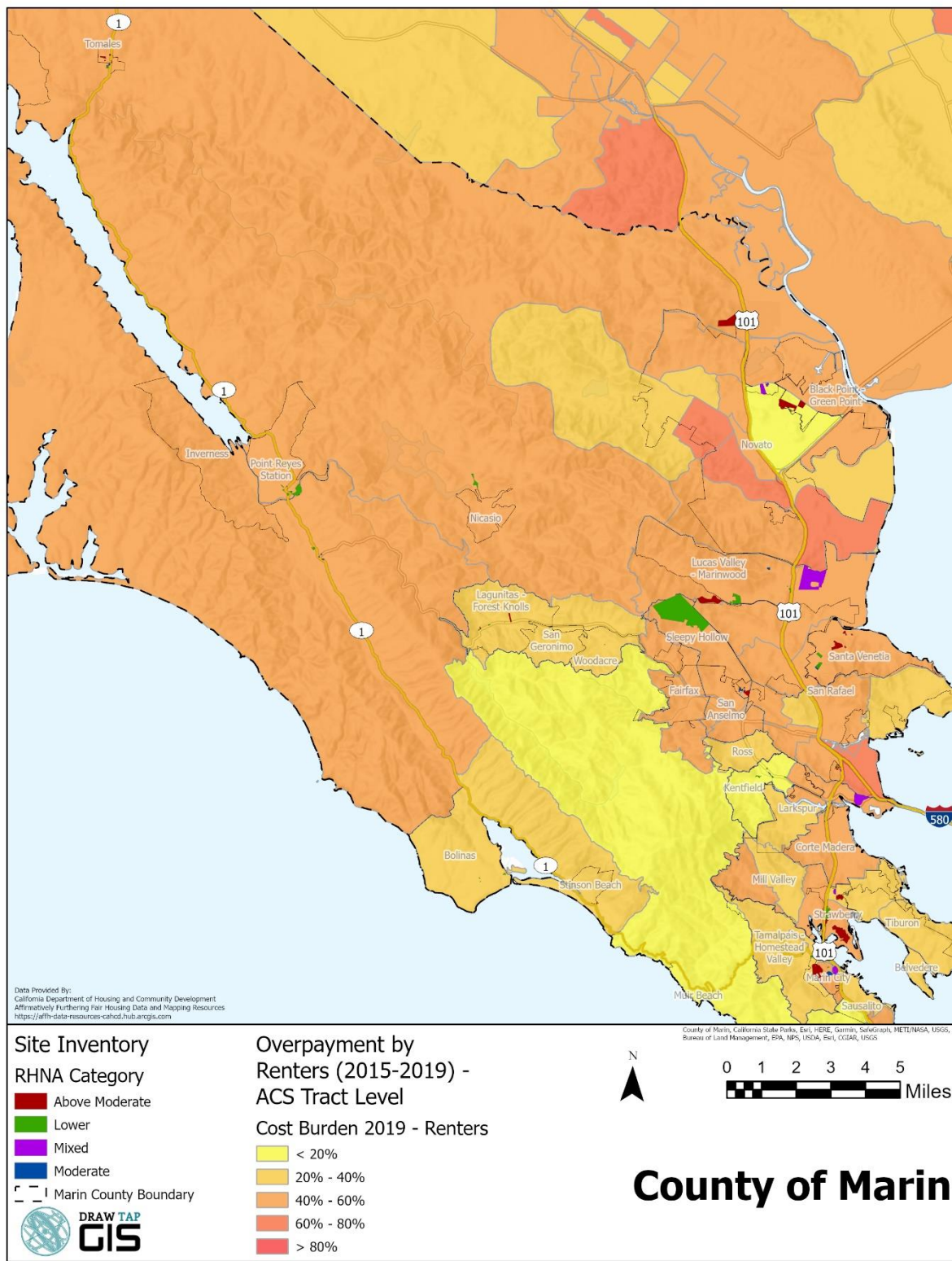
Table D- 45: RHNA Unit Distribution by % Cost-Burdened Renters in Tract

	Lower	Moderate	Above Moderate	Total RHNA Units
< 20 %	0.0%	0.0%	0.0%	0.0%
20% - 40%	20.3%	46.5%	26.2%	26.0%
40% - 60%	79.7%	53.5%	73.8%	74.0%
60% - 80%	0.0%	0.0%	0.0%	0.0%
> 80%	0.0%	0.0%	0.0%	0.0%
Total Units	1,850	505	1,305	3,660

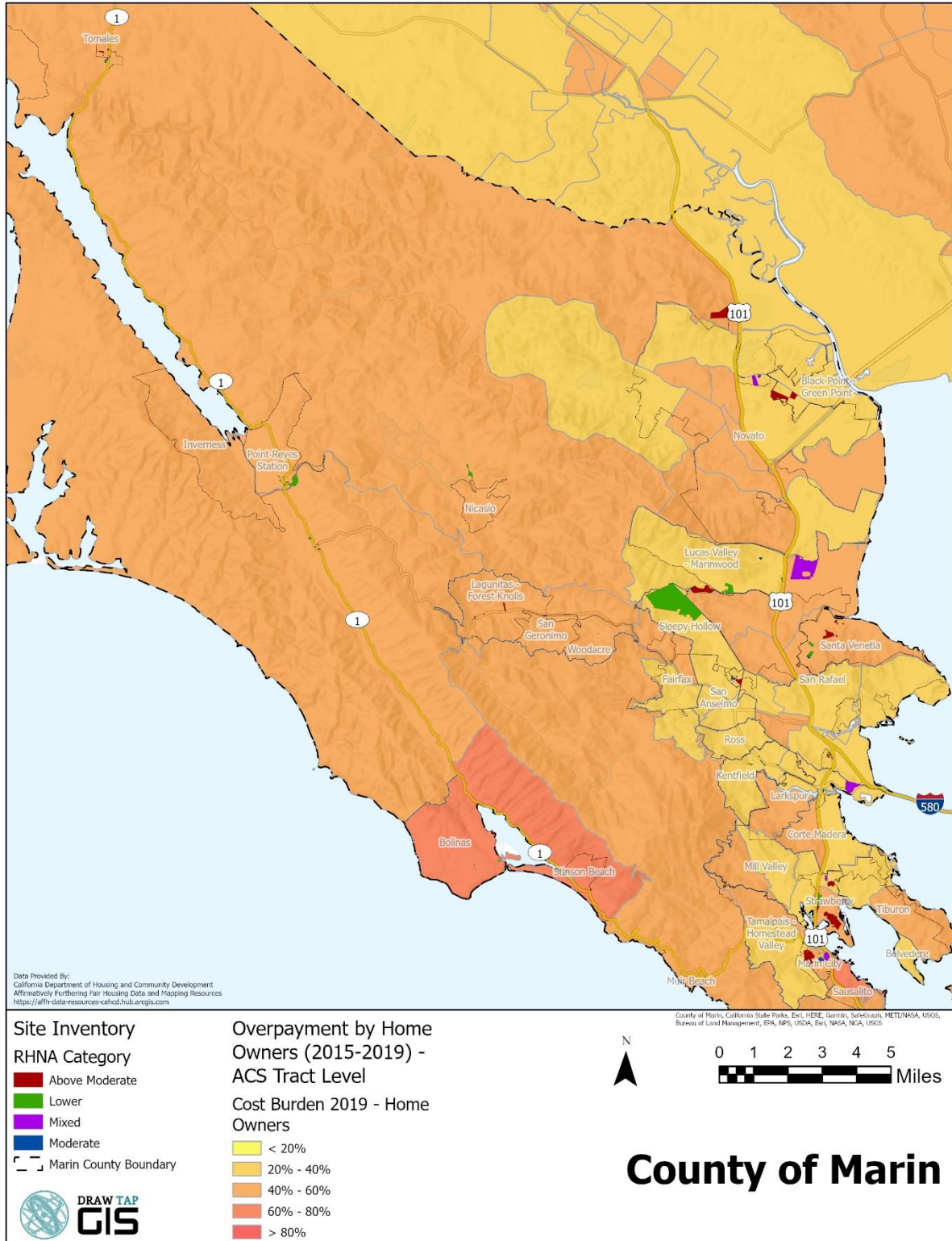**Figure D- 54**: *RHNA Unit Distribution by % Cost-Burdened Owners in Tract*

Table D- 46: **RHNA Unit Distribution by % Cost-Burdened Owners in Tract**

	Lower	Moderate	Above Moderate	Total RHNA Units
< 20 %	0.0%	0.0%	0.0%	0.0%
20% - 40%	38.9%	65.1%	30.0%	39.3%
40% - 60%	60.4%	34.9%	66.3%	59.0%
60% - 80%	0.7%	0.0%	3.8%	1.7%
> 80%	0.0%	0.0%	0.0%	0.0%
Total Units	1,850	505	1,305	3,660

Figure D- 55: **_RHNA Unit Distribution by % Overcrowded Households in Tract_**
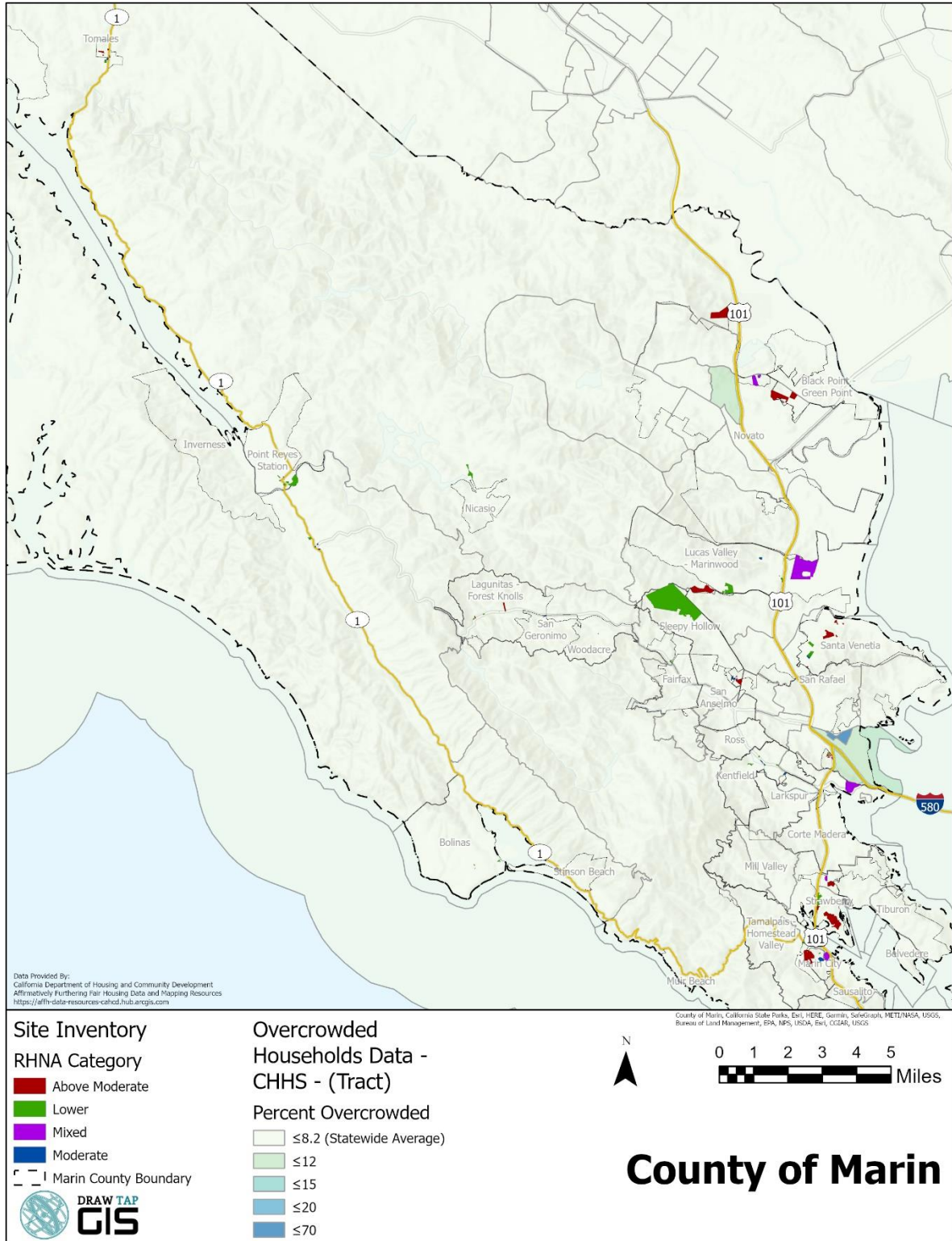
Table D- 47: *RHNA Unit Distribution by % Overcrowded Households in Tract*

	Lower	Moderate	Above Moderate	Total RHNA Units
≤ 8.2 (Statewide Average)	100.0%	100.0%	100.0%	100.0%
≤ 12%	0.0%	0.0%	0.0%	0.0%
≤ -5%	0.0%	0.0%	0.0%	0.0%
≤ 20%	0.0%	0.0%	0.0%	0.0%
≤ 70%	0.0%	0.0%	0.0%	0.0%
Total Units	1,850	505	1,305	3,660