

Appendix B - ASSESSMENT OF FAIR HOUSING

Public agencies, which includes all cities and counties, have the duty to affirmatively further fair housing (AFFH) as part of the agency's activities and programs relating to housing and community pursuant to Government Code Section 8899.50 et seq. This is an ongoing and continual obligation. Enactment of Assembly Bill 686 (2017) takes the AFFH duty further by requiring all housing elements due to be revised on or after January 1, 2021, contain an assessment of fair housing practices, an analysis of the relationship between available sites and areas of high or low resources, and concrete actions in the form of programs to affirmatively further fair housing. A housing element must contain AFFH components for:

Public Outreach: A diligent effort in the public participation process to include all community stakeholders, including individuals and organizations in the city and the region who represent lower income households, people in protected classes, and households with special needs.

Conduct an Assessment of Fair Housing: The housing needs assessment is to include an analysis of fair housing issues, existing patterns and trends of segregation and inclusion, and current fair housing issues. In the context of AFFH, segregation means there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.

The Housing Element Land Inventory: The City's inventory of available sites must be evaluated for consistency with affirmatively furthering fair housing. The analysis must include how particular sites will meet the needs of all households, and how segregated living patterns will be replaced by integrated and balanced patterns, transforming racially and ethnically concentrated areas of poverty to areas of opportunity.

Housing Element Programs: Explicitly address, combat, and relieve disparities resulting from past and current patterns of segregation to foster more inclusive communities, address disparities in housing needs and access to opportunity, and foster inclusive communities.

1. PUBLIC OUTREACH

As described Chapter 1, Introduction, the City engaged community members and stakeholders in several venues. The information obtained through public meetings, surveys, and stakeholder interviews, including the regional continuum of care, provide insight to the true needs of the community. More specifically, the City coordinated with the Continuum of Care network through Siskiyou County Health and Human Services during the process to engage the persons experiencing homelessness. The City interviewed caregivers, homeless youth programming staff, and received input from the individuals who are homeless. While the City's RHNA may be low, the actual need of the community may be much greater. Through the public participation process the City can identify what issues and obstacles people may be experiencing when trying to find housing.

2. ASSESSMENT OF FAIR HOUSING

California Government Code Section 65583 (10)(A)(ii) requires the City of Yreka to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. State Highway 263 consistently shows up as line of separation across numerous fair housing indicators. Generally, populations residing east of Highway 263 are more likely to live below the poverty line and less likely to own their homes.



The City of Yreka is not identified in the 2020 and 2021 TCAC mapping as an area of high segregation and poverty. There are mapped areas of high segregation and poverty in northwest and northeast Siskiyou County, however, these areas are outside the City limits and are not adjacent to the City. There are no racial and ethnic areas of concentrated poverty (R/ECAP) in the City or Siskiyou county. There are no areas in Yreka that were identified in the homeowners loan corporation (HOLC) redlining grade created during the New Deal Era, a federal government sponsored program that implemented housing segregation and discrimination.

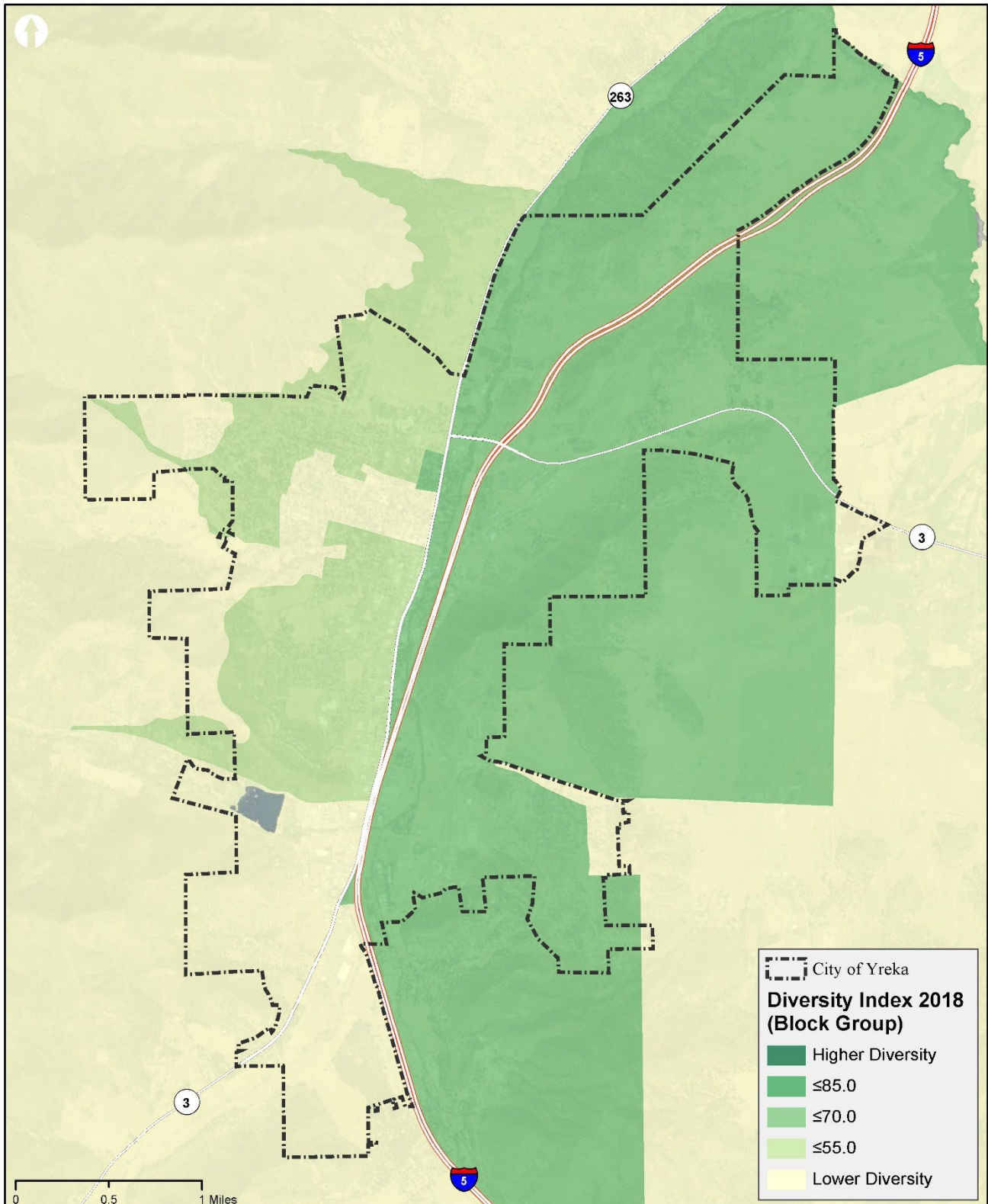
2.1. INTEGRATION AND SEGREGATION PATTERNS

To assess where there may be geographic patterns of segregation and integration, the City analyzed four characteristics: race and ethnicity, disability, income and familial status.

As shown in Figure 1, Diversity Index 2018 Block Group, the population residing east of State Highway 263 is more diverse with Diversity Index score of 58 whereas areas west of State Highway 263, are less diverse with Diversity Index scores of 44 (indicated with the light green shading) and 36 (yellow).¹ The pattern of the City's diversity index scores largely extend to the unincorporated areas adjacent to the City limits. The diversity scores of the unincorporated areas generally decrease as the distance from the City limits increase, indicating the City is more diverse. Where diversity decreases, residents tend to be White, non-Hispanic. The 2020 geographic diversity pattern is similar to the pattern in 2010 with the area east of State Highway 263 being more diverse. The map of Neighborhood Segregation (Figure 2) shows geographic areas where groups have more than 10 percent representation within a given Census tract. For Yreka the data indicates the "3 Group Mixed" has the largest geographic distribution in Yreka: most of the area east of State Highway 263 and Fairchild Medical Center neighborhoods. The downtown area is "Other-White", and the western edges of the City and neighborhood south Greenhorn Road and south of the convergence of State Highway 3 and Interstate 5 are "Mostly White". The patterns of neighborhood segregation occurring in the City continue outside the City limits, although further away from the City the population is increasing White, non-Hispanic. This pattern is consistent with the Table A-5 which shows 90.4 percent of residents of the County are White to the City's 85.8 percent. The City's greater diversity relative to the unincorporated area is consistent with the racial and ethnic composition data presented in Table A-5 in Appendix A. The data for ethnic distribution (Figure 3) presents a scattered distribution pattern, with areas where 20 percent or less are non-white being adjacent to areas where 61 percent or more of residents are Non-White. The largest concentration of

Persons with disabilities are more likely to reside east of Highway 263 and in the neighborhoods surrounding the Fairchild Medical Center. In these geographic areas more than 22 percent of the population have a disability, as shown in Figure 4. Approximately 17 percent of residents in the downtown area have a disability. The geographic areas having the lowest percentage of persons with disabilities are west of downtown and the Fairchild Medical Center neighborhood, neighborhoods that are west of Interstate 5 and south Greenhorn Road, and the Campbell Avenue neighborhood.

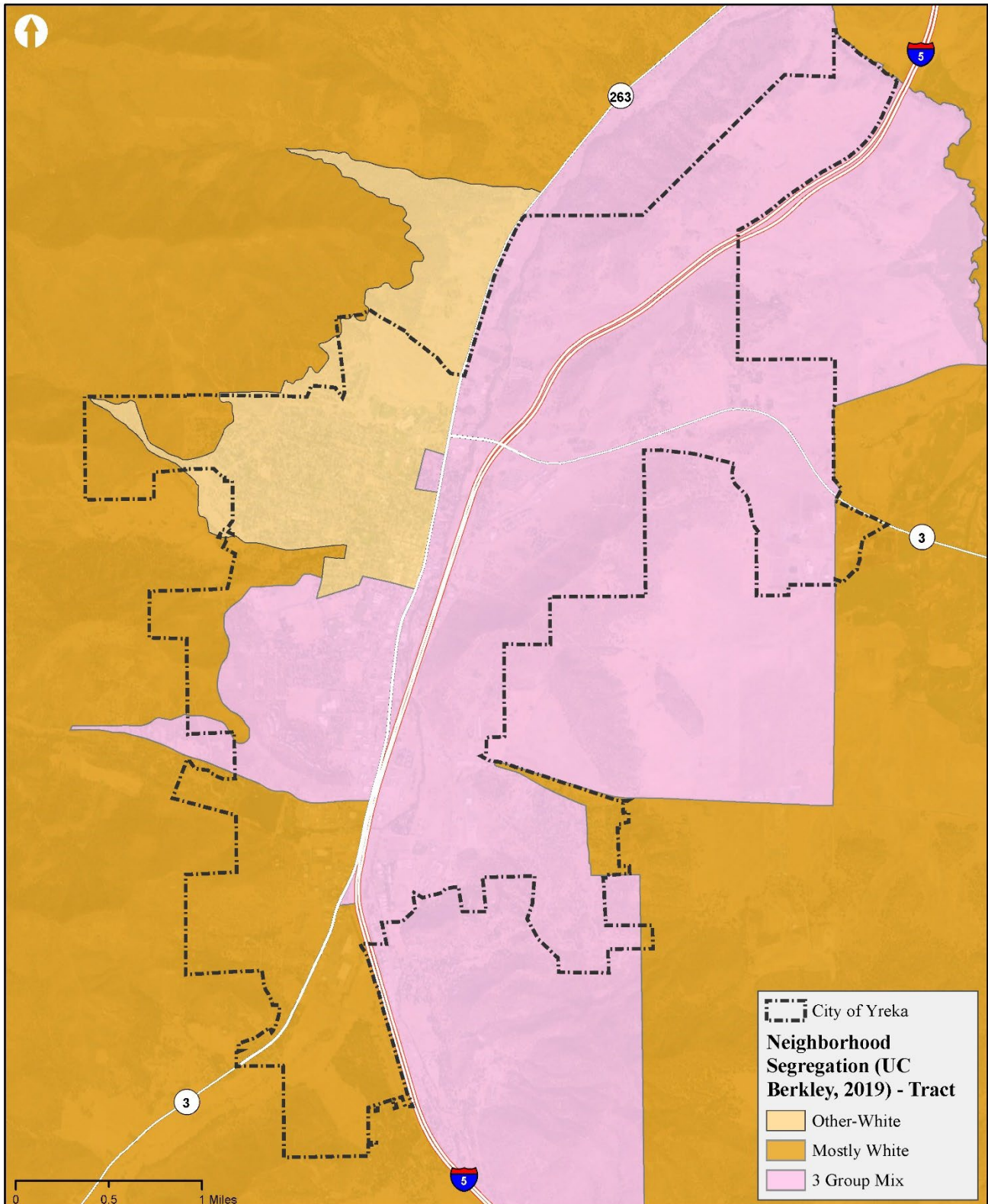
The City also assessed incomes measures as household income is a critical variable affecting the ability of households to access housing. Figure 4 presents median income by Census block groups. Figure 4 shows the geographic extent of households having a median income between \$30,000 to less than \$50,000 to be the largest: residents living east of State Highway 263 (except for the Campbell Avenue neighborhood), the Fairchild Medical Center neighborhoods, and southeastern downtown neighborhoods. The household income for all other geographic areas is between \$55,000 and \$87,100. When Figure 4's data is compared to concentrations of poverty (Figure 5), similar patterns are observed: Figure 5 shows a greater percentage of Yreka residents, 20 to 30 percent, fall below the poverty line reside east of State Highway 263 and in Fairchild Medical Center neighborhoods.² While a lower percentage of residents live at or below poverty line, 10 to 20 percent, reside in the neighborhoods



**City of Yreka
Diversity Index**

Figure 1

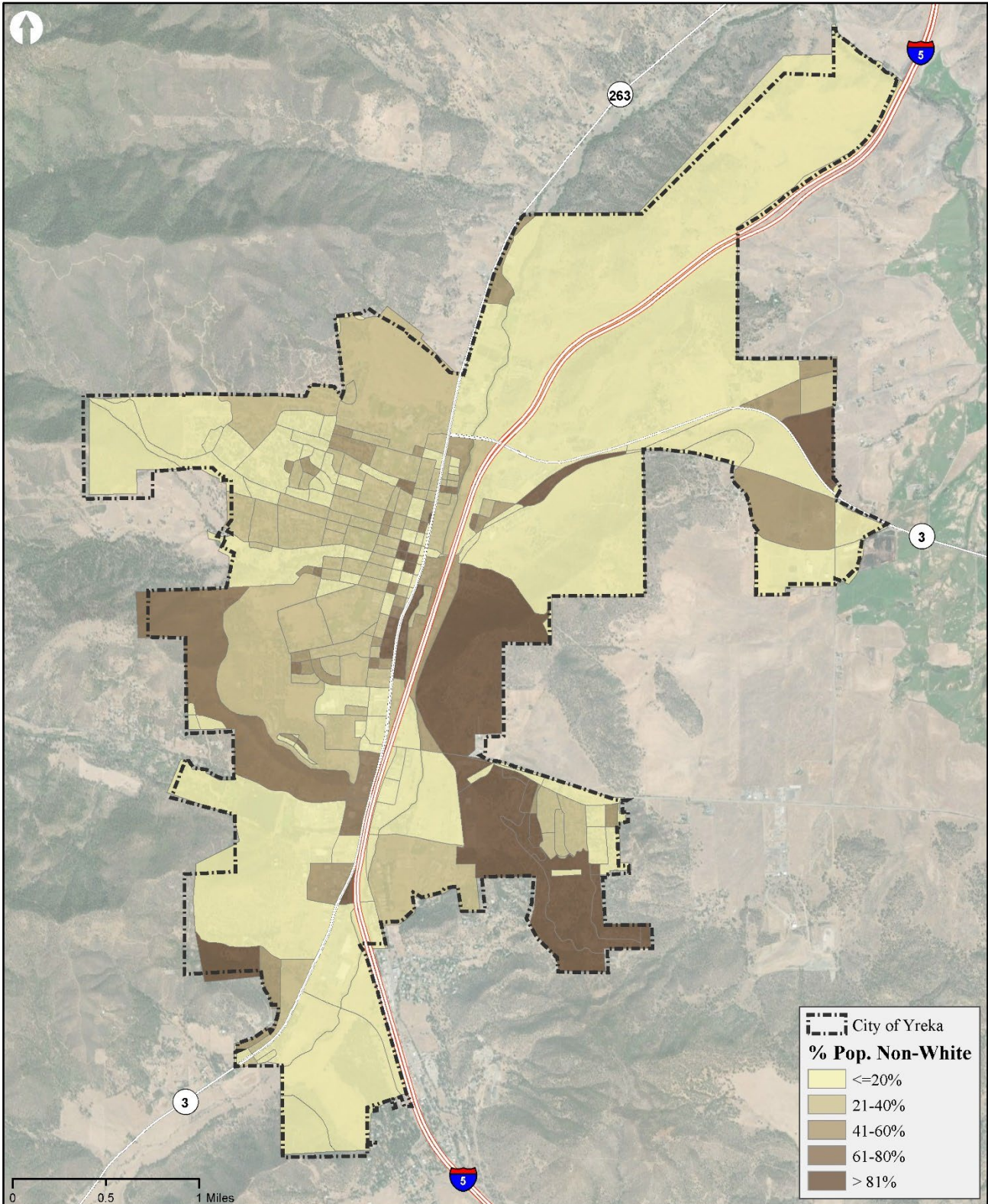
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**City of Yreka
Neighborhood Segregation**

Figure 2

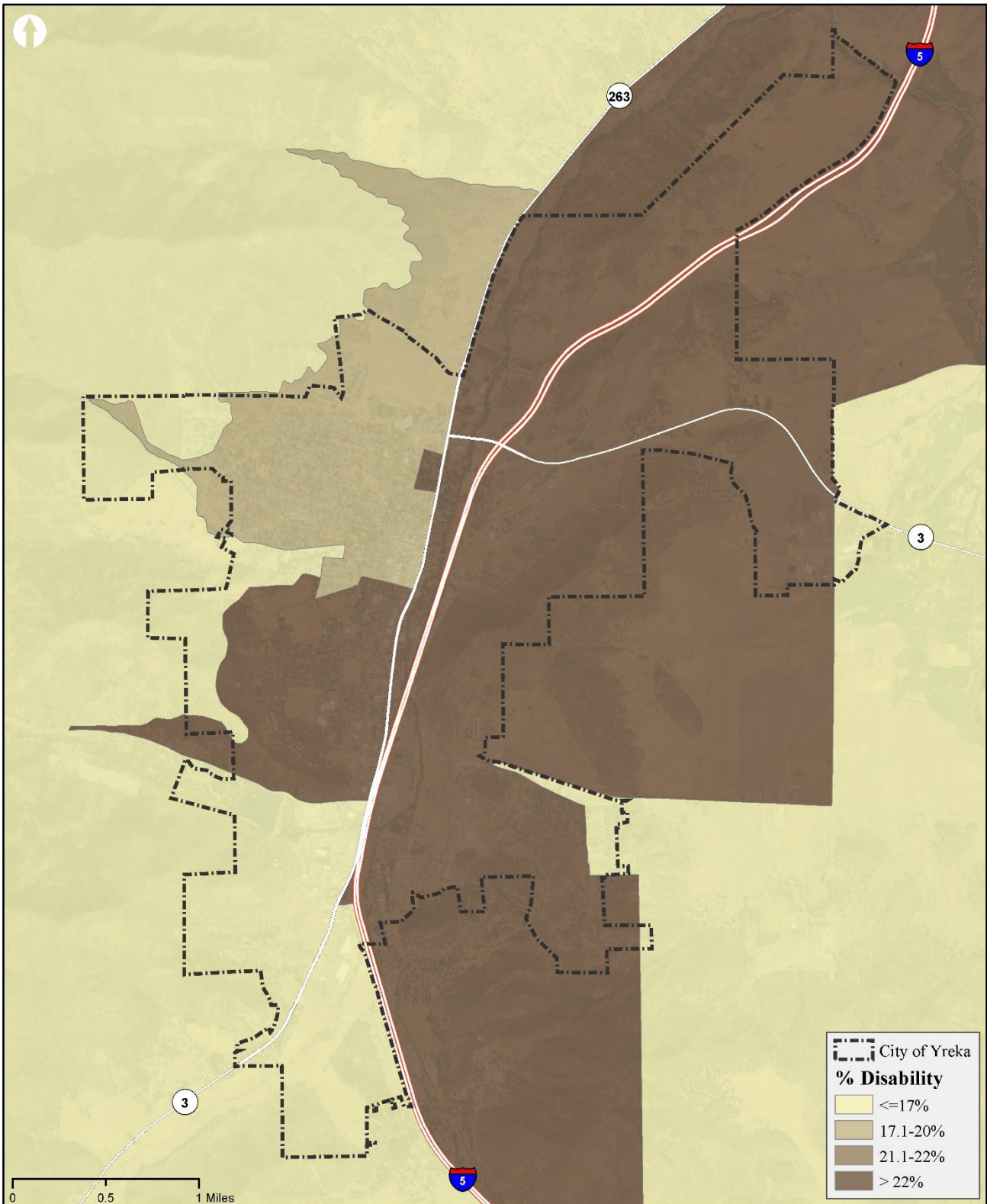
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**City of Yreka
Ethnic Population Distribution - Percent Non-White**

Figure 3

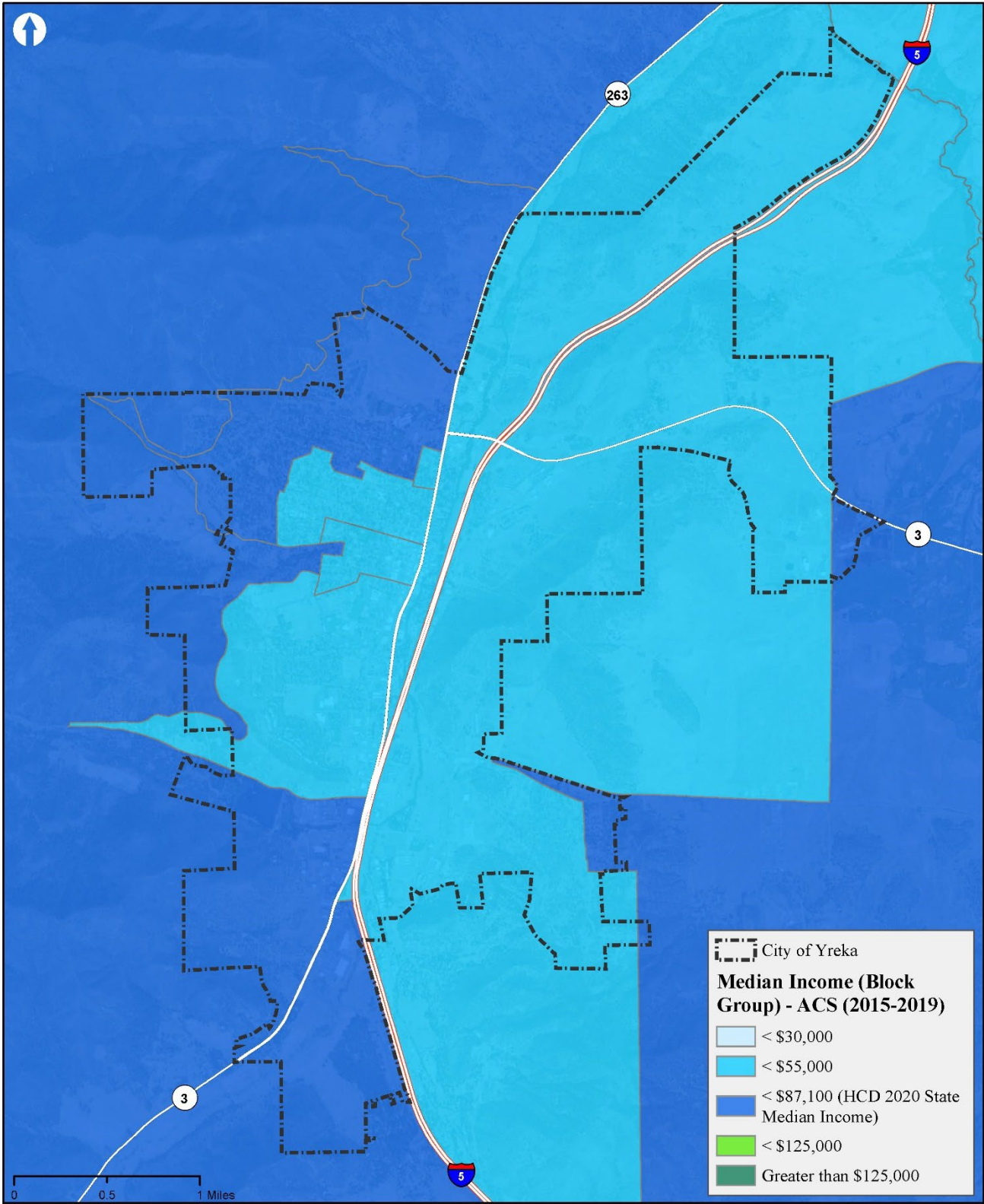
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**City of Yreka
Percent of Population With a Disability**

Figure 4

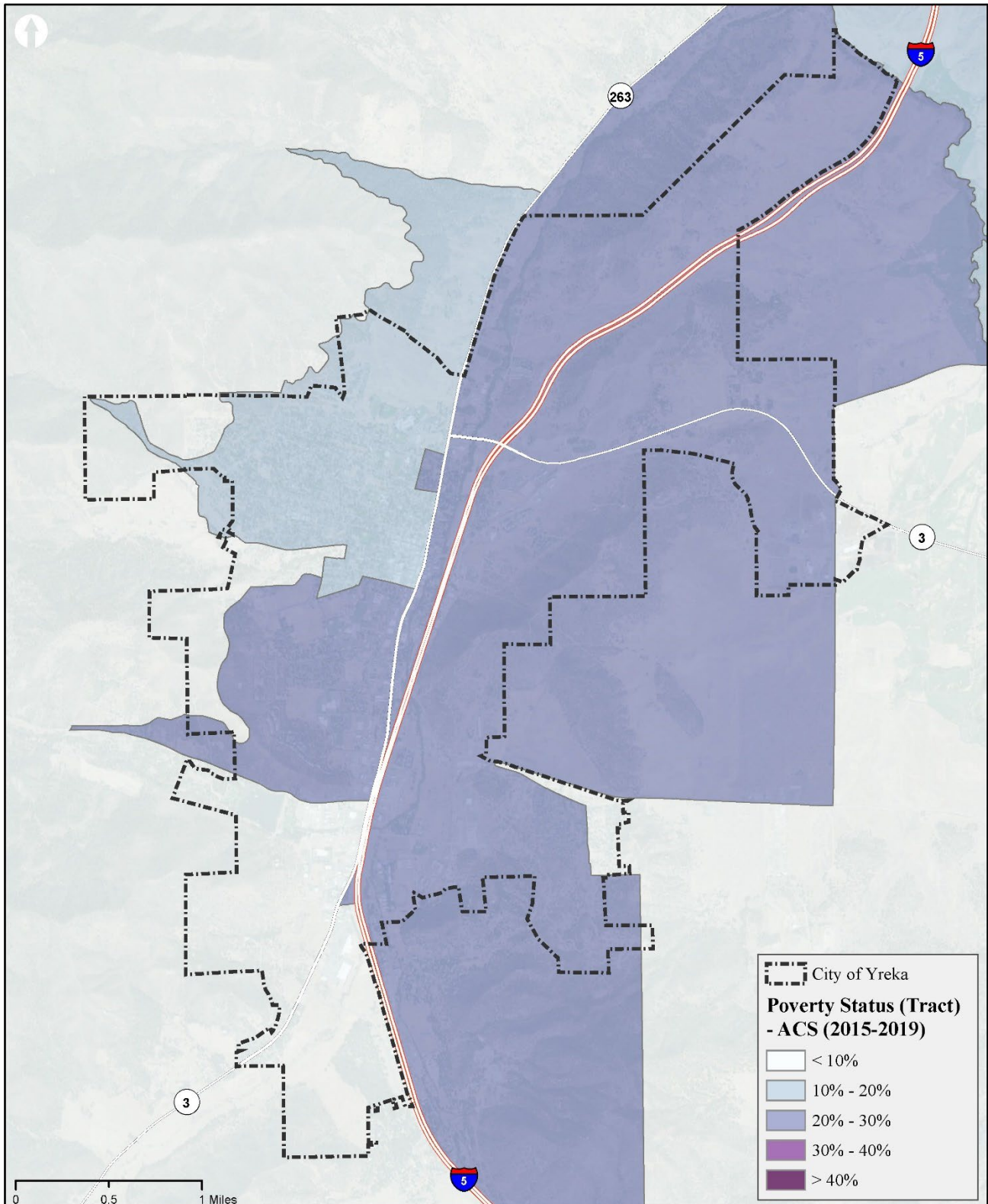
Map Date: 3/28/2022



**City of Yreka
Median Income**

Figure 4.B

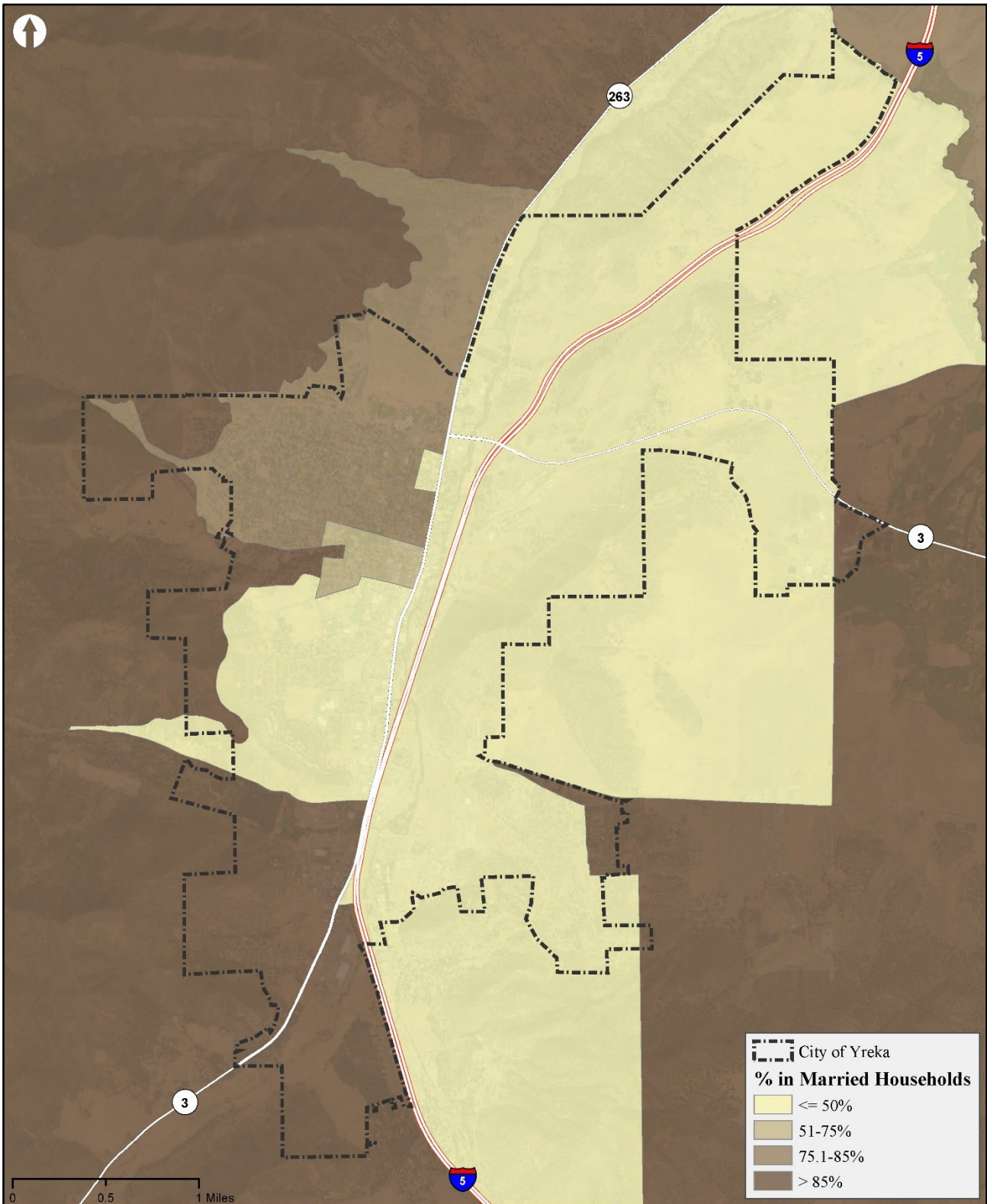
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**City of Yreka
Poverty Status**

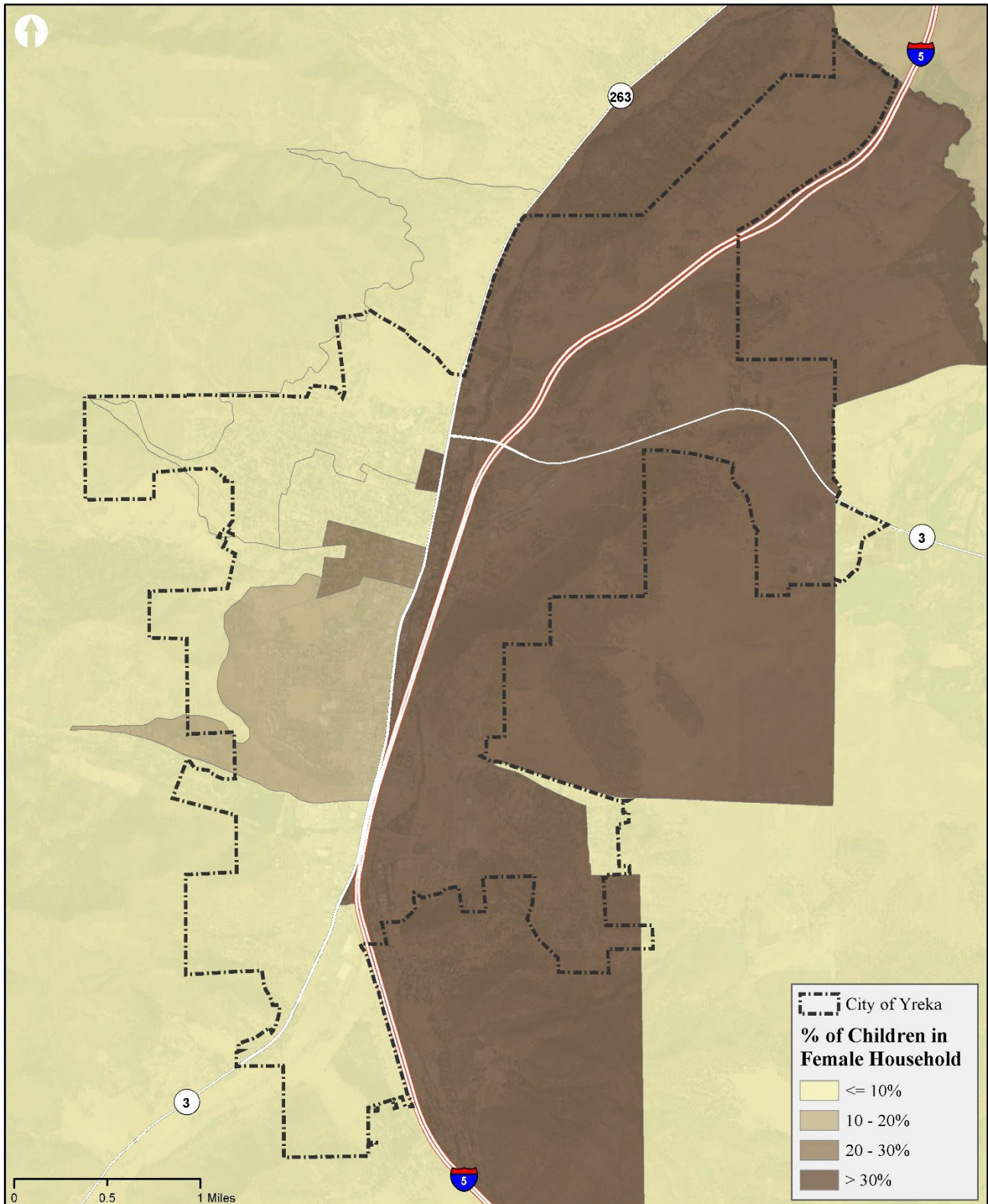
Figure 5

Map Date: 6/9/2022



City of Yreka
Percent of Children in Married-Couple Households

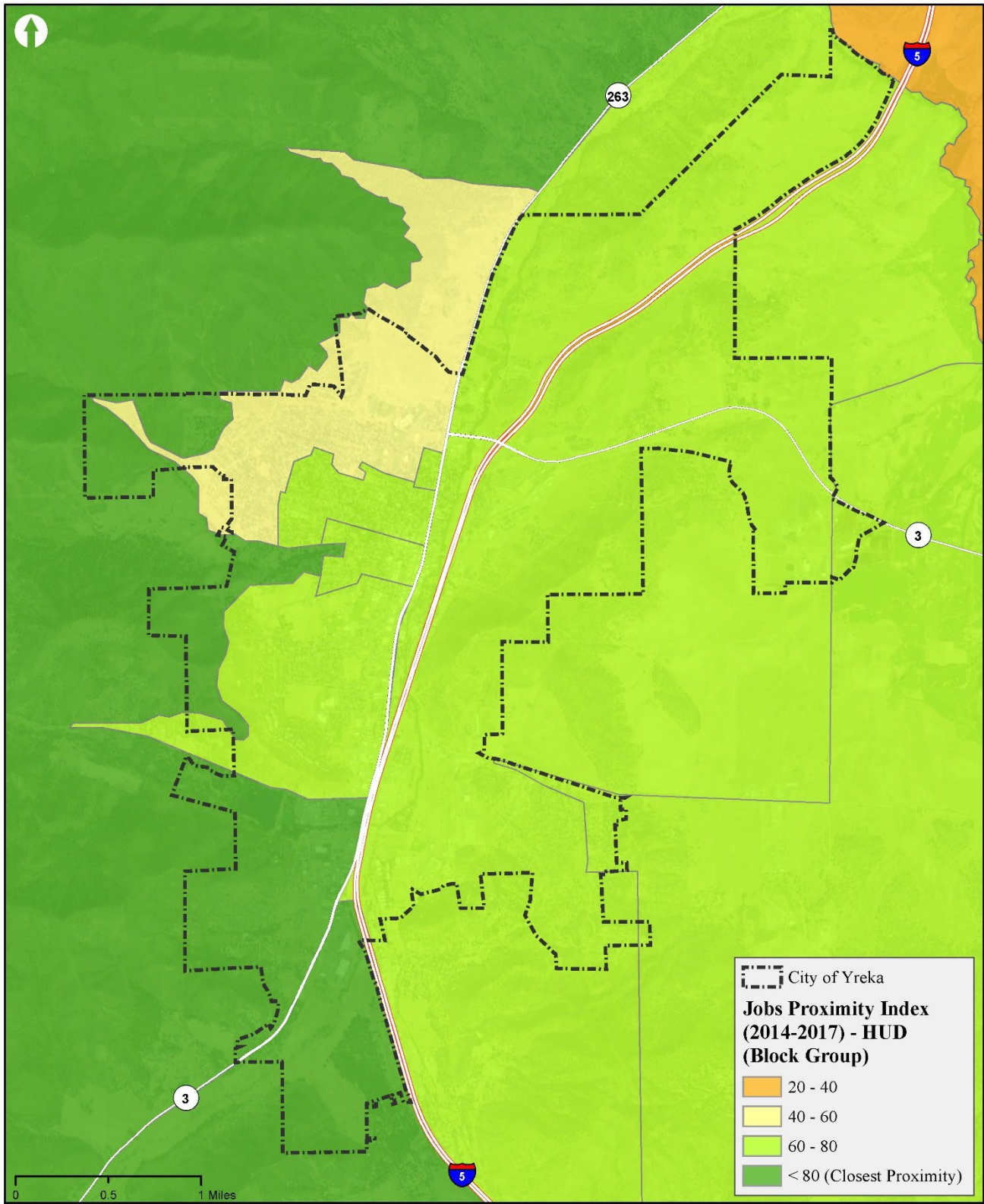
Figure 6
Map Date: 3/28/2022



**City of Yreka
Percent of Children in Female Headed Households**

Figure 7

Map Date: 4/15/2022



**City of Yreka
Jobs Proximity Index**

Figure 8

Map Date: 6/10/2022

in Yreka's downtown, this is another geographic concentration. In the neighborhoods south of Greenhorn Road and west of State Highway 3, and at the City's western edge, less than 10 percent of residents fall below the poverty line in these neighborhoods. Much of Yreka is considered a low-income community because the median income is 80 percent or less of the statewide median income. Table A-7 reports a significant difference in the median incomes of owners and renters: \$53,611 and \$29,662 both of which are less than 80 percent of the statewide median income of \$78,672 as 2022. This data is consistent with Table A-8 "Households by Income Group, 2019", which indicates nearly 38 percent of Yreka residents are low income with an annual income that does not exceed \$33,987, 20 percent of residents are moderate income and 43 percent are above moderate income.

As presented in Table A-6, Appendix A, families comprised a majority of households in Yreka in 2020, although the total number of family households declined from 2010. In 2020, a greater percentage of married-couple family households had children: 25 percent in 2010 and 27 percent in 2020. With respect to geographic distribution, married-couple households with children are most likely to reside west of State Highway 263, except for the Fairchild Medical Center neighborhoods, and in neighborhoods southerly of the convergence of State Highway 3 and Interstate 5 as shown in Figure 6. As discussed in Appendix A, the total number single-parent households was nearly identical in 2010 and 2020 but the number and percentage of female householders, no spouse, and female householders, no spouse, with children relative to all family households declined from 2010 to 2020. Over 30 percent of children who live in female headed-households, no spouse, are geographically concentrated in the area east of State Highway 263 (except for the Campbell Avenue neighborhoods where less than 10 percent of children live in female headed households, no spouse), as illustrated in Figure 7. In the southeast downtown neighborhoods, 20 to 30 percent of children reside in female headed-households, no spouse. In the neighborhoods around Fairchild Medical Center, 10 to 20 percent of children reside in female headed-households, no spouse.

Generally, many Yreka residents live in relative close proximity to jobs according to Figure 8. Residents of downtown neighborhoods have the furthest proximity to jobs, meaning these residents have the longest (as measured by distance) commute to reach jobs. This data indicates the northwestern portion of the City has a lowest number of job centers relative to the rest of the City. Overall, Yreka residents have relative low commute times with 88 percent of Yreka residents commuting less 30 minutes to their job, as indicated in Table A-10 in Appendix A.

As shown in Table A-28 of Appendix A, in 2019 the City of Yreka has a vacancy rate of 1.5 percent for rental units and there were no vacant ownership units. The 2019 vacancy rates are consistent with 2000 and 2010 rates, with the rate for rentals decreasing from 3 percent in 2000 to 2019's rate of 1.5 percent. These are extremely low vacancy rates. As presented in Table A-27 in Appendix A, detached single family units make up 61 percent of the City's housing stock, and nearly 60 percent of the housing units are owner occupied. The combination of extremely low vacancy rates, the fact that detached single family detached are the most common type of housing unit, and that most units are owner occupied indicates little room for mobility and high demand for the affordable units there are.

2.2. ACCESS TO OPPORTUNITY

The California Tax Credit Allocation Committee (TCAC) Opportunity Areas mapping is an approach "to measure and visualize place-based characteristics linked to critical life outcomes, such as educational attainment, earnings from employment and economic mobility" ([Methodology for the 2021 TCAC/HCD Opportunity Map](#), pg. 1). The indicators indexed include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental



pollutants, among others. Moderate resource areas have access to many of the same resources as high and highest resource areas but may have longer commutes to places of employment, lower median home values, fewer educational opportunities, or other factors that lower their indices for economic, environmental, and educational indicators. Areas of high segregation and poverty are those that have an overrepresentation of people of color compared to the County, and at least 30 percent of the population in these areas is below the federal poverty line (\$26,200 annually for a family of four in 2020). Geographic areas with higher resource scores indicate areas that support positive economic, educational, and health outcomes for low-income families. HCD recommends jurisdictions consult these maps as part of their AFFH analysis to help identify opportunity areas to locate and prioritize affordable housing. The maps are used by TCAC to evaluate and rank funding application for housing.

Economic Domain

The TCAC economic domain considers poverty, education attainment of the adult population, proximity to jobs job and median home value indicator. For Yreka, the most positive economic outcomes are likely for populations residing on the western side of the side as shown in green in Figure 9. Consistent with other socio-economic patterns discussed earlier, populations residing in and near Fairchild Medical Center and east of State Highway 263 (except for the neighborhood south of Campbell Avenue), have least positive outcome.

Education Domain

For the education domain, the TCAC factors math and reading proficiency, high school graduation rates, and student poverty. While Figure 10 illustrates the 2020 TCAC data, 2021 data has since been published. The newer TCAC data indicates the likelihood of positive outcomes in the education domain across the City decreased from 2020 to 2021. This decline may reflect the challenges of virtual-teaching for both educators, students, and families during the COVID-19 pandemic.

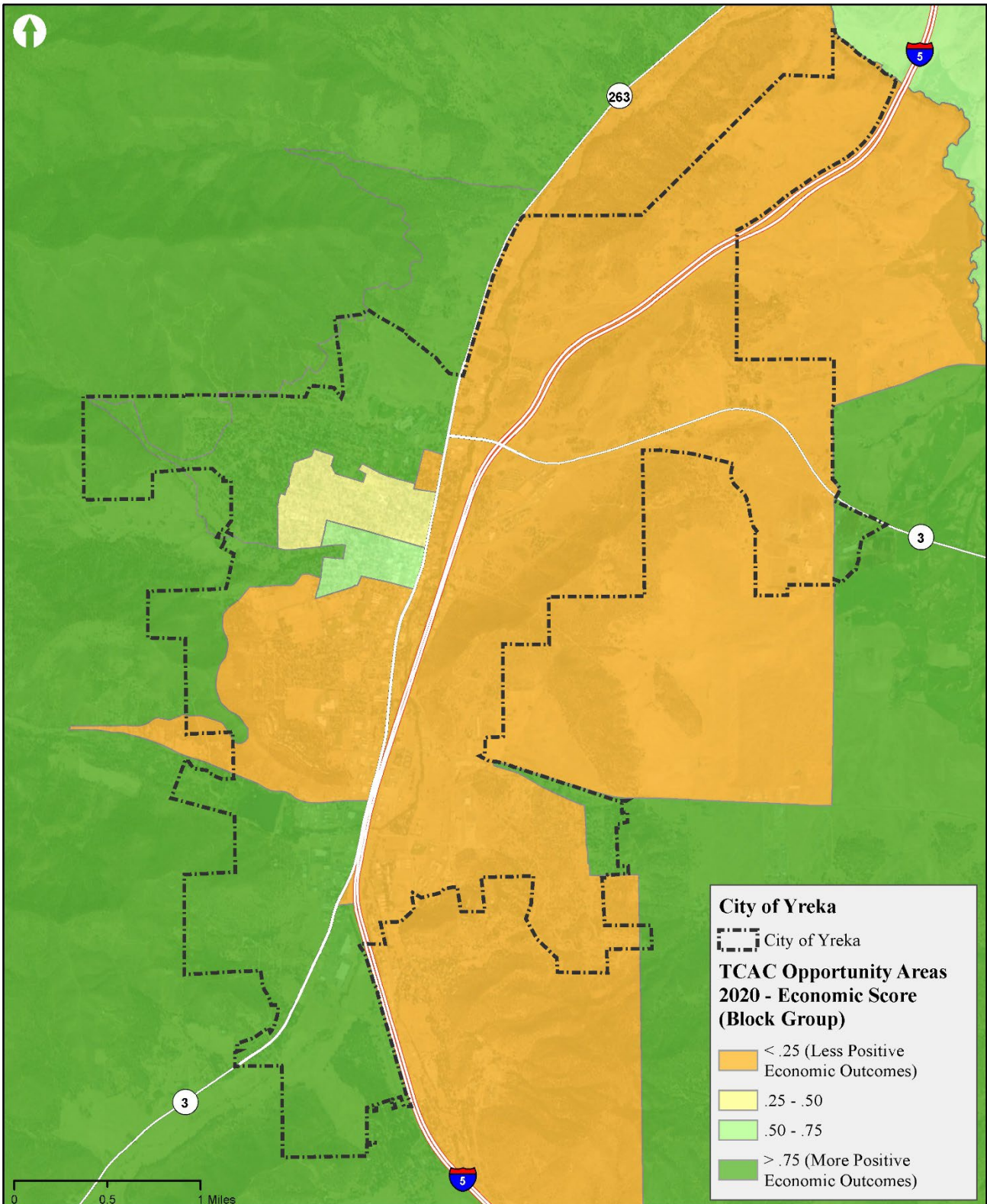
Environmental Domain

This domain relies on twelve of the indicators that are used in the California Office of Environmental Health Hazard Assessment (OEHHA)’s CalEnviroScreen 3.0 tool which are subcomponents of the “pollution burden”. The twelve indicators are grouped into two categories, “exposure” and “environmental effects”:

Exposure indicators:	Environmental effects indicators:
1. Ozone Concentrations	8. Cleanup Sites
2. PM2.5 Concentrations	9. Groundwater Threats
3. Diesel PM Emissions	10. Hazardous Waste Generators and Facilities
4. Drinking Water Contaminants	11. Impaired Water Bodies
5. Pesticide Use	12. Solid Waste Sites and Facilities
6. Toxic Releases from Facilities	
7. Traffic Density	

The ranking of outcomes in the environmental domain are illustrated in Figure 11. Yreka’s downtown neighborhoods are ranked as having the most positive environmental outcomes. Most neighborhoods lying east of State Highway 263 and in and around Fairchild Medical Center ranked below the downtown neighborhoods. Neighborhoods in the western edges of the City, south of the convergence of State Highway 3 and Interstate 5 and south Greenhorn Road were ranked to have the least positive outcomes.

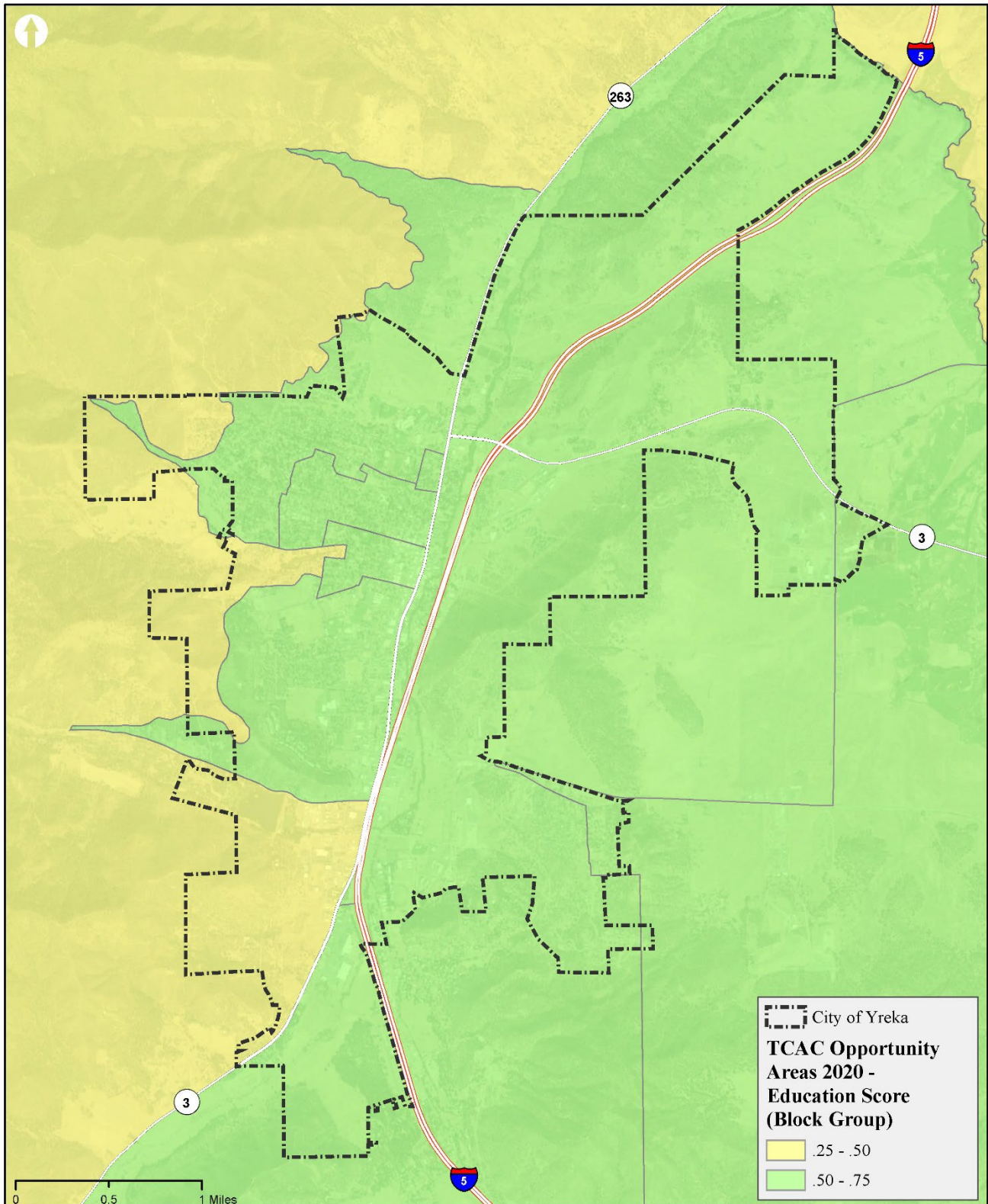




**City of Yreka
TCAC Opportunity Areas - Economic**

Figure 9

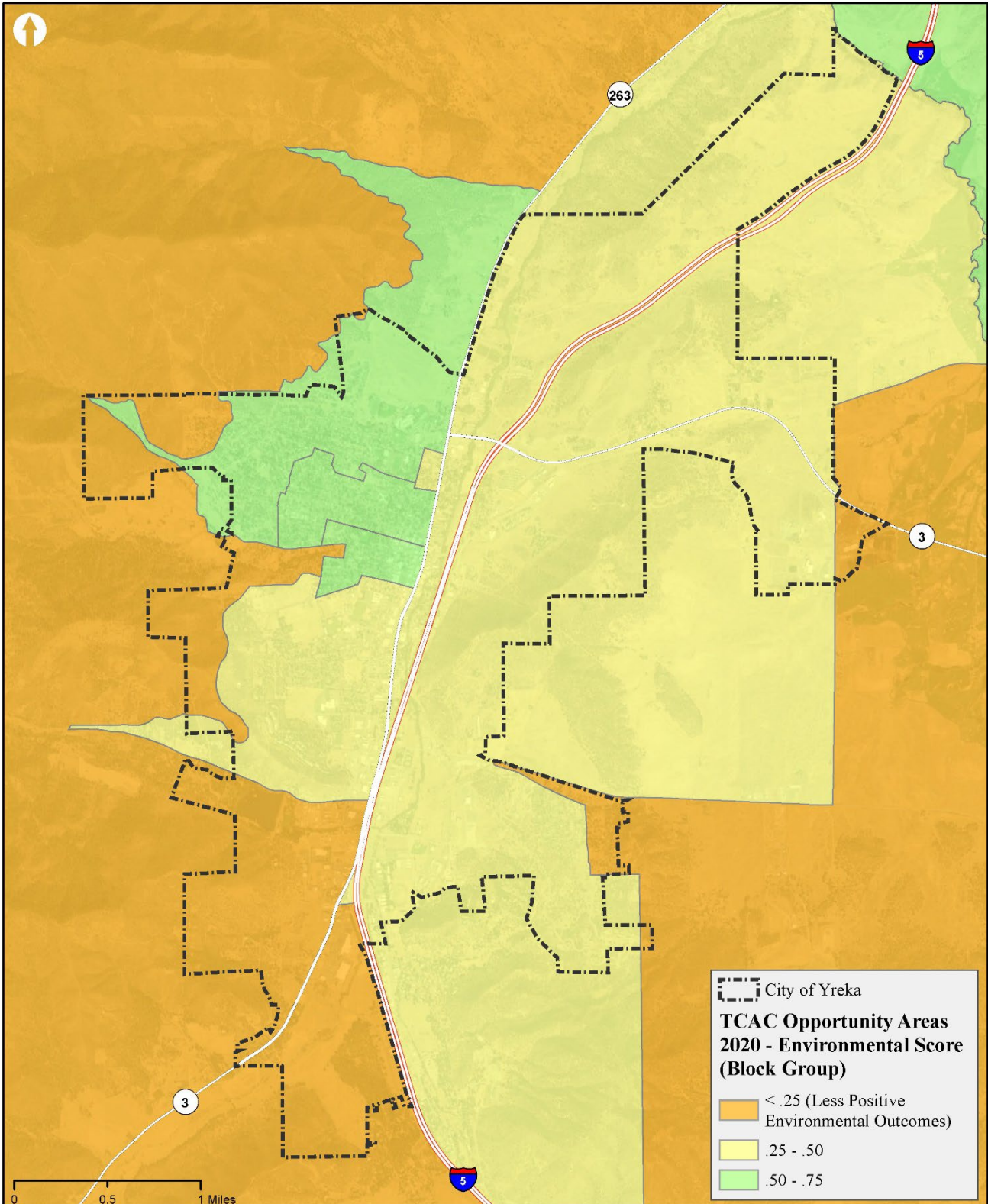
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**City of Yreka
TCAC Opportunity Areas - Education**

Figure 10

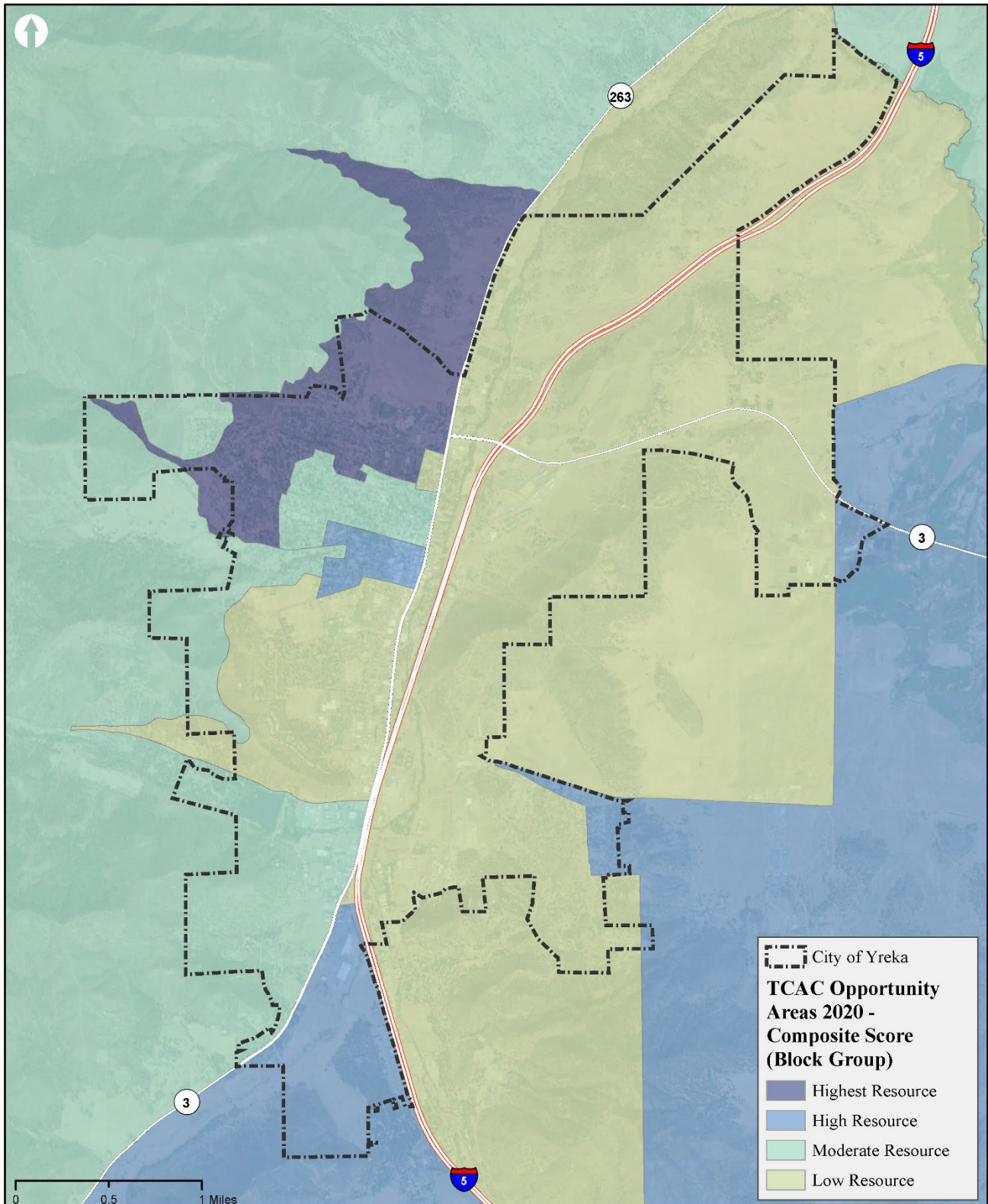
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**City of Yreka
TCAC Opportunity Areas - Environmental**

Figure 11

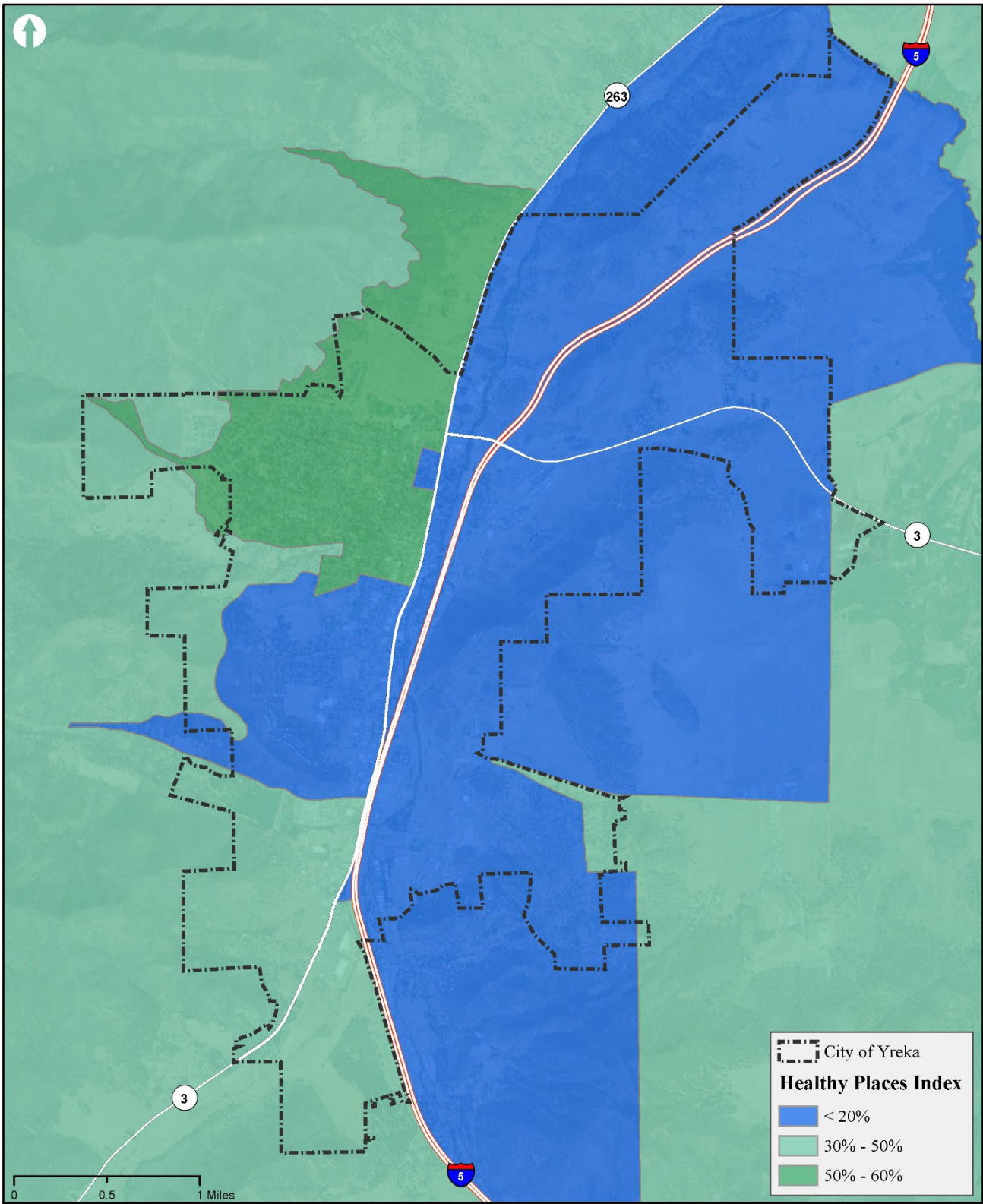
Map Date: 6/9/2022



**City of Yreka
TCAC Opportunity Areas - Composite**

Figure 12

Map Date: 6/9/2022



**City of Yreka
Healthy Places Index**

Figure 12.B

Map Date: 7/6/2022

Areas of Opportunity

According to the 2020 TCAC Opportunity Areas (Figure 12), the Highest, High and Moderate resource areas all occur west of State Highway 263, with almost the entirety of the area east of Highway 263 identified as Low Resource, except for the neighborhood located south of Campbell Avenue and east of the Casino. The TCAC mapping identifies the Highest Resource area as the northern and western portions of Yreka's historic downtown that lie west of State Highway 263, as shown on Figure 12. The Highest Resource area is contiguous and extends northerly outside City limits. There are three High Resource areas. The largest is southerly of the convergence of State Highway 3 and Interstate 5. The other High Resource areas are the 1) the neighborhood sandwiched between Lane and French streets that is west of State Highway 263; and 2) and south of Campbell Avenue. The measured as Low Resource is most areas lying east of State Highway 263 and in and around Fairchild Medical Center. While the two tracts used by the Health Places Index (HPI) includes unincorporated greater Yreka, they include a significant portion of the City. As shown on Figure 12.B, the HPI data further indicates downtown Yreka and westward, have socio-economic attributes indicating it is an area of higher opportunity:

- 100 percent of the households have housing with complete kitchens and plumbing, whereas the eastern tract 95.1 percent of households are residing in dwellings with complete kitchens and plumbing.
- 20 percent of the population older than 25 have bachelor's education or higher, whereas 16.3 percent of the population have attained at least bachelor's education.
- 91 percent of the population residing in the western tract have automobile access, compared to 84 percent of the population residing in the eastern tract. Reduced automobile affects mobility for jobs, access to basic goods and services, and overall affect access to opportunities, especially if public transit options are limited
- Nearly 99 percent of the population residing in the western tract have access to nearby parks and other open spaces; whereas nearly 61 of the population of access to nearby parks for the eastern tract.
- The reported employed percentage for the two tracts is nearly identical: 66.3 percent of the population residing in the eastern tract being employed, and 66.2 percent of those residing in the western tract being employed.³

The HPI scores depicted on Figure 12.B are a composite of the indicators discussed above and additional variables. The tract that is blue overall has healthier community conditions than 22 percent of other California tracts. The dark green tract that covers the northern part of the City has healthier community conditions than nearly 51 percent of other California tracts. The overall community health conditions are nearly 42 percent better than other tracts in California for areas that are green. The programs in Chapter 2 aim to not only improve access to opportunity in the higher resource areas of the City, the programs seek to improve conditions in areas that have lower resource attributes. The programs include changes to the City's land use regulations to remove regulatory and procedural barriers to housing production and allowing more diverse types of housing by-right. Not only will the City take an active role to partner with housing developers, but it will improve the information available about ADU and SB 9 housing developments for property owners. Uniformly this information will be made available on the City's website. The programs commit the City to applying for funding for workforce and affordable housing development but also for an owner-occupied rehab program that is oriented to property owners and correcting housing conditions.

2.3. DISPROPORTIONATE HOUSING NEED AND DISPLACEMENT RISK

The AFFH analysis needs to report the community's housing problems especially for low income households. The data indicate many households are cost burdened, and some households are living in units that do not have



adequate kitchen or plumbing. The four housing problems considered are listed below, and in Yreka, 23 percent of households are experiencing at least one of the following housing problems:

1. Incomplete kitchen facilities;
2. Incomplete plumbing facilities;
3. More than 1 person per room (also referred to as overcrowding); and
4. Cost burden greater than 30 percent.

Housing Habitability

The first two factors are not reported at the city level, rather the data is reported at the broader Census tracts as part of the California Healthy Place Index (<https://map.healthyplacesindex.org>, accessed July 6, 2022). This tract that contains a significant portion of eastern Yreka, and 95 percent of households have basic kitchen facilities and plumbing. In comparison to households in Siskiyou county and the State, there are a lower percentage of households in this tract with complete kitchens or complete plumbing: in Siskiyou county 98 percent of households have basic kitchens and plumbing and in the State 98.7 percent of households having basic kitchen and plumbing. To address habitability issues, the Housing Element includes a program committing the City to seeking funding to develop an owner-occupied rehabilitation program that would provide low-interest loans, grants, labor, or materials to assist low-income, older adults, or residents with disabilities make needed home repairs.

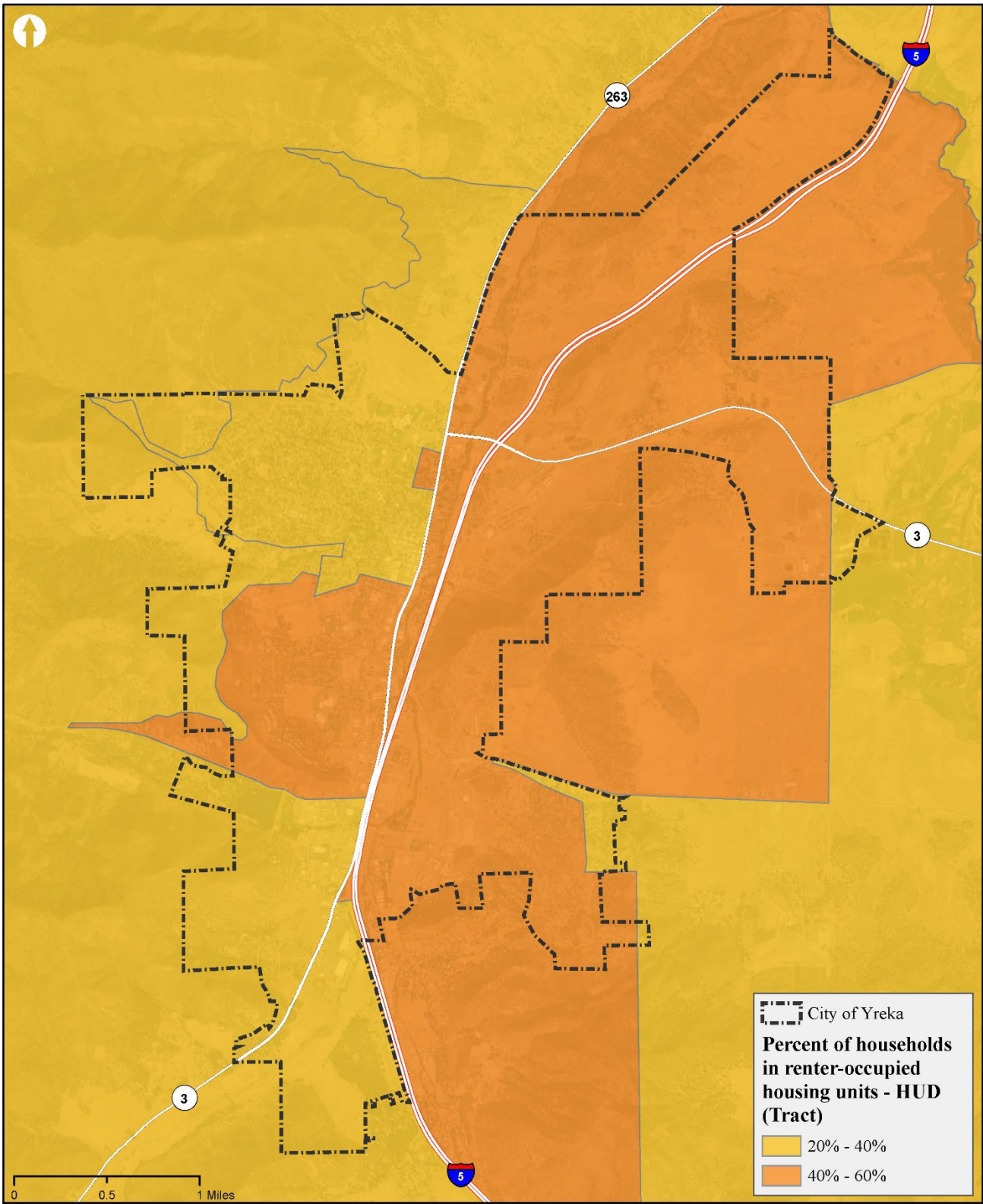
Overcrowding

Overcrowding is defined by the US Census as more than 1.01 persons per room. Severe overcrowding occurs when there are more than 1.5 persons per room. Table A-32 illustrate the number and percentage of units in the city according to occupants per room. Less than 1 percent of owner-occupied housing units and less than 2 percent of renter-occupied units were either overcrowded or severely overcrowded in 2019. Although there are some households experiencing overcrowding, these numbers show that both overcrowding and severe overcrowding does not appear to be an issue in the City. While mapping that specifically depicts the geographic distribution of overcrowding in Yreka is not currently available, Figure 13 "Percentage of households in renter-occupied housing units" can be consulted. Figure 13 shows there are renter households in all Yreka neighborhood ranging from 20 to 60 percent. The greater percentage, 40 to 60 percent, being the neighborhoods east of State Highway 263 (except for south of Campbell Avenue) and neighborhoods in and around the Fairchild Medical Center.

Cost Burden

While the median gross rent for Yreka and surrounding area is less than \$1,000 a month, the American Community Survey data indicate 40 to 60 percent of renter households pay 30 percent or more of their household income to rent (see Figure 14). This indicates while Yreka rents may be low relative to other communities, renter annual median income is less than \$30,000, as indicated above, and household incomes are not adequate.

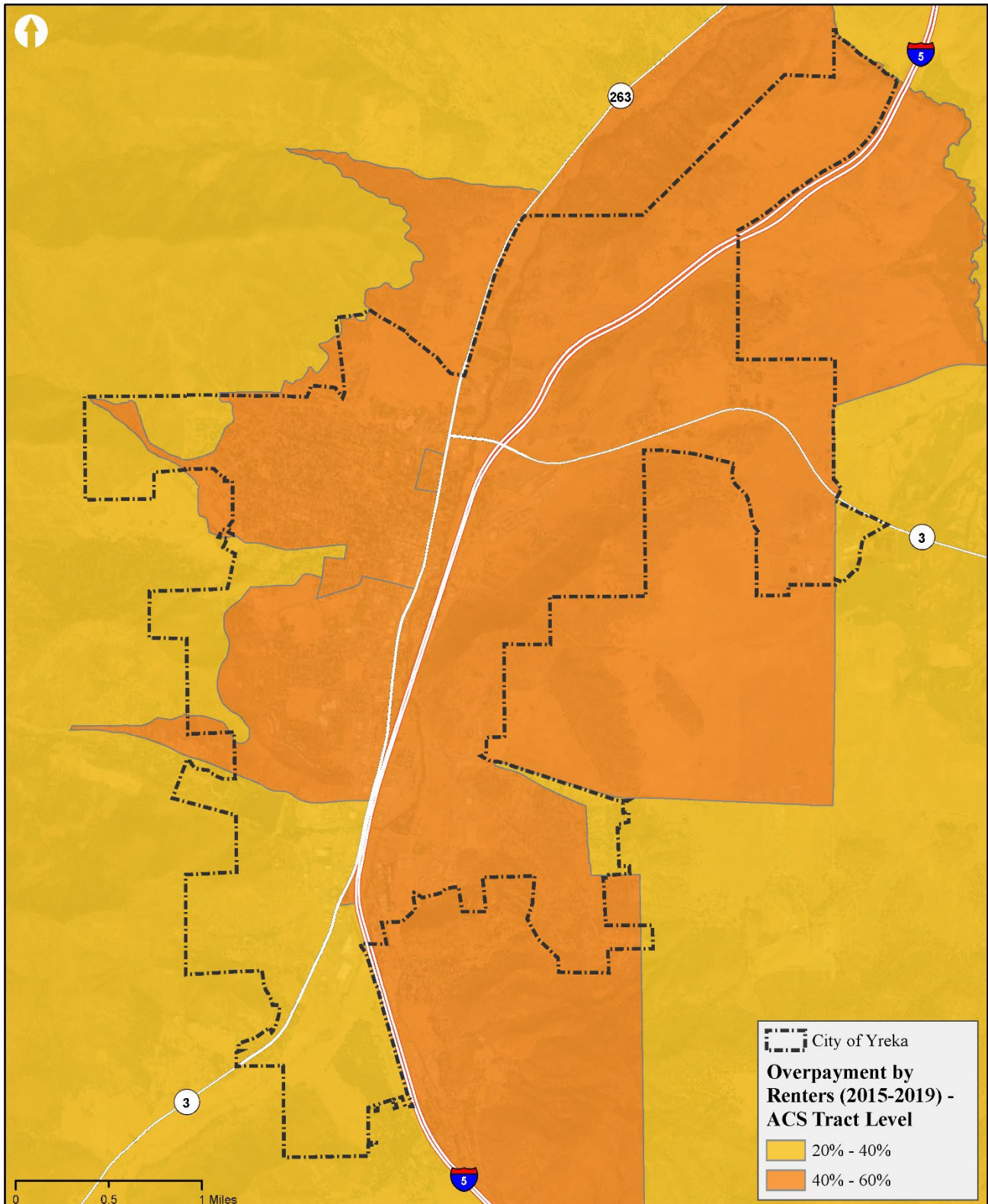




**City of Yreka
Renter Occupied Housing Units**

Figure 13

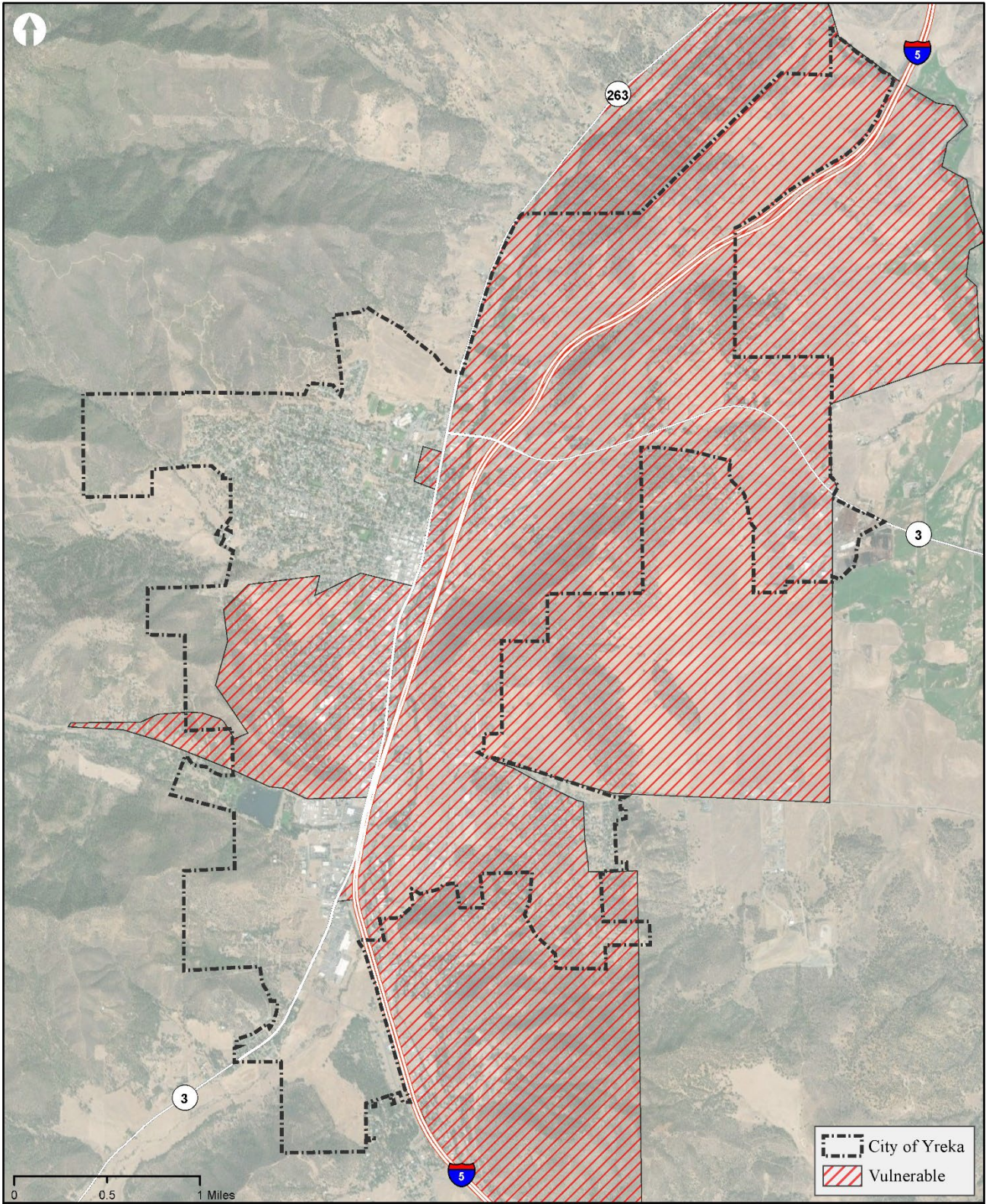
Map Date: 6/9/2022



**City of Yreka
Overpayment by Renters**

Figure 14

Map Date: 6/20/2022



**City of Yreka
Sensitive Communities - Displacement**

Figure 15

Map Date: 6/10/2022

Vulnerable to Displacement

Figure 15 depicts portions of Yreka population are vulnerable to displacement (thereby being designated as sensitive), in the event of increased redevelopment and drastic shifts in housing cost. Geographically it is the same area that while more diverse, residents have lower incomes, are more likely to be renters and are cost burdened for housing, etc. A population is considered vulnerable to displacement if:

The share of very low income residents is above 20%, and the tract meets two of the following criteria:

- a. Share of renters is above 40 percent
- b. Share of people of color is above 50 percent
- c. Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median
- d. The populations, or those in close proximity, have been experiencing displacement pressures. (Displacement pressure is defined as percent change in rent above county median for rent increases, or the difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap), 2017)

2.4. CONTRIBUTING FACTORS

Discussions with community organizations, fair housing advocates, and the assessment of fair housing issues identified several factors that contribute to fair housing issues in Yreka, including:

- The dominance of single-family homes despite the presence of smaller households (single person), with little diversity in the types of housing;
- Low-vacancy rates for both rental and ownership with limited availability of affordable housing options;
- High cost of new construction and rehabilitating existing residences including City fees;
- Displacement from the wildfires and loss of housing, e.g., the Slater fire. These events destroyed homes, displacing residents, and resulting in increased demand for housing in region;
- Displacement resulting from a wide variety of conditions, for example, COVID-19 resulted in an economic depression and the loss of many incomes. Other causes of displacement include increases in rental costs and lack of available housing stock.
- Housing condition and the cost of repairs where needed,
- Lack of information made easily available to homeowners and tenants on their rights and opportunities

3. ENFORCEMENT AND OUTREACH CAPACITY

The City implements fair housing laws by ensuring the City's procedures, policies and regulations comply with state and federal fair housing laws, and by implementation of the code enforcement program. The City's code enforcement is complaint driven where received complaints are investigated by a building inspector. While the City has reasonable accommodation procedures, it is undertaking a comprehensive update of the Zoning Code to modernize the Zoning Code to facilitate improvements to overall housing production, allowing a variety of housing types for all income categories, such as workforce housing, missing middle housing types and configurations, group homes, so all community members have access to affordable and sound housing.



In addition to fair housing issues related to regulations, fair housing issues can also include discriminatory behaviors by landlords such as refusal to grant reasonable accommodation requests, not allowing service animals, discrimination against familial status, sex, religion, or other protected class, and more. City posts fair housing posters California Department of Fair Employment and Housing at City Hall to assist those with discrimination complaints. As complaints are received, individuals are directed to the appropriate agency. The City will continue to make information on fair housing available to the public by posting fair housing information in City Hall, the public library, other public buildings, the Senior Center and on bulletin boards at existing apartment complexes. Program HE-6-1.2 commits the City to continuing marketing fair housing information to the public including making information available on the website. The City will continue to support the enforcement of the fair housing laws to protect against housing discrimination, provide adequate information about renters' rights, and promote equal housing opportunity.

HUD's Region IX Office of Fair Housing and Equal Opportunity (FHEO) fair housing data set indicates two cases were filed from 2006 to June 2020 for all of Siskiyou county during the 14 year reporting period. This is a case rate of 0.05 cases per one thousand of the population. Both were disability bias cases. According to the California Department of Fair Employment and Housing 2020 annual report, there was one housing violation for the Siskiyou county region (the type of violation, e.g., disability, race, etc. is not indicated). Available data regarding inquiries to the office of Fair housing and Equal Opportunity from residents about possible discrimination indicates Yreka's inquiry rate was less than 0.25 per one-thousand people for the period of January 2013 to March 2021. A resident may not further pursue an inquiry for a variety of reasons. While underreporting may occur, the available data indicates low incident rate of housing discrimination in the City. In addition to continuing to make fair housing information available, Program HE-6-1.2 commits the City to codifying its reasonable accommodation procedures into the Zoning Code, and marketing the availability of the procedures to the public. This Program includes review the current procedures for compliance with federal and state fair housing law, and preparing amendments as needed.

¹ The Diversity Index indicates the probability that two people chosen at random will be from different race and ethnic groups. For more information about the index and measuring racial and ethnic diversity, see the US Census blog, <https://www.census.gov/newsroom/blogs/random-samplings/2021/08/measuring-racial-ethnic-diversity-2020-census.html> (accessed June 14, 2022).

² In 2019, the poverty line was \$25,750 for a family of four, according to the U.S. Department of Health and Human Services: [2019 Poverty Guidelines | ASPE \(hhs.gov\)](https://www.hhs.gov/ashpr/poverty-guidelines), accessed June, 21, 2022.

³ While the retail density differential between the western and eastern tracts is significant with the western tract having 3.3 jobs per acre, and the 0.87 jobs per acre for the eastern tract, this may be more of a function of the difference in the size between the two areas. The mapping indicates the eastern tract is at least twice the size of the western tract.

