

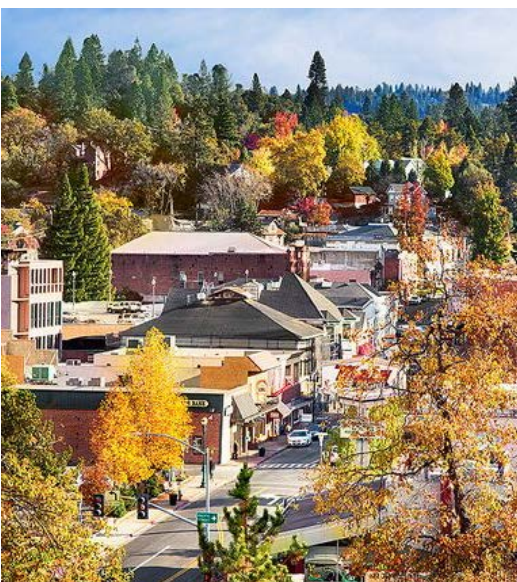
## **APPENDIX B. HOUSING ELEMENT FAIR HOUSING ASSESSMENT**

bae urban economics

## Housing Element Fair Housing Assessment

Prepared for the City of Placerville

May 3, 2021



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# INTRODUCTION

With adoption of AB 686, all housing elements completed on or after January 1, 2019 must include a program that promotes and affirmatively furthers fair housing throughout the community for all persons, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, disability, or any other characteristics that are protected by the California Fair Employment and Housing Act (FEHA), Government Code Section 65008, and all other applicable State and Federal fair housing and planning laws. Under state law, affirmatively furthering fair housing means to take “meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”<sup>1</sup>

The law also requires that all housing elements completed as of January 1, 2021 or later include an Assessment of Fair Housing (AFH) that is consistent with the core elements of the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule from July 2015. This report summarizes key findings from the Assessment of Fair Housing, which was completed in accordance with current HCD guidance regarding the application of the new AB 686 requirements, as well as a detailed reading of the California Government Code.<sup>2</sup> The housing element land inventory, as well as the identification of sites, must also be consistent with the findings of the fair housing assessment, and the jurisdictions obligation to affirmatively further fair housing under applicable state law.

The following assessment of fair housing relies upon data from the US Census Bureau’s 2014-2018 American Community Survey (ACS) and 2010 Decennial Census, California Department of Fair Employment and Housing (DFEH), HUD Office of Fair Housing and Equal Opportunity (FHEO), HUD Comprehensive Housing Affordability Strategy (CHAS), Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA), California Economic Development Department (EDD), State Tax Credit Allocation Committee (TCAC), and the City of Placerville, among other sources.

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<sup>1</sup> California Government Code § 8899.5 (a)(1).

<sup>2</sup> Olmstead, Z. (April 23, 2020). AB 686 Summary of Requirements in Housing Element Law Government Code Section 8899.50, 65583©(5), 65583(c)(10), 65583.2(a).

## EXISTING CONDITIONS

The following section summarizes existing demographic characteristics of Placerville residents and evaluates contemporary patterns of integration and segregation, identifies racially and ethnically concentrated areas of poverty, assesses disparities in access to opportunity, and evaluates disproportionate housing needs and displacement risk. This section was prepared using data and methods established by HUD and recommended by HCD.

### Racial and Ethnic Characteristics and Trends

Approximately three-quarters of Placerville's population is non-Hispanic White. The only non-White population with substantial numbers in the City is the Hispanic and Latino population, who make up 19.1 percent of the population. The remainder of the population is spread across the other non-Hispanic race categories, with no group making up more than three percent of the total citywide population. These proportions have remained relatively unchanged since 2010.

The distribution of the population by race and ethnicity in Placerville is similar to the countywide distribution, with non-Hispanic Whites accounting for just under 80 percent of the population. The county also has a notable population of Asian residents, as well as of persons of two or more races. For example, Asian residents represent around 4.4 percent of the total population, while persons of two or more races represent just over three percent. This is compared to 0.6 percent and 1.2 percent, respectively, in Placerville. As with the city, the distribution of residents by race and ethnicity remained relatively stable within El Dorado County between 2010 and the 2014-2018 survey period.

**Table 1: Population by Race and Ethnicity, 2010 and 2014-2018**

|                                       | City of Placerville |               |               |               | El Dorado County |               |                |               |
|---------------------------------------|---------------------|---------------|---------------|---------------|------------------|---------------|----------------|---------------|
|                                       | 2010                |               | 2014-2018     |               | 2010             |               | 2014-2018      |               |
|                                       | Number              | Percent       | Number        | Percent       | Number           | Percent       | Number         | Percent       |
| <b>Not Hispanic or Latino by Race</b> |                     |               |               |               |                  |               |                |               |
| White                                 | 7,938               | 76.4%         | 8,443         | 77.7%         | 144,689          | 79.9%         | 145,990        | 78.2%         |
| Black/African American                | 78                  | 0.8%          | 81            | 0.7%          | 1,296            | 0.7%          | 1,432          | 0.8%          |
| American Indian/Alaska Native         | 122                 | 1.2%          | 69            | 0.6%          | 1,553            | 0.9%          | 939            | 0.5%          |
| Asian                                 | 88                  | 0.8%          | 66            | 0.6%          | 6,143            | 3.4%          | 8,237          | 4.4%          |
| Native Hawaiian/Pacific Islander      | 13                  | 0.1%          | 0             | 0.0%          | 261              | 0.1%          | 396            | 0.2%          |
| Some other race alone                 | 16                  | 0.2%          | 0             | 0.0%          | 318              | 0.2%          | 184            | 0.1%          |
| Two or more races                     | 271                 | 2.6%          | 131           | 1.2%          | 4,923            | 2.7%          | 5,852          | 3.1%          |
| <b>Total, Not Hispanic or Latino</b>  | <b>8,526</b>        | <b>82.1%</b>  | <b>8,790</b>  | <b>80.9%</b>  | <b>159,183</b>   | <b>87.9%</b>  | <b>163,030</b> | <b>87.3%</b>  |
| <b>Hispanic or Latino</b>             | <b>1,863</b>        | <b>17.9%</b>  | <b>2,070</b>  | <b>19.1%</b>  | <b>21,875</b>    | <b>12.1%</b>  | <b>23,631</b>  | <b>12.7%</b>  |
| <b>Total, All Races</b>               | <b>10,389</b>       | <b>100.0%</b> | <b>10,860</b> | <b>100.0%</b> | <b>181,058</b>   | <b>100.0%</b> | <b>186,661</b> | <b>100.0%</b> |

Sources: U.S. Census Bureau, 2010 Decennial Census, Table P9; American Community Survey, 2014-2018 five-year sample data, B03002, BAE, 2021.

### ***Historic Patterns of Racial Discrimination***

At various points throughout its history, the community of Placerville has hosted relatively large subpopulations of both Chinese and African American residents. The following describes some of these historical settlement patterns and discusses how these patterns are reflected in the contemporary built environment.

Placerville and El Dorado County experienced a large surge in population during the Gold Rush, attracting “49ers” from around the country and the world. The 1860 Census reported a total countywide population of 20,562, with 2,306 people living in Placerville. This included a total population of 4,762 residents of Chinese descent living throughout El Dorado County (nearly 25 percent of the county total) and 319 in Placerville (14 percent of the city total).

As mining yields diminished and the Gold Rush era ended, the El Dorado County population declined sharply to only 10,309 in 1870. The countywide population did not recover to 1860 levels until nearly one hundred years later (i.e., after 1950). The Placerville population also declined, to 1,562 in 1870. Nevertheless, both the city and the county maintained a relatively large Chinese population, including 218 Chinese residents in Placerville and 1,582 countywide in 1870. In Placerville, the Sanborn Fire Maps from 1886 and 1891 identify buildings occupied or used by Chinese residents. These buildings were clustered in two specific areas of the City, clearly highlighting the segregated housing patterns of the era. The clusters were generally in the vicinity of Pacific Street at Benham Street to the west of downtown and at what is now the southeast corner of Mosquito Road at Broadway.

Discrimination against the Chinese population grew through the end of the 1800s, culminating in the Chinese Exclusion Act of 1882, which banned future immigration from China to the United States. Those already in Placerville, El Dorado County, and California more broadly, faced continued harassment and discrimination, to the point of being forced out of jobs and even being driven out of the community, as indicated by news reports, such as this one from the *San Jose Evening Herald*, from February 1886:

*Boycotting in ... Placerville, Cal., February 15. - The Anti-Chinese Association held a meeting last night and boycotting was agreed to begin the first day of March. A written agreement will be presented to the people of the township for signatures, whereby the signers promise to discharge the Chinamen in their employ by the first of March, and withdraw their patronage from all persons employing them after that date. All persons refusing to sign the agreement are listed on a blackboard for the purposes of boycotting. A committee of twenty*

*was appointed to visit Chinatown on the first of March to request the Chinese to leave by the first of April.*<sup>3</sup>

This discrimination resulted in a precipitous decline in the size of the Chinese population in Placerville and El Dorado County over several decades. Most of the Chinese immigrants had been men, so even those already in the U.S. had difficulties forming family households and having children. By 1950, the Census reported only seven Chinese persons in El Dorado County; while the size of the population in the county began to increase after that, even in 1908 the Census reported no persons of Chinese descent in Placerville. This trend is confirmed by the Sanborn Fire Maps. By 1910, no buildings are labeled as Chinese-occupied, and many of the buildings so labeled on earlier maps from 1886 and 1891 had been removed or replaced; in 1910, the Chinese population of El Dorado County was only 58. The restrictions on all Chinese immigration were not lifted until World War II, when China was an ally of the U.S.

The Gold Rush also attracted African Americans to Placerville and El Dorado County; albeit not in large numbers, since the Gold Rush preceded the Civil War and Emancipation. Similar to the overall population, the African American population declined from 277 individuals in El Dorado County in 1860 to 132 in 1870, and from 67 in Placerville in 1860 to 26 in 1870. Early reports from the 1860s and a townsite map from 1872 indicate the presence of at least one church that explicitly served the African American community in Placerville, but it is not shown on the Sanborn Fire Maps from 1886 or later. As of 1960, the Census reported no African American persons living in Placerville, and only 23 throughout all of El Dorado County.

Additional evidence indicates that the overt discrimination of the mid-to-late 1800s spilled over into other formalized forms of discrimination that persisted well into the 20<sup>th</sup> Century. As in many communities throughout the nation, non-White residents were subject to exclusionary neighborhood covenants and deed restrictions that prohibited non-White residents from purchasing and/or occupying homes in various parts of the community. However, where such covenants and restrictions in many communities contributed over time to the development of segregated high minority neighborhoods, often coupled with relatively high rates of poverty, in Placerville and El Dorado County, such policies contributed to the exclusion of non-White individuals and households from the community altogether. While such covenants are no longer enforceable, these patterns of segregation persist throughout California, with both the City and County exhibiting very small non-White populations.

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<sup>3</sup> <https://marketstreet.stanford.edu/2014/07/historic-newspapers/>. Market Street Chinatown Archaeology Project, San Jose Newspaper Articles, February 1886. Posted July 30, 2014. Accessed March 25, 2021.

### ***Measures of Segregation***

To identify the extent to which a community currently experiences patterns of segregation, HUD recommends the use of two quantitative metrics known as the dissimilarity index and the isolation index.

#### **Geographic Areas of Analysis**

Calculation of both the dissimilarity and isolation indices relies on the use of block group level data from the U.S. Census Bureau, which is the smallest geographic unit available. The following analysis discusses indices calculated using all of the block groups located within the City of Placerville, with two key exceptions. Block Groups 60170311003 and 60170312001 were excluded because less than 50 percent of each block group's total land area is within the Placerville City limits, and the portions that are within the City contain very little housing. Most of the remaining block groups also extend beyond the City limits, but contain notable concentrations of development within the City limits, with less development within the surrounding unincorporated areas. The calculations summarized below necessarily reflect the characteristics of entire block groups, including the portions of those block groups that extend beyond the City limits.

#### **Dissimilarity Index**

The dissimilarity index measures the evenness with which two groups are distributed across the geographic units that make up a larger area, such as block groups within a city. The index ranges from zero to 100, with zero indicating no segregation or spatial disparity, and 100 indicating complete segregation (i.e., no intermingling) between the non-Hispanic White population and the specified non-White populations. The index score can be interpreted as the percentage of one of the two groups that would have to move to produce an even distribution. An index score above 60 is considered high, while 30 to 60 is considered moderate, and below 30 is considered low.<sup>4</sup>

The data in Table 2 compares dissimilarity index scores between the 2010 Census and the 2014-2018 ACS. Based on this data, the dissimilarity index scores for most non-White racial and ethnic groups appear to have increased over the study period, with two exceptions.<sup>5</sup> However, it is important to note that due to the extremely small population sizes for these non-White populations, very small changes in the size of the population can result in substantial changes in index scores. This is particularly apparent in the shift within the American Indian and Alaska Native population, which increased from a score of 13.4 to a score of 70.0, as well as the shift in the index scores for residents of two or more races, which increased from 6.5 to 37.6. The score for the African American population also increased from 42.1 to 64.0, while

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<sup>4</sup> Massey, D.S. and N.A. Denton. (1993). *American Apartheid: Segregation and the Making of the Underclass*. Cambridge, MA: Harvard University Press.

<sup>5</sup> The number of residents that identify with the Native Hawaiian and Other Pacific Islander, and Some Other Race, categories decreased to the point that no dissimilarity index scores could be calculated for the 2014-2018 period.

the score for the Asian population similarly increased from 26.1 to 63.2. The Hispanic and Latino population notably accounts for a much larger portion of the City's population compared to the other non-White populations listed. Nonetheless, the index score for Hispanic and Latino residents similarly increased from 18.7 to 32.7. This indicates that while the size of non-White racial and ethnic populations in Placerville is quite small, non-White households are experiencing increasing levels of geographic clustering.

**Table 2: Dissimilarity Index Scores, City of Placerville, 2010 and 2014-2018**

| Racial and/or Ethnic Group                       | Dissimilarity Index Score |           |
|--------------------------------------------------|---------------------------|-----------|
|                                                  | 2010                      | 2014-2018 |
| Black or African American alone                  | 42.1                      | 64.0      |
| American Indian and Alaska Native alone          | 13.4                      | 70.0      |
| Asian alone                                      | 26.1                      | 63.2      |
| Native Hawaiian and Other Pacific Islander alone | 15.0                      | n.a.      |
| Some other race alone                            | 38.6                      | n.a.      |
| Two or more races                                | 6.5                       | 37.6      |
| Hispanic or Latino                               | 18.7                      | 32.7      |

Note:

(a) The racial and/or ethnic groups with dissimilarity index scores that are statistically insignificant due to insufficient sampling and high margins of error are denoted as "n.a."

(b) Includes all block groups within the City of Placerville, except for Block Groups 60170311003 and 60170312001, which extend well beyond the current City boundary and include limited residential development within the city itself.

Sources: U.S. Census Bureau, 2010 Decennial Census, Table P9; American Community Survey, 2014-2018 five-year sample data, B03002, BAE, 2021.

### Isolation Index

The other key metric recommended for analysis under the federal AFFH rule is the Isolation Index, which compares a group's share of the overall population to the average share within a given block group. Ranging from zero to 100, the isolation index represents the percentage of residents of a given race or ethnicity in a block group where the average resident of that group lives, correcting for the fact that this number increases mechanically with that group's share of the overall citywide population. Using Hispanic or Latino residents as an example, an aggregate isolation index of 26.9 indicates that the average Hispanic or Latino resident lives in a block group where the Hispanic or Latino share of the population exceeds the citywide average by roughly 26.9 percentage points. Isolation index values that equal, or are close to, zero indicate that members of that group live in relatively integrated neighborhoods, while those close to 100 indicate high degrees racial and ethnic concentration.<sup>6 7</sup>

Table 3 summarizes isolation index scores by racial and ethnic affiliation in 2000 and 2014-2018. According to this metric, the City of Placerville exhibits relatively high levels of racial

<sup>6</sup> HUD. (2013). *AFFH Data Documentation*. Available at: [http://www.huduser.org/portal/publications/pdf/FR-5173-P-01\\_AFFH\\_data\\_documentation.pdf](http://www.huduser.org/portal/publications/pdf/FR-5173-P-01_AFFH_data_documentation.pdf)

<sup>7</sup> Glaeser, E. and Vigdor, J. (2001). *Racial Segregation in the 2000 Census: Promising News*. Washington, DC: The Brookings Institution, Center on Urban and Metropolitan Policy. Available at: <http://www.brookings.edu/es/urban/census/glaeser.pdf>

and ethnic integration, with the exception of non-Hispanic White and Hispanic or Latino residents. Non-Hispanic Whites have the highest isolation index score at 76.8, indicating that the average non-Hispanic White resident was likely to live in a block group that was predominantly non-Hispanic White. The data also indicate that the isolation index for non-Hispanic White residents decreased slightly from 2010, indicating that non-Hispanic Whites are living in increasingly integrated neighborhoods. Meanwhile, the index values for American Indian and Alaska Native, Asian, persons of two or more races, and Hispanic or Latino residents increased slightly. This indicates that there was a modest increase in the clustering of people in these racial and ethnic groups, though they remain relatively integrated overall. The observed changes in the index values of non-White residents are largely affected by each group's small population size; therefore, the clustering of even a handful of households results in notable isolation scores. This is particularly evident among Native Hawaiian and Pacific Islander residents and residents of some other race, where the population sizes were not statistically significant according to the 2014-2018 ACS.<sup>8</sup>

**Table 3: Isolation Index Scores, City of Placerville, 2010 and 2014-2018**

| <b>Racial and/or Ethnic Group</b>                | <b>Isolation Index</b> |                  |
|--------------------------------------------------|------------------------|------------------|
|                                                  | <b>2010</b>            | <b>2014-2018</b> |
| Non-Hispanic White                               | 77.5                   | 76.8             |
| Black or African American alone                  | 2.4                    | 2.2              |
| American Indian and Alaska Native alone          | 1.1                    | 2.0              |
| Asian alone                                      | 1.0                    | 6.4              |
| Native Hawaiian and Other Pacific Islander alone | 0.2                    | n.a.             |
| Some other race alone                            | 0.5                    | n.a.             |
| Two or more races                                | 2.8                    | 3.9              |
| Hispanic or Latino                               | 19.6                   | 26.9             |

Note:

(a) The racial and/or ethnic groups with dissimilarity index scores that are statistically insignificant due to insufficient sampling and high margins of error are denoted as "n.a.".

Sources: U.S. Census Bureau, 2010 Decennial Census, Table P9; American Community Survey, 2014-2018 five-year sample data, B03002, BAE, 2021.

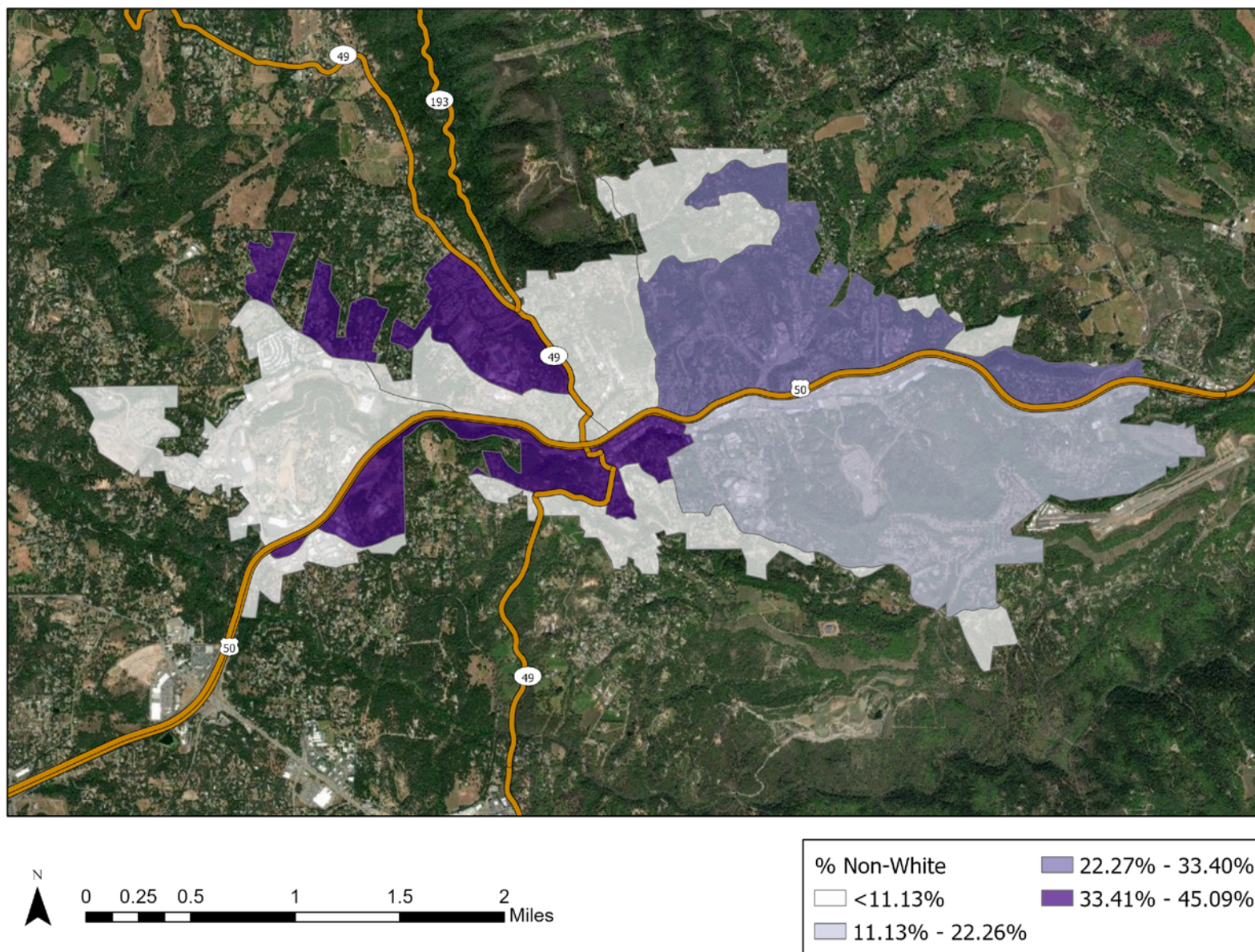
### ***Geographic Distribution of Non-White Residents***

Figure 1 and Figure 2 illustrate the geographic distribution of non-White residents, and Hispanic and Latino residents more specifically, by block group, as reported in the 2014-2018 ACS. The figures show Hispanic and Latino residents, as this is the largest single racial and ethnic subpopulation, but the other non-White subpopulations make up relatively small proportions of the total Citywide population and are therefore presented in aggregate. Additional maps are provided in Appendix A which illustrate the geographic concentration of the remaining racial and ethnic subpopulations individually.

<sup>8</sup> Based on the sample sizes, the margins of error for the estimated number of residents in these racial and ethnic categories were greater than the estimates themselves, meaning that the data do not indicate with certainty the extent to which persons affiliated with these groups actually lived in the City of Placerville during the survey period.

**Figure 1: Census Block Groups by Percent Non-White, 2014-2018 ACS**

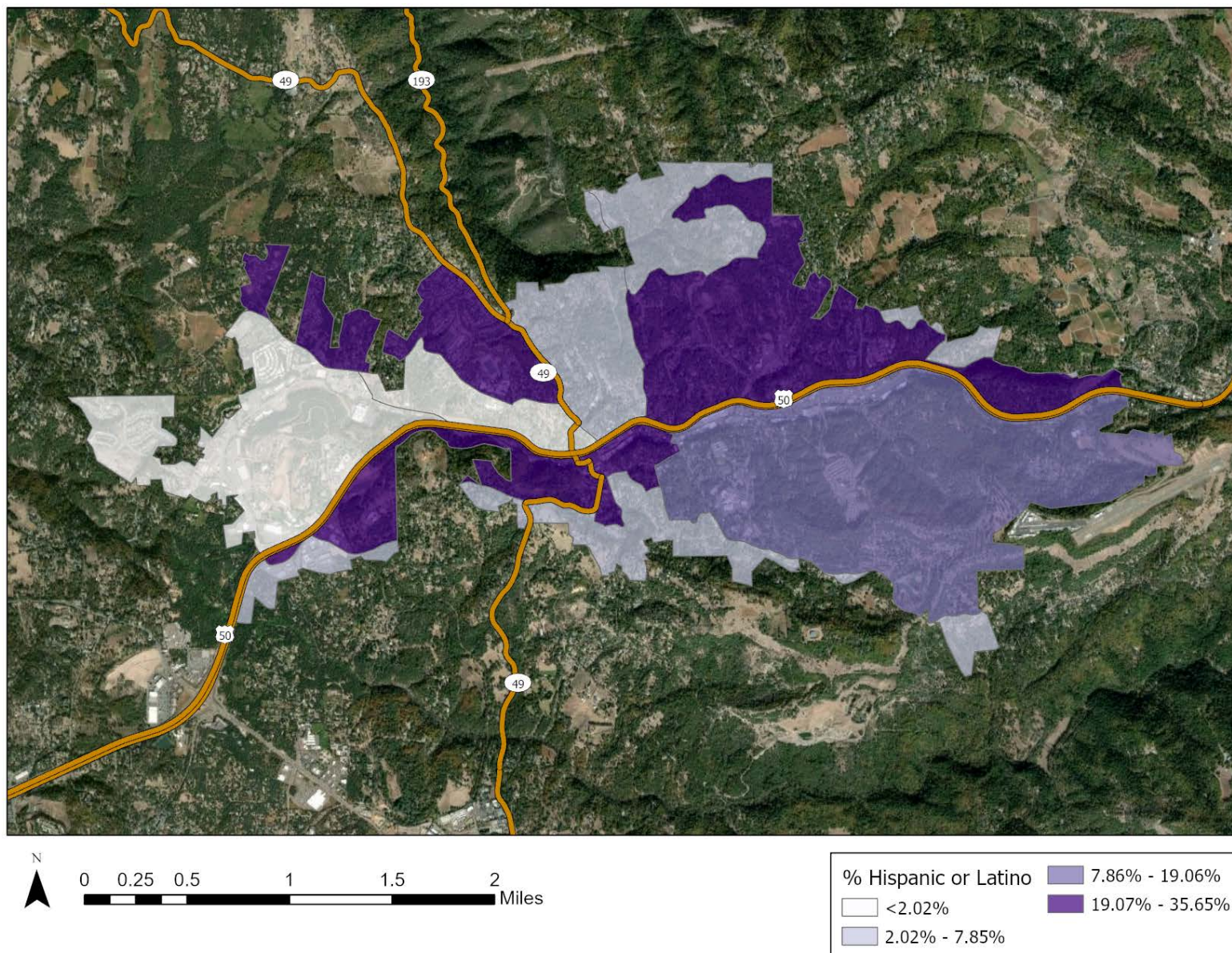
Appendix B-9



Sources: U.S. Census Bureau, American Community Survey, 2014-2018 five-year sample data; BAE, 2021.

**Figure 2: Census Block Groups by Percent Hispanic or Latino, 2014-2018 ACS**

Appendix B-10



Sources: U.S. Census Bureau, American Community Survey, 2014-2018 five-year sample data; BAE, 2021.

As noted above, Figure 1 illustrates the relative concentration of all non-White residents within the City of Placerville, meaning everyone other than those who identify as non-Hispanic White. As shown in the figure, the City's non-White residents are generally concentrated in two block groups that each have non-White concentrations of greater than 30 percent. The northernmost non-White concentration is in block group 310003, which extends through relatively low-density residential neighborhoods from Highway 49 westward towards the northern City boundary in a block group that extends beyond the existing City limits. The second block group (312003) with a relatively high concentration of non-White residents is located south of Highway 50 and includes Downtown Placerville and extends westward to include the mostly commercial area around Forni Road at Lo Hi Way. There is also an area of lesser concentration (i.e., 23.4 percent non-White concentration, which is roughly average) located north of Highway 50 and extending from around Bedford Avenue eastward to the City limits. Recognizing that Hispanic and Latino residents are the largest single non-White subpopulation in Placerville, Figure 2 illustrates that the areas with the highest Hispanic and Latino concentrations generally align with those noted above.

### ***Limited English Proficiency***

Persons with a limited knowledge of the English language can often experience discrimination in housing due to racial, ethnic, or cultural biases. Due to their limited language abilities, these persons can also face unscrupulous leasing and lending practices that take advantage of their inability to read, interpret, and/or understand leasing agreements and loan documents. Persons with limited proficiency with the English language face additional difficulties once housing is secured, such as difficulties with interpreting posted notices and correspondence. As a result, persons with limited English proficiency (LEP) are identified as a protected class under the Fair Housing Act, as well as applicable California law.

Table 4 reports the total population in the City of Placerville and El Dorado County for whom language competencies could be determined, as well the primary language spoken and the proportion of residents and households with limited English proficiency. Based on these data, the primary language spoken at home for 86.0 percent of the City of Placerville residents was English. The remaining 14.0 percent of residents primarily spoke another language when at home. This represents a total of around 1,441 individuals. The most prevalent language spoken at home other than English was Spanish at 10.9 percent of all households, with other Indo-European languages at 0.9 percent, and Asian and Pacific Island languages at 0.7 percent. Other languages not in any of the above categories make up 1.5 percent of all households.

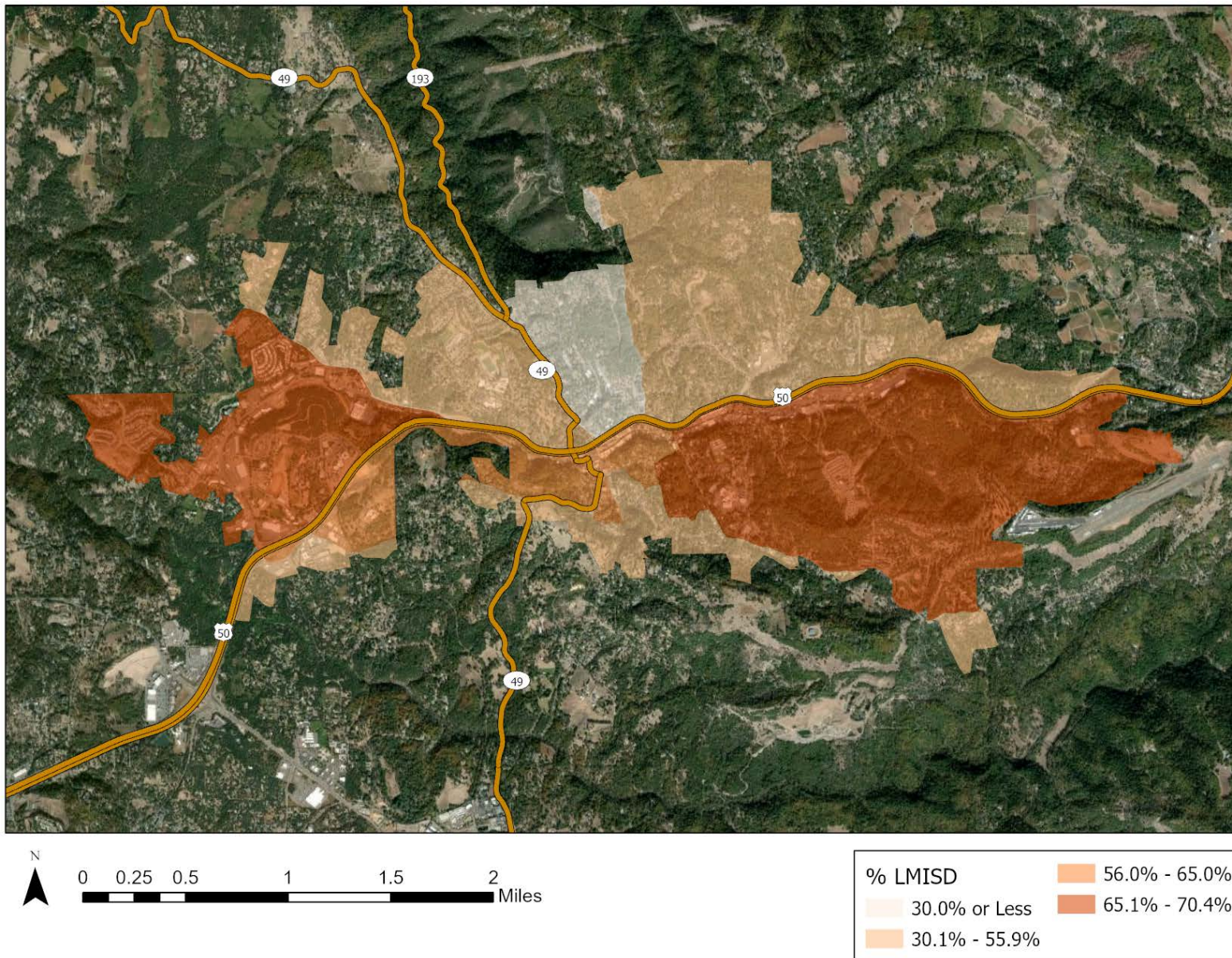
In addition to reporting language spoken at home, Table 4 also reports the percent of the population, and percent of households, that do not speak any English, or speak English less than "very well." The data indicate that among Spanish speakers (i.e., the largest non-English speaking subpopulation), approximately 31.2 percent have limited English proficiency.

Nonetheless, only an estimated 5.8 percent of Spanish speaking households are categorized as having limited English proficiency, indicating that most Spanish speaking households have at least one member who is proficient with English. The data also indicate that while households that primarily speak other Indo-European languages or Asian and Pacific Island languages represent a relatively small minority, these residents are more likely to have limited English proficiency. Households that speak Asian and Pacific Island languages, in particular, show a relatively high proportion with limited English proficiency (i.e., 65.4 percent), meaning that a majority contain no person that speaks English “very well.” Therefore, the City should consider policies and actions that help to ensure that materials pertaining to the City’s housing policies and fair housing rights, obligations, and services are appropriately translated.

### ***Geographic Distribution of Low- and Moderate-Income Households***

Figure 3, above, identifies block groups within the City of Placerville based on proportion of low- and moderate-income households that they contain. The map features data from the HUD fiscal year 2020 Low- and Moderate- Income Summary Data (LMISD), which is based on the 2011-2015 ACS. For the purpose of this analysis, a high concentration of low- and moderate-income households is considered to be anything greater than the citywide average of 55.9 percent. The map identifies these high concentration block groups with the two darker shades. Based on these data, there are notable concentrations of low- and moderate-income households in eastern Placerville, south of Highway 50 extending along Cedar Ravine Road to the City boundary, as well as in western Placerville to the north of Highway 50 in the commercial area along Placerville Drive. While the non-White populations in these areas are quite small, these block groups represent areas with relatively high concentrations of African American, Asian, and persons of two or more races. Also, the portion of central Placerville that was previously identified as an area with an above average concentration of Hispanic and Latino residents is also identified as having moderate concentrations of low- and moderate-income households.

**Figure 3: Percent of Low- and Moderate-Income Households by Block Group, City of Placerville, FY 2020**



Sources: HUD, FY 2020 CDBG Low Mod Income Summary Data, ACS 2015 five-year sample period; BAE, 2021.

**Table 4: Population by Language Spoken at Home and Percent of Households with Limited English Proficiency, City of Placerville and El Dorado County, 2014-2018**

| Language Spoken                    | City of Placerville                       |               |                                                 |                                                 |
|------------------------------------|-------------------------------------------|---------------|-------------------------------------------------|-------------------------------------------------|
|                                    | Population by Primary Language Spoken (a) |               | Population with Limited English Proficiency (b) | Households with Limited English Proficiency (c) |
|                                    | Number                                    | Percent       |                                                 |                                                 |
| Spanish                            | 1,127                                     | 10.9%         | 31.2%                                           | 5.8%                                            |
| Other Indo-European languages      | 95                                        | 0.9%          | 35.8%                                           | 27.7%                                           |
| Asian and Pacific Island languages | 68                                        | 0.7%          | 52.9%                                           | 65.4%                                           |
| Other languages                    | 151                                       | 1.5%          | 31.8%                                           | 0.0%                                            |
| <b>Total, All Non-English</b>      | <b>1,441</b>                              | <b>14.0%</b>  | <b>32.6%</b>                                    | <b>n.a.</b>                                     |
| <b>English Only</b>                | <b>8,888</b>                              | <b>86.0%</b>  | <b>n.a.</b>                                     | <b>n.a.</b>                                     |
| <b>Total, All Languages</b>        | <b>10,329</b>                             | <b>100.0%</b> | <b>4.6%</b>                                     | <b>1.4%</b>                                     |

| Language Spoken                    | El Dorado County                          |               |                                                 |                                                 |
|------------------------------------|-------------------------------------------|---------------|-------------------------------------------------|-------------------------------------------------|
|                                    | Population by Primary Language Spoken (a) |               | Population with Limited English Proficiency (b) | Households with Limited English Proficiency (c) |
|                                    | Number                                    | Percent       |                                                 |                                                 |
| Spanish                            | 11,651                                    | 6.5%          | 32.3%                                           | 11.4%                                           |
| Other Indo-European languages      | 5,478                                     | 3.1%          | 26.3%                                           | 8.5%                                            |
| Asian and Pacific Island languages | 4,271                                     | 2.4%          | 35.2%                                           | 12.2%                                           |
| Other languages                    | 649                                       | 0.4%          | 18.6%                                           | 4.1%                                            |
| <b>Total, All Non-English</b>      | <b>22,049</b>                             | <b>12.4%</b>  | <b>30.9%</b>                                    | <b>n.a.</b>                                     |
| <b>English Only</b>                | <b>155,940</b>                            | <b>87.6%</b>  | <b>n.a.</b>                                     | <b>n.a.</b>                                     |
| <b>Total, All Languages</b>        | <b>177,989</b>                            | <b>100.0%</b> | <b>3.8%</b>                                     | <b>1.5%</b>                                     |

Notes:

(a) Represents the population age five years and over by the primary language spoken at home.

(b) Percent of population age five years and over who does not speak English, or speaks English less than "very well."

(c) Percent of households where no one age 14 and over speaks English only, or speaks English "very well."

Sources: U.S. Census Bureau, ACS 2018 five-year sample period, S1601, S1602; BAE, 2021.

**Table 5: Poverty by Race and Ethnicity, City of Placerville, 2014-2018**

| City of Placerville                   | Below Poverty Line (a) |                 |                                   | Total Population |               | Share in Poverty<br>Minus Share of<br>Total Population |
|---------------------------------------|------------------------|-----------------|-----------------------------------|------------------|---------------|--------------------------------------------------------|
|                                       | Number                 | Poverty<br>Rate | Share of Total<br>Pop. In Poverty | Number           | Percent       |                                                        |
| White                                 | 1,403                  | 14.5%           | 93.0%                             | 9,708            | 95.2%         | -2.2%                                                  |
| Black or African American             | 4                      | 30.8%           | 0.3%                              | 13               | 0.1%          | 0.1%                                                   |
| American Indian and Alaska Native     | 46                     | 66.7%           | 3.0%                              | 69               | 0.7%          | 2.4%                                                   |
| Asian                                 | 13                     | 30.2%           | 0.9%                              | 43               | 0.4%          | 0.4%                                                   |
| Native Hawaiian and Other Pacific Is. | 0                      | n.a.            | 0.0%                              | 0                | 0.0%          | 0.0%                                                   |
| Some other race alone                 | 9                      | 3.3%            | 0.6%                              | 269              | 2.6%          | -2.0%                                                  |
| Two or more races                     | 34                     | 34.7%           | 2.3%                              | 98               | 1.0%          | 1.3%                                                   |
| <b>Total, All Races</b>               | <b>1,509</b>           | <b>14.8%</b>    | <b>100.0%</b>                     | <b>10,200</b>    | <b>100.0%</b> |                                                        |
| Hispanic or Latino                    | 275                    | 14.0%           | 18.2%                             | 1,968            | 19.3%         | -1.1%                                                  |
| Not Hispanic or Latino                | 1,234                  | 15.0%           | 81.8%                             | 8,232            | 80.7%         | 1.1%                                                   |
| <b>Total, All Ethnicities</b>         | <b>1,509</b>           | <b>14.8%</b>    | <b>100.0%</b>                     | <b>10,200</b>    | <b>100.0%</b> |                                                        |

Note:

(a) Includes only those for whom poverty status was determined.

Sources: U.S. Census Bureau, ACS 2018 five-year sample period, S1701; BAE, 2021.

### ***Poverty by Race and Ethnicity***

Table 5 above reports the poverty rate by race and ethnicity in the City of Placerville according to the 2014-2018 ACS. The data indicate that most non-White subpopulations, with the exception of persons of some other race, had poverty rates above 30 percent, which is more than twice the average citywide poverty rate of 14.8 percent. The relatively low citywide average is attributable to the large White population (i.e., White residents represent 93 percent of the citywide impoverished population), which had a poverty rate of 14.5 percent. The small comparative size of the City's non-White populations mean that the overall average is only 0.3 percentage points higher than the White poverty rate, though the poverty rates within most individual non-White subpopulations were generally much higher. American Indian and Alaska Native residents had the highest overall poverty rate at 66.7 percent, about 51.9 percent higher than the citywide average.

### ***Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)***

To further assist communities in identifying the existence of racially and ethnically concentrated areas of poverty (also known as RCAPs and ECAPs), HUD developed a definition that relies on a racial and ethnic concentration threshold, as well as a poverty test. The racial and ethnic concentration threshold requires that an RCAP or ECAP have a non-White population of 50 percent or more. The poverty test defines areas of "extreme poverty" as those where 40 percent or more of the population lives at or below the federal poverty line, or those where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. In areas that are unlikely to have racial or ethnic concentrations as high as 50 percent, such as Placerville, the R/ECAP is adjusted to 20 percent. Even with this adjustment, there are no block groups in Placerville that meet the definition of an R/ECAP.

While there are three block groups with non-White concentrations greater than 20 percent, none have poverty rates that exceed either threshold identified above.<sup>9</sup>

## **Community Assets and Access to Opportunity**

### ***Disparities in Access to Opportunity***

AB 686 requires that the Housing Element Needs Assessment includes an analysis of access to opportunity. To facilitate this assessment, HCD and TCAC convened an independent group of organizations and research institutions under the umbrella of the California Fair Housing Task Force (CFHTF), which produces an annual set of Opportunity Maps that identify areas in every region of the state “whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families – particularly long-term outcomes for children.”<sup>10</sup>

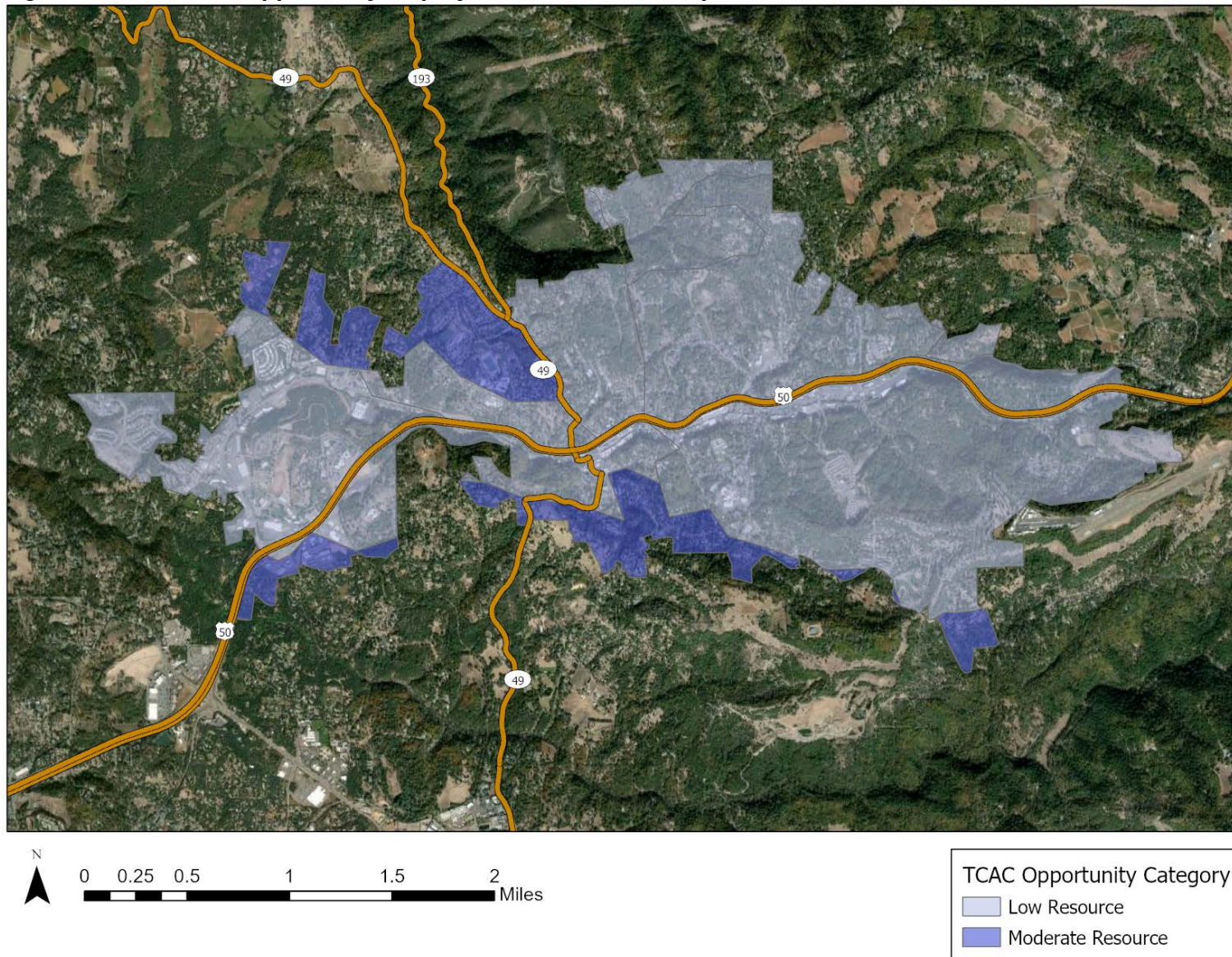
As illustrated in Figure 4, most of the City of Placerville is identified as “low resource,” with the exception of areas along the southern boundary and along the northern boundary west of Highway 49.

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<sup>9</sup> These block groups include 060170311001, 060170310003, and 060170312003.

<sup>10</sup> California Fair Housing Task Force. December 2020. *Methodology for the 2021 TCAC/HCD Opportunity Map*. Available at: <https://www.treasurer.ca.gov/ctcac/opportunity/2021-hcd-methodology.pdf>

Figure 4: TCAC/HCD Opportunity Map by Census Block Group, 2021



Sources: California Tax Credit Allocation Committee; HCD, 2021; BAE, 2021.

The two “moderate resource” areas show economic index scores in of 51 and 58, respectively. Scores for the three low-resource areas west of Highway 49 and north of Highway 50 are in the 40s. The economic index score for the two block groups located along Placerville Drive range from eight to 11. The block group that extends along Main Street west of Spring Street shows an economic index score of 39, while the large block group that extends south of Highway 50 from Downtown to the City boundary has a score of only 18.

The education score for most block groups is 20, including for both low and moderate resource areas, with two exceptions. The education score for the area surrounding the commercial district along Placerville Drive in western Placerville is relatively low at 13 and corresponds with a low resource area, while the score in the moderate resource area in northern Placerville has an education score of 41. The latter moderate resource area has notable non-White concentrations, including Hispanic and Latino, Asian, and American Indians.

Lastly, the environmental scores for most block groups in the City is 42, with three block groups scoring 14. The three block groups with the lowest scores on the environmental index represent those located south of Highway 50.

### ***Access to Education***

With the goal of identifying relationships between segregation and access to educational opportunities, this analysis evaluates the geographic location of public, private, and nonpublic schools within the City of Placerville, as well as the demographic characteristic of students enrolled at each school. As shown in Figure 5, most schools are clustered in central or western Placerville, with only one private school in eastern Placerville. All schools are generally well served by public transit, as well as busing programs.

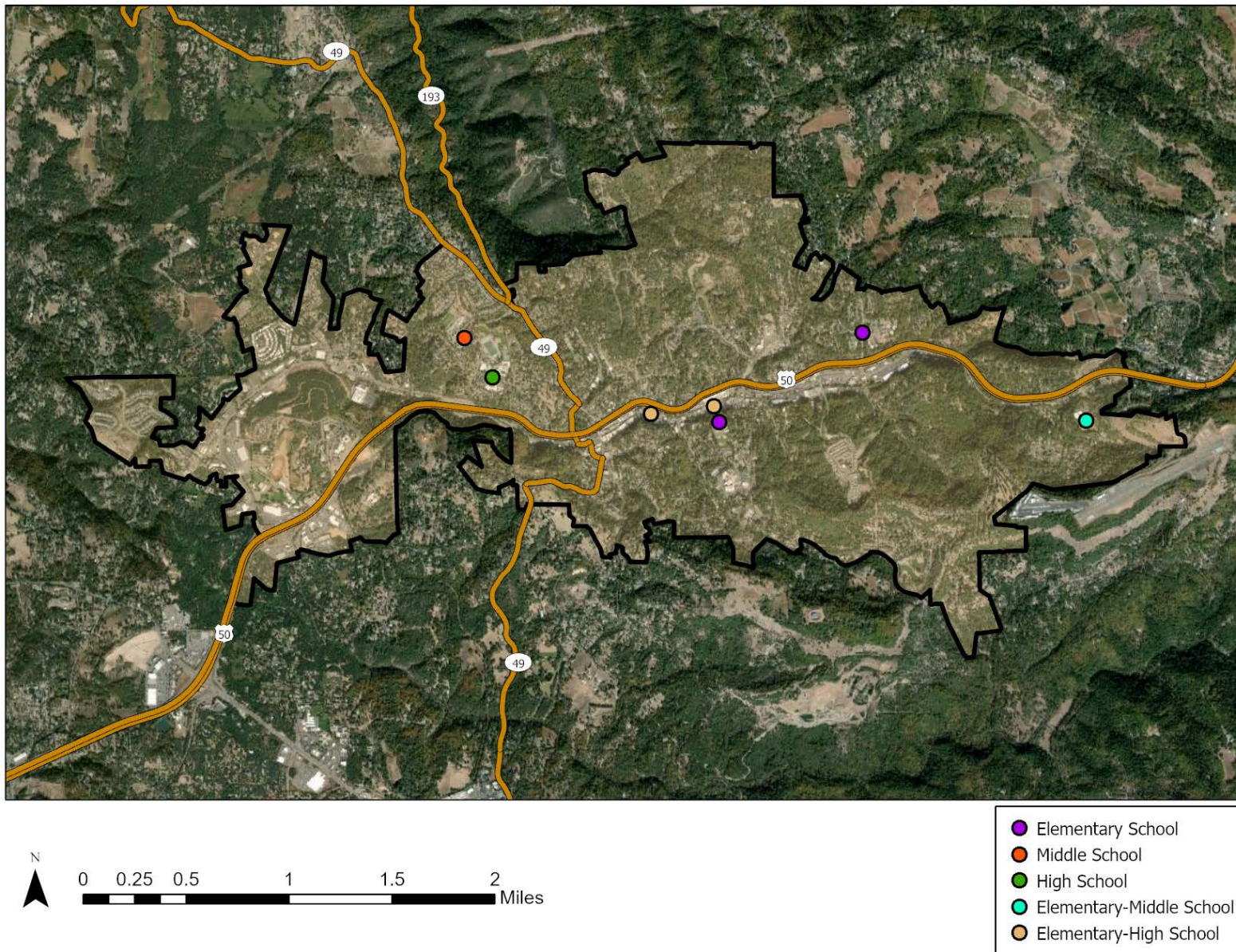
Table 6 reports demographic characteristic for students attending public schools with a Placerville address.<sup>11</sup> All but three schools have non-White student populations which exceed the citywide non-White share of 22.3 percent. While all of the schools for which data are available have sizable subpopulations of socioeconomically disadvantaged students (i.e., at least 25 percent),<sup>12</sup> there does not appear to be a direct relationship between the share of socioeconomically disadvantaged students and the share of non-White students. Among schools with high non-White concentrations, the share of socioeconomically disadvantaged students ranges from 27.7 percent to 72.5 percent.

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<sup>11</sup> Public schools with a Placerville address include those not within the City boundaries, such as Charter Community School Home Study, Pleasant Valley Middle School, Herbert C. Green Middle School, Sky Mountain Charter, Sutters Mill Elementary, Special Education (at the El Dorado County Office of Education), Indian Creek School, Gold Oak Elementary, and Gold Trail School.

<sup>12</sup> Socioeconomically disadvantaged includes students who are eligible for free or reduced priced meals, and/or have legal guardians who did not receive a high school diploma.

**Figure 5: Location of School Facilities by Grade Levels Served, City of Placerville, 2020**



Sources: California Department of Education, 2020; BAE, 2021

**Table 6: School Demographics, City of Placerville, 2020 (Page 1 of 2)**

| <b>School</b>                   | <b>Charter Community School Home Study</b> |                | <b>Pleasant Valley Middle</b> |                | <b>Herbert C. Green Middle</b> |                | <b>Sierra Elementary</b> |                |
|---------------------------------|--------------------------------------------|----------------|-------------------------------|----------------|--------------------------------|----------------|--------------------------|----------------|
| <b>Address</b>                  | 6767 Green Valley Road                     |                | 4120 Pleasant Valley Road     |                | 3781 Forni Road                |                | 1100 Thompson Way        |                |
| <b>Grades Served</b>            | K-12                                       |                | 6-8                           |                | 5-8                            |                | K-5                      |                |
|                                 | <b>Number</b>                              | <b>Percent</b> | <b>Number</b>                 | <b>Percent</b> | <b>Number</b>                  | <b>Percent</b> | <b>Number</b>            | <b>Percent</b> |
| <b>Total</b>                    | <b>440</b>                                 |                | <b>151</b>                    |                | <b>457</b>                     |                | <b>457</b>               |                |
| <b>Student Group</b>            |                                            |                |                               |                |                                |                |                          |                |
| Foster Youth                    | 7                                          | 1.6%           | 0                             | 0.0%           | 2                              | 0.4%           | 2                        | 0.4%           |
| Homeless                        | 3                                          | 0.7%           | 2                             | 1.3%           | 30                             | 6.6%           | 9                        | 2.0%           |
| Socioeconomically Disadvantaged | 127                                        | 28.9%          | 71                            | 47.0%          | 270                            | 59.1%          | 221                      | 48.4%          |
| English Learners                | 7                                          | 1.6%           | 5                             | 3.3%           | 67                             | 14.7%          | 48                       | 10.5%          |
| Student with Disabilities       | 56                                         | 12.7%          | 24                            | 15.9%          | 51                             | 11.2%          | 66                       | 14.4%          |
| <b>Race/Ethnicity</b>           |                                            |                |                               |                |                                |                |                          |                |
| Hispanic                        | 76                                         | 17.3%          | 22                            | 14.6%          | 156                            | 34.1%          | 116                      | 25.4%          |
| White                           | 313                                        | 71.1%          | 119                           | 78.8%          | 263                            | 57.5%          | 316                      | 69.1%          |
| African American                | 5                                          | 1.1%           | 1                             | 0.7%           | 3                              | 0.7%           | 2                        | 0.4%           |
| Asian/Pacific Islander          | 4                                          | 0.9%           | 4                             | 2.6%           | 2                              | 0.4%           | 2                        | 0.4%           |
| American Indian                 | 4                                          | 0.9%           | 3                             | 2.0%           | 15                             | 3.3%           | 4                        | 0.9%           |
| Two or more Races               | 31                                         | 7.0%           | 2                             | 1.3%           | 18                             | 3.9%           | 16                       | 3.5%           |

| <b>School</b>                   | <b>Sky Mountain Charter</b> |                | <b>Sutters Mill Elementary</b> |                | <b>Special Education</b> |                | <b>Indian Creek</b>    |                |
|---------------------------------|-----------------------------|----------------|--------------------------------|----------------|--------------------------|----------------|------------------------|----------------|
| <b>Address</b>                  | 4535 Missouri Flat Road     |                | 4801 Luneman Road              |                | 6767 Green Valley Road   |                | 6701 Green Valley Road |                |
| <b>Grades Served</b>            | K-12                        |                | K-3                            |                | P-Adult                  |                | K-4                    |                |
|                                 | <b>Number</b>               | <b>Percent</b> | <b>Number</b>                  | <b>Percent</b> | <b>Number</b>            | <b>Percent</b> | <b>Number</b>          | <b>Percent</b> |
| <b>Total</b>                    | <b>1,781</b>                |                | <b>285</b>                     |                | <b>195</b>               |                | <b>567</b>             |                |
| <b>Student Group</b>            |                             |                |                                |                |                          |                |                        |                |
| Foster Youth                    | 0                           | 0.0%           | 2                              | 0.7%           | 2                        | 1.0%           | 9                      | 1.6%           |
| Homeless                        | 29                          | 1.6%           | 14                             | 4.9%           | 2                        | 1.0%           | 35                     | 6.2%           |
| Socioeconomically Disadvantaged | 592                         | 33.2%          | 78                             | 27.4%          | 54                       | 27.7%          | 332                    | 58.6%          |
| English Learners                | 30                          | 1.7%           | 8                              | 2.8%           | 2                        | 1.0%           | 82                     | 14.5%          |
| Student with Disabilities       | 162                         | 9.1%           | 40                             | 14.0%          | 193                      | 99.0%          | 64                     | 11.3%          |
| <b>Race/Ethnicity</b>           |                             |                |                                |                |                          |                |                        |                |
| Hispanic                        | 539                         | 30.3%          | 34                             | 11.9%          | 28                       | 14.4%          | 166                    | 29.3%          |
| White                           | 759                         | 42.6%          | 236                            | 82.8%          | 140                      | 71.8%          | 361                    | 63.7%          |
| African American                | 83                          | 4.7%           | 1                              | 0.4%           | 6                        | 3.1%           | 5                      | 0.9%           |
| Asian/Pacific Islander          | 110                         | 6.2%           | 6                              | 2.1%           | 11                       | 5.6%           | 4                      | 0.7%           |
| American Indian                 | 2                           | 0.1%           | 5                              | 1.8%           | 5                        | 2.6%           | 15                     | 2.6%           |
| Two or more Races               | 142                         | 8.0%           | 0                              | 0.0%           | 5                        | 2.6%           | 16                     | 2.8%           |

Sources: California Department of Education, California School Dashboard, 2020; BAE, 2021.

**Table 6: School Demographics, City of Placerville, 2020 (Page 2 of 2)**

| <b>School</b>                   | <b>Louisiana Schnell Elementary</b> |                | <b>Gold Oak Elementary</b> |                | <b>El Dorado High</b> |                | <b>Edwin Markham Middle</b> |                |
|---------------------------------|-------------------------------------|----------------|----------------------------|----------------|-----------------------|----------------|-----------------------------|----------------|
|                                 | <b>Address</b>                      |                | <b>Address</b>             |                | <b>Address</b>        |                | <b>Address</b>              |                |
| <b>Grades Served</b>            | 2871 Schnell School Road            |                | 3171 Pleasant Valley Road  |                | 561 Canal Street      |                | 2800 Moulton Drive          |                |
|                                 | K-5                                 |                | K-5                        |                | 9-12                  |                | 6-8                         |                |
|                                 | <b>Number</b>                       | <b>Percent</b> | <b>Number</b>              | <b>Percent</b> | <b>Number</b>         | <b>Percent</b> | <b>Number</b>               | <b>Percent</b> |
| <b>Total</b>                    | <b>418</b>                          |                | <b>318</b>                 |                | <b>1,163</b>          |                | <b>438</b>                  |                |
| <b>Student Group</b>            |                                     |                |                            |                |                       |                |                             |                |
| Foster Youth                    | 0                                   | 0.0%           | 1                          | 0.3%           | 13                    | 1.1%           | 3                           | 0.7%           |
| Homeless                        | 23                                  | 5.5%           | 6                          | 1.9%           | 23                    | 2.0%           | 9                           | 2.1%           |
| Socioeconomically Disadvantaged | 303                                 | 72.5%          | 122                        | 38.4%          | 464                   | 39.9%          | 212                         | 48.4%          |
| English Learners                | 66                                  | 15.8%          | 2                          | 0.6%           | 33                    | 2.8%           | 39                          | 8.9%           |
| Student with Disabilities       | 35                                  | 8.4%           | 50                         | 15.7%          | 168                   | 14.4%          | 65                          | 14.8%          |
| <b>Race/Ethnicity</b>           |                                     |                |                            |                |                       |                |                             |                |
| Hispanic                        | 131                                 | 31.3%          | 38                         | 11.9%          | 259                   | 22.3%          | 129                         | 29.5%          |
| White                           | 235                                 | 56.2%          | 261                        | 82.1%          | 795                   | 68.4%          | 272                         | 62.1%          |
| African American                | 1                                   | 0.2%           | 1                          | 0.3%           | 13                    | 1.1%           | 0                           | 0.0%           |
| Asian/Pacific Islander          | 2                                   | 0.5%           | 3                          | 0.9%           | 30                    | 2.6%           | 3                           | 0.7%           |
| American Indian                 | 4                                   | 1.0%           | 3                          | 0.9%           | 20                    | 1.7%           | 3                           | 0.7%           |
| Two or more Races               | 44                                  | 10.5%          | 11                         | 3.5%           | 37                    | 3.2%           | 28                          | 6.4%           |

| <b>School</b>                   | <b>Gold Trail School</b> |                |
|---------------------------------|--------------------------|----------------|
| <b>Address</b>                  | 889 Cold Springs Road    |                |
| <b>Grades Served</b>            | 4-8                      |                |
|                                 | <b>Number</b>            | <b>Percent</b> |
| <b>Total</b>                    | <b>366</b>               |                |
| <b>Student Group</b>            |                          |                |
| Foster Youth                    | 4                        | 1.1%           |
| Homeless                        | 11                       | 3.0%           |
| Socioeconomically Disadvantaged | 103                      | 28.1%          |
| English Learners                | 7                        | 1.9%           |
| Student with Disabilities       | 55                       | 15.0%          |
| <b>Race/Ethnicity</b>           |                          |                |
| Hispanic                        | 50                       | 13.7%          |
| White                           | 298                      | 81.4%          |
| African American                | 1                        | 0.3%           |
| Asian/Pacific Islander          | 6                        | 1.6%           |
| American Indian                 | 3                        | 0.8%           |
| Two or more Races               | 6                        | 1.6%           |

Sources: California Department of Education, California School Dashboard, 2020; BAE, 2021.

In most cases, the share of socioeconomically disadvantaged students exceeds the non-White share by anywhere from 1.6 percent to 28.9 percent. In the case of the Special Education school on Green Valley Road, the shares are roughly equal, while at the K-12 school on 4535 Missouri Flat Road the non-White share of the student body is relatively high (49.2 percent) while the percent that is socioeconomic disadvantaged was relatively low (33.2 percent) compared to other schools in the area.

### ***Access to Employment***

According to 2020 data from the California Economic Development Department (EDD), seven out of the 25 major employers in El Dorado County are located in the City of Placerville. As illustrated in Figure 6, six out of the seven major employers located in Placerville are based in the commercial district off of Placerville Drive in the western portion of the community. The seventh major employer, the El Dorado Irrigation District, is located in northeastern Placerville along Mosquito Road. Due to the relatively small size of the City of Placerville, most residents have relatively good access to employment opportunities within the City, which are mostly concentrated in the western commercial district along Placerville Drive, within the historic Downtown area, or along the Broadway commercial district south of Highway 50. As discussed in more detail below, all of Placerville's major employers are located within one mile of an existing bus stop, and all but one have an existing bus stop within one-quarter mile. However, the lack of transit access in the southeast and north of Placerville may present a barrier to fair housing choice for households who rely on public transportation to access employment opportunities. Households with access to an automobile, or who can access public transportation, likely have reasonably access to employment within the City of Placerville and within higher employment opportunity areas located further to the west, such as within the El Dorado Hills Business Park and in and around the cities of Folsom and Sacramento.

### ***Public Transportation***

Public transportation for the Western Slope of El Dorado County area is provided by El Dorado Transit, which provides fixed route, regularly scheduled bus services from Sacramento to Pollock Pines, as well as curb-to-curb Paratransit for persons with disabilities and mobility impairments and non-emergency medical transportation. There are five El Dorado Transit bus routes that serve the City of Placerville, as illustrated in Figure 7. Service on these routes is provided on a regular schedule that typically stretches from around 6:00 or 7:00 am to around 7:00 pm, with the exception of the Saturday Express, which runs between 9:00 am to 5:00 pm. A one-way pass for local routes costs \$1.50 for the general public, which is discounted to \$0.75 for seniors over the age of 60, people with disabilities, and children up to 12<sup>th</sup> grade. The Sacramento Commuter route, which connects western El Dorado County to downtown Sacramento, costs \$5.00 for a one-way pass. Paratransit services are \$10.00 for non-emergency medical trips and \$3.00 for curb-to-curb ADA paratransit.

As discussed earlier, all major employers located within the City are relatively well served by the existing El Dorado Transit system (i.e., have a public transit stop within one-quarter to one-half mile), though many residents may be required to make at least one transfer. The existing fixed routes also provide direct service to the El Dorado Hills Town Center, key commercial nodes in southern Folsom, and to downtown Sacramento, which are all important employment centers. Nonetheless, lower-income households that live in areas within the City limits that are beyond one quarter mile of an existing transit stops may face barriers to fair housing choice due to limited public transportation availability. For example, the neighborhood surrounding Lions Park in southern Placerville is roughly one mile from the nearest bus stop located at the Marshall Medical Center. Another area that is not well served by public transit includes the neighborhood surrounding the Gold Bug Park and Mine, which is approximately one mile from the nearest bus stop at the Cottonwood Senior Apartments. For residents in areas such as these, the availability of a personal vehicle is particularly important to ensure access to employment and important commercial and public services. Therefore, at least in some cases, access to public transportation may present an impediment to fair housing choice for those who rely on such transit to access employment and educational opportunities. This is important to note as one of the census tracts with the highest proportion of low- and moderate-income households, located in southeastern Placerville, is not particularly well served by existing transit and bicycle/pedestrian infrastructure.

#### Means of Transportation to Work

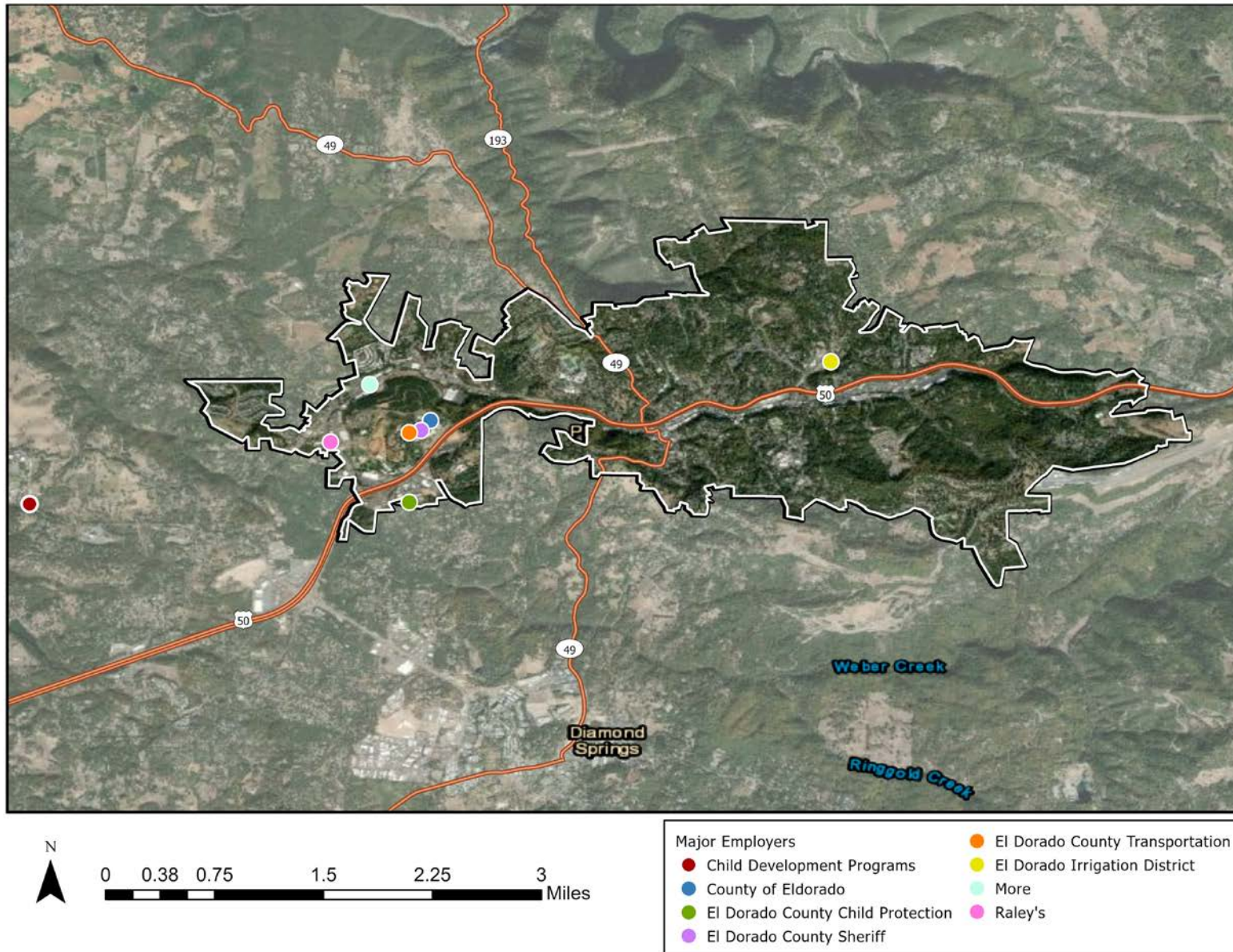
Table 7 illustrates the number of workers ages 16 or over by their primary means of transportation to work. The data indicate that Placerville's non-White residents are more likely than their non-Hispanic White counterparts to drive alone to work, at 85.3 percent compared to 75.9 percent, respectively. Nonetheless, non-White residents are also notably less likely to carpool and more likely to walk or take alternative modes of transportation, such as a taxi, motorcycle, or bicycle. This indicates that while most non-White residents have access to automotive transportation, a small number rely on other modes like walking, bicycling, etc.; though the relatively high degree of statistical error in the available Census estimates makes any final determination difficult. While it is not clear whether workers use alternative modes by choice (e.g., the health benefits cycling) or out of necessity (e.g., lack of access to an automobile, work off-hours when public transit is not available), the data highlight a possible need to explore expanding transit access into underserved areas and/or times of day.

**Table 7: Means of Transportation to Work by Race and Ethnicity, City of Placerville, 2014-2018**

| Means of Transportation          | City of Placerville |             |            |             |              |             |
|----------------------------------|---------------------|-------------|------------|-------------|--------------|-------------|
|                                  | Non-Hispanic White  |             | Minority   |             | All          |             |
|                                  | Number              | Percent     | Number     | Percent     | Number       | Percent     |
| Car, truck, van - drove alone    | 2,680               | 75.9%       | 818        | 83.5%       | 3,498        | 77.6%       |
| Car, truck, van - carpooled      | 351                 | 9.9%        | 72         | 7.3%        | 423          | 9.4%        |
| Public transportation            | 83                  | 2.4%        | 0          | 0.0%        | 83           | 1.8%        |
| Walked                           | 35                  | 1.0%        | 55         | 5.6%        | 90           | 2.0%        |
| Taxi, motorcycle, bicycle, other | 85                  | 2.4%        | 31         | 3.2%        | 116          | 2.6%        |
| Worked at home                   | 295                 | 8.4%        | 4          | 0.4%        | 299          | 6.6%        |
| <b>Total</b>                     | <b>3,529</b>        | <b>100%</b> | <b>980</b> | <b>100%</b> | <b>4,509</b> | <b>100%</b> |

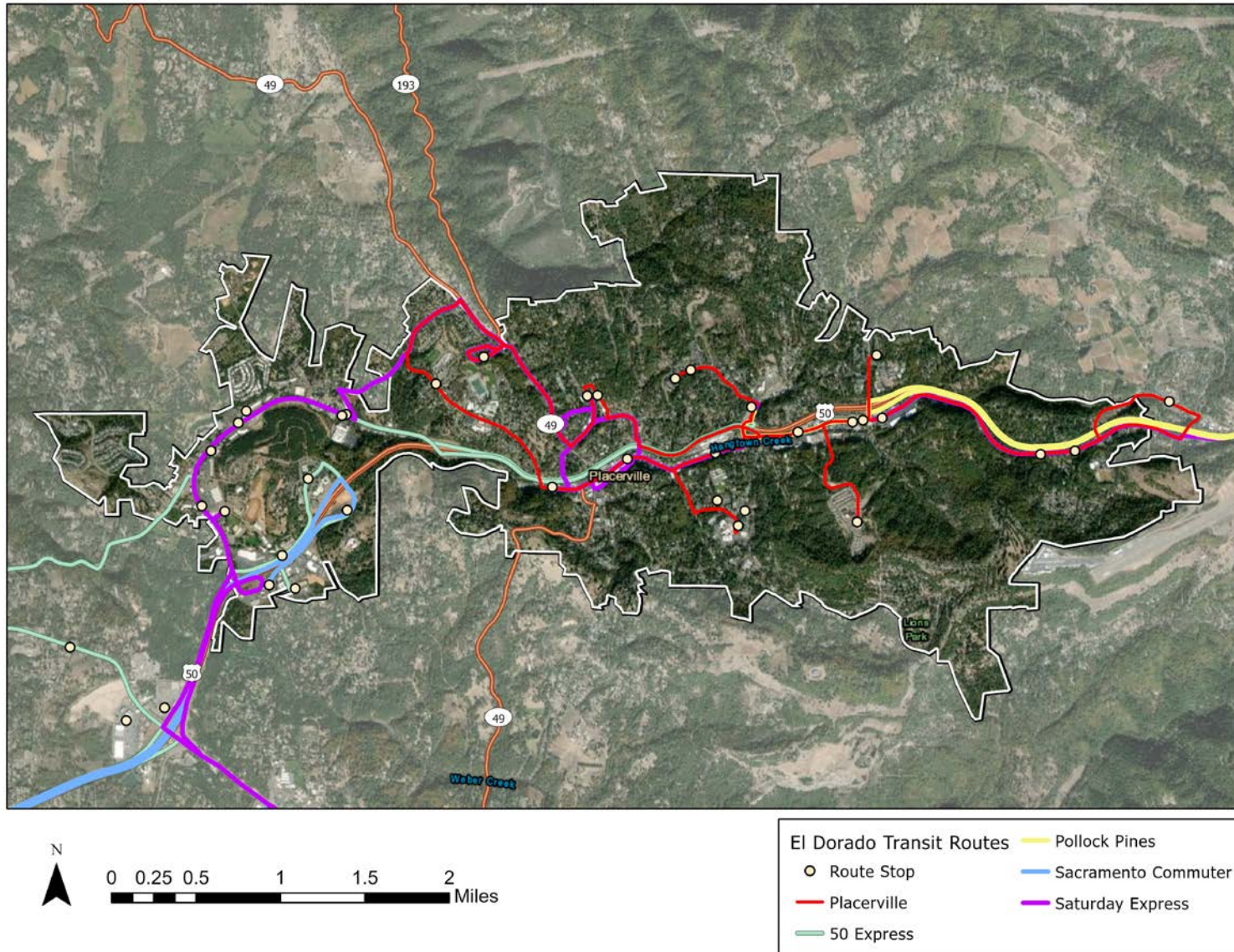
Sources: U.S. Census Bureau, ACS 2018 five-year sample period, B08301, B08105H; BAE, 2021.

Figure 6: Major Employers, City of Placerville, 2020



Sources: California Economic Development Department, 2020; BAE, 2021.

**Figure 7: El Dorado Transit Route Map, 2021**



Sources: El Dorado Transit, 2021; BAE, 2021

## Disproportionate Housing Needs and Displacement

The following section assesses the extent to which protected classes, particularly members of non-White racial and ethnic groups, experience disproportionate housing needs and are at risk for displacement.

**Table 8: Housing Problems by Income and Race/Ethnicity, City of Placerville, 2013-2017**

| Within Group Housing Problems Rate (a) |                |        |        |         |           |
|----------------------------------------|----------------|--------|--------|---------|-----------|
| Race/Ethnicity                         | Percent of AMI |        |        |         | Total (b) |
|                                        | 0-30%          | 30-50% | 50-80% | 80-100% |           |
| Non-Hispanic                           |                |        |        |         |           |
| White                                  | 63.7%          | 77.0%  | 61.0%  | 45.1%   | 64.2%     |
| Black/African American                 | n.a.           | n.a.   | n.a.   | n.a.    | n.a.      |
| Asian                                  | n.a.           | n.a.   | n.a.   | n.a.    | n.a.      |
| American Indian                        | n.a.           | 100.0% | n.a.   | n.a.    | 100.0%    |
| Pacific Islander                       | n.a.           | n.a.   | n.a.   | n.a.    | n.a.      |
| Other (Including Multiple Races)       | 0.0%           | 100.0% | n.a.   | n.a.    | 30.0%     |
| Hispanic                               | 100.0%         | 100.0% | 68.2%  | n.a.    | 86.7%     |
| Subtotal, Housing Problems             | 68.1%          | 78.2%  | 61.6%  | 45.1%   | 66.2%     |
| Average Rate +10%                      | 78.1%          | 88.2%  | 71.6%  | 55.1%   | 76.2%     |

| Within Group Severe Housing Problems Rate (c) |                |        |        |         |           |
|-----------------------------------------------|----------------|--------|--------|---------|-----------|
| Race/Ethnicity                                | Percent of AMI |        |        |         | Total (b) |
|                                               | 0-30%          | 30-50% | 50-80% | 80-100% |           |
| Non-Hispanic                                  |                |        |        |         |           |
| White                                         | 58.9%          | 23.0%  | 30.1%  | 11.8%   | 34.5%     |
| Black/African American                        | n.a.           | n.a.   | n.a.   | n.a.    | n.a.      |
| Asian                                         | n.a.           | n.a.   | n.a.   | n.a.    | n.a.      |
| American Indian                               | n.a.           | 100.0% | n.a.   | n.a.    | 100.0%    |
| Pacific Islander                              | n.a.           | n.a.   | n.a.   | n.a.    | n.a.      |
| Other (Including Multiple Races)              | 0.0%           | 100.0% | n.a.   | n.a.    | 30.0%     |
| Hispanic                                      | 100.0%         | 0.0%   | 54.5%  | n.a.    | 79.5%     |
| Subtotal, Housing Problems                    | 64.4%          | 26.9%  | 32.9%  | 11.8%   | 39.7%     |
| Average Rate +10%                             | 74.4%          | 36.9%  | 42.9%  | 21.8%   | 49.7%     |

Notes:

(a) Housing problems include: Lack of complete kitchen, Lack of complete plumbing facility; More than one person per room; Cost burden greater than 30% of income.

(b) Includes all households within incomes at or below 100% of area median income.

Sources: U.S. Department of Housing and Urban Development, 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data; BAE, 2020.

### ***Prevalence of Housing Problems***

Table 8, above, reports the relative prevalence of housing problems among households with incomes equal to, or less than, the area median, by race and ethnicity. Households of a given racial or ethnic heritage are considered to have a disproportionately greater need for housing assistance if they experience housing problems at a significantly greater rate (10 percentage points or more), than do households within the same income level as a whole, regardless of

race or ethnicity. For example, 78.2 percent of all very low-income households (i.e., incomes between 30 and 50 percent of AMI) in Placerville experienced at least one of the four housing problems between 2013 and 2017, as did 100 percent of very low-income Hispanic households, as reported in Table 8. Under the applicable definition, very low-income Hispanic households exhibit a disproportionately greater need for housing assistance that could help to eliminate their current housing problems. Furthermore, both American Indian and Hispanic households, as well as households that fall into the “other” race and ethnicity category, experienced housing problems at rates that, at some income levels, exceeded the citywide average by at least 10 percentage points. The results are similar for severe housing problems. Note that the sample sizes are very small in most instances where the housing problems rate for a given subgroup is greater than the citywide average. For example, the ACS data estimated that there were 15 very low-income American Indian households, all of whom experienced housing problems.

### ***Resident Displacement***

While there is no single accepted definition for displacement risk, this analysis assumes that any lower-income renter household that is experiencing one or more of the HUD defined housing problems, discussed above, may be at risk for displacement. This is because, as lower-income renters, these households are more exposed to increases in housing costs and, due to the nature of rental contracts, are subject to issues such as the non-renewal of leases, refusal to conduct or substandard maintenance of properties over which the renter has no control, etc. Nonetheless, lower-income owner households may also be at some risk for displacement resulting from disruptions to their income, such as temporary unemployment or illness resulting in missed mortgage payments, as well as due to issues like deferred maintenance.

Table 9 reports the number of households experiencing any of the HUD defined housing problems by income category and tenure. Please note that households are reported based on the most severe housing problem experienced but may experience more than one housing problem at a time. According to this data, there were 1,360 households renter households that earned the median income or less in Placerville between 2013 and 2017 who experienced at least one of the four HUD defined housing problems and which may, therefore, be at risk for displacement. The data generally indicate that the prevalence of housing problems decreases inversely with income, meaning that as a household’s income goes up the likelihood that they will experience at least one of the HUD defined housing problems goes down. The data also indicate that there were 630 lower-income owner households who experienced high or severe housing cost burdens during this period, indicating that they may be at somewhat greater risk for displacement compared to other homeowners.

**Table 9: Housing Problems by Tenure and Type, City of Placerville, 2013-2017 Five-Year Sample Period (Page 1 of 2)**

| Housing Problems in Order of Severity (a) | Owner-Occupied Households  |              |            |              |            |              |             |             | All Households   |              |
|-------------------------------------------|----------------------------|--------------|------------|--------------|------------|--------------|-------------|-------------|------------------|--------------|
|                                           | 0-30% AMI                  |              | 30-50% AMI |              | 50-80% AMI |              | 80-100% AMI |             | ≤ 100% HAMFI (b) |              |
|                                           | Number                     | Percent      | Number     | Percent      | Number     | Percent      | Number      | Percent     | Number           | Percent      |
| Substandard Housing (c)                   | 0                          | 0.0%         | 0          | 0.0%         | 0          | 0.0%         | 0           | 0.0%        | 0                | 0.0%         |
| Severely Overcrowded (d)                  | 0                          | 0.0%         | 0          | 0.0%         | 0          | 0.0%         | 0           | 0.0%        | 0                | 0.0%         |
| Overcrowded (e)                           | 0                          | 0.0%         | 0          | 0.0%         | 0          | 0.0%         | 0           | 0.0%        | 0                | 0.0%         |
| Severe Housing Cost Burden (f)            | 90                         | 3.8%         | 75         | 3.2%         | 95         | 4.0%         | 30          | 1.3%        | 290              | 12.2%        |
| Housing Cost Burden (e)                   | 0                          | 0.0%         | 155        | 6.5%         | 110        | 4.6%         | 75          | 3.2%        | 340              | 14.3%        |
| Zero/Negative Income                      | 0                          | 0.0%         | 0          | 0.0%         | 0          | 0.0%         | 0           | 0.0%        | 0                | 0.0%         |
| <b>Subtotal, Housing Problems</b>         | <b>90</b>                  | <b>3.8%</b>  | <b>230</b> | <b>9.7%</b>  | <b>205</b> | <b>8.6%</b>  | <b>105</b>  | <b>4.4%</b> | <b>630</b>       | <b>26.6%</b> |
| <b>Subtotal, Owner Households</b>         | <b>145</b>                 |              | <b>320</b> |              | <b>340</b> |              | <b>205</b>  |             | <b>1,010</b>     |              |
| Housing Problems in Order of Severity (a) | Renter-Occupied Households |              |            |              |            |              |             |             | All Households   |              |
|                                           | 0-30% AMI                  |              | 30-50% AMI |              | 50-80% AMI |              | 80-100% AMI |             | ≤ 100% HAMFI (b) |              |
|                                           | Number                     | Percent      | Number     | Percent      | Number     | Percent      | Number      | Percent     | Number           | Percent      |
| Substandard Housing (c)                   | 25                         | 1.1%         | 10         | 0.4%         | 90         | 3.8%         | 0           | 0.0%        | 125              | 5.3%         |
| Severely Overcrowded (d)                  | 0                          | 0.0%         | 0          | 0.0%         | 0          | 0.0%         | 0           | 0.0%        | 0                | 0.0%         |
| Overcrowded (e)                           | 60                         | 2.5%         | 4          | 0.2%         | 0          | 0.0%         | 0           | 0.0%        | 64               | 2.7%         |
| Severe Housing Cost Burden (f)            | 340                        | 14.3%        | 70         | 3.0%         | 60         | 2.5%         | 0           | 0.0%        | 470              | 19.8%        |
| Housing Cost Burden (e)                   | 30                         | 1.3%         | 160        | 6.8%         | 95         | 4.0%         | 10          | 0.4%        | 295              | 12.4%        |
| Zero/Negative Income                      | 130                        | 5.5%         | 0          | 0.0%         | 0          | 0.0%         | 0           | 0.0%        | 130              | 5.5%         |
| <b>Subtotal, Housing Problems</b>         | <b>585</b>                 | <b>24.7%</b> | <b>244</b> | <b>10.3%</b> | <b>245</b> | <b>10.3%</b> | <b>10</b>   | <b>0.4%</b> | <b>1,084</b>     | <b>45.7%</b> |
| <b>Subtotal, Renter Households</b>        | <b>655</b>                 |              | <b>275</b> |              | <b>385</b> |              | <b>45</b>   |             | <b>1,360</b>     |              |
| <b>Total, All Households</b>              | <b>800</b>                 |              | <b>595</b> |              | <b>725</b> |              | <b>250</b>  |             | <b>2,370</b>     |              |

## Notes:

(a) Housing problems are listed from most severe to least severe, as ordered by HUD. Households may have multiple housing problems, but, for the purposes of this table, they are counted under their most severe housing problem.

(b) "HAMFI" is the HUD Area Median Family Income for the county in which the household is located.

(c) Lacking complete plumbing or kitchen facilities.

(d) Greater than 1.5 persons per room.

(e) 1.01 to 1.5 persons per room.

(f) Housing costs greater than 50% of gross income.

(g) Housing costs greater than 30% but less than 50 % of gross income.

Sources: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data; BAE, 2020.

## Equal Opportunity in Mortgage and Home Improvement Financing

Mortgage lending is governed by both state and federal statutes, including the Federal Fair Housing Act and the Home Mortgage Disclosure Act (HMDA). The HMDA mandates that most mortgage lenders report on the details associated with each mortgage application, including identifying how each application was resolved, any reason for the denial of the application, and details regarding the borrower and the subject property. These reports provide a primary source of information regarding the residential mortgage market, including sale and purchase activity. For the purpose of this report, a “successful” home loan application is defined as one that is originated, or approved by the lender and accepted by the borrower. Mortgage applications that are approved by the lender but not accepted by the borrower are not considered successful and are not categorized as “originated.”

### *Non-White Homeownership Rates*

Rates of home ownership often vary widely by race and ethnicity, both within local jurisdictions and throughout larger regions. According to the available data from the 2014-2018 ACS, the homeownership rate for non-Hispanic White households was 63.5 percent. This is compared to 48.4 percent for Hispanic and Latino households and 33.3 percent for American Indian and Alaska Native households. All of the 17 estimated Asian households owned their own homes, but none of the households of “some other race” or “two or more races” owned their homes.

**Table 10: Homeownership Rates by Race/Ethnicity, City of Placerville, 2014-2018**

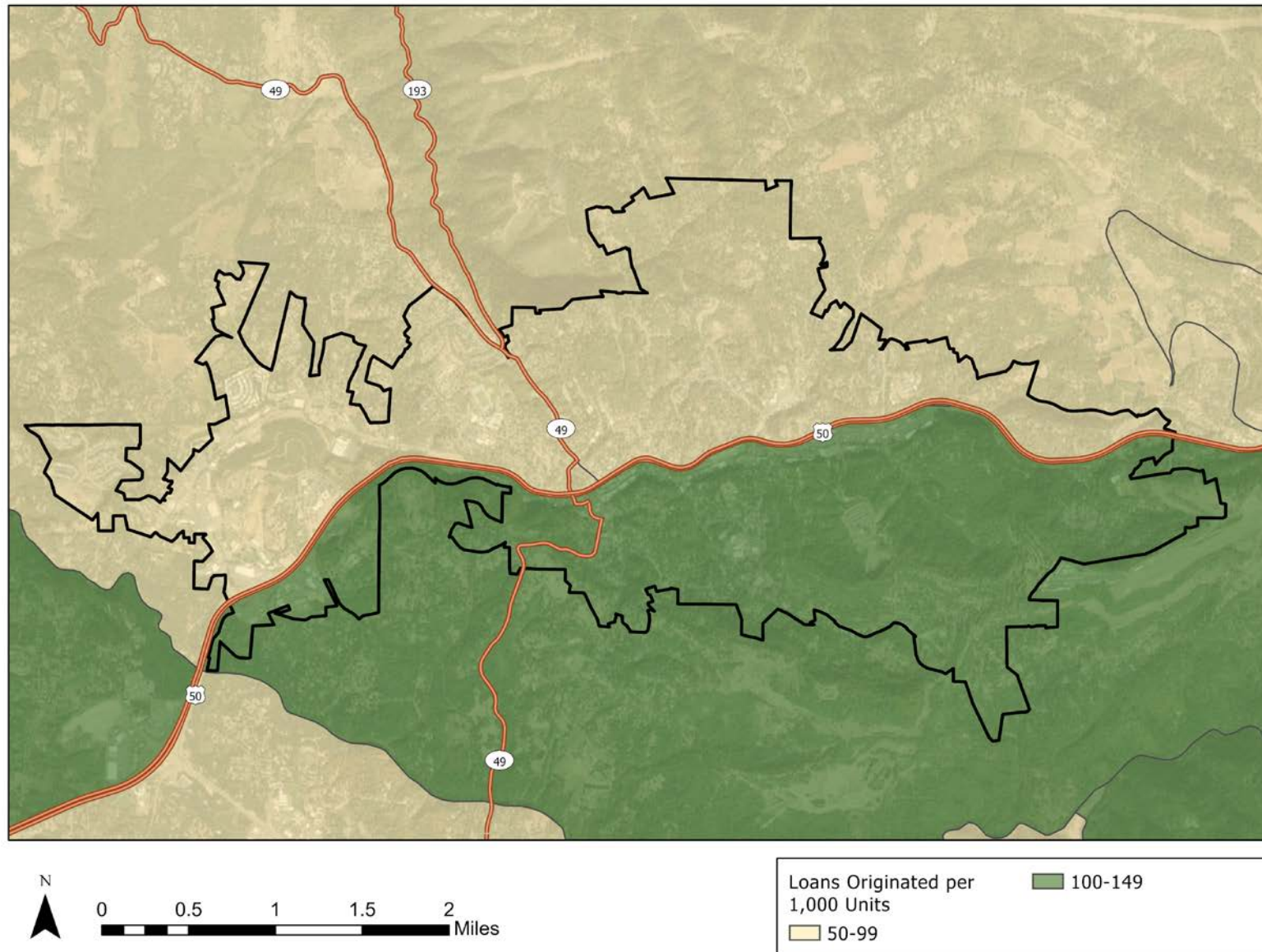
| Householder by Race                         | Household Tenure |        | Total | Ownership Rate |
|---------------------------------------------|------------------|--------|-------|----------------|
|                                             | Owner            | Renter |       |                |
| Non-Hispanic White                          | 2,084            | 1,197  | 3,281 | 63.5%          |
| Black or African American Alone             | 0                | 0      | 0     | n.a.           |
| American Indian and Alaska Native Alone     | 23               | 46     | 69    | 33.3%          |
| Asian Alone                                 | 17               | 0      | 17    | 100.0%         |
| Native Hawaiian and Other Pacific Is. Alone | 0                | 0      | 0     | n.a.           |
| Some other race alone                       | 0                | 75     | 75    | 0.0%           |
| Two or more races                           | 0                | 82     | 82    | 0.0%           |
| Hispanic or Latino                          | 261              | 278    | 539   | 48.4%          |

Sources: U.S. Census Bureau, American Community Survey, 2014-2018 5-year sample data, B25003A-G, BAE, 2021.

### *Geography of Mortgage Lending*

Figure 8 on the following page illustrates the geographic distribution of originated home loans by Census tract in 2019. Based on this data, the portions of the City located to the south of Highway 50 had the highest overall loan origination rates at between 100 and 149 loans per 1,000 housing units, compared to 50-99 loans per 1,000 housing units in the portions of the City located to the north of Highway 50. Comparison with the Census block groups with high non-White concentrations identified in Figure 1 and Figure 2, and the detailed maps provided in Appendix A, indicates that there is no clear relationship between homeownership rates and non-White household concentrations. Notably, the portion of the city with the highest concentrations of African American and Asian residents is within the area with higher home loan origination rates.

**Figure 8: Number of Loans Originated Per 1,000 Housing Units, 2019**



Sources: HMDA; BAE, 2021.

### ***Race and Ethnicity of Borrowers***

Table 11 reports information on the disposition of home loan applications by applicant income level and racial and ethnic affiliation. On average, non-White households accounted for 8.0 percent of all applications for conventional home loan financing and 14.1 percent of government insured loan applications in Placerville. Recognizing that minorities accounted for 19.6 percent of all households in Placerville between 2014 and 2018, this indicates that non-White households are significantly underrepresented in the mortgage lending market. Nonetheless, the data provided in Table 11 indicate that non-White households that applied for mortgage financing were generally more likely to be approved compared to their non-Hispanic White counterparts.

Table 11 reports detailed information regarding the number of applications received, approved, denied, and originated, for both non-Hispanic White and non-White households. The data indicate that those non-White households that did apply for conventional mortgage financing had an approval rate that was 2.6 percentage points higher than average and a loan origination rate that was 3.9 percentage points higher than for all Placerville households. Non-White households that applied for government issued loans, by comparison, had a loan approval rate that was 1.3 percentage points higher than for all households, but a loan origination rate that was 2.7 percentage points lower. Among home loan applicants of all races and ethnicities, approval rates and loan origination rates generally decline with income, though non-White households earning less than 50 percent of AMI appear much less likely to have their application approved or a loan originated.

Additional information summarized in Figure 9 indicates that all conventional loan applications submitted by American Indian, Asian, and African American applicants were approved, and that among the two racial/ethnic categories with less than 100 percent approval, Hispanic and Latino applicants had lower denial rates compared to their non-Hispanic White counterparts. Among applicants for government insured loans only African American households had a 100 percent approval rate. The lowest approval rate for government insured loans was among American Indian households, who had a 25.0 percent denial rate, compared to 12.7 percent for non-Hispanic White households and 11.1 percent for Hispanic or Latino households.

**Table 11: Disposition of Home Loans by Applicant Income and Race/Ethnicity, 2019**

|                                        | <u>Less than 50% AMI</u> |                     | <u>50% to 79% of AMI</u> |                     | <u>80% to 99% of AMI</u> |                     | <u>100% to 119% of AMI</u> |                     | <u>120% of AMI or More</u> |                     | <u>All Income Levels</u> |                     |              |
|----------------------------------------|--------------------------|---------------------|--------------------------|---------------------|--------------------------|---------------------|----------------------------|---------------------|----------------------------|---------------------|--------------------------|---------------------|--------------|
|                                        | <u>White (a)</u>         | <u>Minority (b)</u> | <u>White (a)</u>         | <u>Minority (b)</u> | <u>White (a)</u>         | <u>Minority (b)</u> | <u>White (a)</u>           | <u>Minority (b)</u> | <u>White (a)</u>           | <u>Minority (b)</u> | <u>White (a)</u>         | <u>Minority (b)</u> | <u>Total</u> |
| <b>Conventional Loans (c)</b>          |                          |                     |                          |                     |                          |                     |                            |                     |                            |                     |                          |                     |              |
| Applications Received                  | 45                       | 7                   | 99                       | 11                  | 79                       | 5                   | 76                         | 5                   | 252                        | 25                  | 551                      | 53                  | 604          |
| Withdraw n or Incomplete               | 5                        | 1                   | 16                       | 3                   | 8                        | 1                   | 16                         | 2                   | 43                         | 6                   | 88                       | 13                  | 101          |
| % Withdraw n or Incomplete             | 11.1%                    | 14.3%               | 16.2%                    | 27.3%               | 10.1%                    | 20.0%               | 21.1%                      | 40.0%               | 17.1%                      | 24.0%               | 16.0%                    | 24.5%               | 16.7%        |
| <b>Valid Applications (d)</b>          | <b>40</b>                | <b>6</b>            | <b>83</b>                | <b>8</b>            | <b>71</b>                | <b>4</b>            | <b>60</b>                  | <b>3</b>            | <b>209</b>                 | <b>19</b>           | <b>463</b>               | <b>40</b>           | <b>503</b>   |
| <b>Applications Approved</b>           | <b>28</b>                | <b>4</b>            | <b>65</b>                | <b>7</b>            | <b>57</b>                | <b>4</b>            | <b>51</b>                  | <b>2</b>            | <b>168</b>                 | <b>16</b>           | <b>369</b>               | <b>33</b>           | <b>402</b>   |
| % Valid Applications                   | 70.0%                    | 66.7%               | 78.3%                    | 87.5%               | 80.3%                    | 100.0%              | 85.0%                      | 66.7%               | 80.4%                      | 84.2%               | 79.7%                    | 82.5%               | 79.9%        |
| <b>Originated/Purchased</b>            | <b>29</b>                | <b>3</b>            | <b>66</b>                | <b>7</b>            | <b>56</b>                | <b>4</b>            | <b>51</b>                  | <b>3</b>            | <b>172</b>                 | <b>17</b>           | <b>374</b>               | <b>34</b>           | <b>408</b>   |
| % Valid Applications                   | 73%                      | 50%                 | 80%                      | 88%                 | 79%                      | 100%                | 85%                        | 100%                | 82%                        | 89%                 | 81%                      | 85%                 | 81%          |
| <b>Applications Denied (d)</b>         | <b>10</b>                | <b>2</b>            | <b>13</b>                | <b>1</b>            | <b>11</b>                | <b>0</b>            | <b>5</b>                   | <b>0</b>            | <b>31</b>                  | <b>2</b>            | <b>70</b>                | <b>5</b>            | <b>75</b>    |
| % Valid Applications                   | 25.0%                    | 33.3%               | 15.7%                    | 12.5%               | 15.5%                    | 0.0%                | 8.3%                       | 0.0%                | 14.8%                      | 10.5%               | 15.1%                    | 12.5%               | 14.9%        |
| <b>Government Insured Loans (c)(e)</b> |                          |                     |                          |                     |                          |                     |                            |                     |                            |                     |                          |                     |              |
| Applications Received                  | 30                       | 4                   | 31                       | 6                   | 22                       | 7                   | 15                         | 1                   | 39                         | 4                   | 137                      | 22                  | 159          |
| Withdraw n or Incomplete               | 3                        | 1                   | 11                       | 2                   | 2                        | 0                   | 6                          | 0                   | 5                          | 1                   | 27                       | 4                   | 31           |
| % Withdraw n or Incomplete             | 10.0%                    | 25.0%               | 35.5%                    | 33.3%               | 9.1%                     | 0.0%                | 40.0%                      | 0.0%                | 12.8%                      | 25.0%               | 19.7%                    | 18.2%               | 19.5%        |
| <b>Valid Applications (d)</b>          | <b>27</b>                | <b>3</b>            | <b>20</b>                | <b>4</b>            | <b>20</b>                | <b>7</b>            | <b>9</b>                   | <b>1</b>            | <b>34</b>                  | <b>3</b>            | <b>110</b>               | <b>18</b>           | <b>128</b>   |
| <b>Applications Approved</b>           | <b>22</b>                | <b>3</b>            | <b>14</b>                | <b>3</b>            | <b>18</b>                | <b>6</b>            | <b>7</b>                   | <b>0</b>            | <b>29</b>                  | <b>3</b>            | <b>90</b>                | <b>15</b>           | <b>105</b>   |
| % Valid Applications                   | 81.5%                    | 100.0%              | 70.0%                    | 75.0%               | 90.0%                    | 85.7%               | 77.8%                      | 0.0%                | 85.3%                      | 100.0%              | 81.8%                    | 83.3%               | 82.0%        |
| <b>Originated/Purchased</b>            | <b>24</b>                | <b>3</b>            | <b>14</b>                | <b>3</b>            | <b>17</b>                | <b>5</b>            | <b>7</b>                   | <b>0</b>            | <b>27</b>                  | <b>3</b>            | <b>89</b>                | <b>14</b>           | <b>103</b>   |
| % Valid Applications                   | 89%                      | 100%                | 70%                      | 75%                 | 85%                      | 71%                 | 78%                        | 0%                  | 79%                        | 100%                | 81%                      | 78%                 | 80%          |
| <b>Applications Denied (d)</b>         | <b>2</b>                 | <b>0</b>            | <b>5</b>                 | <b>1</b>            | <b>2</b>                 | <b>1</b>            | <b>2</b>                   | <b>1</b>            | <b>5</b>                   | <b>0</b>            | <b>16</b>                | <b>3</b>            | <b>19</b>    |
| % Valid Applications                   | 7.4%                     | 0.0%                | 25.0%                    | 25.0%               | 10.0%                    | 14.3%               | 22.2%                      | 100.0%              | 14.7%                      | 0.0%                | 14.5%                    | 16.7%               | 14.8%        |

## Notes:

(a) Includes applicants that identify as non-Hispanic White.

(b) Includes applicants that identify as non-White or Hispanic.

(c) Excludes refinance loans and those originated by lenders not subject to HMDA.

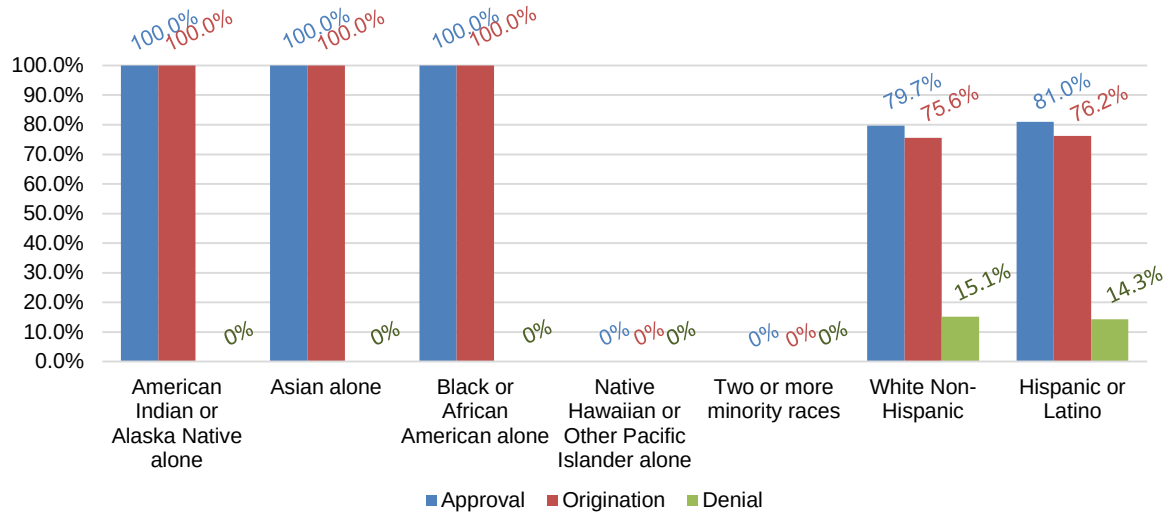
(d) Excludes applications that were withdrawn and files that were closed due to incompleteness.

(e) Includes FHA, USDA, and VA home loans on single-family (one to four units) and single-family manufactured dwellings.

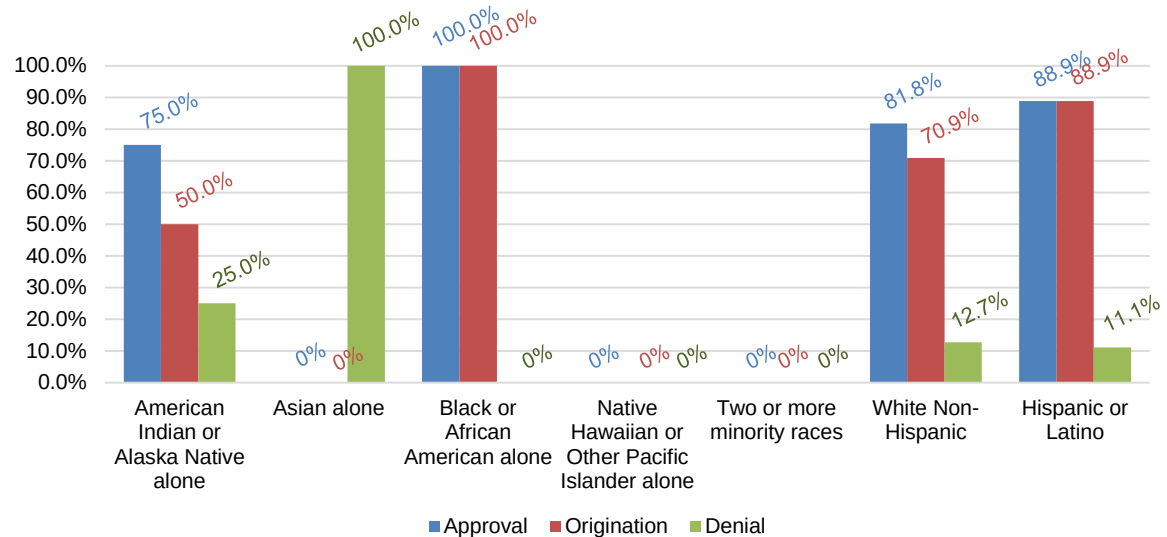
Sources: FFIEC, Home Mortgage Disclosure Act data, 2019; BAE, 2021.

**Figure 9: Approval, Origination and Denial Rates by Race and Ethnicity, Conventional Home Loans, 2019**

**Conventional Loans**



**Government Insured Loans**



Sources: FFIEC, Home Mortgage Disclosure Act data, 2019; BAE, 2021.

# FAIR HOUSING ISSUES AND RESOURCES

The following section summarizes the available information regarding fair housing complaints submitted by residents of the City of Placerville to the applicable state and federal authorities, as well as information collected regarding resident perspectives on fair housing issues within the City of Placerville, as collected through an hard copy and online resident survey.

## Fair Housing Complaints

Complaints alleging housing discrimination can be filed at either the state or federal level. Federal housing discrimination complaints are filed with the HUD Office of Fair Housing and Equal Employment Opportunity (FHEO). The FHEO administers the Fair Housing Assistance Program (FHAP), which awards and manages the program grants and works with lawmakers to develop and refine fair housing legislation. Formal complaints can be filed either with the central HUD office, or at any of the field offices located within each state.

Table 12 identifies the number of fair housing complaints filed with the FHEO annually between 2013 and 2020. According to these data, there were only four fair housing complaints filed by residents of the City of Placerville during this period, with one complaint or none being filed each year. The complaints include two which were dismissed under a determination of no cause, with another that was dismissed due to lack of jurisdiction. Only one of the four complaints was settled, with \$10,000 in compensation provided to the plaintiff on the basis of alleged discriminatory refusal to rent based on familial status in 2014.

By comparison, there were 28 complaints filed with the FHEO regarding alleged fair housing discrimination in El Dorado County between 2013 and 2020, including eight that were settled and two that were withdrawn following resolution. Nearly all of the settled or withdrawn fair housing complaints in El Dorado County during this period pertained to discriminatory refusal to rent or sell due to disability and failure to make reasonable accommodation, with two instances of alleged retaliation. There were three awards made to plaintiffs in the case of settlements which ranged from \$1,300 to \$6,500 in value. The remaining complaints include 17 which were dismissed for no cause, and one that was dismissed for lack of jurisdiction.

In addition to data from the FHEO, this analysis also reviewed data from the California Department of Fair Employment and Housing (DFEH). As reported in Table 13, there were only five fair housing complaints filed with the DFEH between 2015 and 2020 by residents of the City of Placerville. Of those, two were investigated and either dismissed or withdrawn with a resolution having been agreed to between the involved parties; both of which pertained to the denial of equal terms and conditions and reasonable accommodation to persons with disabilities. Of the remaining three complaints, one was dismissed for lack of jurisdiction. The remaining two were dismissed following investigation, with the DFEH finding no reasonable cause to believe that housing discrimination occurred.

**Table 12: FHEO Fair Housing Complaints by Resolution Type, 2013-2020****City of Placerville**

| Resolution                         | Year Resolved |          |          |          |          |          |          |          | Total,<br>All Years | Percent<br>of Total |
|------------------------------------|---------------|----------|----------|----------|----------|----------|----------|----------|---------------------|---------------------|
|                                    | 2013          | 2014     | 2015     | 2016     | 2017     | 2018     | 2019     | 2020     |                     |                     |
| Conciliated/Settled                | 0             | 1        | 0        | 0        | 0        | 0        | 0        | 0        | 1                   | 25.0%               |
| No Cause                           | 0             | 0        | 1        | 0        | 0        | 1        | 0        | 0        | 2                   | 50.0%               |
| Withdrawal Without Resolution      | 0             | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0                   | 0.0%                |
| FHAP Judicial Consent Order        | 0             | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0                   | 0.0%                |
| Failed to Cooperate                | 0             | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0                   | 0.0%                |
| Dismissed for Lack of Jurisdiction | 0             | 0        | 0        | 0        | 0        | 0        | 0        | 1        | 1                   | 25.0%               |
| <b>Subtotal, All Complaints</b>    | <b>0</b>      | <b>1</b> | <b>1</b> | <b>0</b> | <b>0</b> | <b>1</b> | <b>0</b> | <b>1</b> | <b>4</b>            | <b>100.0%</b>       |

**El Dorado County**

| Resolution                         | Year Resolved |          |          |          |          |          |          |          | Total,<br>All Years | Percent<br>of Total |
|------------------------------------|---------------|----------|----------|----------|----------|----------|----------|----------|---------------------|---------------------|
|                                    | 2013          | 2014     | 2015     | 2016     | 2017     | 2018     | 2019     | 2020     |                     |                     |
| Conciliated/Settled                | 0             | 1        | 0        | 0        | 2        | 2        | 1        | 2        | 8                   | 28.6%               |
| No Cause                           | 1             | 0        | 3        | 3        | 4        | 5        | 1        | 0        | 17                  | 60.7%               |
| Withdrawal After Resolution        | 0             | 1        | 0        | 0        | 1        | 0        | 0        | 0        | 2                   | 7.1%                |
| Withdrawal Without Resolution      | 0             | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0                   | 0.0%                |
| FHAP Judicial Consent Order        | 0             | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0                   | 0.0%                |
| Failed to Cooperate                | 0             | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0                   | 0.0%                |
| Dismissed for Lack of Jurisdiction | 0             | 0        | 0        | 0        | 0        | 0        | 0        | 1        | 1                   | 3.6%                |
| <b>Subtotal, All Complaints</b>    | <b>1</b>      | <b>2</b> | <b>3</b> | <b>3</b> | <b>7</b> | <b>7</b> | <b>2</b> | <b>3</b> | <b>28</b>           | <b>100.0%</b>       |

Sources: HUD, Office of Fair Housing and Equal Opportunity, 2020; BAE, 2021.

**Table 13: DFEH Fair Housing Complaints by Basis, Discriminatory Practice, and Resolution Type, 2015-2020**

| <u>File Date</u> | <u>Basis</u>                                                                                                        | <u>Harm</u>                                                                                                                                   | <u>Close Reason</u>                                                   |
|------------------|---------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| 10/16/2015       | Disability                                                                                                          | Denied equal terms and conditions                                                                                                             | Investigated and Dismissed -<br>Withdraw n - Resolved between parties |
| 2/21/2017        | Disability; National Origin                                                                                         | Denied reasonable accommodation;<br>Denied rental/lease/sale; Subjected to<br>discriminatory<br>statements/advertisements                     | No Cause Determination                                                |
| 4/20/2017        | Disability                                                                                                          | Denied reasonable accommodation;<br>Denied rental/lease/sale                                                                                  | Investigated and Dismissed -<br>Withdraw n - Resolved between parties |
| 11/21/2019       | Race                                                                                                                | Denied rental/sale/lease; Subjected to<br>restrictive rule/covenant                                                                           | Dismissed for Lack of Jurisdiction                                    |
| 3/20/2020        | Association with someone of<br>a protected class; Disability<br>(physical or mental); Familial<br>status (Children) | Denied reasonable accommodation<br>for a disability or medical condition;<br>Evicted; Subjected to discriminatory<br>statements/advertisement | No Cause Determination                                                |

Sources: California Department of Fair Employment and Housing, 2021; BAE, 2021.

## Resident Fair Housing Questionnaire

In preparation for the Housing Element Update, the City of Placerville administered a resident survey in early 2021 to collect information regarding resident sentiments towards the quality of City services and extent of needs to be addressed by the City, including an assessment of the extent to which residents are aware of their fair housing rights and responsibilities and the presence of fair housing issues within the community. Responses were collected through an online web interface, as well as with mail-in hard copy surveys that were distributed to residents by mail in conjunction with monthly utility bills.

The City received a total of 215 responses, including from 182 owners households (84.7 percent) and 19 renter households (8.8 percent).<sup>13</sup> This indicates that the survey responses disproportionately represent the views of owner households, which represent 54 percent of all households citywide, compared to renter households who account for 25 percent of all households. Similarly, there were 175 surveys (81.4 percent) completed by non-Hispanic White respondents and 26 (12.1percent) completed by non-White residents, who represent 77.7 percent and 22.3 percent of the general population, respectively. This indicates that non-White residents are underrepresented compared to their share of the broader population.

Of the 21 questions administered, five directly pertained to fair housing awareness and the identification of known issues.

The first of these questions asked about the extent to which respondents are aware of how to report suspected fair housing violations. The majority of respondents either did not respond (8.4 percent) or were unsure (55.3 percent). Only 10.7 percent said “yes,” indicating a likely lack of knowledge regarding fair housing rights, obligations, and reporting procedures. Those who did indicate that they were familiar with how to report discrimination, four were homeowners and one was a renter.

The next question asked respondents to speculate regarding the reasons why fair housing complaints may not be reported. Though just over 30 percent of respondents did not answer, those that did suggested that residents:

- Do not know how (39.5 percent)
- Retaliation (34.4 percent)
- Fear (32.1 percent)
- Distrust of process (25.6 percent)
- Reporting process (19.1 percent)

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<sup>13</sup> As reported in the Sacramento Area Council of Governments (SACOG) Housing Element Data Package for the 2014-2018 American Community Survey (ACS) five-year survey period.

The third fair housing related question on the survey asked respondents whether, as a renter, their landlord had refused to make reasonable accommodations for a disability and, if so, what the request was. Of the 21 respondents who answered this question, three (14.3 percent) responded in the affirmative, though none specified what the request was.

The survey then asked respondents whether they have faced housing discrimination based on characteristics of a number of common protected classes. More than 80 percent of respondents did not answer this question. Of the 20 that provided meaningful responses, six indicated that they had experienced discrimination based on sex, six based on familial status, four based on source of income, two based on race or ethnicity, and one each based on color and national origin.

The final dedicated fair housing question asked respondents to indicate the extent to which they believe certain factors and situations contribute to further discrimination and/or function as barriers to fair housing choice within the City of Placerville. Table 14 summarizes the survey results pertaining to this question. In general, more respondents agreed that the 11 identified factors and/or situations contribute to further discrimination and/or function as impediments to fair housing choice more often than the disagreed; though in most cases, the majority of respondents took a neutral position. There are five areas where more than 40 percent of respondents indicated that they agreed that these items furthered discrimination. These items include:

- Lack of accessible housing for persons with disabilities (41 percent agreed);
- Lack of accessibility of neighborhoods (42 percent agreed);
- Lack of fair housing education (45 percent agreed);
- Lack of knowledge among residents regarding fair housing (47 percent agreed); and
- Lack of affordable housing in certain areas (63 percent agreed).

Though designed to be simple and accessible to a broad population, the survey conducted by the City generally highlights a lack of understanding regarding fair housing rights and obligations, as well as the resources and protections that are in place to support households experiencing discrimination. The survey highlights that at-risk households may be reluctant to report or seek resolution of discrimination due to lack of knowledge, fear of retaliation, and/or distrust of the process. Though the survey further supports the conclusion that reports of discrimination are relatively rare in Placerville, respondents further confirmed the importance of working to eliminate many of the common factors that contribute to discrimination and a lack of fair housing; particularly lack of knowledge regarding fair housing, accessibility of housing and community amenities to persons with disabilities, and a general lack of decent and affordable housing options.

**Table 14: Survey Question 14 Results – Do the following situations result in further discrimination and/or barriers to fair housing in the City of Placerville?**

| <b>Situation Type</b>                                                          | <b>Total Agree</b> | <b>Strongly Agree</b> | <b>Agree</b> | <b>Neutral/ Unsure</b> | <b>Disagree</b> | <b>Strongly Disagree</b> | <b>Total Disagree</b> |
|--------------------------------------------------------------------------------|--------------------|-----------------------|--------------|------------------------|-----------------|--------------------------|-----------------------|
| State or Local laws and policies that limit housing choice                     | <b>28%</b>         | 12%                   | 16%          | <b>56%</b>             | 7%              | 9%                       | <b>16%</b>            |
| Lack of fair housing organizations in the City                                 | <b>31%</b>         | 10%                   | 21%          | <b>57%</b>             | 5%              | 6%                       | <b>11%</b>            |
| Lack of knowledge among bankers/lenders regarding fair housing                 | <b>20%</b>         | 6%                    | 14%          | <b>63%</b>             | 9%              | 7%                       | <b>16%</b>            |
| Lack of knowledge among landlords and property managers regarding fair housing | <b>38%</b>         | 10%                   | 28%          | <b>47%</b>             | 7%              | 8%                       | <b>15%</b>            |
| Lack of knowledge among real estate agents regarding fair housing              | <b>27%</b>         | 7%                    | 20%          | <b>52%</b>             | 13%             | 8%                       | <b>21%</b>            |
| Lack of knowledge among residents regarding fair housing                       | <b>47%</b>         | 13%                   | 34%          | <b>43%</b>             | 4%              | 6%                       | <b>10%</b>            |
| Lack of accessible housing for persons with disabilities                       | <b>41%</b>         | 15%                   | 27%          | <b>50%</b>             | 4%              | 4%                       | <b>9%</b>             |
| Lack of accessibility in neighborhoods (i.e. curb cuts)                        | <b>42%</b>         | 17%                   | 25%          | <b>49%</b>             | 5%              | 5%                       | <b>10%</b>            |
| Lack of fair housing education                                                 | <b>45%</b>         | 12%                   | 33%          | <b>45%</b>             | 5%              | 6%                       | <b>10%</b>            |
| Lack of affordable housing in certain areas                                    | <b>63%</b>         | 33%                   | 30%          | <b>25%</b>             | 6%              | 5%                       | <b>12%</b>            |
| Concentration of subsidized housing in certain neighborhoods                   | <b>36%</b>         | 14%                   | 21%          | <b>53%</b>             | 6%              | 6%                       | <b>12%</b>            |

Source: City of Placerville, Resident Questionnaire; BAE, 2021.

## Fair Housing Issues and Contributing Factors

The following subsection summarizes known fair housing issues and their contributing factors, as identified through the fair housing assessment documented above. Where applicable, the discussion notes instances where protected classes are disproportionately impacted.

Issue: The harm caused by segregation is manifest in disproportionate housing needs and differences in economic opportunity.

Contributing Factors: The legacy of past actions, omissions, and decisions that denied housing opportunities and perpetuated segregation and lack of inclusion have continued to limit opportunities for members of protected classes, which is evident through continued differences in poverty rates, homeownership rates, and rental housing instability. While Placerville's recent history shows relatively low levels of segregation, the data indicate a modest increase in segregation and racial/ethnic clustering, which may be influenced by the small size of the resident non-White subpopulations. It is not clear to what extent non-White residents are inclined to congregate together due to cultural affinities and shared identity, rather than discriminatory actions or policies.

Disproportionate Impact: African American, American Indian, and Asian residents, as well as persons of two or more races, experience significantly higher rates of poverty compared to the community at large. There are also sizable differences in homeownership rates in Placerville between non-Hispanic White households and all reported non-White subpopulations; though the available data on mortgage lending indicates that while non-White households are under represented among mortgage applicants, they are more likely than their non-Hispanic White counterparts to be approved. Nonetheless, non-White loan applicants earning less than 50 percent of AMI had below average approval and loan origination rates compared to non-Hispanic Whites. The analysis also identified that American Indian and Hispanic or Latino households, as well as households of some other race or multiple races, have a disproportionate need for housing assistance based on the relative prevalence of housing problems.

Issue: Residents with disabilities need for, and lack of, access to accessible housing.

Contributing Factors: Much of the naturally occurring affordable housing is older and is therefore less accessible, or not accessible, to persons with disabilities. There is also a lack of understanding among property owners and managers about what "accessible" means within the context of the Americans with Disabilities Act (ADA). Survey responses indicate that some residents have had trouble getting property owners to complete reasonable accommodations requests.

Issue: There is a lack of widespread knowledge regarding fair housing rights, responsibilities, and reporting procedures.

Contributing Factors: Placerville residents and property owners appear to be less than well informed regarding their rights and responsibilities under applicable law. Residents also do not appear well informed regarding the various ways to report fair housing complaints and discrimination, or how/where to locate reliable information.

Disproportionate Impact: Due to limited English proficiency, persons who speak English as a second language, or not at all, face additional hurdles when accessing information about their fair housing rights and responsibilities, and often face difficulties when seeking assistance with resolving fair housing claims or disputes. While just under one-third of Spanish speakers have limited English proficiency, most live in households with at least one English speaker. Households that speak Asian and Pacific Island languages, in particular, show a relatively high proportion with limited English proficiency, meaning that a majority contain no person that speaks English “very well.” Therefore, the City should consider policies and actions that help to ensure that materials pertaining to the City’s housing policies and fair housing rights, obligations, and services are appropriately translated.

Issue: Gaps in transportation accessibility may limit access to opportunity and impede fair housing choice.

Contributing Factors: At least in some cases, access to public transportation and/or alternative transportation infrastructure may present an impediment to fair housing choice for those who rely on such services/facilities to access employment, resident services, and educational opportunities.

Disproportionate Impact: While most non-White residents have access to automobiles, a small number rely on other modes like public transit, walking, bicycling, etc. While the extent to which workers use alternative modes by choice (e.g., the health benefits cycling) or out of necessity (e.g., lack of access to an automobile, work off-hours when public transit is not available) is unclear, the data highlight a possible need to explore expanding transit access into underserved areas and/or times of day.

## **Fair Housing Priorities and Goals**

The following section summarizes the City’s fair housing priorities and goals and identifies recommended policies and programs to affirmatively further fair housing. The recommendations prioritize actions that address the fair housing issues identified above, that impede fair housing choice or access to opportunity, or that negatively impact civil rights compliance. Table 15 also identifies metrics and milestones that the City may use for evaluating results and effectiveness in achieving the City’s fair housing priorities and goals.

**Table 15: Fair Housing Goals, Policies/Programs, and Metrics/Milestones (Page 1 of 2)**

| Goal                                                                                                 | Strategy                                                                                                                                                                                                           | Policy/Program                                                                        | Metrics/Milestones                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Expand and preserve affordable housing opportunities, both rental and for-sale.                   | 1.a. Encourage reasonable policies for tenant criminal history, rental history, credit history, and reasonable accommodations.                                                                                     | Landlord education.                                                                   | Support ongoing landlord education towards reasonable policies for VAWA, criminal history, reasonable accommodations, and fair housing issues, with targeted outreach to local landlords. |
|                                                                                                      | 1.b. Increase accessibility and affordable housing opportunities.                                                                                                                                                  | Provide support for developing affordable units.                                      | [TBD]                                                                                                                                                                                     |
|                                                                                                      |                                                                                                                                                                                                                    | Provide planning and community development support for new housing development.       | Completion of new Housing Element and monitor development pipeline.                                                                                                                       |
|                                                                                                      | 1.c. Encourage residential infill opportunities.                                                                                                                                                                   | Provide planning and community development support for infill projects.               | [TBD]                                                                                                                                                                                     |
|                                                                                                      | 1.d. Engage the private sector in solutions.                                                                                                                                                                       | Work with private for profit and non-profit developers on innovative housing options. | Engage in stakeholder input, data collection, and ongoing discussions around funding, zoning, etc.                                                                                        |
| 2. Proactively provide resources and education on fair housing right, responsibilities, and services | 2.a. Make fair housing educational materials and referral information available on the City's website and at key locations (e.g., City Hall, libraries, etc.) for the public and other community gathering places. | Create a webpage and provide information in hard copy at key locations.               | Provide and populate a fair housing website and provide materials at key City offices and community locations.                                                                            |
|                                                                                                      | 2.b. Ensure that all relevant materials are appropriately translated for use by persons with limited English proficiency.                                                                                          | Provide translated materials                                                          | Provide materials, both digital and hard copy, that are translated into appropriate languages.                                                                                            |
|                                                                                                      | 2.c. Conduct outreach to community organizations, churches, etc., that have connections to key non-White populations to proactively provide information on fair housing.                                           | Community outreach                                                                    | Conduct at least six workshops on fair housing issues and resources.                                                                                                                      |

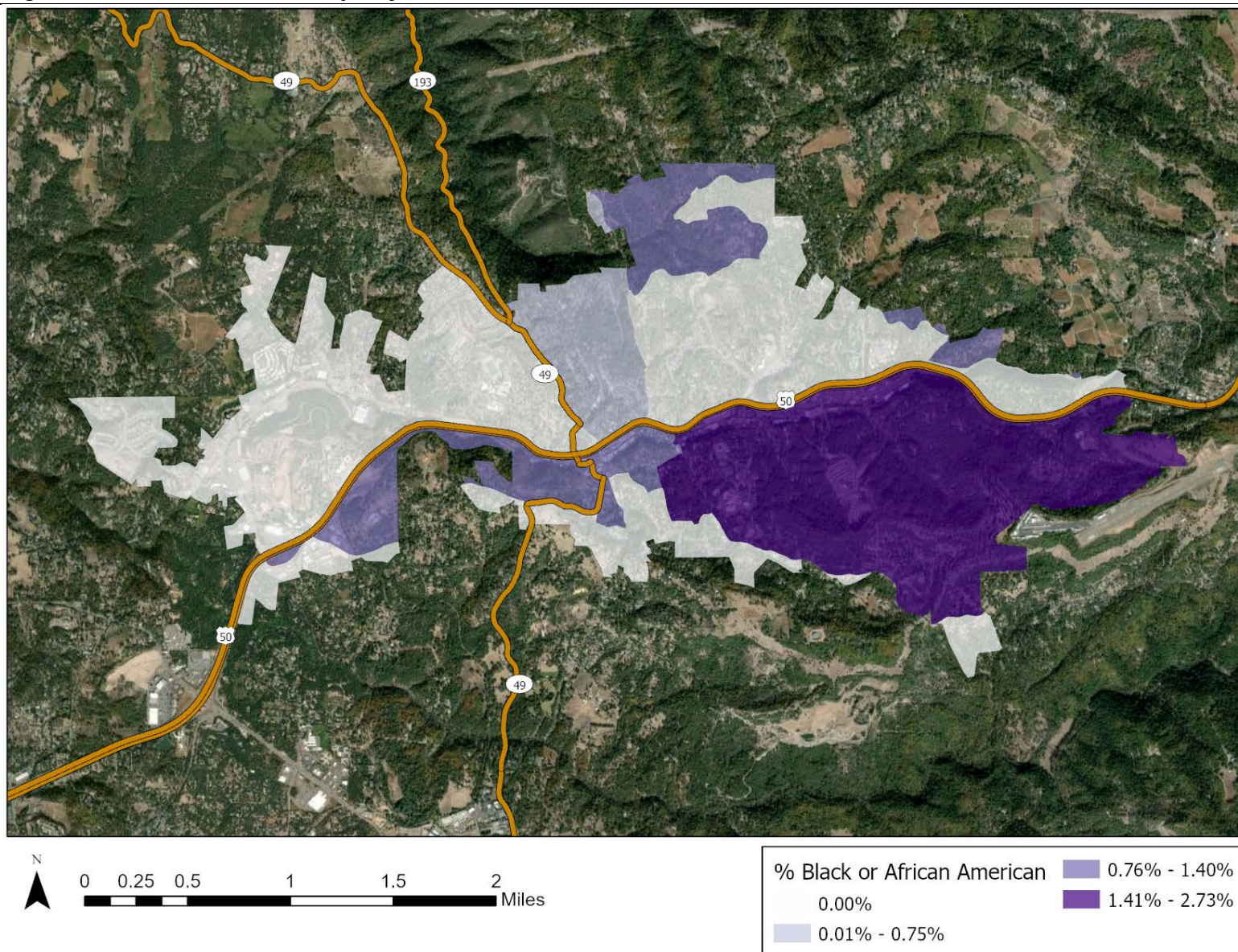
**Table 15: Fair Housing Goals, Policies/Programs, and Metrics/Milestones (Page 2 of 2)**

| Goal                                                                                                 | Strategy                                                                                                                                                                                                   | Action Item                                                                | Metrics and Milestones                                                                                                                                                                    |
|------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2. Proactively provide resources and education on fair housing right, responsibilities, and services | 2.d. Encourage reasonable policies for tenant criminal history, rental history, credit history, and reasonable accommodations.                                                                             | Landlord education.                                                        | Support ongoing landlord education towards reasonable policies for VAWA, criminal history, reasonable accommodations, and fair housing issues, with targeted outreach to local landlords. |
| 3. Close gaps in transportation to promote fair housing and access to opportunity.                   | 3.a. Consider extending public transportation and/or alternative transportation infrastructure to expand accessibility into underserved areas and/or times of day when transit is not otherwise available. | Expand public transportation and alternative transportation infrastructure | [TBD]                                                                                                                                                                                     |

## APPENDIX A: NON-WHITE RACIAL AND ETHNIC POPULATION DISTRIBUTIONS

**Figure 10: Census Block Groups by Percent Black or African American, 2014-2018 ACS**

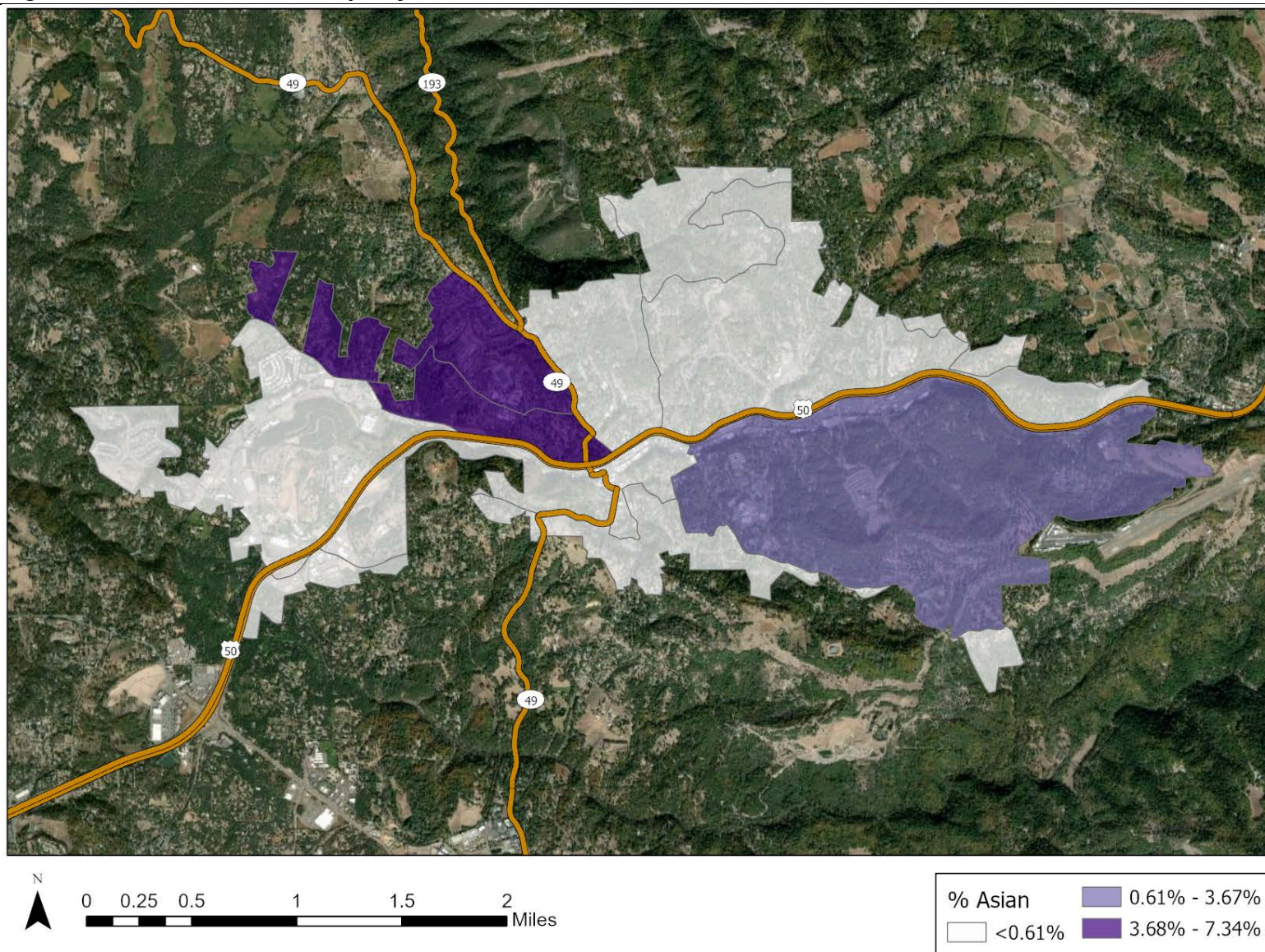
Appendix B-45



Sources: U.S. Census Bureau, American Community Survey, 2014-2018 five-year sample data; BAE, 2021.

**Figure 11: Census Block Groups by Percent Asian, 2014-2018 ACS**

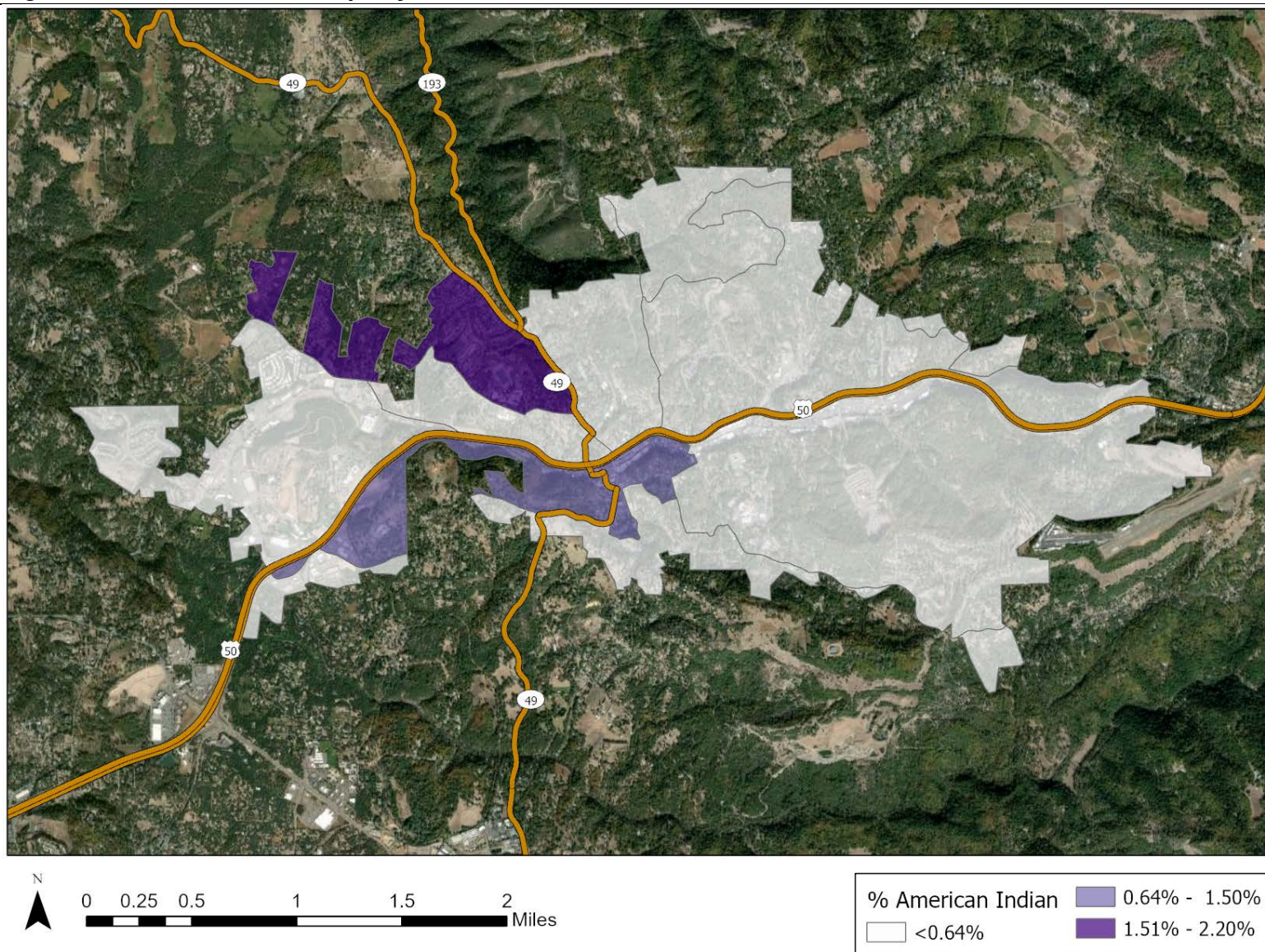
Appendix B-46



Sources: U.S. Census Bureau, American Community Survey, 2014-2018 five-year sample data; BAE, 2021.

**Figure 12: Census Block Groups by Percent American Indian and Alaska Native, 2014-2018 ACS**

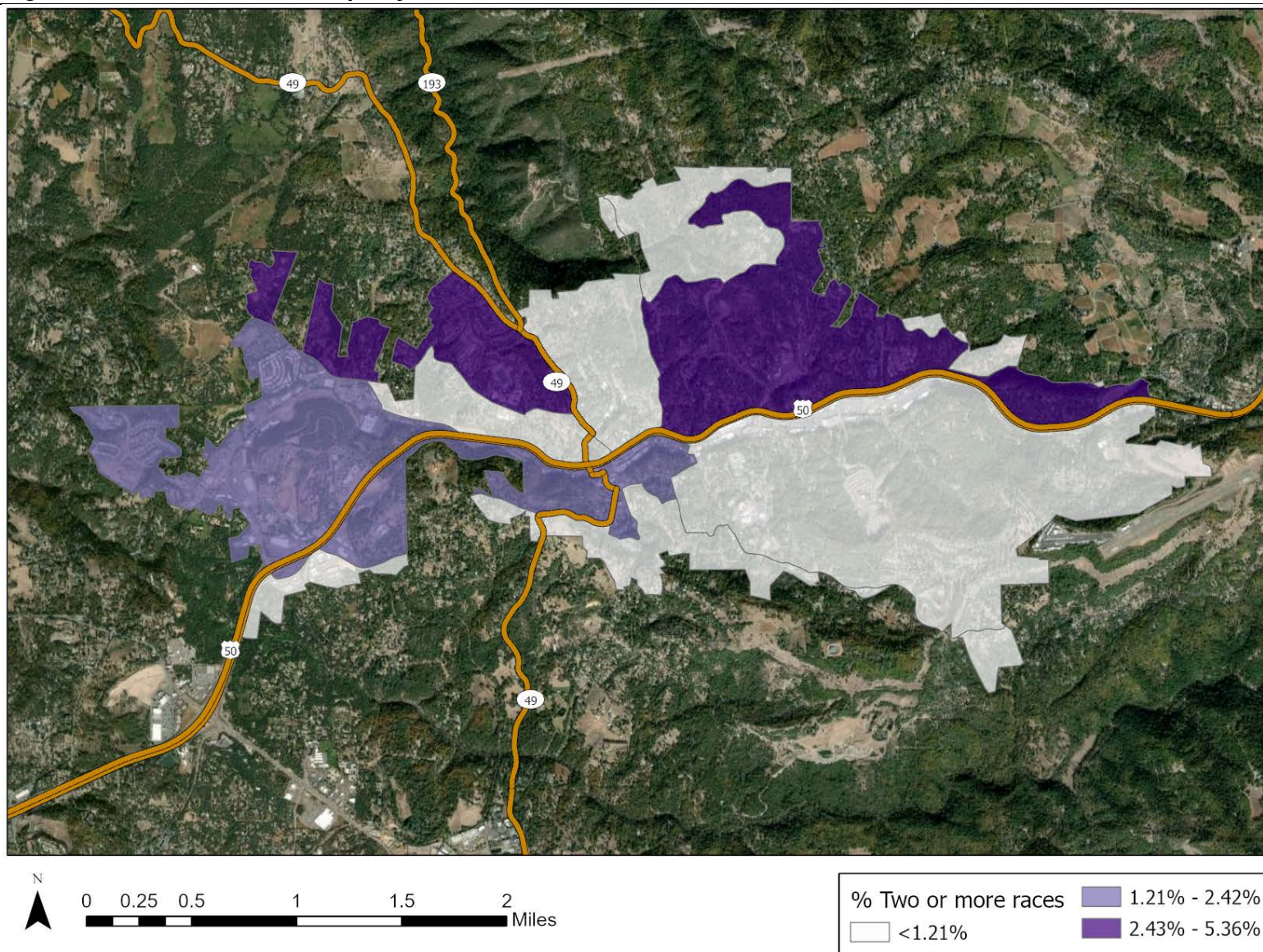
Appendix B-47



Sources: U.S. Census Bureau, American Community Survey, 2014-2018 five-year sample data; BAE, 2021.

**Figure 13: Census Block Groups by Percent Two or More Races, 2014-2018 ACS**

Appendix B-48



Sources: U.S. Census Bureau, American Community Survey, 2014-2018 five-year sample data; BAE, 2021.