

ASSESSMENT OF FAIR HOUSING

AB 686 requires that all housing elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

Under state law, AFFH means “taking 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.”

The City has completed the following:

1. Conducted an Assessment of Fair Housing, which includes summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify, and assess the contributing factors for the fair housing issues. Prepared the Housing Element Land Inventory and Identification of Sites through the Lens of Affirmatively Furthering Fair Housing.
2. Included a Program that Affirmatively Furthers Fair Housing and Promotes Housing Opportunities throughout the Community for Protected Classes (applies to housing elements beginning January 1, 2019). (Program 14)

Outreach

In 2019, the City of Rocklin participated in a joint effort with other jurisdictions in the Sacramento Valley region to develop the Sacramento Valley Analysis of Impediments to Fair Housing Choice (AI) to guide actions that will guide the participating communities to overcome historic patterns of segregation, foster inclusive communities, and promote fair housing. The AI resulted in several goals and actions that the City is committed to pursuing. This Assessment of Fair Housing furthers the AI through a consistent process put forth by HCD.

During the development of the AI, extensive community engagement was conducted with residents and stakeholders across the Sacramento region to gather their experiences with fair housing. Engagement techniques included focus groups and subsequent in-depth interviews, “pop ups” at local events, and a resident survey. Resident focus groups targeted protected classes and groups who experience discrimination in housing, including African American and Hispanic residents, low-income families, residents with disabilities, and transgender residents. Stakeholder focus groups included those who work in housing, real estate, supportive services, education, transportation, advocacy, and more. While this engagement process included residents and stakeholders from across the region, the findings are representative of Rocklin as well.

Additionally, as discussed in the Public Participation section of the Housing Element, the City held a City Council workshop in September 2020 at which community members were encouraged to provide feedback and ideas on housing and housing programs in Rocklin. The workshop was publicized through publication of a notice in the local newspaper, a post on the City’s website and a notice emailed directly to the Placer Collaborative Network, Placer Consortium on Homelessness

(PCOH), non-profit list-serve groups, and interested parties who had requested to be updated on the Housing Element process. Community members and organization representatives expressed a desire to promote distributing affordable housing equally across the City and supported alternatives to promote affordable housing such as pre-approved ADU plans and ministerial approval of infill housing. Prior to the joint Planning Commission/City Council public hearing for the Housing Element Update Public Review Draft, the City sent notices to 16 organizations and all residents who had requested notice. The City has included Program 14 to ensure that community members are involved in the future of housing in Rocklin.

In addition to the AI outreach process and public workshops, the City conducted one-on-one consultation meetings with service providers and community organizations who serve special needs groups and other typically hard to reach groups during the outreach process. The purpose of these consultations was to solicit direct feedback on housing needs, barriers to fair and affordable housing, and opportunities for development from all community groups, not just those who are able to attend the public hearings and town halls. The primary concern raised by stakeholders included availability of affordable rental and for-sale housing to meet the needs of lower-income households and housing for special needs groups near services and resources.

Assessment of Fair Housing Issues

State Government Code Section 65583 (10)(A)(ii) requires the City of Rocklin to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs including displacement risk. According to the 2020 TCAC/HCD Opportunity Area map, the City of Rocklin does not include any areas of high segregation or poverty, or areas of low access to resources. However, as seen in Figure 7-1, areas immediately south of the City, south of State Route 65, are areas of low resource. While the City does not have jurisdiction in or plan for housing for these areas, it is likely that some of these residents rely on Rocklin for services and it is possible that people that work in Rocklin live in these areas. As such, the City has taken a broader view than just the City limits when assessing fair housing issues.

Some of the indicators identified by TCAC and HCD to determine the access to opportunity include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others. These indicator scores decrease as the level of designation decreases until “Low Resource” areas, which typically have limited access to education and employment opportunities and may have poor environmental quality. The City also individually analyzed several factors, described below, to assess patterns that may further fair housing issues and identify actions to combat these. The results of the AI have also been incorporated in this Assessment of Fair housing.

The City of Rocklin got its start in the 1860s as a destination on the transcontinental railroad before being incorporated in 1893 and the beginning of granite mining in the City and surrounding areas. During this time, the City experienced its first population growth and its first developed property: Spring Valley Ranch. Founded in 1855 just north of the center of Rocklin, Spring Valley Ranch included housing for employees on 30,000 acres and was later subdivided in the mid-1900s and sold

to interested developers at the start of subdivision expansion from the City of Sacramento. Most of Rocklin's growth has occurred in the last 50 years, at the start of which low land costs and lower costs of living than in Sacramento attracted commercial and residential development. With several master plan areas including Stanford Ranch, Whitney Oaks, and Whitney Ranch, the City of Rocklin now has housing across its area with few remaining opportunities for large-scale development. This recent, rapid period of suburban growth has resulted in newer housing that is often more unaffordable and may explain existing patterns of overpayment and poverty. The resulting patterns are analyzed in detail in this Assessment of Fair Housing.

The City has conducted the following analysis of available data to assess local access to opportunities and indicators of fair housing issues, in addition to the designations provided by the TCAC/HCD Opportunity Areas map. Data for disability, poverty, familial status, was available at the census tract level, and data for rates of opportunity areas, overpayment, jobs proximity, and diversity were available at the block group level. The City has used the most localized level of data available for the analysis.

Patterns of Integration and Segregation

During the AI process and analysis conducted as part of this Housing Element, the City assessed patterns of segregation with a focus on segregation based on disability, race and ethnicity, income, and familial status. The Analysis of Impediments included extensive surveying of residents in Rocklin, and throughout the region, and ultimately found that Rocklin has low rates of segregation compared to the region. However, patterns still emerge. While the City of Rocklin reflects many patterns found throughout Placer County, this is not indicative of the rest of the region. While there are many social and economic ties between Placer County and the rest of the region, most Placer County jurisdictions, including Rocklin, differ in their relatively high median incomes and home values and the limited availability of affordable housing. This analysis identifies many of the patterns that differ between Rocklin and other areas of the region.

As shown in Figure 7-2, the highest rate of households living below the federal poverty line was along Pacific Street in 2018. There is a higher percentage of Housing Choice Voucher recipients in this area than most of the City, though the highest concentration of voucher holders is in the area between Park Drive, Sunset Boulevard, Midas Avenue, and Whitney Boulevard. Across the SACOG region (counties of El Dorado, Placer, Sacramento, Sutter, Yolo, Yuba and the 22 cities within) the pattern of poverty rates is similar to Rocklin and surrounding communities. There tends to be a higher concentration of poverty in downtown areas of jurisdictions, where housing is older or more expensive to maintain. While the AI process found that the rate of poverty in Rocklin was the lowest in the region, tied only with the City of Roseville, the distribution between low- and higher-income households increased between 2010 and 2016, meaning there is a greater income gap. This confirms that the rate of poverty in Rocklin is increasing, albeit remaining lower than the regional rate. The City of Rocklin has included several programs in the Housing Element to incentivize development of affordable housing in a variety of types to provide for currently unmet needs and encourage property owners in high resource areas to accept Section 8 vouchers.

Since 1990, Rocklin has experienced a decline in the percent of the population that identifies as non-Hispanic White from 89% of the population to 75%, demonstrating an increase in diversity in recent

history. During this time, the share of foreign-born residents doubled. Despite these shifts, Rocklin still remains less diverse than its regional neighbors to the west and reflects similar trends as other suburbs in the region. Across the SACOG region, jurisdictions west of the foothills of the Sierra Nevada mountain range tend to have higher rates of diversity. In the City of Sacramento and Yolo and Sutter counties there are areas where the majority of residents identify as Hispanic, in contrast to most of the eastern portion of the region, including Rocklin, that is predominantly non-Hispanic White. Figure 7-3 shows the diversity index in Rocklin, which is higher than rural and semi-rural Placer County communities but significantly lower than the City of Sacramento and surrounding communities. Additionally, while there are no racially or ethnically concentrated areas of poverty in Rocklin, the areas with higher rates of poverty in the city are also those with a larger share of the minority population. The City will monitor fair housing complaints to ensure that there are not increased rates of discrimination based on race in these areas and will work with fair housing advocates to identify ways to promote integration (Program 14).

Rocklin has historically been highly family-oriented, a pattern that still exists today. As shown in Figure 7-4, Rocklin and the surrounding areas are dominated by families with children. Across the SACOG region, the majority of households in suburban communities and most incorporated areas are married couples with children, like Rocklin. The percent of households with children decreases in more rural and unincorporated areas; but the SACOG region is dominated by married-couple households, with the City of Sacramento being the only community not dominated by married-couple households. The dominance of single-family development and the presence of families does not inherently suggest segregation based on familial type, but the low rate of vacancy (3.73% overall, 5.1% for rental units, and 0.90% for ownership units in 2018) and dominance of single-family development may present a barrier to households and families seeking other housing options. The City will work with developers to promote and incentivize the development of a variety of housing types to meet the needs of all current and future residents (Programs 7, 9, and 21).

As discussed in the Household Characteristics section of the Housing Element, approximately 9% of Rocklin's population has at least one disability, and 44% of those individuals were seniors. In 2014, there was a higher percent of persons with a disability in the area south of Pacific Street between State Route 65 and Rocklin Road. This has since diminished, and the concentration of this population has been distributed more evenly across the City. In contrast, the percent of the population with a disability, and areas of higher concentration, has remained stable across the SACOG region over time. Overall, the City of Rocklin has a lower percent of the population with a disability compared to the region. In 2018, 8.2% of Rocklin residents had at least one disability, compared to 10.0% of the City of Roseville's population, 10.7% of Placer County residents, 11.8% of City of Lincoln, 12.1% of City of Sacramento, and 16.1% of Citrus Heights residents.

Access to Opportunity

Twenty-one Rocklin elementary, middle, and high schools were highly ranked in a statewide ranking of 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com. Of the 21 Rocklin schools, 9 were ranked in the 90th percentile when compared to similar schools across the state, 7 were ranked in the 80th percentile, and the remaining 5 were ranked in the 70th percentile. The AI confirmed the quality of Rocklin schools finding that there were no disparities in school quality between low- and higher-income neighborhoods and that there were

no differences in access to school by race or ethnicity. The AI determined that Rocklin residents were some of the most likely in the region to have access to proficient schools across the whole city. As shown in Figure 7-5, almost all areas of the city are located within 1-mile of a highly ranked school. The two areas showing a lack of close proximity to school are an area covered by the Sierra College campus and the undeveloped area around Clover Valley Creek.

In addition to close access to proficient schools, the AI found residents of the City of Rocklin to be some of the most likely in the region to have access to an economically strong neighborhood. As shown in Figure 7-6, most Rocklin neighborhoods are in close proximity to jobs. The 2014-2018 ACS reported that residents of Rocklin have a slightly shorter commute than the County average, 26.3 minutes for Rocklin compared to 27.4 for Placer County. Additionally, Rocklin residents have shorter commutes than most similarly sized and suburban communities including Granite Bay (29.8 minutes) and Lincoln (29.6 minutes), and a similar commute time to residents of Roseville (26.1 minutes). The areas of higher poverty in Rocklin still have close access to jobs, which suggests that either the cost of housing or the type of available jobs for these residents, or both, have resulted in increased poverty, rather than the overall jobs.

Rocklin residents are served by Placer County Transit Agency (PCT), which provides bus service to and from Sacramento in addition to connections to Sacramento Regional Transit (RT) stations. The Sierra College – Lincoln Route runs through Rocklin to provide connections to the Sierra College campus, Westfield Galleria Mall, Rocklin Commons, and Rocklin Crossings shopping centers. The route primarily follows Sunset Boulevard through the City, with a short detour onto Stanford Ranch Road to S. Whitney Boulevard before reconnecting with Sunrise Boulevard to Pacific Street. While this provides connection to residents on the main thoroughfares, the route provides little access within residential neighborhoods. Residents surveyed for the AI expressed concerns about the availability of public transit in the region, both in frequency of service and routes. The City will (Program 14) continue to work with PCT to expand marketing and awareness of Citywide Dial-A-Ride services which are available to the general public and assess demand and feasibility for expanded transportation routes. If feasible based on anticipated fare box recovery standards, etc., the City will seek funding to support expansion of existing services or the creation of new transportation options, to connect all residents of Rocklin to their desired jobs, schools, and other resources and opportunities.

To meet the needs of the population with disabilities in Rocklin, there are two licensed adult residential care facilities and six adult day care facilities in the city. Additionally, residents are served by Access in Motion, a medical transportation service for seniors and individuals with mobility limitations for non-emergency medical transportation, Dial-A-Ride, a transportation service provided by Placer County Transit, and Placer Rides a no cost transportation service for non-emergency medically related appointments. The City also requires new developments to comply with Title 24 of the California Building Code to ensure that all new construction meets accessible design standards, thus ensuring that all new housing is accessible for all residents regardless of disability. Additionally, the City ensures that older housing that may not meet the same accessibility requirements can be adapted as needed through their reasonable accommodation process, discussed in the Governmental Constraints section of this Housing Element, and assistance with rehabilitations (Programs 1 and 3).

Disproportionate Housing Need and Displacement Risk

As discussed in the Needs Assessment section of the Housing Element, overcrowding is not a significant issue in Rocklin, with approximately 1.7% of households living in overcrowded situations in 2018. However, overcrowding is more common among renters (3.8%) than among homeowners (1%). The California Health and Human Services Agency (CHHS) does not report any areas of the city where overcrowding is more common, supporting the AI finding that overcrowding is lower than the regional average and there are no patterns of disproportionate need for larger housing units.

Unlike overcrowding, overpayment for housing is a significant issue in Rocklin, especially among renters. (Figure 7-7). Approximately 47% of all renters are overpaying for housing, impacting renters in nearly all neighborhoods. The area with the lowest rate of overpayment among renters is largely undeveloped and includes Rocklin High School. While homeowners across the City are also overpaying for housing, the issue is to a lesser degree and is more concentrated in the Whitney Oaks neighborhood. The rate of overpayment among homeowners has declined over the years, as shown between Figure 7-8 and 7-9, unlike among renters which has remained stable. The pattern of overpayment for both renters and homeowners in Rocklin is similar to surrounding suburban communities and reflects a lack of affordable housing across the region. Despite similar patterns to the region, Rocklin residents reported a higher than the regional average concern about rent increasing to an unaffordable amount, but a lower than regional average concern about being able to afford a down payment. This discrepancy highlights the difference between affordability between renters and homeowners in Rocklin. However, a survey of residents for the AI found that there is a 10-percentage point gap between Hispanic and non-Hispanic White homeowners, that mortgage loan denial rates are higher for minority groups, and that households that include a member with a disability are half as likely as a non-disability household to own a home in the region. Thus, there is a disproportionate need for affordable and accessible homeownership opportunities in the City for certain populations and a risk of displacement for renters who are overpaying for housing. In order to address affordability gaps, the City has included Programs 5, 6, and 9 to provide materials to property managers on the benefits of subsidized units, to meet with developers to identify opportunities for affordable rental housing, and to develop a targeted program to promote development of missing middle housing types to provide lower and moderate-income residents with affordable homeownership and rental options within the City.

In addition, issues presented by overpaying for housing and inequitable access to funding, housing condition can present a safety concern for residents living in substandard housing in need of repairs. Approximately two-thirds of housing units in the City of Rocklin were constructed since 1990; typically, housing that is less than 30 years old is less likely to be in need of repairs or rehabilitation. However, given the median home value of \$452,000 and median income of \$97,508 in Rocklin, it is assumed that most homeowners have the means to complete ongoing repairs to maintain the value of their homes. While this suggests that the overall condition of housing in Rocklin is good, the AI found that approximately one-third of households in the Sacramento region that include a member with a disability live in a home that does not meet their needs. While the results of this survey for the AI are not isolated to Rocklin, it can be assumed that at least some low-income households in the City may be living in substandard conditions. However, as of January 2021 the City's Code Compliance Officer indicated that there are currently only 3 open cases regarding substandard

residential units in the City and two of the three were the result of fire. This data suggests that substandard housing units is not a significant issue in the City at this time.

Enforcement and Outreach Capacity

The City proactively addresses any potential fair housing issues that may arise as a result of development standards and city policies through ongoing review of land use policies, permitting practices, and building codes to ensure compliance with state and federal fair housing laws, including reviewing and amending specific definitions and zone districts as necessary, most recently in 2011, 2017, and 2020. In addition, the City will encourage development of housing for lower-income households and special needs groups (Policy 2.3).

Additionally, the City's Community Development Department has, and will continue to, refer fair housing questions and discrimination complaints to the California Department of Fair Employment and Housing, Legal Services of Northern California, and the Fair Housing Hotline Project (Program 14).

Legal Services of Northern California (LSNC), the only civil legal aid office for Placer County, assists low-income and senior residents in the City of Rocklin who face housing discrimination and other issues. On August 2020, the Auburn office provided information on fair housing issues in Placer County. LSNC staff expressed that the most common complaint they receive across Placer County is regarding a lack of affordable housing. Paired with a surge in suburban development, these factors result in segregated communities due to a lack of accessibility for many low-income residents. Other complaints they receive regarding fair housing include refusal to rent, discriminatory treatment, and termination of tenancies by landlords, predominantly due to the residents' income class and income source (i.e., Section 8 Vouchers). While income is often a driving factor in many fair housing cases, LSNC also reports that they receive a significant number of disability discrimination cases, often alleging a refusal to grant reasonable accommodation requests. LSNC confirmed that these issues are not isolated to Rocklin and are experienced by residents across their service area.

In their *2019 Annual Report*, the California Department of Fair Employment and Housing (DFEH) reported that they received eight housing complaints for residents of Placer County, less than 1% of the total number of cases in the state that year (934). As part of the Fair Housing Assistance Program (FHAP), DFEH dual-files fair housing cases with HUD's Region IX Office of Fair Housing and Equal Opportunity (FHEO); the FHEO reported 14 housing discrimination cases filed by residents of Rocklin between January 1, 2013 and September 1, 2020, roughly two per year. These cases included discriminatory refusal to rent, failure to make reasonable accommodations, discriminatory terms, and other discriminatory acts. The number of cases reported is extremely low overall but does provide a snapshot of discrimination cases that exist as many may go unreported or are referred to other agencies. Of the 14 cases filed, the most common alleged bases of discrimination were disability and familial status (Table 7-23).

TABLE 7-23: BASES FOR HOUSING DISCRIMINATION CASES IN ROCKLIN		
Basis	Number	Percent
Disability	5	35.7%
Familial Status	5	35.7%
Race	2	14.3%
National Origin	2	14.3%
Religion	0	0.0%
Retaliation	2	14.3%
Sex	0	0.0%
Color	0	0.0%
Total Cases	14*	100.0%
<i>Source: HUD Region IX Office of Fair Housing and Equal Opportunity, 2020.</i>		
<i>*Some cases alleged multiple bases; therefore, the number of alleged bases exceeds the total number of cases.</i>		

None of these fair housing agencies, LSNC, DFEH, or FHEO, were able to provide specific location information for cases either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, the City was unable to conduct a spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the city. Program 14 has been included to work with fair housing enforcement organizations and agencies to track issues and identify patterns in the city.

In addition to information from fair housing agencies, the City sought to gather public input on fair housing issues. In order to do this, the City assisted with extensive community engagement as part of the AI development process with residents and stakeholders across the Sacramento region. Residents of Rocklin reported higher ratings for healthy neighborhood indicators than the regional average and lower than average rates of concern about retribution by landlords for repair requests, neighborhood crime rates, concerns about their housing conditions, and fear of eviction. Overall, Rocklin residents reported fewer experiences with fair housing issues or limited access to resources than other jurisdictions in the region.

Sites Inventory

The City examined the opportunity area map prepared by the TCAC and HCD (Figure 7-11). The opportunity area map identifies 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.

Using the statewide opportunity area map and indicators of segregation, displacement risk, and access to opportunity as overlays to the City's sites inventory, the City was able to identify if the sites identified in the inventory to accommodate the lower-income RHNA disproportionately concentrate these units or increase patterns of segregation. As shown in Figures 7-11, 7-12 and 7-13, the City has

distributed the sites for lower-income units across the city and has integrated them with the sites for moderate- and above moderate-income units along Pacific Street. Most sites for lower-income units are located within a half-mile of the public transit route and integrated into neighborhoods with high median incomes, increasing the potential for mixed-income communities and a variety of housing types to meet the needs of both family and non-family households.

As found in this assessment of fair housing issues, while disproportionate need for affordable and accessible housing exists in Rocklin, there are not any segregated areas of concentrated need. Therefore, the City's plan to integrate sites for lower-income units throughout multiple neighborhoods presents an opportunity to provide affordable housing to residents across the City and provide housing within a close proximity to resources. Based on the findings of this assessment, the City is confident that the sites identified will combat any emerging patterns of income segregation or disproportionate need. Additionally, the program actions identified throughout the assessment will result in proactive measures to ensure that all residents of Rocklin are provided equal access to safe, affordable housing near jobs, schools, and other resource needs.

Contributing Factors to Fair Housing Issues

The AI development process and assessment of fair housing identified several barriers to fair housing in Rocklin and throughout the Sacramento region, including the following:

Factors that Contribute to Fair Housing Issues		
AFH Identified Fair Housing Issues	Contributing Factors	Meaningful Actions
Displacement of residents due to economic pressures	Unaffordable rents and home prices Costs of rehabilitation or repair Shortage of affordable housing units	Collaborate with neighboring cities and organizations to promote affordable housing (Program 13) Analyze the feasibility of implementing an affordable housing impact fee (Program 19) Incentivize the development of affordable housing (Program 6) Offer assistance with repair and rehabilitation needs (Program 1) Encourage housing preservation, conservation, and acquisition rehabilitation (Program 2)

Factors that Contribute to Fair Housing Issues		
AFH Identified Fair Housing Issues	Contributing Factors	Meaningful Actions
Higher cost of housing than many areas in the region	<p>Relatively new housing stock</p> <p>Dominance of low-density zoning and land uses</p> <p>Shortage of funding to support development of affordable housing</p> <p>Lack of regional coordination to address housing issues</p>	<p>Consider allowing higher density development in single-family zones (Program 9)</p> <p>Promote a variety of housing types, including ADUs (Programs 7 and 9)</p> <p>Market Housing Choice Vouchers to households in other areas of the region (Program 5)</p> <p>Provide additional incentives, beyond assistance identifying funding, for affordable housing (Program 6)</p> <p>Preserve existing affordable housing stock (Program 4)</p> <p>Work with neighboring jurisdictions and regional organizations to expand affordable housing (Program 13)</p>
Limited variety of housing types to meet a range of needs	Historic market demand for single-family development	<p>Promote the construction of “missing middle” housing types (Program 9)</p> <p>Encourage development of multifamily housing in high resource areas (Program 14)</p> <p>Encourage construction of ADUs (Program 7)</p>
Displacement of residents due to access to services	<p>Shortage of housing for special needs group</p> <p>Limited transit availability within residential neighborhoods resulting in reduced mobility, especially for lower-income households</p>	<p>Encourage housing mobility by creating an affordable housing database (Program 4)</p> <p>Assist with pre- and post-moving counseling, housing search assistance and</p>

Factors that Contribute to Fair Housing Issues		
AFH Identified Fair Housing Issues	Contributing Factors	Meaningful Actions
		<p>guidance about neighborhood features (Program 5).</p> <p>Work with service providers to identify opportunities for additional housing for special needs groups and require developers to prepare an affirmative marketing plan (Program 14).</p> <p>Work with transit agencies to market and promote awareness of the existing citywide Dial-A-Ride service that is available to the general public. Assess demand for and opportunities to invest in active transportation to revitalize disconnected neighborhoods and provide increased service between neighborhoods and job centers to improve residents' access to employment (Program 14)</p> <p>The City will annually track the demographics of the people benefiting from low- and moderate-income housing assets to ensure they are equitably distributed and focus funds in areas of high opportunity or in areas at risk of displacement (Program 24).</p>

Through the analysis of impediments, the City found that there are no neighborhoods in Rocklin that are more burdened by environmental health issues, poor educational opportunities, or limited economic resources than others. Residents across the City have relatively equal access to the resources that provide fair housing and opportunity for success in life. However, the City has identified the lack of affordable housing options for both renters and owners and access to transportation as priorities to combat fair housing issues. The City has included actions to address these factors, and all issues identified in this assessment, throughout the Housing Element

programs and policies. In addition to including actions in all programs, Program 14 has been included to affirmatively further fair housing, per AB 686, and take meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity for all groups protected by state and federal law. Regional coordination efforts outlined in Program 13 will ensure that the City of Rocklin furthers patterns of integration and development of affordable housing in such a way that it will have a positive impact on residents of the city and region.

Since 2021, the Housing Element's Site Inventory has changed several times. Following the publication of the Housing Element, several development applications were submitted and ultimately approved by the City. As a result, several market-rate projects, on sites originally designated for "Lower" and "Moderate" RHNA categories in the Housing Element, were approved. This led to the loss of approximately 32 acres from the RHNA Sites Inventory. Consequently, these properties were no longer eligible for inclusion in the City's RHNA capacity during the 2024 GPA/Rezone effort.

As part of the Alternative RHNA Sites projects in 2024 and 2025, staff modified Table 7-42, which provides the characteristics of the available sites to accommodate the lower income RHNA, Table 7-43, which lists sites to accommodate the moderate income RHNA and Table 7-44, which includes capacity that will accommodate the City's above moderate RHNA.

Specific to Assessment of Fair Housing, staff reviewed the AFH/AFFH section of the Housing Element and found the Alternative RHNA Sites referenced above to be substantially consistent with the existing sites distribution as there is limited undeveloped residential land within the City of Rocklin limits and the alternative sites identified are distributed in substantially similar areas and circumstances as the previously approved sites.