

**APPENDIX 2
PAST IMPEDIMENTS AND ACTIONS**

PAST IMPEDIMENTS	ACTION
1. IMPEDIMENT: Lack of sufficient affordable housing supply.	
<p>1.1. Action: Provide assistance to preserve existing affordable housing and to create new affordable housing. Assistance will be provided through the Consolidated Plan programs of the Consortium member jurisdictions. These include CDBG, HOME, and HOPWA.</p>	<p>Antioch – Antioch allocates CDBG funds to promote Fair Housing activities. The City of Antioch has historically funded BALA and/or Echo to provide fair housing services to its residents. These agencies provide trainings and workshops to landlords, tenants and other interested parties annually. Both agencies are HUD-approved housing counseling agencies, and satisfy HUD’s definition of Fair Housing Enforcement Organization and Qualified Fair Housing Enforcement Organization.</p> <p>Concord – Concord took the following actions to preserve and create affordable housing</p> <ul style="list-style-type: none"> a. Preserve affordable housing – The City reserved \$300,000 in RDA Housing set-aside funds to assist in rehabilitating a 48-unit multifamily complex in the Monument Corridor, however, due to the State Budget elimination of RDAs and subsequent litigation, these

	<p>funds are currently unable to be used. The developer also was unsuccessful in securing State funding for the project.</p> <p>b. Preserve affordable housing – The City used \$220,000 in RDA Housing set-aside funds for 7 loans to low to moderate income First Time Homebuyers to purchase their first home during the fiscal year. In addition, the City's Housing Rehabilitation Loan and Grant Program provided 6 loans and 33 grants and rebates to rehabilitate housing for low income households utilizing CDBG and RDA funds. 2011/12: Based upon the limited CDBG funding, the City's Housing Rehabilitation Loan and Grant Program still provided 2 loans and 13 grants to rehabilitate housing for low income households utilizing CDBG funds. 2012/13: Based upon the limited CDBG funding, the City's Housing Rehabilitation Loan and Grant Program still provided 2 loans and 13 grants to rehabilitate housing for low income households utilizing CDBG funds. 2013/14: The City's Housing Rehabilitation Loan and Grant Program received eight applications and completed work for four grants. 2014/15: The City's</p>
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	<p>Housing Rehabilitation Loan and Grant Program provided twenty-six (24) grants and one loan to rehabilitate housing for low income households utilizing CDBG funds.</p> <p>c. Preserve affordable housing – The City invested \$102,652 in CDBG funds and \$25,927 in General Funds to conduct Code Enforcement in lower income areas to preserve and protect single family housing stock and neighborhoods. 2011/12: The City invested \$59,626 in CDBG funds to conduct Code Enforcement in lower income areas to preserve and protect single family housing stock and neighborhoods. 2012/13: The City invested \$59,626 in CDBG funds to conduct Code Enforcement in lower income areas to preserve and protect single family housing stock and neighborhoods. 2013/14: The City invested \$55,408 in CDBG funds to conduct Multi-family housing inspections for affordable housing units to preserve and protect single family housing stock and neighborhoods: 2014/15: The City invested \$32,620 in CDBG funds to conduct Multi-family housing inspections for affordable housing units to preserve and protect housing stock and neighborhoods.</p>
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	<p>d. Create new affordable housing – The City continues to coordinate with the Urban County on potential housing projects that may be funded with HOME and HOPWA funds. No projects were funded in FY 2010-11.</p> <p>e. Create new affordable housing – The City continues to implement the Inclusionary Housing Ordinance (adopted June 2004), that requires all new residential developments to provide a component of lower or moderate income housing. It includes a 45-year term of affordability for ownership projects, 55 years for rental projects; 10% moderate- or 6% low income for ownership, and 10% low or 6% very low income for rental. Minimal development activity was experienced in Concord during FY 2010-11 and no new inclusionary units were approved or built. Once the existing number of foreclosures declines, the City anticipates some development may begin. 2011/12: Minimal development activity was experienced in Concord during FY 2011-12 and only one new</p>
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inclusionary unit was built. 2012/13: Minimal development activity was experienced in Concord during FY 2012-13 and only one new inclusionary unit was built.

f. The City continues to require housing development sponsors to provide housing on an equal opportunity basis without regard to race, religion, disability, sex sexual orientation, marital status, or national origin.

Walnut Creek –

- From 2010-2015, the City of Walnut Creek committed over \$8 million dollars to create new affordable housing through land acquisition, predevelopment and development financing. Funding sources included Housing Impact Fees, commercial linkage fees, and CDBG. The City also purchased a remnant Cal Trans parcel and donated it to Habitat for Humanity.
- The City contributed to affordable housing preservation by refinancing two affordable housing projects and extending both the affordability and loan terms; and also provided CDBG funding for facility improvements.

<p>1.2. Action: Offer regulatory relief and incentives for the development of affordable housing. Such relief includes that offered under state “density bonus” provisions. (See housing element programs.)</p>	<p>Concord - The City has an existing Density Bonus Ordinance. No project applications were processed during the fiscal year that requested a density bonus. The City's Planning Division prepared a comprehensive update of the City's Development Code, which includes the Affordable Housing provisions of the Code. Affordable Housing provisions include inclusionary housing, density bonus, and a new affordable housing incentive program with regulatory incentives. Planning Commission public hearings were held throughout the year with final hearings in June 2012 and adoption by the City Council on July 24, 2012. The Development Code became effective in August 2012.</p> <p>Walnut Creek –</p> <ul style="list-style-type: none"> • Between 2010-2015, the City granted density bonuses and concessions to two affordable housing projects. Additionally, an affordable project that was entitled prior to 2012, was constructed in 2013 and received a 150% density bonus plus 3 concessions.

	<ul style="list-style-type: none"> The City's 2015-2025 housing element was certified in 2014, including an extensive opportunity sites list. The opportunity sites are reviewed and updated annually.
<p>1.3. Action: Assure the availability of adequate sites for the development of affordable housing. (See housing element programs.)</p>	<p>Concord - Housing Element Policy H-1.1 promotes ensuring an adequate supply of housing sites to achieve the City's Regional Housing Needs Allocation numbers. The City adopted its Housing Element Update (2014-2022) on January 6, 2015. As part of that effort an updated inventory was conducted to determine if there are adequate sites available for the construction of the City's Regional Housing Needs Allocation (RHNA). The inventory update concluded that the City does have enough adequately zoned sites to achieve the capacity necessary to meet the City's RHNA over the next 8 years. The City also promotes programs and ordinances and incentives for the development of affordable housing.</p> <p>Pittsburg - From 2010-2015, assisted with –</p> <ol style="list-style-type: none"> 1. La Almenara – recorded restriction 11/02/11; 20 units 2. Siena Court – recorded restriction 11/09/10; 110 units 3. Santa Fe Commons – recorded restriction 11/02/11; 10 units

	<p>4. Approval of a loan to Domus for Veterans Square was given 06/15/15.</p> <p>5. CDBG funds were awarded to the County to administer the Housing Rehab program in fiscal years [please fill in] to preserve and expand affordable housing opportunities.</p>
<p>2. IMPEDIMENT: Concentration of affordable housing.</p>	
<p>2.1. Action: Housing Authorities within the County (Contra Costa County, Richmond and Pittsburg) will be encouraged to promote wide acceptance of Housing Choice Vouchers, and will monitor the use of Housing Choice Vouchers to avoid geographic concentration.</p>	<p>Contra Costa County - From 2010-2015, more than \$19.8 million of the County's CDBG, HOME, NSP, and HOPWA resources was allocated to develop new units and rehabilitate existing units of affordable housing in different regions of the County. In addition, resources were provided for single-family rehabilitation programs, first time homebuyer programs, and fair housing counseling, legal services, and outreach.</p> <p>Concord - Concord has no public housing authority, therefore, 2.1 does not apply. While Concord has no jurisdiction over the above Housing Authorities, the Housing division receives calls from persons seeking assistance, and provides information and referral services to the Housing Authorities.</p>

	<p>Pittsburg - The Housing Authority has over 1100 HCV/VASH throughout Pittsburg. The tenants are given the opportunity to choose where they want to live. The challenge for Pittsburg isn't concentration, it's finding available housing. In 2017, a landlord workshop will be conducted to encourage property owners/managers throughout Pittsburg, to lease to HCV clients.</p>
<p>2.2. Action: Consortium member jurisdictions will collaborate to expand affordable housing opportunities in communities in which they are currently limited.</p>	<p>Concord –</p> <ul style="list-style-type: none"> • The Consortium met during FY 2011-12 to discuss affordable housing opportunities and reviewed HOPWA applications. One of the recipients of HOPWA funds was the Riley Court Project (48-unit rental) where funds were to be utilized toward a substantial rehabilitation. Due to the elimination of RDA funds committed to the project and a lack of MHP State funds, the project moved forward on a smaller scale using HOPWA funds. • In 2012, the City of Concord adopted a new Development Code which streamlines the review process for many types of development by requiring a staff level review and an Administrative Use Permit which does not require a hearing. Other developments require review by the Design Review Board which is advisory to staff and for which a limited number of meetings are scheduled. Use Permits

	<p>for multifamily developments are approved by the Planning Commission and are not required to go before the City Council unless appealed, or if a General Plan Amendment or Re-zoning is required. The City expedites multifamily development in the review process.</p> <p>Walnut Creek - Through the City's inclusionary ordinance, ownership residential projects can provide affordable units on site or pay a fee. When units are provided on site it increases the distribution of affordable units throughout the City. Between 2010-2015, 11 affordable ownership units were developed through the inclusionary ordinance.</p>
<p>2.3. Action: A higher priority for the allocation of financial and administrative resources may be given to projects and programs which expand affordable housing opportunities in communities in which they are currently limited.</p>	<p>Concord –</p> <ul style="list-style-type: none"> a. The City's Housing Element Update, adopted January 2015, includes Program H-1.9.3 which streamlines the processing of building permits for residential developments that include units below-market rate (BMR). Building permits for the Wisteria project (including BMRs) were streamlined. The City spent a large amount of effort during the fiscal year on advanced planning projects including the next step for the Complete Streets initiative, which includes the Bike and Pedestrian Master Plan, which

is anticipated to be completed during FY 2015-16. In addition, the process for selection of a master developer for the City's Reuse Plan at the Concord Naval Weapons Station has been progressing with selection of a master developer anticipated in September 2015. The Reuse Plan will include approximately 12,200 housing units with 25% of those planned as affordable. The City's Housing Element Update and Development Code Update through the Affordable Housing Incentive Program are geared toward attracting affordable housing to the City by providing incentives for affordable developers.

- b. The City's Development Code (adopted July 24, 2012) includes an Affordable Housing Incentive Program geared toward encouraging the development of housing affordable to a broad range of households with varying income levels within the City. The new Program is intended to ensure that a minimum percentage of units affordable to very low, low, and/or moderate income individuals is included within new residential developments and that appropriate incentives are established to encourage affordable units beyond the minimum.

	<p>Contra Costa County - CDBG funds were awarded to the County to administer the Housing Rehabilitation program in fiscal years 2014-2015 and 2015-2016 to expand and preserve affordable housing opportunities.</p> <p>Walnut Creek - The City administers a First Time Homebuyer Downpayment Assistance program (FTHB) that can help to make homeownership affordable to moderate income households throughout the City. Between 2010-2015, the City processed 16 downpayment assistance loans.</p>
<p>2.4. Action: Member jurisdictions will report on the location of new affordable housing in relation to the location of existing affordable housing and areas of low-income, poverty and minority concentration.</p>	<p>Concord –</p> <ul style="list-style-type: none"> a. Staff has met with a variety of affordable developers throughout the year, however no new affordable housing is currently in the pipeline for development. The sites inventory conducted as part of the Housing Element Update 2014-2022 has determined that the City has adequate capacity through appropriately zoned sites to provide the amount of affordable housing necessary to meet the City's Regional Housing Needs Allocation over the next 8 years. Staff has met with a variety of affordable developers throughout the year, however no new affordable housing is currently in the pipeline for development. The sites inventory conducted as part of the

	<p>Housing Element Update 2014-2022 has determined that the City has adequate capacity through appropriately zoned sites to provide the amount of affordable housing necessary to meet the City's Regional Housing Needs Allocation over the next 8 years.</p> <p>b. The City received grant funding through ABAG/MTC toward the development of a Downtown Specific Plan with the goal of increasing housing density, particularly for affordable housing, intensifying transit opportunities and optimizing connections. The 18-month project was concluded on June 24, 2014, when the City Council adopted the Downtown Specific Plan which encourages the development of approximately 4,200 units during the next 25 years. The Downtown Steering Committee for the Specific Plan selected a Preferred Alternative for the Specific Plan which has a heavy housing focus. The Alternative was further developed and a wide range of implementation strategies were developed to attract downtown growth in the short-, mid- and long-term.</p> <p>c. The City has a great deal of affordable housing, much of it concentrated in the lower income Monument Corridor,</p>
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with others focused downtown and along Clayton Road. The City is attempting to relieve this concentration through adoption of an Inclusionary Housing Ordinance, efforts to construct housing near BART and transit hubs, and through the Concord Naval Weapons Station base closure process, which is ongoing. Two projects were rehabilitated during 2010-2015 including the Robin Lane Apartments (16 units in Monument Corridor) and the Grant Street Apartments (at 3142 Grant St in North Concord) both of which provide housing to very low and low income households, respectively.

- d.** The Concord Reuse Plan Area Plan adopted by the City Council in January 2012, included a commitment toward affordable housing with a stated requirement of 25% of the overall units (12,200), targeted as affordable. The City is currently in the process of retaining a master developer for the site. In January 2015, staff will recommend two finalists to the City Council. After a series of negotiations, one firm will be selected by the Council sometime in 2015. The successful company will be responsible for conducting more detailed planning/design and engineering studies, providing all of the infrastructure for the site, including roads, sewer,

	<p>water, power, as well the financing and successful phasing of the project over many years. After the site is improved, the master developer will likely partner with other companies to build the residential, retail, commercial and community facilities called for in the plan. While the city is selecting a master developer, the Navy, which still owns the property, is completing approval processes so it can begin to transfer the land to civilian entities in late 2015 or early 2016.</p> <p>Contra Costa County - The County compiles and annually updates a complete list of all subsidized affordable <u>rental</u> housing available in all cities. This list provides the type of housing (senior, family, HIV/AIDS, disabled adults, etc.), number of units which are affordable, address and city, and contact information for property management. All jurisdictions utilize this list when receiving telephone inquiries about affordable rental housing.</p> <p>Walnut Creek - Walnut Creek does not have any areas of low-income, poverty and minority concentration. The city has a map of all the affordable housing locations on their website.</p>

<p>3. IMPEDIMENT: Differential origination rates based on race, ethnicity and location.</p>	
<p>3.1. Action: Member jurisdictions will periodically monitor Home Mortgage Disclosure Act (HMDA) data and report significant trends in mortgage lending by race, ethnicity and location.</p>	
<p>3.2. Action: When selecting lending institutions for contracts and participation in local programs, member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of “Outstanding.” Member jurisdictions may exclude those with a rating of “Needs to Improve,” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, member jurisdictions may review an individual institution’s most recent HMDA reporting as most recently published by the FFIEC.</p>	
<p>4. IMPEDIMENT: Lack of knowledge about the requirements of mortgage lenders and the mortgage lending/home purchase process, particularly among lower income and minority households.</p>	
<p>4.1. Action: Member jurisdictions will support pre-purchase counseling and home buyer education programs.</p>	<p>Concord –</p> <ul style="list-style-type: none"> a. During 2010-2015, the City conducted monthly HUD-certified First Time Homebuyer classes (all day Saturdays), to provide potential buyers with homebuyer education to those interested in buying their first home. These efforts were funded

by RDA funds and by the City's Inclusionary Housing In-Lieu funds.

b. Beginning FY 2013/14, the City referred potential first time homebuyers interested in the City's program to certified HUD First Time Homebuyer education programs and required a HUD-certified certificate as evidence of their attendance at such a program, as part of their application submittal documents for the City's program to provide potential buyers with homebuyer education to those interested in buying their first home.

Contra Costa County - From 2010-2015 there were 622 rental units that were created or rehabilitated throughout the County for low-income households; 389 homeowner units that were constructed and/or rehabilitated throughout the County for low-income households. There were 355 units that were developed or rehabilitated for non-homeless Special Needs households, which included Elderly/Frail Elderly, persons with disabilities, persons living with HIV/AIDS, and victims of domestic violence.

Pittsburg - SA funds PCSI for housing counseling services including:

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	<ul style="list-style-type: none"> • mortgage delinquency and default counseling to homeowners • facilitate tenant/landlord dispute resolution or such other dispute resolution services • conduct pre- and post- purchase counseling with homebuyers • provide free of charge information and referral services regarding home ownership to households within the City. • refer homeowners that require credit maintenance and money management services to a credit counseling agency <p>Walnut Creek - Walnut Creek requires that all program participants (for BMR and FTHB programs) attend a homebuyer certification course.</p>
<p>4.2. Action: Member jurisdictions will support home purchase programs targeted to lower income (low and very low), immigrant, and minority households. Minority households include Hispanic households.</p>	<p>Concord –</p> <ul style="list-style-type: none"> a. During FY 2010-11, the City continued implementation of its First Time Homebuyer (FTHB) Program and closed 7 FTHB loans for low- to median-income households (at 60% to 100% of median income) with loans totaling \$222,000 in RDA funds. The Program was promoted through the City's website, the website of Homebricks (the City's administrator for the Program) and through the Mount Diablo Housing Opportunity Center, as well as through the City's First Time

	<p>Homebuyer classes. The program was put into hiatus in FY 2011/12, but was reinstated in FY 2013/14 to provide for down payment assistance for 2-3 loans per fiscal year for First Time Homebuyers, with Hello Housing administering the program for the City. The City's program provides assistance of \$20,000 to \$40,000 for eligible households based on income and household size, with income levels between 60%-100% of Area Median Income Program brochures and applications are available in Spanish.</p> <p>b. During FY 2010-11, the City contracted with Housing Rights, which provided assistance to low-income households in becoming homeowners through homeowner education and counseling, in addition to conducting fair housing counseling, tenant landlord counseling, and foreclosure prevention counseling. During FY 2011-12, the City also contracted with Eden Council for Hope & Opportunity (ECHO) Housing to provide assistance to low-income households to conduct fair housing counseling, tenant landlord counseling and continued contracting with ECHO through FY 2012/13. In FY 2013/14 the City also contracted with Eden Council for Hope & Opportunity (ECHO) Housing to provide assistance to low-income households to conduct fair housing counseling. The</p>
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	<p>City contracted with Bay Area Legal Aid (BALA) for tenant landlord counseling.</p> <p>Pittsburg - HOME funds for down payment assistance to restart in 2017.</p> <p>Walnut Creek - Walnut Creek has a downpayment assistance program for low and moderate income households.</p>
<p>4.3. Action: Member jurisdictions will encourage mortgage lenders to responsibly market loan products to lower income (low and very low), immigrant, and minority households. Minority households include Hispanic households.</p>	<p>Concord - The City's First Time Homebuyer Program requires that homebuyers receive a 30-year fixed mortgage product. Loan applications are reviewed to confirm the homebuyer is receiving a competitive rate and reasonable closing costs. Buyers' rates ranged from 4.25% to 5.5% and a few used CALHFA products. Housing Program staff coordinated with HomeBricks staff to implement a preferred lender program to achieve better loan products and streamline the process for the homebuyer.</p> <p>Walnut Creek - In the fall of 2007, housing staff from the City of Walnut Creek, Contra Costa County, and the City of Richmond convened a series of meetings regarding the region's increasing difficulties with the sub-prime mortgage crisis and the rapidly increasing number of home foreclosures. The jurisdictions met with</p>

	<p>all of the non-profit agencies countywide that are providing home loan counseling and low cost legal services. The agencies reported tremendous increases in calls for assistance due largely to calls for mortgage counseling, and difficulty in staffing their homeowner counseling functions due to the increase in demand.</p> <p>As a result of these discussions, the non-profit organizations have come together into a collaborative called HEPA (Home Equity Preservation Alliance) to provide coordinated services more effectively and efficiently than if the agencies worked independently. The HEPA Collaborative received CDBG funding from the Cities of Walnut Creek, Antioch, and Contra Costa County between 2008-2013. Activities included homeowner information seminars, financial and asset preservation counseling, renter information seminars, one-on-one counseling, and legal services. The HEPA team facilitated an annual foreclosure prevention workshop in Walnut Creek where residents can get one-on-one assistance, counseling, legal advice, and resources.</p>
<p>5. IMPEDIMENT: Lower mortgage approval rates in areas of minority concentration and low-income concentration.</p>	
<p>5.1. Action: Member jurisdictions will support home purchase programs targeted to households who wish to purchase homes in</p>	<p>Concord - The City's First Time Homebuyer Program completed seven loans during FY 2010/11; however, it was put on hold due to</p>

<p>Census Tracts with loan origination rates under 50 percent according to the most recently published HMDA data.</p>	<p>the loss of Redevelopment funding. City staff has contacts with Spanish-speaking loan agents that are also listed on the City's Preferred lender list.</p>
<p>5.2. Action: Member jurisdictions will encourage mortgage lenders to responsibly market loan products to households who wish to purchase homes in Census Tracts with loan origination rates under 50 percent according to the most recently published HMDA data.</p>	<p>Concord - City staff has contact with Spanish-speaking loan agents that are also listed on the City's Preferred lender list to market to both English and Spanish speaking low-income clients. The City also coordinated the subordination of existing loans to assist existing eligible homeowners in the FTHB Program or Rehabilitation Loan Program to achieve better interest rates through a refinance of their homes.</p>
<p>6. IMPEDIMENT: Lack of knowledge of fair housing rights.</p>	
<p>6.1. Action: Support efforts to educate tenants, and owners and agents of rental properties regarding their fair housing rights and responsibilities.</p>	<p>Concord - Concord allocated resources to encourage and facilitate the development of affordable housing, as detailed in this CAPER. To ensure fair access to housing for all in Concord, the City invested \$70,000 in resources for fair housing and tenant/ land lord counseling services through Housing Rights; \$40,000 to provide one-stop services for housing and tenant/landlord issues at the Mt. Diablo Housing Opportunity Center; and additional \$5,000 to provide augmented foreclosure-related housing services. At least 67 percent of all services were provided to extremely low- and very</p>

	<p>low-income households. These services were paid for with RDA funds. The City also provided free printing services for all fair housing outreach materials used within the city. Housing rights also held 3 legal clinics during the year, and assisted with coordination on critical tenant issues such as pest control. Housing Rights relocated at the beginning of the fiscal year to the Keller House, co-locating with the Monument Community Partnership to provide better access to residents.</p> <p>Pittsburg - PCSI services funded by SA.</p> <p>Walnut Creek - Walnut Creek funds ECHO Housing to provide Fair Housing and Tenant/Landlord services to Walnut Creek residents. ECHO housing provides resource materials, and educational workshops for residents.</p>
<p>7. IMPEDIMENT: Discrimination in rental housing.</p>	
<p>7.1. Action: Support efforts to enforce fair housing rights and to provide redress to persons who have been discriminated against.</p>	<p>Concord – Through 2010-2015, the City contracted with Housing Rights and ECHO to provide assistance to enforce fair housing rights. They assisted 26 residents with fair housing issues during the year.</p>

	<p>Contra Costa County - From 2010 – 2015, the County allocated \$122,400 of CDBG funds to Bay Area Legal Aid to provide Fair Housing services, which included investigation services and outreach. Bay Area Legal Aid and its partner agencies distributed fair housing literature at seven events on an annual basis throughout the County. They also distributed fliers to over 60 nonprofit and governmental agencies throughout the County, explaining the fair housing services that they provide and how to get in contact with them. Outreach was focused in low income communities, many with significant numbers of Spanish speaking and other non-English speaking residents.</p> <p>Pittsburg - PCSI services funded by SA.</p>
	<p>Walnut Creek - ECHO Housing will investigate and report Fair Housing violations. ECHO housing also conducts annual fair housing tests in Walnut Creek.</p>
<p>7.2. Action: Support efforts to increase the awareness of discrimination against persons based on sexual orientation.</p>	<p>Concord - Through 2010-2015, the City contracted with Housing Rights and ECHO to provide assistance to enforce fair housing rights, which included discrimination against residents who have experienced discrimination based on sexual orientation, race, religion, ethnicity or disabilities.</p>

	<p>Pittsburg - Agreements such as a lease or housing agreement executed by the City, SA, HA, etc. specifically addresses language against discrimination.</p>
<p>8. IMPEDIMENT: Failure to provide reasonable accommodation to persons with disabilities.</p>	
<p>8.1. Action: Support efforts to educate tenants, and owners and agents of rental properties regarding the right of persons with disabilities to reasonable accommodation.</p>	<p>Concord - Through 2010-2015, the City contracted with Housing Rights and ECHO to promote fair housing assistance and tenant/landlord counseling to provide reasonable accommodation to persons with disabilities.</p> <p>Pittsburg - PCSI services funded by SA.</p> <p>Walnut Creek - Walnut Creek funds ECHO Housing to provide Tenant/Landlord and Fair Housing services.</p>
<p>8.2. Action: Support efforts to enforce the right of persons with disabilities to reasonable accommodation and to provide redress to persons with disabilities who have been refused reasonable accommodation.</p>	<p>Concord - Through 2010-2015, the City contracted with Housing Rights and ECHO to promote fair housing assistance and tenant/landlord counseling to provide reasonable accommodation to persons with disabilities.</p> <p>Pittsburg - Agreements such as a lease or housing agreement executed by the City, SA, HA, etc. specifically addresses language</p>

	against discrimination.
9. IMPEDIMENT: Lack of information on the nature and basis of housing discrimination.	
9.1. Action: Monitor the incidence of housing discrimination complaints and report trends annually in the CAPER.	Concord - The City monitored incidence of discrimination complaints through review of the quarterly Housing Rights and ECHO reports. No trends have been noted.
9.2. Action: Improve the consistency in reporting of housing discrimination complaints. All agencies who provide this information should do so in the same format with the same level of detail. Information should be available by the quarter year.	Concord - All Housing Rights and ECHO reports were submitted by quarter year, with breakdowns regarding type of assistance, household composition, household ethnicity and household income, with a brief summary of the quarter and an outreach report, with the types and number of clinics, mailings, or household distributions conducted. The City will implement reporting online in City Data Services in FY 2011-12.
9.3. Action: Improve collection and reporting information on discrimination based on sexual orientation and failure to provide reasonable accommodation to persons with disabilities.	Concord - During 2010-2015, the City's Housing Program continued to coordinate with Housing Rights and ECHO through quarterly reporting in monitoring trends and incidents of discrimination.

<p>10. IMPEDIMENT: Lack of formal policies and procedures regarding reasonable accommodation.</p>	
<p>10.1. Action: Jurisdictions which have not done so will adopt formal policies and procedures for persons with disabilities to request reasonable accommodations to local planning and development standards.</p>	<p>Concord - The City has completed this action. The City's Municipal Code, Section 122-213 through -220, pursuant to the federal Fair Housing Amendments Act of 1988, the Americans with Disabilities Act, and the California Fair Employment and Housing Act, provides people with disabilities, reasonable accommodation as necessary to ensure equal access to housing and a process for individuals with disabilities to make requests for reasonable accommodation in regard to relief from the zoning rules, policies, practices and/or procedures of the City.</p> <p>Contra Costa County - The County's Mortgage Credit Certificate program reserves 40 percent of its allocation for households with incomes at or below 80 percent of area median income. Lenders have been cooperative with this program, and 150 Mortgage Credit Certificates were provided to low-income households through 2010 - 2015.</p> <p>Walnut Creek - In 2014 the City of Walnut Creek adopted a Reasonable Accommodation Ordinance that outlines the policy and procedure for requesting reasonable accommodation in the application of local planning, zoning, and building standards.</p>

<p>11. IMPEDIMENT: Transitional and supportive housing is not treated as a residential use subject only to those restrictions that apply to other residential uses of the same type in the same zone, and is not explicitly permitted in the zoning code.</p>	
<p>11.1. Action: Jurisdictions which have not done so will amend their zoning codes to treat transitional and supportive housing types as a residential use subject only to those restrictions that apply to other residential uses of the same type in the same zone, and to explicitly permit both transitional and supportive housing types in the zoning code.</p>	<p>Concord - The City's new Development Code currently lists transitional and supportive housing (group homes) under the category of residential uses as a Permitted Use in both the Industrial Business Park and Industrial Mixed Use zoning districts, similar to Live/Work units. The Development Code was adopted on July 24, 2012.</p> <p>Walnut Creek - In 2014, the City of Walnut Creek amended its zoning codes to treat transitional and supportive housing types as a residential use subject only to those restrictions that apply to other residential uses of the same type in the same zone, and to explicitly permit both transitional and supportive housing types in the zoning code.</p>
<p>12. IMPEDIMENT: Permanent emergency shelter is not permitted by right in at least one appropriate zoning district.</p>	
<p>12.1. Action: Jurisdictions which have not done so will amend their zoning codes to permit transitional and supportive housing by right in at least one residential zoning district.</p>	<p>Concord - The City's new Development Code lists Emergency or Homeless Shelters under the category of residential uses as a Permitted Use in the Office Business Park, Industrial Business Park and</p>

	<p>Industrial Mixed Use zoning districts, similar to Live/Work units. The Development Code was approved by the City Council on July 24, 2012.</p> <p>Walnut Creek - The City of Walnut Creek amended its zoning codes to permit transitional and supportive housing by right in at least one residential zoning district.</p>
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