D.5 Disproportionate Housing Needs and Displacement Risk

According to State HCD's AFFH Guidance Memo, disproportionate housing needs "generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area." Consistent with State HCD guidance, this analysis evaluates disproportionate housing need through the assessment of cost burden, overcrowding, displacement risk, publicly assisted housing, substandard housing, and homelessness.

COST BURDEN

Households paying more than 30 percent of their income on housing costs are considered cost burdened, while those paying more than 50 percent are considered severely cost burdened. Cost burden among homeowners and rents in Oakland is discussed in depth in Appendix B, the Housing Needs Assessment. Here, cost burden is examined by race/ethnicity. Rates of cost burden, severe or otherwise, are highest for non-Hispanic Black or African American households, followed by Hispanic or Latinx households. Cost burden, severe or otherwise is lowest for non-Hispanic white households, followed by American Indian/Alaska Native households (Chart D-7). As described in Table B-31b in the Housing Needs Assessment, while cost burden in Alameda County and the Bay Area region are comparable, cost burden in Oakland is higher than in the County and region. In particular, more Oakland households are severely cost-burdened (20.9 percent) than in the County (17.1 percent) or region (16.8 percent). Several factors result in Oakland experiencing higher cost burdened than the county and regional average, including a higher percentage of households that make less than the area median income, a higher share of very low income households, a higher percentage of single and two-person households, and, although comparatively lower in other cities and regions, a very high median renter costs. More information on these factors is available in Appendix B.

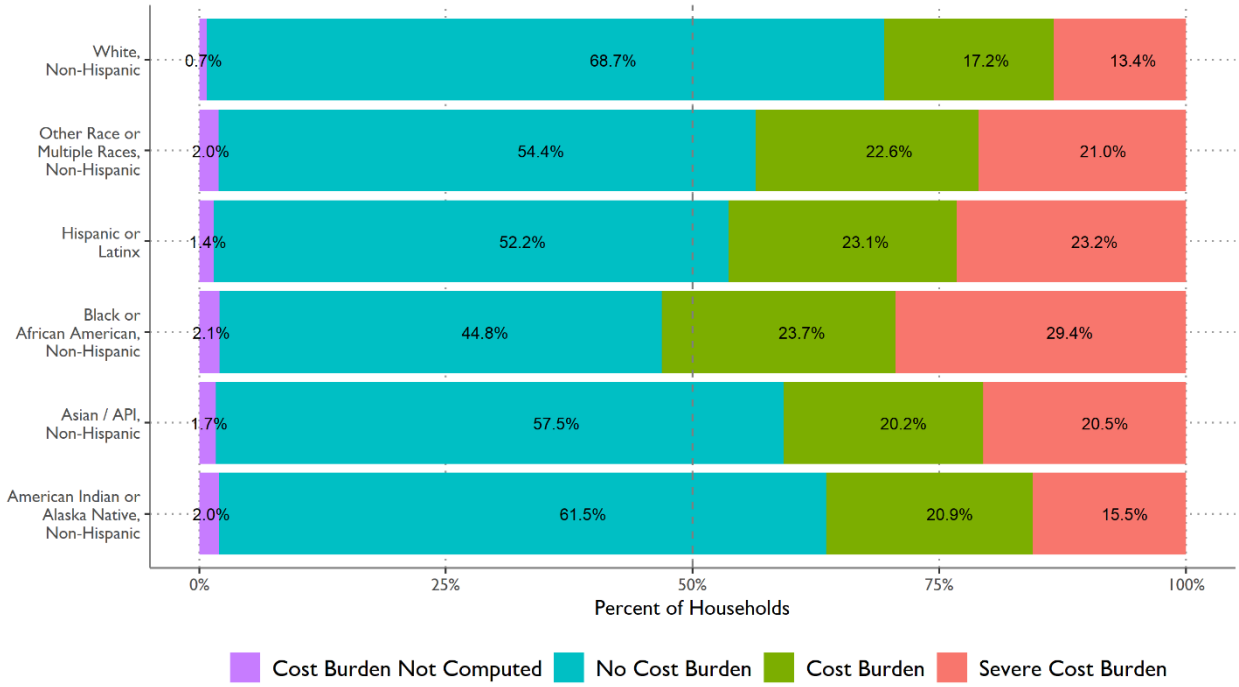


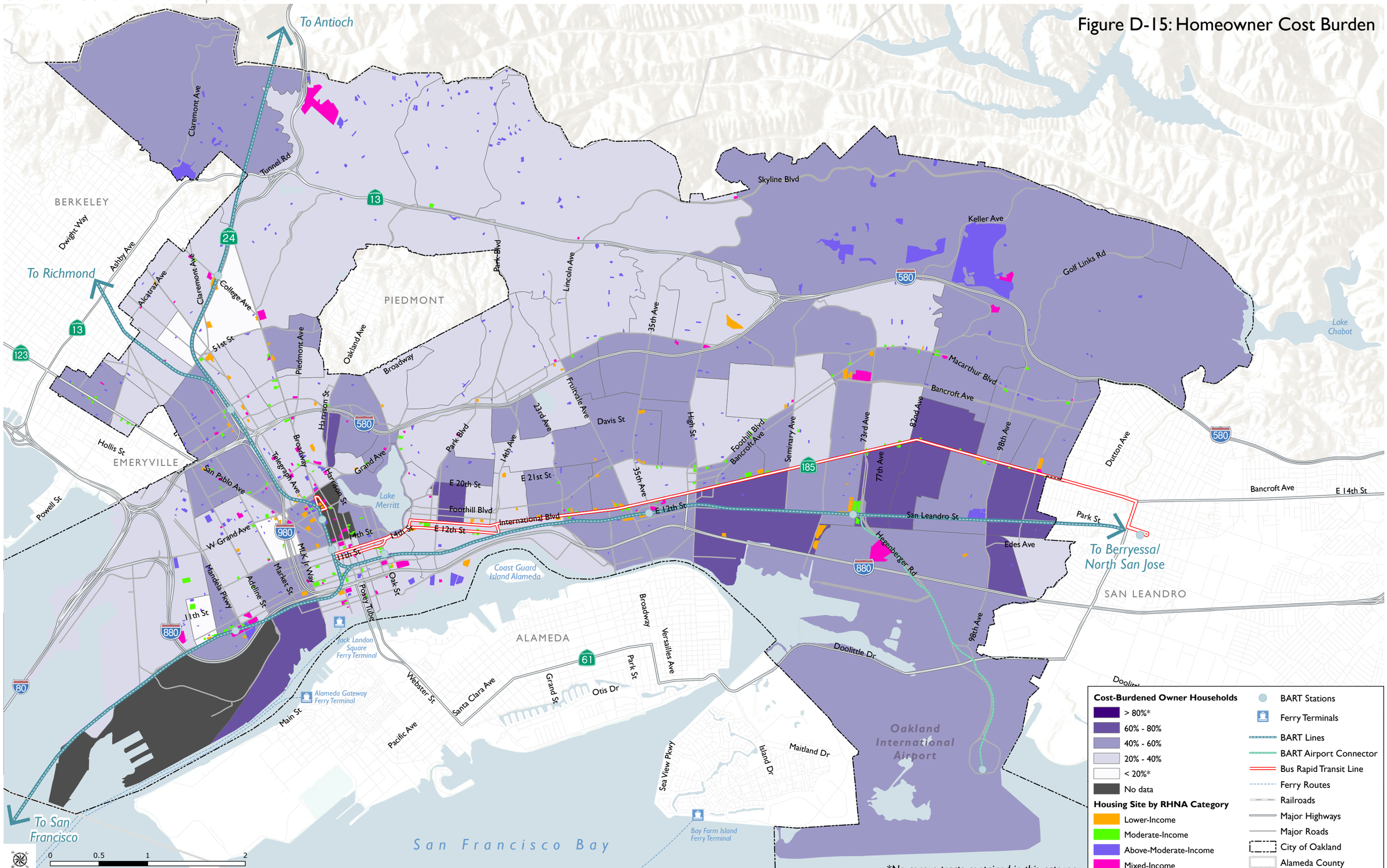
Chart D-7: Cost Burden by Race in Oakland, 2013-2017

Source: ABAG-MTC Housing Needs Data Workbook (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

Figures D-15a and D-16a show the geographic distribution of cost burden in Oakland for owner- and renter-occupied households, respectively. Rates of households experiencing cost burden—among both renters and owners—do not exceed 80 percent in any one census tract.[17] The lowest levels of renter cost burden (less than 20 percent) are in Rockridge, the North Oakland Hills, and one tract south of Piedmont. The lowest levels of homeowner cost burden (less than 20 percent) are located in two North Oakland tracts and two West Oakland tracts. The highest rates (60-80 percent) of both homeowner and renter cost burden are located in East Oakland, plus a couple additional tracts experiencing high homeowner cost burden in the Jack London District and the Grand-Lake neighborhood. Renter cost burden skews higher than homeowner cost burden, with most tracts having over 40 percent cost burden for renters. Figures 15b and 16b show Oakland cost burden compared to other cities in the region; a greater proportion of Oaklanders spend 30 percent or more than the Bay Area overall: 42 percent of Oaklanders spend over 30 percent of their income on housing, whereas 36 percent of all Bay Area residents spend more than 30 percent of their income.

[17] The State HCD AFFH Data and Mapping Tool provides cost burden data in quintiles, with over 80 percent representing the highest concentration of cost burden possible. This should not be interpreted as a threshold, but rather a natural break in the data.

Figure D-15: Homeowner Cost Burden



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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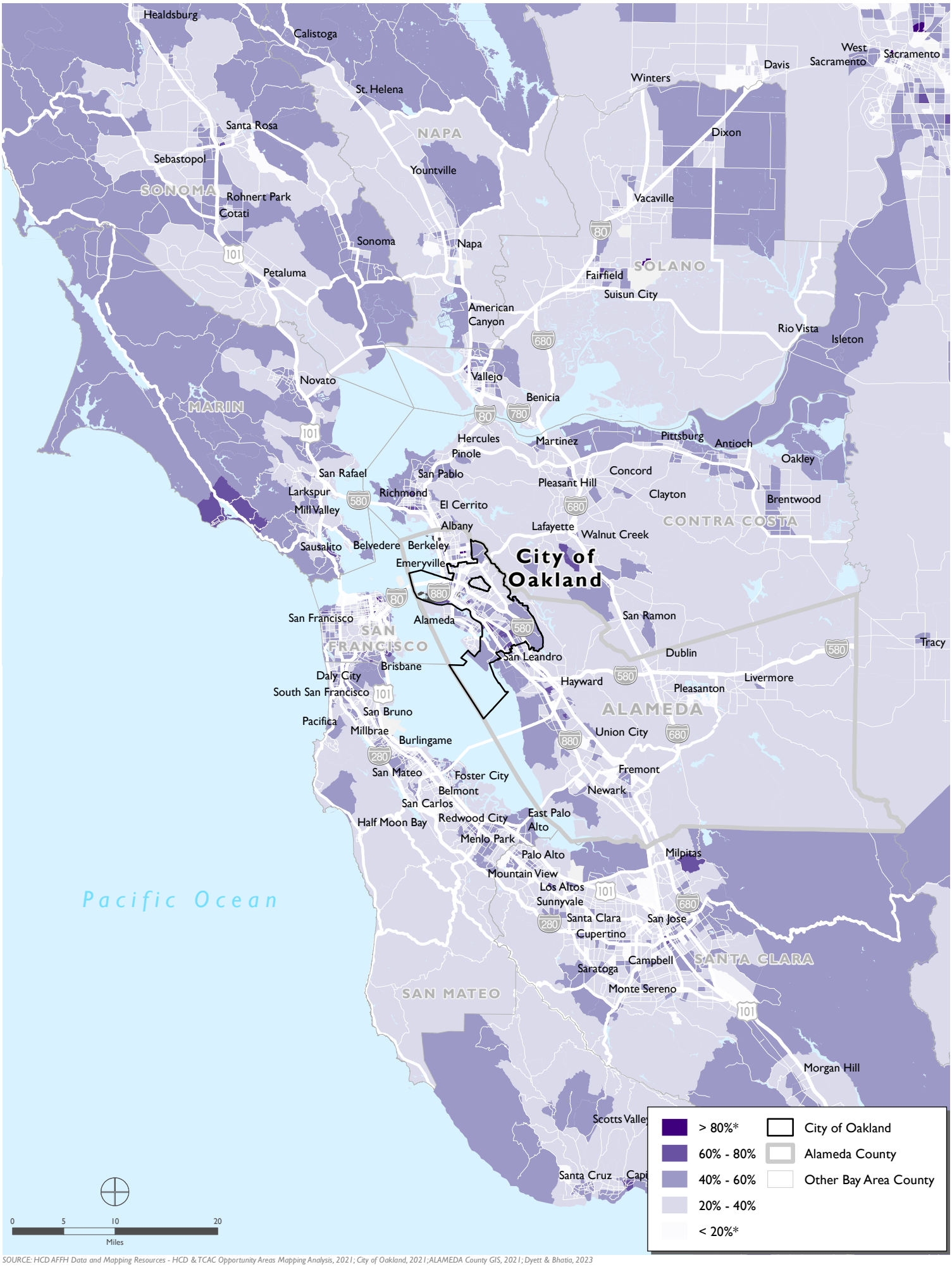
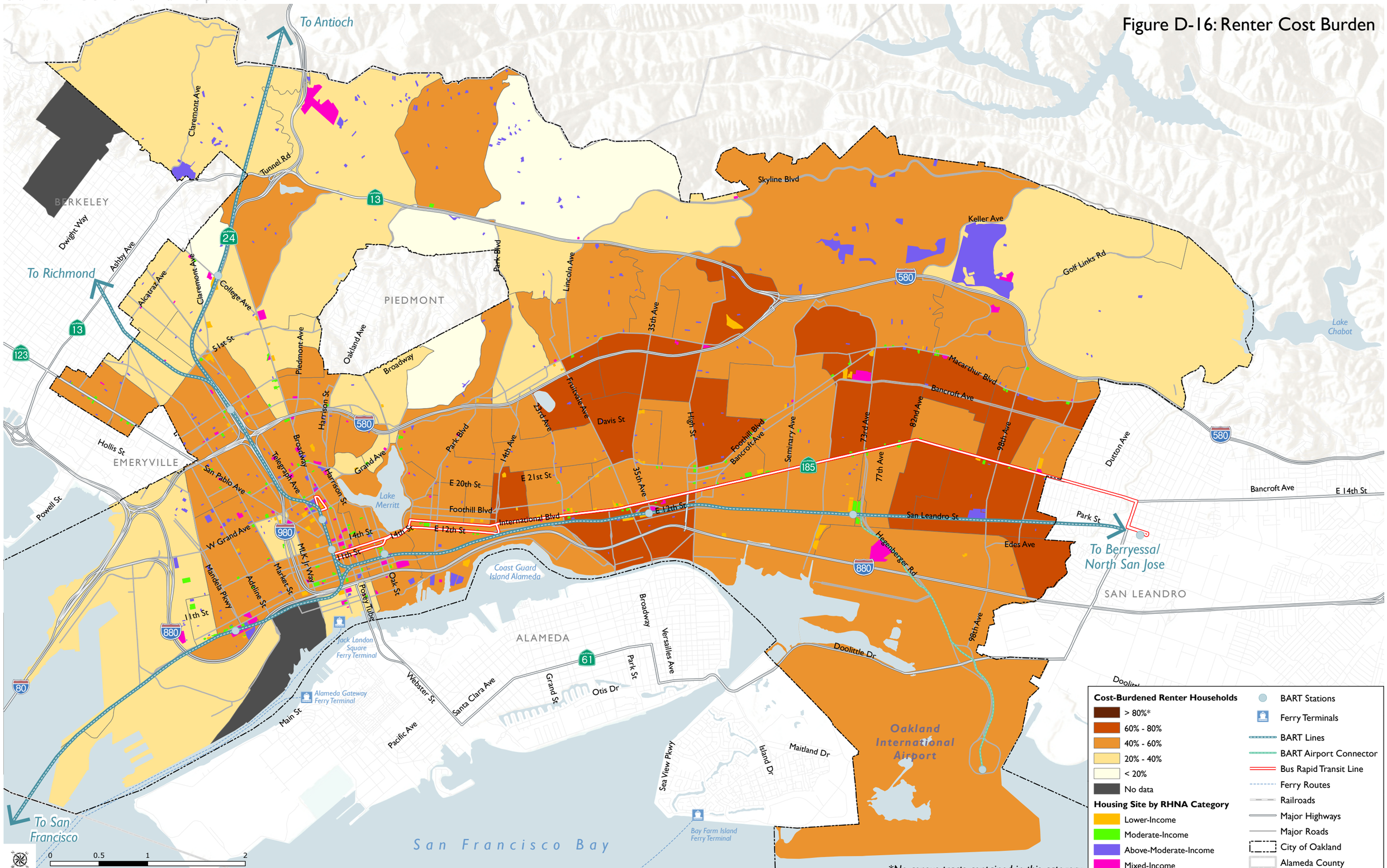
Figure D-15b: Homeowner Cost Burden



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2023

Figure D-16: Renter Cost Burden



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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Figure D-16b: Renter Cost Burden

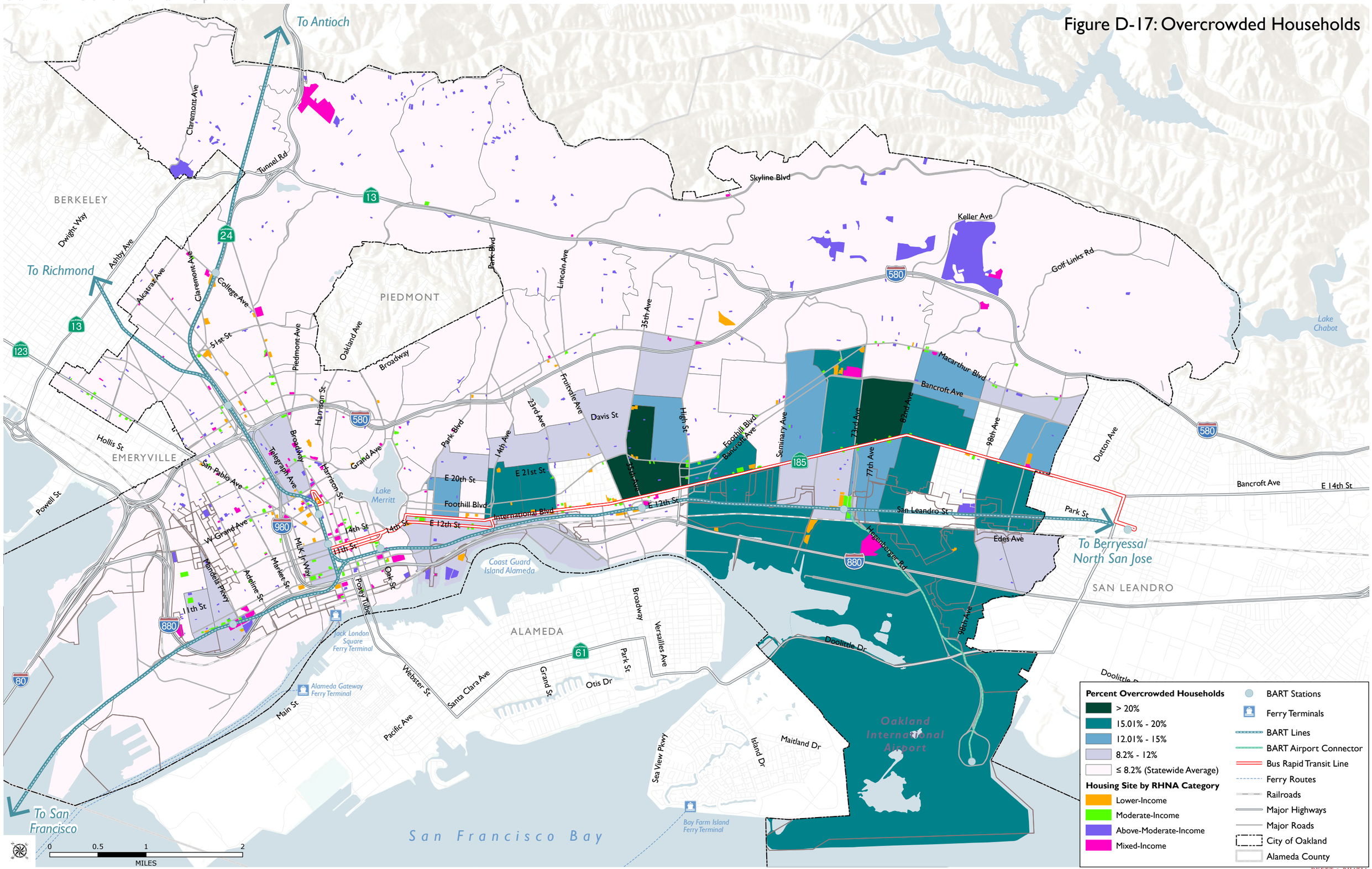
SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2023

OVERCROWDING

Appendix B, the Housing Needs Assessment, discusses overcrowding in detail, but here the geographic component of overcrowding is examined. The highest tract-level rates of overcrowding were found in the East Oakland flatlands, notably in Fruitvale and other tracts along International Boulevard near the Coliseum (Figure D-17a). All tracts experiencing some level of overcrowding higher than the statewide average are also tracts identified by State HCD/TCAC as Low Resource or High Segregation and Poverty areas. Recalling Figure D-1B, most tracts experiencing higher levels of overcrowding (more than 15 percent of households) have a predominant Hispanic or Latinx population, though a few tracts have a predominant Black or African-American population, one has a predominant Asian population, and one tract is the sole census tract in Oakland without a predominant race/ethnicity (in the Bancroft-Havenscourt neighborhood).

As noted in the Housing Needs Assessment, Oakland experiences slightly higher rates of overcrowding (8.41 percent) than the county (7.87 percent) or the region (6.9 percent). Regional overcrowding patterns are shown in Figure D-17b. When compared regionally, rates of overcrowding are about the same in Oakland and the Bay Area region. Overcrowding disproportionately impacts renters (11.5 percent), lower-income households (6.48 percent of extremely-low-income, 8.69 percent of very-low-income, and 7.3 percent of low-income), Hispanic or Latinx households (24.5 percent), and multiple or other race households of any ethnicity (22.0 percent).

Figure D-17: Overcrowded Households



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Figure D-17b: Overcrowded Households

SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2023

DISPLACEMENT RISK

As housing costs increase, lower-income households may be displaced from their neighborhoods, whether this is due to landlord action or market changes. In Oakland, communities of color are particularly impacted by this dynamic.

The City's 2021 East Oakland Mobility Action Plan reported significant racial displacement of Black and Asian American populations from 2000 to 2018 in former ethnic enclaves. Black residents faced the largest decline and are no longer the majority population in the Black ethnic enclaves. For example, from 2000 to 2018, the Black population in Eastmont experienced a 53% decrease. During the same period these same neighborhoods experienced significant increases in higher income white population. There was an unprecedented rise in rent while median renter household income for Black, Asian, and Latinx households decreased. While East Oakland renters had previously maintained relative housing affordability, big spikes in housing unaffordability occurred from 2013 to 2018. By 2018, East Oakland renters making the median renter household income would have to pay 81% of their income to afford median rents in their neighborhoods, compared to 65% citywide. Current racialized displacement and housing unaffordability are directly linked to predatory sub-prime lending and foreclosures in the 2000s that removed the safety net of homeownership stability and equity. Many of the Black ethnic enclaves had Black homeownership rates higher than citywide rates until the foreclosure crisis which was concentrated in East and West Oakland flatland areas. Today, many of the East Oakland neighborhoods, especially the once Black ethnic enclaves, have higher homelessness risks than citywide, reflecting the lasting impact of the foreclosure crisis and ongoing displacement across East Oakland.

Stanford University's Changing Cities Research Lab performed an in-depth investigation of Oakland residential instability in 2021 and found that West and East Oakland were disproportionately affected.[18] Key findings include:

- Eviction filing rates in 2018-2019 were highest in the southern parts of West Oakland, as well as in pockets of East Oakland; however, eviction filing locations did not align fully with the spatial distribution of moves among lower-socioeconomic-status residents. Rather, eviction filings were likely being used as a tactic to collect rent. Residents are likely experiencing informal forms of displacement that instigate moves.
- Unregistered rentals as of July 2020 were highest in West and Deep East Oakland, two areas that were hit hard by the foreclosure crisis and underwent the most disinvestment during the Recession.
- Tax delinquent properties, owners of large numbers of properties, and code violations are most prevalent in Deep East and West Oakland.

[18] Hwang, Jackelyn, and Vineet Gupta 2021. 'Residential and Neighborhood Instability in Oakland." Available at https://ccrl.stanford.edu/publications/residential-and-neighborhood-instability-in-oakland (accessed November 2022).

These findings underscored a need for preservation and protection strategies in Deep East Oakland and pockets of West Oakland, which have majority BIPOC populations, long histories of disinvestment and are at high risk of renter vulnerability. These findings also highlighted a need to monitor vulnerable areas for disinvestment and residential instability, especially in the wake of the COVID-19 pandemic.

The State HCD AFFH Data and Mapping Tool also provides information related to neighborhood displacement risk. This includes "sensitive communities" typologies developed by UC Berkeley's Urban Displacement Project (UDP) to quantify the risk of displacement within a community.[19] Sensitive communities are those with populations vulnerable to displacement due to increased redevelopment and drastic shifts in housing cost. Figure D-18a shows that most of Oakland is vulnerable to displacement, except the Oakland Hills, Rockridge, Temescal, and neighborhoods surrounding the City of Piedmont.

The 2020 AI noted that between 2010 and 2017, Black, Hispanic, and Asian or Pacific Islander residents were all being displaced in Oakland and replaced by white residents at a census tract level. Recalling racial/ethnic demographic data from Section D.2, the Black population was the only racial/ethnic group in Oakland to experience a net loss in population from 2010 to 2019. However, other racial/ethnic groups are also being displaced, but perhaps to other locations within the City. This data might also reflect that as lower-income residents of certain racial/ethnic groups are displaced from Oakland, higher-income residents of the same racial/ethnic groups are replacing them.

From the 2020 AI survey distributed to residents across Alameda County, 28 percent of Hispanic respondents say they have been displaced in the last five years and 25 percent of Black respondents say that they have been displaced in the same period. The primary reason for displacement, according to the survey results, is that rent became unaffordable (56 percent of those displaced). This experience is validated by a 2019 study by the UDP which found that census tracts in the region that experienced a 30 percent increase in the median rent also experienced a decrease of 28 percent of low-income households of color.

UDP provides useful information in examining displacement risk at the tract level. Table D-7 describes the criteria used to develop neighborhood typologies.[20] Table D-8 provides the number of households at displacement risk in 2018, broken down by owner-occupied vs renter-occupied. More renters than owners are living in tracts susceptible to or experiencing displacement and gentrification. Nearly half of all households in Oakland, regardless of tenure, live in tracts at risk of or experiencing gentrification, while almost a quarter live in tracts susceptible to or experiencing displacement. This is greater than the region as a whole—according to UDP, "As of 2018, over 10% or 161,343 low income households (households making below 80% of AMI) lived in areas at risk of or currently experiencing gentrification. Nearly half of these households live in either Alameda or San Francisco counties."

Figure D-19, the map that corresponds with Tables D-7 and D-8, illustrates where these neighborhoods are located by typology. Exclusive areas are all clustered in/around the North Oakland Hills, while most of the

[19] Urban Displacement Project, SF Bay Area – Gentrification and Displacement, 2021, available at https://www.urbandisplacement.org/maps/sf-bay-area-gentrification-and-displacement/.
[20] It should be noted that this data is several years old and does not capture all factors of neighborhood change – not all Oakland neighborhoods experiencing displacement may be captured in UDP's model.

northwestern tracts of Oakland, including Downtown, are in varying stages of gentrification or at risk of gentrification, and most tracts in the East Oakland flatlands are either low income/susceptible to displacement or at risk of gentrification, with one tract experiencing ongoing displacement. Only a handful of tracts in Oakland are considered Stable Moderate/Mixed Income, which UDP defines as neighborhoods that are not experiencing housing market pressures characteristic of the rest of the country, so the displacement of low-income residents is rare.

Regionally, sensitive communities are concentrated in coastal census tracts in Contra Costa, Alameda, and San Francisco County. The cities of Vallejo, Richmond, Berkeley, San Leandro, Oakland, and San Francisco are shown to have the highest number of sensitive communities, meaning these communities are at the highest risk of experiencing the displacement of existing established communities. These communities are shown in Figure 18b.UDP also identified that many parts of the Bay Area region, nearly 30% of all tracts, are either at risk or becoming exclusive to low income households. Exclusive tracts are concentrated in suburban counties, including Marin and San Mateo, but also include enclaves in Oakland, Berkeley, and San Francisco. Displacement typologies for the region are shown in Figure 19b.

Table D-7: Gentrification and Displacement Census Tract Typologies, 2018

Typology	*Criteria*
Low-Income/Susceptible to Displacement	• Low- or mixed-income tract in 2018
Ongoing Displacement of Low-Income Households	• Low- or mixed-income tract in 2018 • Absolute loss of low-income households, 2000-2018
At Risk of Gentrification	• Low or mixed-income tract in 2018 • Housing affordable to low- or mixed-income households in 2018 • Did not gentrify 1990-2000 or 2000-2018 • Marginal Change in housing costs or Zillow home or rental value increases in the 90th percentile between 2012-2018 • Local and nearby increases in rent were greater than the regional median between 2012-2018 or the 2018 rent gap is greater than the regional median rent gap
Early/Ongoing Gentrification	• Low or mixed-income tract in 2018 • Housing affordable to low- or mixed-income households in 2018 • Increase or rapid increase in housing costs or above regional median change in Zillow home or rental values between 2012-2018 • Gentrified in 1990-2000 or 2000-2018
Advanced Gentrification	• Moderate-, mixed-moderate-, mixed-high-, or high-income tract in 2018 • Housing affordable to middle-, high-, mixed-moderate-, and mixed-high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs • Gentrified in 1990-2000 or 2000-2018
Stable Moderate/Mixed Income	• Moderate-, mixed-moderate-, mixed-high-, or high-income tract in 2018
At Risk of Becoming Exclusive	• Moderate-, mixed-moderate-, mixed-high-, or high-income tract in 2018 • Housing affordable to middle-, high-, mixed-moderate-, and mixed-high-income households in 2018 • Marginal change or increase in housing costs
Becoming Exclusive	• Moderate-, mixed-moderate-, mixed-high-, or high-income tract in 2018 • Housing affordable to middle-, high-, mixed-moderate-, and mixed-high-income households in 2018 • Rapid increase in housing costs • Absolute loss of low-income households, 2000-2018 • Declining low-income in-migration rate, 2012-2018 • Median income higher in 2018 than in 2000
Stable/Advanced Exclusive	• High-income tract in 2000 and 2018 • Affordable to high- or mixed-high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs

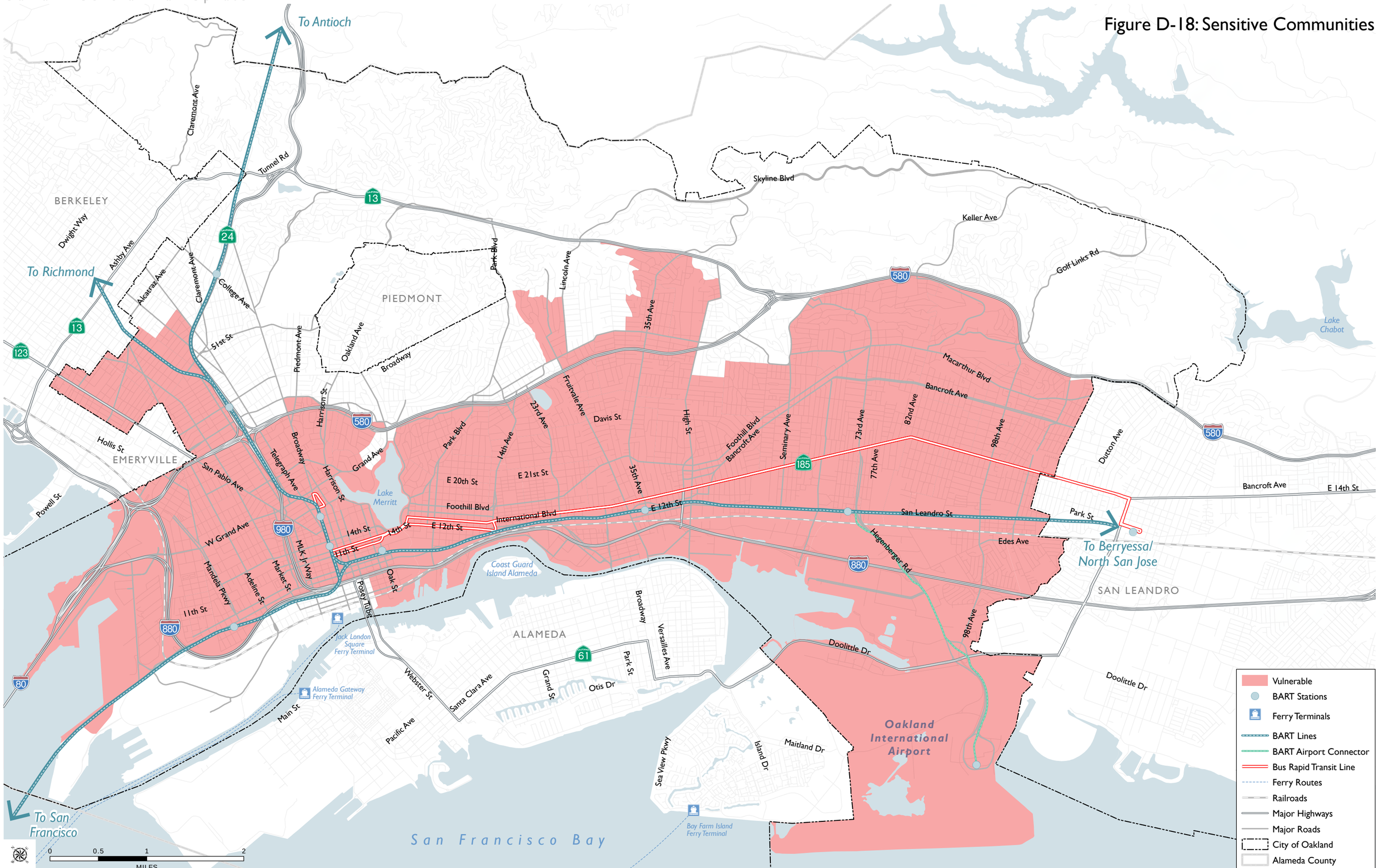
Source: UC Berkeley, Urban Displacement Project, 2018

Table D-8: Households by Displacement Risk and Tenure in Oakland, 2015-2019

Typology	*Owner-Occupied*	*Renter-Occupied*	*Percent*
Susceptible to or Experiencing Displacement	13,699	21,625	21.7%
At Risk of or Experiencing Gentrification	19,744	56,452	46.9%
Stable Moderate/Mixed Income	9,505	8,208	10.9%
At Risk of or Experiencing Exclusion	22,415	9,747	19.8%
Other	857	290	0.7%

Source: Urban Displacement Project, 2018; American Community Survey 5-Year Data (2015-2019), Table B25003

Figure D-18: Sensitive Communities



SOURCE: HCD AFFH Data and Mapping Resources - Urban Displacement Project, 2019; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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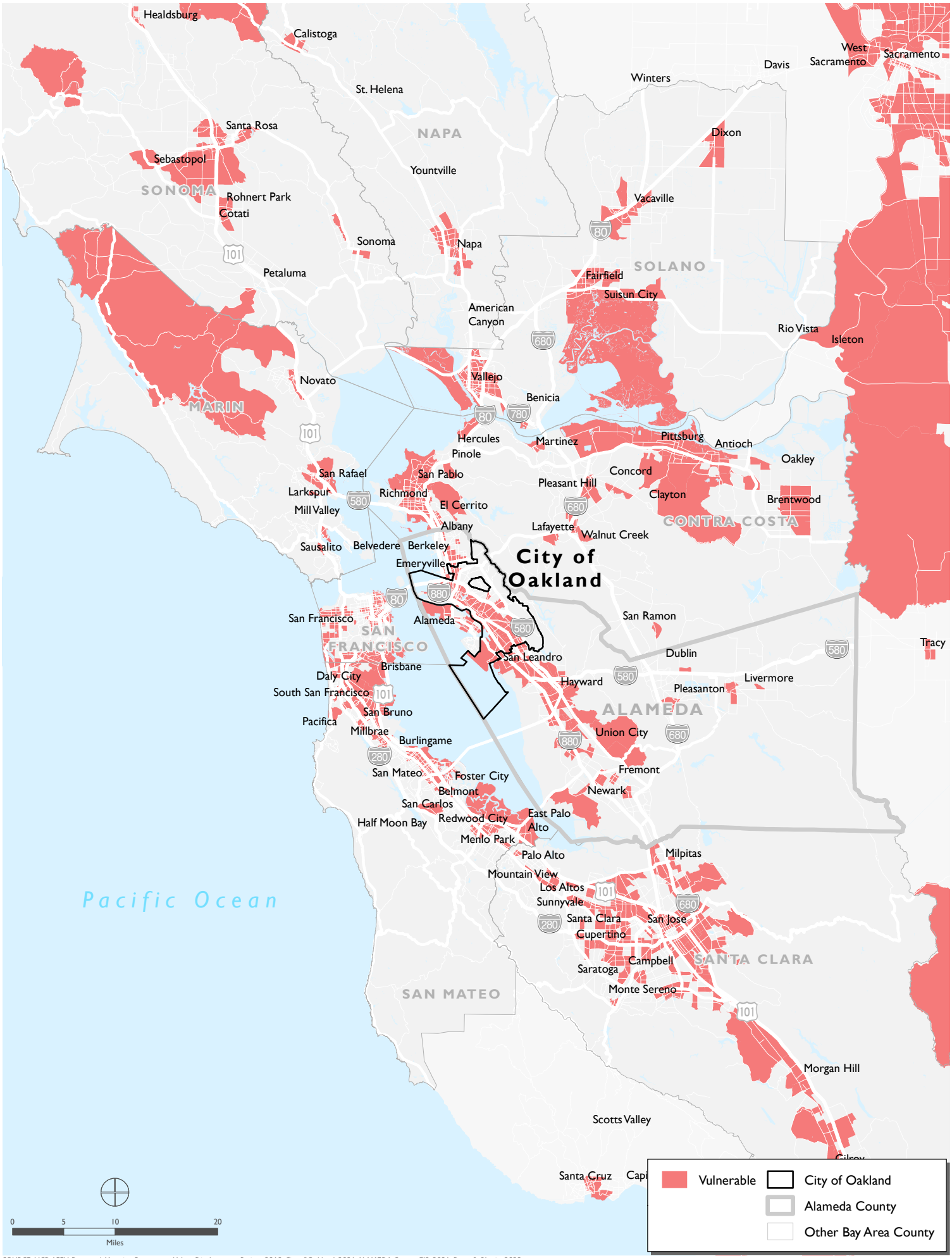
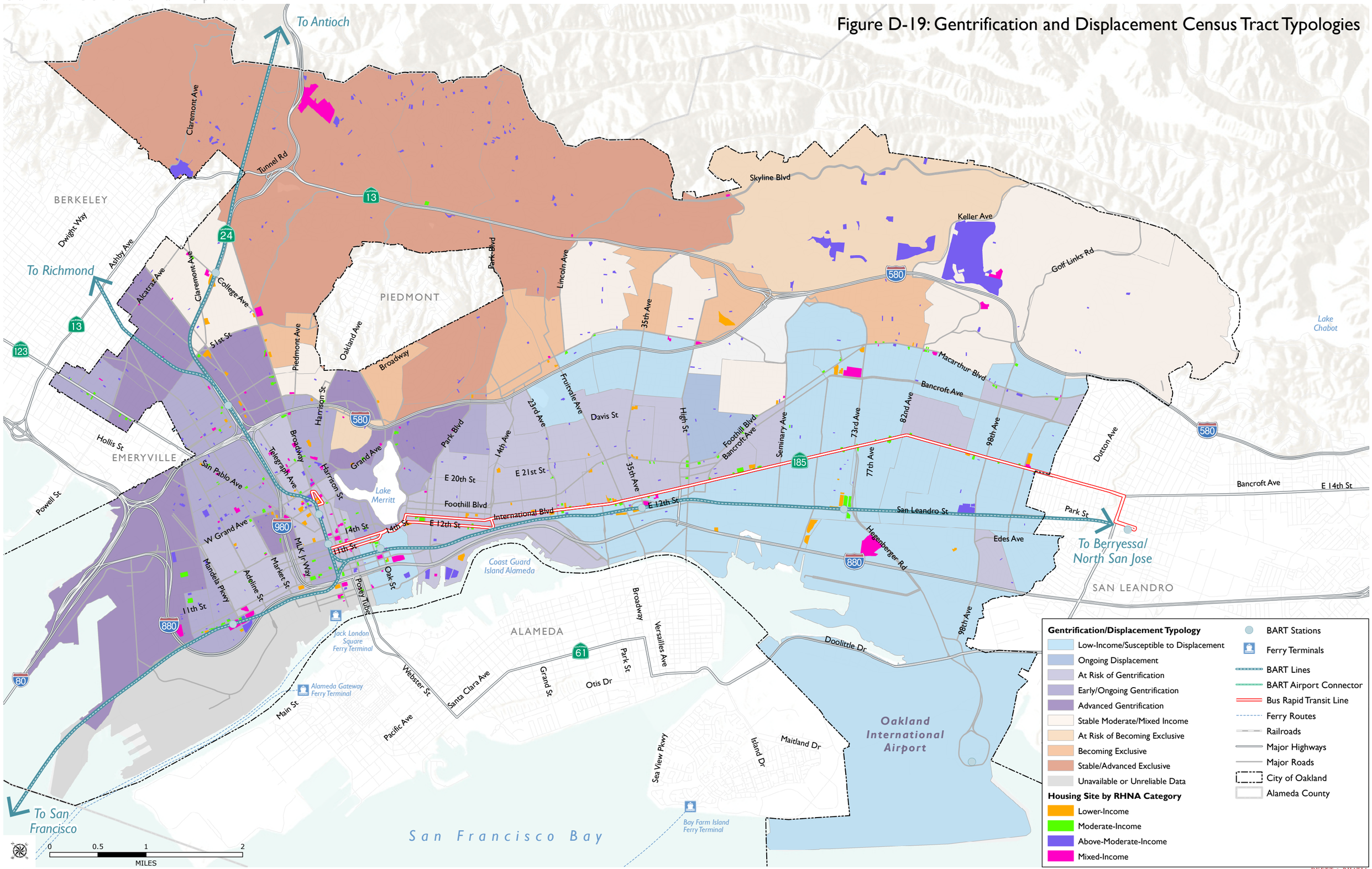
Figure 18-b: Sensitive Communities



SOURCE: HCD AFFH Data and Mapping Resources - Urban Displacement Project, 2019; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2023

Figure D-19: Gentrification and Displacement Census Tract Typologies



SOURCE: Urban Displacement Project, 2018; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Figure D-19b: Gentrification and Displacement Census Tract Typologies

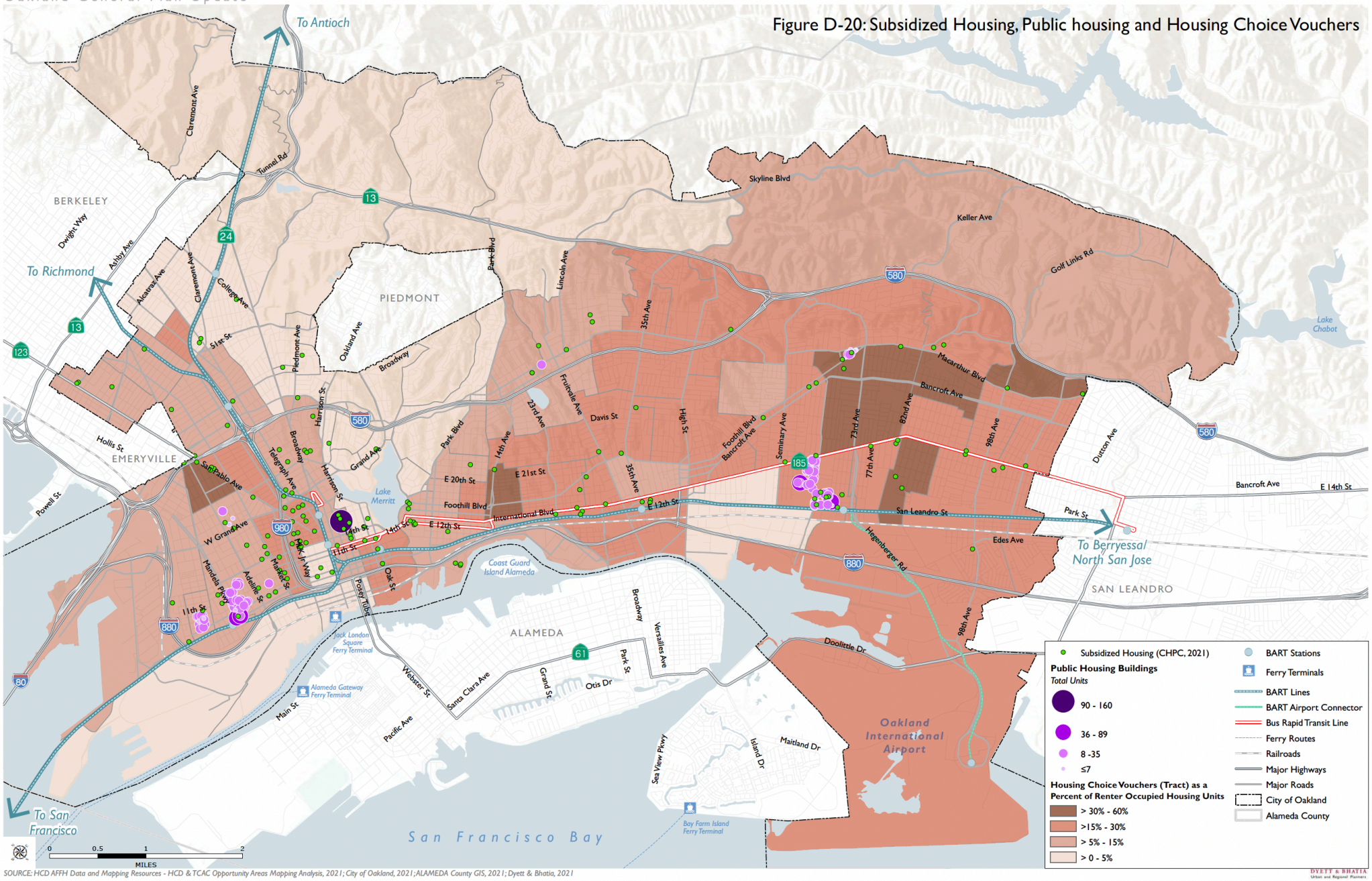
SOURCE: Urban Displacement Project, 2018; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

PUBLICLY ASSISTED HOUSING

The Oakland Housing Authority (OHA) provides publicly assisted housing to residents of Oakland. According to OHA's Draft Fiscal Year 2023 Making Transitions Work Annual Plan, OHA's housing inventory includes public housing (1,454 units), Project-Based Section 8 vouchers (4,973 allocated units), Housing Choice Vouchers and other HUD programs (15,168 units), and other local programs (1,910 units). According to Figure D-20, most public housing units are concentrated in Downtown, West Oakland, and the Coliseum area, primarily in tracts designated by TCAC as Low Resource or High Segregation and Poverty, though there are a few units located in Moderate and High Resource areas, with none in Highest Resource areas. Housing Choice Voucher use follows a similar pattern. Subsidized housing, such as Project-Based Section 8, is more distributed throughout Oakland, found in all opportunity areas except those designated Highest Resource, but most is clustered in Downtown and West Oakland (California Housing Partnership, 2021).[21] According to the 2020 AI, across Alameda County, BIPOC populations (excluding Hispanic and Latinx) are overrepresented in publicly assisted housing, with the Black and African American population composing the majority across all housing types.

[21] It should be noted that the State HCD AFFH Data and Mapping Tool does not provide the most current information on Project-Based Section 8 vouchers and Housing Choice Vouchers – existing patterns of geographic distribution may differ from data provided by the State.

Figure D-20: Subsidized Housing, Public housing and Housing Choice Vouchers



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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SUBSTANDARD HOUSING

The condition of the housing stock, including the age of buildings and units that may be in substandard condition, is also an important consideration in a community's housing needs. As summarized in the Housing Needs Assessment, about 80.4 percent of Oakland's housing stock was constructed prior to 1980 and is over 40 years old. About 8.0 percent of the housing stock has been constructed since 2000, with only 1.8 percent constructed since 2010.

A high proportion of older buildings, especially those built more than 30 years ago, may indicate that substantial housing conditions may be an issue. Housing is considered substandard when physical conditions are determined to be below the minimum standards of living, as defined by Government Code Section 17920.3. A building is considered substandard if any of the following conditions exist:

- Inadequate sanitation
- Structural hazards
- Nuisances
- Faulty weather protection
- Fire, safety, or health hazards
- Inadequate building materials
- Inadequate maintenance
- Inadequate exit facilities
- Hazardous wiring, plumbing or mechanical equipment
- Improper occupation for living, sleeping, cooking, or dining purposes
- Inadequate structural resistance to horizontal forces
- Any building not in compliance with Government Code Section 13143.2

Any household living in substandard conditions in considered in need of assistance, even if they are not actively seeking alternative housing arrangements. Estimating the number of substandard units can be difficult, but the lack of certain infrastructure and utilities can often be an indicator of substandard conditions. According to the 2018 Oakland Equity Indicators Report, 1.36 percent of housing units in zip codes that were more than 60 percent non-white reported housing habitability complaints, compared to 0.67 percent of housing units in zip codes that were more than 60 percent white. In addition, according to 2019 ACS estimates compiled by ABAG-MTC, about 0.28 percent of owners lack complete kitchen facilities while 1.91 percent of renters do. Further, approximately 0.2 percent of owners lack complete plumbing facilities while 1.02 percent of renters do. In total, there are 837 occupied housing units with incomplete plumbing facilities and 3,514 units with incomplete kitchen facilities. During outreach, lower income residents in West and East Oakland indicated that they face unhealthy housing conditions including lack of heat, electrical issues, faulty plumbing, and exposure to mold and lead.

Further, the City's Building Bureau's Code Enforcement division summarizes inspections for blight, housing, and zoning-related issues. During Fiscal Year 2020 – 2021, there were 5,575 blight and building maintenance complaints in Oakland. While the City has not carried out a census of substandard housing,

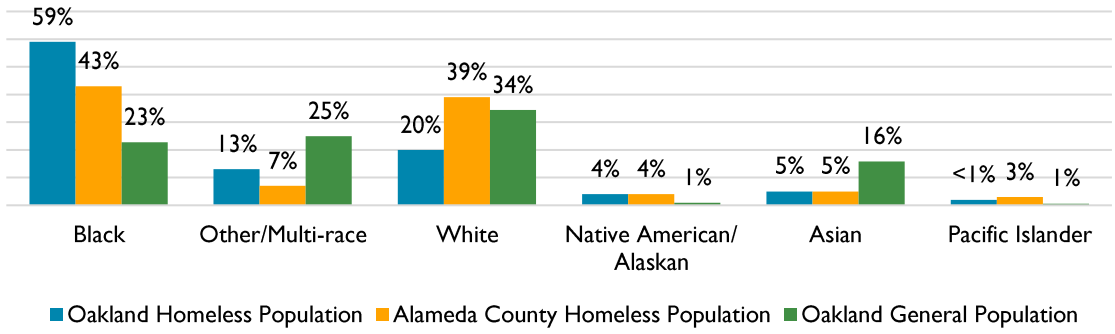
based on known substandard housing issues from the Building Bureau's documented housing complaints, approximately 3.5 percent of the city's housing stock is likely substandard.

HOMELESSNESS

Homelessness is a significant issue in Oakland. Nearly four out of five (79 percent) of the people experiencing homelessness in Oakland are unsheltered and live outdoors or in tents or vehicles, often along the city's streets and in our parks.

Point-in-Time (PIT) Counts are a common way to assess the number of persons experiencing homelessness in a jurisdiction. The PIT Count is a biennial (every two years) census of sheltered and unsheltered persons within a Continuum of Care (CoC) area completed over a 24-hour period \.[22] On February 23, 2022 (the date of the last Alameda County Point-in-Time count), there were a total of 9,747 persons experiencing homelessness in the County, 5,055 of whom were in the City of Oakland. In Alameda County, this is an increase of 1,275 people (22 percent) from the 28,022 unhoused individuals who were counted in 2019. These numbers represent an unprecedented 24 percent increase in total homelessness in Oakland and a four percent increase in unsheltered homelessness since 2019. These numbers account for only a fraction of the people who become homeless over the course of a year. When disaggregated by race, as shown in Chart D-8, the 202 PIT Count shows that there is a disproportionate representation of Black individuals experiencing homelessness. Those who identify as Black or African American (Hispanic and non-Hispanic) represent 70 percent of Oakland's unhoused population, but only 23 percent of the overall population. Additionally, those identify as American Indian or Alaska Native (Hispanic and non-Hispanic) are also represented disproportionately among the unhoused population, as they make up 4 percent of homeless Oakland residents but less than one percent of its overall population. Asian/API, White, and those who identify as some other race or multiple races are all underrepresented among the homeless population compared to their share of the overall population. However, it is noted that data from HUD does not separately distinguish Hispanic/Latinx as a racial group, so those identifying as Hispanic/Latinx may be counted under any of the other racial groups. When considering ethnicity alone, Hispanic/Latinx individuals made up 13 percent of Oakland's homeless population and 17 percent of Alameda County's homeless population, while 27 percent of Oaklanders identify as Hispanic/Latinx (of any race).

Chart D-8: Point-in-Time Count of the Homeless Population in Oakland, 2019 by Race



Note: Because Hispanic/Latinx origin is tracked as an ethnicity rather than a racial group, data shown above may include Hispanic/Latinx populations.

*Source: City of Oakland Homeless Count & Survey Comprehensive Report Applied Survey Research Housing Instability Research Department, 2019; ACS 5-Year Estimates, 2019*The increase in homeless residents over the past five years has resulted in a

[22] Due to this method, community advocates and local datasets often have a more comprehensive, better understanding of the unhoused population and describe higher numbers of unhoused people than what is reported in PIT Counts.

significant rise in the number of homeless encampments; the City estimates that at least 140 encampments are scattered throughout the city.[23] In 2017, the City established the Encampment Management Team (EMT) to address the physical management of homeless encampments and establish criteria for determining the types of interventions to undertake at encampments. In April 2021, the City of Oakland Office of the City Auditor conducted a performance audit of the City's homeless encampment management interventions and activities, including activities by the EMT. This report highlighted the need to establish and fund a formal encampment management program to implement an effective management system for the City's new encampment policy passed in October 2020.

A substantial proportion of the homeless population in Oakland includes formerly incarcerated individuals. According to the City's updated Permanent Access to Housing (PATH) framework, systemic barriers often prevent residents who are returning home from incarceration from living with family members and/or accessing both public and private rental housing and employment opportunities. Additionally, the longer one is homeless the worse one's health becomes, the more likely family and friendship networks are frayed, and the harder it becomes to obtain, maintain, and sustain stable housing.

In addition to the barriers associated with returning home from incarceration, other main drivers of homelessness in Oakland include:

- Structural racism
- Insufficient controls on the rental housing market that create vulnerability and housing instability for tenants
- Insufficient housing units that are affordable to households with the lowest incomes, including particularly those whose incomes are below 20% of Area Median Income (AMI)
- Inadequate pay and benefits for many of the jobs that are available in the community, and insufficient access to quality employment opportunities that pay wages that meet the cost of housing

The PATH Framework organizes strategies to address homelessness under three major themes:

- Prevention strategies to keep people from becoming homeless;
- Emergency strategies to shelter and rehouse households and improve health and safety on the street and;
- Creation of affordable, extremely-low-income, and permanent supportive housing units prioritized for households experiencing homelessness.

Additional actions the City takes to provide shelter and permanent supportive housing for unhoused people, as well as potential constraints, are discussed in Appendix F. Further prioritization of permanent housing policies in the PATH Framework should be adopted to fully meet the needs of unhoused residents. These actions are described in the Housing Action Plan.

[23] City of Oakland, Homelessness Services Report, March 18, 2021, https://oakland.legistar.com/View.ashx?M=F&ID=9256071&GUID=9ED0688A-A876-4DEF-9EC1-F426269363F0.

D.6 Housing Sites Inventory Analysis

Tables D-9 though D-15 provides a summary of analysis that includes the number of units per site by income group for each of the AFFH categories relative to the impacts on patterns of disproportionate housing needs.[24] The tables analyze the following categories:

Black, Indigenous, and People of Color Concentration: The analysis evaluates the number of units in the Site Inventory that are in areas where the average of tracts across the City are comprised of people of color. Conversely, this also measures how units are distributed in predominantly white census tracts. Averaged across all census tracts, the average percentage of people of color is approximately 69 percent. Tracts higher than this average have greater percentages of people of color; tracts below this average have greater percentages of white people. Overall, 40 percent of all units added in tracts with a greater white population than the Citywide average include lower and moderate-income housing. In tracts with higher percentages of people of color, lower and moderate income housing units are approximately 49 percent of all units in these tracts. Coupled with housing actions that protect Oakland residents from displacement (policies and actions under Goal 1) and promote opportunities for homeownership (actions under Policy 5), the sites inventory makes progress in addressing racial inequities related to housing.

Table D-9: Number of Units with Above or Below Citywide Average Concentrations of Black, Indigenous, and People of Color

	Lower Income Units	*Moderate Income Units*	*Above Moderate Income Units*
Tracts below citywide average = **50**	2,815	1,218	6,087
Tracts above citywide average = **63**	7,931	3,501	12,122

Source: City of Oakland, 2022; State HCD AFFH Data and Mapping Resources (HCD & TCAC Opportunity Areas Mapping Analysis, 2021); Dyett & Bhatia

TCAC Opportunity Area: This analysis estimates the number of units in each TCAC opportunity area, including racially/ethnically concentrated areas of poverty. Generally, the sites inventory adds more housing in moderate and higher resource areas and avoids concentration of lower income units in high-segregation and poverty areas, consistent with direction to affirmatively further fair housing. As shown in Table D-10, the sites inventory adds most units to High Segregation/Poverty, Low, and Moderate TCAC areas, which is consistent with the bulk of developable area in Oakland being classified as Low and Moderate opportunity (see Table C-22 in Appendix C for more information). The inventory avoids concentrating lower income units in areas of high segregation and poverty, while also providing additional homes affordable to these incomes. Approximately 60 percent of units added in high resource areas are affordable to lower and moderate incomes; however, less than a third of units are affordable to lower and moderate incomes in highest resource tracts. This is due to significant environmental constraints, including wildfire hazard, that limit siting of lower income sites in these areas. However, the Housing Action Plan also includes a number of policies and actions to increase housing in higher opportunity areas. In particular, the Affordable Housing Overlay Zone action would create much broader opportunities for the construction of

[24] This analysis does not reflect the 90 percent capacity modifier on "other potential projects" as described in Appendix C as the modifier is not site-specific; however, the percentage remains proportional.

affordable housing in high resource areas, even if the underlying zoning would impose density maximums that limit the feasibility of affordable housing development.

Table D-10: Number of Units in Each TCAC Opportunity Area

	Lower Income Units	*Moderate Income Units*	*Above Moderate Income Units*
High Segregation/Poverty (RE/CAPs)	1,606	1,353	3,029
Low	5,287	2,066	7,744
Moderate (rapidly changing)	180	250	406
Moderate	2,945	924	5,450
High	271	13	192
Highest	457	113	1,388

Source: City of Oakland, 2022; State HCD AFFH Data and Mapping Resources (HCD & TCAC Opportunity Areas Mapping Analysis, 2021); Dyett & Bhatia

Areas of Affluence: This analysis estimates the number of units in areas of affluence. There are 16 census tracts in Oakland that are designated as RCAAs. The sites inventory adds 3,527 housing units to these areas of affluence, as shown in Table D-11. Consistent with findings above, areas of affluence are primarily in very high fire hazard severity zones and in areas with steep slopes. As such, there are limited opportunities to add lower and moderate income housing to certain affluent areas of Oakland. However, the sites inventory makes a concerted effort to locate housing in the Rockridge area, which includes good access to transit, amenities, and opportunity, adding approximately 1,544 lower and moderate income units to these areas.

Table D-11: Number of Units in Areas of Affluence

	Lower Income Units	*Moderate Income Units*	*Above Moderate Income Units*
RCAA tracts	1,314	230	1,983

Source: City of Oakland, 2022; State HCD AFFH Data and Mapping Resources (HCD & TCAC Opportunity Areas Mapping Analysis, 2021); Dyett & Bhatia

Lower- or Moderate-Income population: The analysis evaluates number of units in census tracts based on percentage of lower- or moderate-income population. Averaged across all census tracts, the average percentage of lower or moderate-income populations in Oakland census tracts is approximately 57 percent. As shown in table D-12, the inventory locates more lower and moderate-income housing sites in these areas accordingly. This helps to alleviate cost. While a greater number of above moderate units are located in areas with higher rates of lower- or moderate-income people, a number of goals, policies, and actions in the Housing Action Plan, including actions 1.1.1 through 1.1.14 under Policy 1: Tenant Protections and Anti-Displacement, reduce displacement pressures that may be associated with these units.

Table D-12: Lower or Moderate Income Population

	Lower Income Units	*Moderate Income Units*	*Above Moderate Income Units*
Tracts below citywide average (lesser percentage of lower and moderate-income population) = 47	2,726	1,014	4,210
Tracts above citywide average (greater percentage of lower and moderate-income population) = 66	8,020	3,705	13,999

Source: City of Oakland, 2022; State HCD AFFH Data and Mapping Resources (HCD & TCAC Opportunity Areas Mapping Analysis, 2021); Dyett & Bhatia

Rent Burden: Also linked with lower or moderate-income populations is cost burden. Averaged across all census tracts, the average percentage of rent burdened populations is approximately 47 percent. Similar to table D-12, the inventory adds a greater proportion of lower and moderate-income sites in areas that experience greater rent burden, as shown in Table D-13. For tracts above the citywide average, approximately 48 percent of all units added in these areas are affordable to lower and moderate incomes.

Table D-13: Number of Units Where Tracts are Below or Above Citywide Rent Burden Rates

	Lower Income Units	*Moderate Income Units*	*Above Moderate Income Units*
Tracts below citywide average = **52**	4,526	1,628	8,068
Tracts above citywide average = **61**	6,220	3,091	10,141

Source: City of Oakland, 2022; State HCD AFFH Data and Mapping Resources (HCD & TCAC Opportunity Areas Mapping Analysis, 2021); Dyett & Bhatia

Overcrowding: As shown in Table D-14, the distribution of units in areas both above and below the citywide average for overcrowding is about equal, despite there being a greater number of census tracts that fall above the citywide average. Averaged across all census tracts, the average percentage of households experiencing overcrowding is approximately six percent. While the *location* of sites in the inventory will not likely move the needle on overcrowding, the inventory would help address two associated AFFH considerations, including housing needs of lower-income and moderate-income people, in addition to those who are cost burdened.

Table D-14: Number of units in areas where there are rates of overcrowding and/or severe overcrowding greater than the citywide average

	Lower Income Units	*Moderate Income Units*	*Above Moderate Income Units*
Tracts below citywide average = **44**	5,348	2,538	8,421
Tracts above citywide average = **69**	5,398	2,191	9,788

Source: City of Oakland, 2022; State HCD AFFH Data and Mapping Resources (HCD & TCAC Opportunity Areas Mapping Analysis, 2021); Dyett & Bhatia

Displacement: As described above, there are several tracts in Oakland that experience displacement pressure. As shown in Table D-15, the sites inventory adds a substantial number of lower and moderate-income units to areas that are susceptible to displacement, at risk of gentrification, and areas at risk of gentrification. While the inventory adds slightly more above-moderate income housing to tracts that are at risk of gentrification (approximately 55 percent of all housing added to these tracts), Housing Action Plan policies 1.1.1-1.1.14 help to protect tenants and prevent displacement in these areas.

The inventory also adds an even mix (49 percent) of lower and moderate-income housing to stable mixed income communities, tracts where ongoing displacement of lower-income households is already occurring (53 percent), and tracts that are susceptible to displacement (66 percent). While the inventory adds a significant number (87 percent) of lower and moderate income housing units added to "becoming exclusive" sites, indicating location of housing in more moderate- and higher-resourced areas, the inventory does not add a significant amount of lower and moderate-income units in advanced exclusive tracts. These tracts, as described above, are in high fire hazard severity zone areas.

Table D-15: Number of units added in areas as defined by the Urban Displacement Project

	Lower Income Units	*Moderate Income Units*	*Above Moderate Income Units*
Low-income/susceptible to displacement	3,978	1,290	2,703
Ongoing displacement of low-income households	-	9	8
At risk of gentrification	3,259	1,670	6,269
Early ongoing gentrification	836	1,009	5,340
Advanced gentrification	861	401	1,308
Stable moderate/mixed income	516	89	620
At risk of becoming exclusive	1	-	75
Becoming exclusive	352	50	60
Stable/advanced exclusive	237	77	1,387
Unavailable or Unreliable Data	706	124	415

Source: City of Oakland, 2022; State HCD AFFH Data and Mapping Resources (HCD & TCAC Opportunity Areas Mapping Analysis, 2021); Dyett & Bhatia

D.7 Summary and Conclusions

State law requires that jurisdictions identify fair housing issues and their contributing factors and assign a priority level for each factor. Further, each jurisdiction must identify specific goals and actions it will take to reduce the severity of fair housing issues within it. Goals, actions, and priorities related to affirmatively furthering fair housing can be found in the Housing Plan of this Housing Element. Oakland will also continue to implement its 2015 goals described in the 2020 AI.

Based on the findings of this assessment and the 2020 AI, Table D-9 presents a summary of existing fair issues, their contributing factors, and their priority level, as well as actions to take. Contributing factors with a high priority level are those that the City can directly address, while medium factors are either those that are longer term problems the City is working on or otherwise has limited ability to address.

Table D-9: Fair Housing Issues, Contributing Factors and Proposed Actions, 2023-2031

Fair Housing Issue	*Contributing Factors*	*Priority Level*	*Goals and Actions*
Fair Housing Outreach and Enforcement	Lack of outreach and enforcement from both the private (nonprofit) and public sector	High	The City should continue to maintain adequate staffing levels to carry out the mandate to affirmatively further fair housing. The City should also increase residents' awareness of nonprofit fair housing service providers.
	Lack of resources for fair housing agencies and organizations	Medium	Continue to apply for grants to fund fair housing agencies and seek more grant opportunities if possible.
	Lack of federal, State, and local funding for affordable housing	Medium	Apply for more grants to fund affordable housing.
Segregation	Affordable housing is limited by location and housing type	High	Provide mobility counseling and recruit landlords to help Housing Choice Voucher holders find housing options in resource-rich neighborhoods. Increase voucher payment standards in resource-rich neighborhoods and enact source of income laws that prohibit owners from refusing to rent to Housing Choice Voucher holders. Increase affordable housing in high-resource areas where it is lacking. This may require the City to purchase land or partner with developers in order to develop mixed-income housing. Eliminate single family zoning to ensure there are no restrictions on housing type.
	Concentration of low-income households and presence of Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) and Racially and Ethnically Concentrated Areas of Affluence (RCAAs)	Medium	Lower-income households and individuals living below the poverty line are concentrated in specific parts of the city. Many of these same tracts have been identified as R/ECAPS. The City should invest in R/ECAPs and other historically disinvested communities using place-based strategies. The City should identify properties in resource-rich (including RCAAs) and gentrifying neighborhoods that could be preserved as affordable housing with project-based vouchers. Finally, the City should ensure publicly-assisted housing is well-distributed in transit-accessible locations throughout the City.
Housing Discrimination	Refusal to rent based on disability status or voucher use	Medium	Housing Choice Voucher holders and those with disabilities have reported difficulty in finding appropriate-sized units that will accept their voucher. Fair housing enforcement must

Table D-9: Fair Housing Issues, Contributing Factors and Proposed Actions, 2023-2031

Fair Housing Issue	*Contributing Factors*	*Priority Level*	*Goals and Actions*
			be increased. Unfortunately lack of funding for fair housing enforcement continues to perpetuate this problem. Another option would be to incentivize landlords to accept vouchers.
	Loan denial rates are generally higher for BIPOC individuals	Medium	While the City has limited control over the approval of home loans, it should continue and expand its workshop offerings with prospective low-income homebuyers and homebuyers of color.
Disability and Access	Difficult to find rental housing that is accessible	High	Review development standards for accessible housing and inclusionary policies for accessible housing units; recommend appropriate amendments. Encourage affordable accessible housing when reviewing development applications for new housing.
Limited Access to Opportunity	Racial/ethnic disparities in access to jobs, low-poverty neighborhoods and quality education exist and these disparities are compounded for those living in poverty	Medium	The City must focus investments in neighborhoods considered "Low Resource" and "High Segregation and Poverty" by the State HCD/TCAC Opportunity Maps. These neighborhoods have high concentrations of BIPOC populations. Despite being considered "Low Resource", these neighborhoods are culturally rich with strong communities; investing in them will allow residents to remain in place while improving economic and educational outcomes. A lot of fair housing capacity is concentrated in these neighborhoods and the City should take advantage of its partnerships with fair housing providers who serve these neighborhoods.
	Lack of public and private investments in specific neighborhoods	Medium	Most tracts in Oakland are considered low resource, and most moderate and higher resource tracts are those that are in the stages of gentrification or exclusivity (i.e. have benefited from investment and working class people have been excluded or displaced). Disparities in access to economic and educational opportunity is most salient. OUSD should invest more strongly in historically underfunded schools, rather than solely relying on lottery-based placement strategies to fix educational imbalances. In tandem, the City must pursue place-based strategies to encourage community revitalization in lower income neighborhoods. These strategies should include production of new affordable housing, preservation of existing affordable housing, and stronger protection from displacement.

Table D-9: Fair Housing Issues, Contributing Factors and Proposed Actions, 2023-2031

Fair Housing Issue	*Contributing Factors*	*Priority Level*	*Goals and Actions*
			While making it possible to move to high-opportunity areas is one strategy, that must be complemented with strategies that enhance opportunity and housing security where lower income people already live, including neighborhoods that are under significant gentrification pressure.
Disproportionate Housing Needs and Displacement Risk	High rates of cost burden for renters and BIPOC individuals, especially Black and Hispanic/Latinx populations	Medium	Provide financial assistance for security deposit and prepaid rent, which can be obstacles for low-income households and people experiencing homelessness. This could be a grant paid directly to a landlord of a low-or no-interest loan funded by federal block grant programs like the Community Development Block Grant, HOME, or Emergency Solutions Grant program.
	Homelessness crisis	Medium	The City must implement the updated PATH framework and focus on securing permanent housing for residents who are currently unhoused. However, current resources are insufficient: the City needs to expand revenues dedicated to this issue and engage the government and the private sector at every level in this effort.
	Prevalence of sensitive communities	Medium	Most of Oakland is considered vulnerable to displacement pressures. The City should implement affordable housing preservation and renter protection strategies, especially in neighborhoods with majority BIPOC populations, long histories of disinvestment and a high risk of renter vulnerability. To reduce housing demand, which may in turn reduce displacement risk, the City should encourage the development of new affordable projects throughout the city.