



City of Willows

2021-2029 HOUSING ELEMENT

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DEVELOPED FOR THE CITY OF WILLOWS BY



TABLE OF CONTENTS

CHAPTER 1: INTRODUCTION AND BACKGROUND	5
a. Purpose of the Housing Element.....	5
b. Context.....	6
i. Camp Fire.....	6
ii. COVID-19.....	7
c. Regulatory Framework.....	7
d. Public Participation Process.....	9
ii. Outreach... ..	9
iii. Methods of Information Distribution and Engagement... ..	10
iii. Focus Group... ..	10
iv. Community Workshops and Online Survey.....	11
v. Affirmatively Furthering Fair Housing: Accessibility and Language.....	12
e. Inter-governmental Review Process.....	13
CHAPTER 2: REVIEW OF PREVIOUS HOUSING ELEMENT	14
a. Overview.....	14
b. Affordable Housing Production Goals and Results (RHNA).....	14
c. Program Actions—Previous Housing Element and Results... ..	15
d. Implication of Findings for the 2021-2029 Housing Element... ..	17
e. New Programs... ..	17
f. Modified Programs... ..	18
CHAPTER 3: GOALS, POLICIES, AND PROGRAMS... ..	19
a. Background... ..	19
b. Housing Development.....	20
c. Energy Conservation.....	23
d. Maintenance and Improvement of Existing Housing.....	24
e. Remove Constraints... ..	25
f. Affirmatively Furthering Fair Housing... ..	28
g. Quantified Objectives... ..	32
CHAPTER 4: HOUSINGS NEEDS ASSESSMENT	33
a. Affirmatively Furthering Fair Housing: Assessment of Fair Housing... ..	33
i. Fair Housing Enforcement and Outreach Capacity.....	34
ii. Segregation and Integration... ..	41
iii. Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)... ..	58
iv. Disparities in Access to Opportunity.....	66
v. Disproportionate Housing Needs and Displacement Risk... ..	92
b. Demographics.....	109
c. Employment... ..	110
d. Household Characteristics	112
e. Housing Stock Characteristics.....	114

i. Number and Type of Units, Persons Per Household.....	114
ii. Overcrowding.....	116
iii. Age of Units.....	117
iv. Housing Conditions... ..	117
v. Rental Market.....	118
vi. For-Sale Market... ..	120
vii. At-Risk Units... ..	121
f. Housing Affordability	122
i. Overpayment.....	122
ii. Availability of Affordable Units... ..	124
iii. For-Sale Home Affordability.....	125
g. Extremely Low Income Households... ..	126
i. Overpayment.....	127
ii. Overcrowding.....	128
iii. Available Units, Resources, and Policies... ..	128
h. Special Needs Households.....	129
i. Seniors.....	129
ii. Persons with a Disability	130
iii. Female-Headed Households.....	131
iv. Large Households.....	132
v. People Experiencing Homelessness.....	133
vi. Farmworkers.....	136

CHAPTER 5: RESOURCE INVENTORY... .. 140

a. Adequate Sites Inventory	140
i. Housing Need (RHNA)	142
ii. Analysis of Density to Accommodate Low Income Housing... ..	142
iii. Analysis of Realistic Capacity	143
iv. Environmental Constraints... ..	143
v. Availability of Utilities... ..	143
vi. Identified Sites... ..	144
vii. Affirmatively Furthering Fair Housing: Sites Inventory	145
b. Financial Resources... ..	149
i. State Sources.....	149
ii. Federal Resources... ..	151
c. Energy Conservation Opportunities.....	152
i. Glenn County Community Action Agency.....	153
ii. LIHEAP	153
iii. AHSC.....	154
iv. DAC-SASH... ..	154
v. BUILD.....	155
vi. Assessment and Recommendations... ..	155

CHAPTER 6: CONSTRAINTS ANALYSIS... .. 156

a. Governmental Constraints... ..	156
i. Land Use Controls... ..	156
ii. General Plan Designations and Zoning Districts.....	156

iii. Density Bonus...	161
iv. Parking...	161
b. Provision for a Variety of Housing Types...	162
i. ADUs...	162
ii. Extremely Low-Income Households and SROs...	163
iii. Manufactured Homes...	163
iv. Emergency Shelters, Transitional and Supportive Housing...	163
v. Housing for Persons with Disabilities...	164
vi. Farmworker Housing...	165
c. Building Codes and Enforcement...	165
d. Permitting Process...	165
i. Typical Residential Permitting Process...	165
ii. Variance Process...	167
iii. Environmental Review...	169
iv. Design Review...	169
e. Subdivision/Parcel Maps and Lot Line Adjustments...	170
i. Subdivision/Parcel Map Review Process...	170
ii. Lot Line Adjustment Process...	170
f. On-Site and Off-Site Improvement Standards...	172
i. On-Site Improvements...	172
ii. Off-Site Improvements...	172
g. Infrastructure...	173
i. Public Utilities...	173
ii. Water Service...	173
iii. Wastewater Collection and Treatment...	174
iv. Police and Fire Protection...	174
v. School Facilities...	174
vi. Other Infrastructure...	174
vii. State and Federal Assistance Programs...	174
h. City Fees...	175
i. Building Permit Fees...	175
ii. Development Impact Fees...	177
i. Non-governmental Constraints...	180
i. Land Cost and Availability...	180
ii. Construction Costs...	181
iii. Financing Availability...	181
iv. Environmental Constraints...	183
v. COVID-19...	183
vi. Camp Fire...	183
vii. Affirmatively Furthering Fair Housing: Identification of Contributing Factors...	184

Appendix A: Review of Previous Housing Element Programs...	188
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Appendix B: Community Meeting #1: Housing Needs and Issues Poll Report.	192
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Appendix C: Community Meeting #2: Housing Goals and Programs Poll Report.	196
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CHAPTER 1

INTRODUCTION AND BACKGROUND

PURPOSE OF THE HOUSING ELEMENT

California requires that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. California’s local governments meet this requirement by adopting Housing Elements as part of their General Plan, which serves as the local government’s “blueprint” for how the city and/or county will grow and develop over a 15–20-year period. The General Plan includes a minimum of seven mandatory elements: land use, transportation, conservation, noise, open space, safety, and housing. The Housing Element must be consistent with the other elements of the General Plan and is updated on 8-year cycles in order to ensure relevancy and accuracy, since the housing market and needs are most closely tied to shifts in the economy. In the past, Willows had a 5-year Housing Element cycle, which the State has now shifted to the 8-year cycle. The current Willows Housing Element was adopted in 2015, and initially covered the period of 2014-2019, but was subsequently extended by the State through November 2021.

California’s Housing Element law acknowledges that in order to address the spectrum of housing needs, local governments must adopt plans and regulatory systems that provide opportunities for and do not unduly constrain housing development. It also establishes that each city and county accommodate their fair share of affordable housing as an approach to distributing housing needs throughout the region and state.

This Housing Element update covers the eight-year period from November 2021 through November 2029. It provides the City of Willows with a comprehensive strategy to promote the production of safe, decent, and affordable housing for all of its residents. It assesses current and projected housing needs, constraints to housing production, and resources available to meet the needs. It then establishes a set of housing goals, policies, and programs which are targeted to meet the housing needs over the Housing Element planning period. A key part of the Housing Element lays out strategies to address the needs of community residents that are not typically met by the private market, including low-income households, seniors, homeless individuals, and people with disabilities. The City does not directly build housing, but facilitates production by guiding zoning policies, coordinating with community partners, and in the case of affordable housing, by partnering with developers, lenders, and nonprofits on funding opportunities.

The Housing Element consists of the following chapters, as required by State regulations:

- Chapter 1 (Introduction and Background) provides an introduction and background to the Housing Element, including its purpose, local context, regulatory framework, the public participation process, and the inter-governmental review process.
- Chapter 2 (Review of Previous Housing Element) reviews the most recent Housing Element for the period 2014-2021 by summarizing its actions and accomplishments, its affordable housing production goals and results, and the findings from this analysis that are relevant to the 2021-2029 Housing Element Goals, Policies, and Programs.

- Chapter 3 (Goals, Policies, and Programs) provides the City’s updated Goals, Policies, and Programs for 2021-2029, along with a Quantified Objectives Summary.
- Chapter 4 (Housing Needs Assessments) provides data and analysis in the following areas: Assessment of Fair Housing, demographics, employment, household characteristics, housing stock characteristics, housing affordability, and the special housing needs of households who are extremely low-income, seniors, persons with a disability, female-headed large households, people experiencing homelessness, and farmworkers.
- Chapter 5 (Resource Inventory) analyzes sites available to accommodate the City’s share of the Regional Housing Needs Allocation (RHNA) by income level, including the sites’ capacity, environmental constraints, and infrastructure/utility availability. This chapter also describes financial resources available to address the identified needs, and opportunities for energy conservation.
- Chapter 6 (Constraints Analysis) assesses the various governmental and market factors that may serve as potential constraints to housing development and improvement in Willows. Appendix A reviews the City’s progress on the 2014-2021 Housing Element Programs.

CONTEXT

Since the City’s Housing Element was last updated in 2015, two significant events have occurred that have impacted housing demand and cost, as well as the development of this Housing Element update: the 2018 Camp Fire in neighboring Butte County, and the COVID-19 pandemic which began in early 2020.

Camp Fire

With numerous unprecedented wildfires throughout the state, 2018 was the deadliest year for wildfires in California’s history. On November 8, 2018, a wildfire which began near Pulga in Butte County quickly spread to the communities west of it, driven by heavy winds and drought conditions. Named the Camp Fire, it largely destroyed the communities of Paradise, Concow, and Magalia, with significant structure loss in Butte Creek Canyon and up to the eastern edge of the City of Chico. It destroyed approximately 14,000 residential units and 85 lives were lost. Those who were burned out of their homes fled to nearby communities, such as Willows, to seek short-term shelter and long-term housing. Both the rental and ownership markets were impacted. In 2018, before the Camp Fire, Housing Tools conducted a survey of both affordable and market-rate rental units in Glenn County, including eight complexes in Willows, which was then updated in 2019. In both 2018 and 2019, the vacancy rate at all eight complexes was zero, while the wait lists at nearly every complex had grown larger. In interviews with property managers in Willows, they indicated that many Camp Fire survivors sought housing at their properties but there were virtually no available units for these households, even with a HUD priority letter in hand. In terms of single-family homes, interviews with a local real estate agent indicated that those who migrated to Willows directly after the Camp Fire moved into any vacant rental or for-sale homes. While the nearby City of Chico was impacted by those forced to relocate from Paradise, Willows was also impacted by a migration of Chico residents to Willows following the Camp Fire, citing increases in crime, population, and traffic, decreases in home availability, and changing demographics in Chico, as reasons for this migration. Single-family home sales in Willows increased 15% between 2018 and 2019, but have dropped again beginning in 2020, ostensibly due to both the limited supply of homes and the general trend of lower home sales when the COVID-19 pandemic began.

COVID-19

The COVID-19 pandemic and accompanying shutdown began in earnest in California in March 2020, affecting the usual community outreach and engagement strategies for the Housing Element update. In compliance with State and local public health orders, community meetings were moved to an online format, rather than meeting in person. Efforts to adapt the process to ensure the participation of marginalized populations are fully described in the public participation process below. Despite these efforts, it must be acknowledged that some individuals who would usually participate in person at community meetings are not comfortable with an online format or may not have access to a computer or reliable internet and telephone services.

In terms of the housing market itself, what is known is that many of those who lost employment due to the pandemic found themselves doubling up with family and friends, or became homeless, even with rent relief measures that were enacted at the Federal level and the increase/extension of unemployment benefits. During public outreach efforts, individuals in Willows reported overcrowding conditions and a lack of affordable housing, with households moving in together and/or renting substandard housing in order to get by. These conditions largely existed before the pandemic but were made worse with the pandemic's economic pressures.

REGULATORY FRAMEWORK

Since 1969, Housing Elements have been a required part of each local government's General Plan process. The State has found that "Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community." California Government Code Sections 65580-65589 codify the requirements for the content and development process of the local Housing Element. The State Department of Housing and Community Development (HCD) is charged with reviewing and approving each jurisdiction's Housing Element for compliance with State law.

California State law mandates that all localities adopt a Housing Element Update every eight years. The law also requires that Housing Elements address the following issues, among others:

- Include all economic segments of the community in the planning process;
- Review the progress and effectiveness of previous Housing Elements;
- Assess housing needs, including those of special needs populations, such as seniors, individuals experiencing homelessness, female-headed households, large households, and persons with disabilities;
- Assess the fair housing issues and trends in four key areas, contributing factors, as well as the local fair housing enforcement and capacity;
- List units at risk of conversion from restricted rents to market rents;
- Inventory whether there are an adequate number of appropriately zoned sites to accommodate growth of housing affordable to all income groups, as projected by the State Department of Housing and Community Development;
- Describe available financial and energy efficiency resources;
- Address constraints to housing production; and
- Outline a housing program with goals, policies, and programs that are consistent with the

General Plan and that address housing needs, constraints, and available resources, including any fair housing issues that have been identified. The housing program must include a timeline of actions during the planning period.

In addition to the requirements listed above, Housing Elements must describe the means by which consistency with the general plan will be achieved and maintained. The 2021-2029 Housing Element will be adopted concurrently with the City of Willows 2022 General Plan. As such, the planning processes for both documents were coordinated to ensure that the two planning documents are consistent with one another and support one another. Going forward, the city, including the Planning Commission and City Council, will annually review progress of the Housing Element and the General Plan in achieving goals. Reviewing the two planning documents together on a regular basis will facilitate an understanding of how the elements of the General Plan affect one another and will provide a vehicle for making any necessary policy or goal adjustments in a coordinated and consistent manner. If there are aspects of the General Plan or Housing Element that are creating an impediment to achieving any goals, these can be addressed during these annual assessment processes.

Since Willows' Housing Element was last adopted in 2015, the State Legislature has passed a significant number of laws which mandate new analyses or actions in each Housing Element, as well as an entire slate of laws regarding Accessory Dwelling Units (ADUs). The following new laws and HCD guidance memos apply to the 2021-2029 City of Willows Housing Element:

- ADUs (AB 3182, AB 671, AB 68, AB 587, AB 670, AB 881, SB 13)—These new laws limit local jurisdictions' ability to restrict the development of ADUs in a variety of ways and mandate streamlined, ministerial approval of ADUs within defined conditions. For the purpose of the Housing Element, they clarify that a local agency may identify an ADU or JADU as an adequate site to satisfy RHNA housing needs.
- Affirmatively Furthering Fair Housing (AB 686)—All Housing Elements adopted on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) conducted in accordance with HCD program guidance, and must include a program that promotes and affirmatively furthers fair housing opportunities throughout the community.
- No Net Loss (SB 166)—As jurisdictions make decisions regarding zoning and land use, or as development occurs, jurisdictions must assess their ability to accommodate new housing on the remaining sites in their Housing Element site inventories. A jurisdiction must add adequate sites if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining RHNA need for each income category.
- Site Inventory (SB 6, AB 1397, AB 1486, AB 686, AB 725)—The Housing Element establishes a jurisdiction's strategy to plan for and facilitate the development of housing over the planning period, by providing an inventory of land adequately zoned or planned to be zoned for housing, and programs to implement the strategy. These laws modified the content of the site inventory, including new analyses for capacity calculations, infrastructure requirements, suitability of non-vacant sites, size of site and density requirements, location requirements, sites identified in the previous Housing Element, and rezone program requirements, among others.

PUBLIC PARTICIPATION PROCESS

Broad public participation is an essential component of the Housing Element update process and is required by State law (Government Code Section 65583(c)(8)). Community outreach must be conducted through a variety of mechanisms to include all economic and cultural segments of the community. This has been furthered strengthened and expanded through the passage of AB 686 which mandates meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall Housing Element.

The Willows' Housing Element update process for 2021-2029 employed an extensive outreach effort to engage a wide spectrum of the community within the necessary restrictions imposed by COVID-19. This effort included a website, a comprehensive contact list, utilization of a variety of methods to disseminate information and engage residents in the process, a focus group with low-income housing residents, a community-wide online survey and two community workshops posted. The draft Housing Element was posted on the City's website on August 11, 2021. After the draft document was completed, it was scheduled for review and comment at public hearing with the Willows' Planning Commission on October 20, 2021, and the City Council on November 9, 2021. The only comments received during the public hearings were from one citizen who urged the city to do whatever it could to take actions to end homelessness. No other public comments were submitted to the city in writing or orally.

Outreach

At the beginning of the Housing Element update process, a community outreach contact list was developed to email announcements about public meetings and progress. This contact list included 50 individuals and encompassed representatives from the following interests and organizations:

- City and County elected officials
- City of Willows' staff
- Glenn County staff from various departments
- Dos Rios Continuum of Care
- Economic development
- Butte-Glenn 211 (information and resource referrals)
- Far Northern Regional Center
- Hispanic Resource Council of Northern California and North State Hispanic Chamber of Commerce
- Housing Authority of the County of Butte (provides Housing Choice Vouchers and Project-Based Section 8 in Glenn County)
- Affordable housing developers
- Disability rights advocates
- Legal services
- Senior services and advocacy groups
- Domestic violence and rape crisis services
- Education representatives
- Real estate brokers
- Property management association
- Chamber of Commerce
- Healthcare organizations
- Civic organizations
- Various non-profit organizations
- General interested community members

Methods for Information Dissemination and Engagement

- **Website:** A website dedicated to the Housing Element update process was made available in both English and Spanish (toggle option at the top of the page). This webpage functioned as the central location for all information related to the Housing Element update. It included background information on the purpose of the Housing Element, how to participate, the updated timeline, resources, and an opportunity to sign up for an email list to receive direct emails on the updated process. Most of the resources, including the presentation slides and recordings from the community meetings, was provided in both English and Spanish. Website address: willowshousingelement.com
- **Social media:** The City's Facebook page was used to notify residents of opportunities to participate in community meetings and an online survey, as well as notifying them when new resources were posted to the website. Facebook events were created for the community meetings. Posts were made available in both English and Spanish.
- **Direct email:** Parallel to the Facebook posts, all stakeholders and interested community members who signed up for email notifications received periodic email "blasts" throughout the process.
- **Flyers:** A flyer announcing the Focus Group was sent to all of the affordable housing complexes in Willows, as well as the Dos Rios Continuum of Care, Glenn County Community Action Department, and Glenn County Department of Social Services. Flyers announcing the two Community Workshops were also sent to these locations, as well as posted at City Hall and the library. Flyers provided information on the options to join the meeting online or by calling in via phone, so residents with various levels of access to technology could participate. After the community meetings, a flyer was developed that advertised the remaining opportunities to make comments on the draft Housing Element (Planning Commission and City Council hearings), as well as an encouragement to visit the website to view resources. These flyers were provided in both English and Spanish and were distributed and posted by City staff around the community.
- **Newspaper articles:** The City sent public services announcements (PSAs) to local newspapers (Glenn County Appeal-Democrat and Chico Enterprise-Record) regarding the community meetings. These brief articles gave the public notice about their opportunity to participate in the meetings, along with the meeting details.

Focus Group

A focus group for low-income residents was held on February 24, 2021. This meeting was held on the virtual meeting Zoom platform due to COVID-19. Live Spanish interpretation was provided as option for participants. Outreach was conducted to all affordable housing complexes in Willows and flyers in both English and Spanish were provided to property managers to distribute to residents. It provided residents with the opportunity to provide input on the location, design, services, and management of affordable housing. They also recommended housing types that are in the greatest need and ways to help people with limited means get into housing. Below are key points from the Focus Group participants:

- Design senior complexes to foster community and promote resident independence (e.g., walkable neighborhoods, accessible units, unit amenities like laundry and internet, etc.).
- Improve low-cost transportation options for accessing medical resources located outside of Willows

- Generate affordable rental housing units for those making 50-80% Area Median Income (AMI).
- Encourage affordable housing properties to have social services staff onsite to help residents stay in place and access information and resources.
- Address dilapidated and substandard housing conditions, especially in low-income neighborhoods.

Community Workshops and Online Survey

Community workshops were held on March 10 and April 7, 2021. These meetings were held on the virtual meeting Zoom platform due to COVID-19. The purpose of the workshops was to solicit input on housing needs, review previous Housing Element Goals, Policies and Programs, and recommend new programs to address unmet needs. These meetings were advertised on the Housing Element website, the City's Facebook page, and in newspaper PSAs. Except for the PSAs, these resources were promoted in both English and Spanish. Each meeting included a presentation using PowerPoint slides, which were made available in both English and Spanish and included definitions of commonly used terms in the Housing Element. Live Spanish interpretation was provided as option for participants during both meetings, as well as closed captions (Zoom "live transcript") for those who are deaf, hard of hearing, or those who preferred a visual transcript of the meeting conversation. Interactive polls and a question and answer (Q&A) session helped make the meetings interactive and informative for participants.

Workshop #1 opened with a presentation on the background of the Housing Element process and its purpose; previous Housing Element progress; an overview of the housing needs, funding available to address those needs, and economic context; and an introduction to the previous Housing Element's Goals, Policies and Programs. In an open forum, participants then discussed the types of housing most needed in Willows; the availability of rental housing; how the City should grow; what challenges are encountered in finding affordable housing; the special need for senior housing; whether residents are interested in Accessory Dwelling Units (both from the owner and renter perspective); and how the City should engage with the local Continuum of Care to support unhoused residents in finding suitable housing.

Workshop #2 opened with a presentation on the key findings from the Needs Assessment and an overview of the current Housing Element Goals, Policies, and Programs. In an open forum, participants then discussed each Goal and its relevance; what updates are necessary to address the housing needs identified; and what resources can the community tap into to address the needs.

An online survey, utilizing the Survey Monkey platform, was available for community member participation from March 2 to March 24, 2021. The survey was provided in both English and Spanish. A print-friendly version of the survey in both English and Spanish was provided to the managers of affordable housing complexes to distribute to their tenants. The confidential survey consisted of 16 questions which asked residents about:

- Their demographics
- The type of housing they live in
- Whether they rent or own their home
- If they were satisfied with their housing
- The physical condition of their home

- Challenges they have experienced in finding housing to meet their needs, especially affordability
- Barriers to home ownership
- The types of housing most needed in Willows
- Discrimination they have encountered in searching for and securing housing
- Accommodations they or a family member need for a disabling condition, and their ability to obtain those accommodations
- Their prioritization of the City's current Housing Element Goals

In evaluating the input received through these varied engagement efforts, consistent themes were expressed by community members and are summarized as follows:

1. Willows needs a greater supply of all types of housing units, both multi-family and single-family.
2. There is a significant lack of affordable units, resulting in many households being cost burdened with rent.
3. There is a mismatch between household sizes and available units. This was expressed as happening at both ends of the spectrum, i.e., large families (5 or more people) cannot find units with enough bedrooms, and single adults cannot find studio or one-bedroom apartments.
4. Both multi-family and single-family homes are in need of rehabilitation.
5. There are very few single-family affordable homes for sale.

The public input and themes listed above were incorporated into the Housing Element analysis of housing needs, and the development of Goals, Policies, and Programs.

Affirmatively Furthering Fair Housing: Accessibility and Language

As described in the sections above, the City designed and implemented public outreach in accordance with AB 686, Affirmatively Furthering Fair Housing. This section describes these efforts in greater detail.

- **Accessibility:** The survey was available online and in-person in both English and Spanish for three weeks so residents could access it in their preferred format, language, day of the week, and time of the day. The Focus Group and Community Workshops were held mid-week in the evenings to minimize barriers to participation based on work hours. Due to COVID-19, they were held virtually using Zoom. This minimized barriers to participation related to transportation and childcare. Flyers advertised both online and call-in methods for joining the meeting so barriers related to access to technology would be minimized. Challenges encountered included: designing virtual meetings to be as similar as possible to in-person meetings, and some residents who would usually participate in person at community meetings not being comfortable with an online format or not having access to a computer or reliable internet and telephone services.
- **Language:** As of 2019, 90.8% of residents over the age of five speak English (63.4%) or Spanish (27.4%) at home (U.S. Census 2015-2019 American Community Survey). Thus, the city focused its efforts on robust bilingual materials and interpretation for English and Spanish languages and contracted with a professional translator for services. An estimated 8.5% of residents over the age of five speak Asian and Pacific Islander languages at home. The City acknowledges that translation

and interpretation were not provided for these languages given its restricted budget and timeline, and will consider providing these services in the future. Zoom’s “live transcript” closed captions feature was used so residents who are deaf or hard of hearing, or who prefer to read closed captions, were able to access information during the Focus Groups and Community Workshops. Technical support instructions were provided at the beginning of the meetings to orient residents to the accessibility and language features. Recordings of the Community Workshops in English and Spanish were posted on YouTube with closed captions and were linked to the Housing Element website.

INTERGOVERNMENTAL REVIEW PROCESS

As required in Government Code Section 65589.7, the city has provided its water and sewer providers with an opportunity to participate in the Housing Element so that housing production can be coordinated with infrastructure plans. For the City of Willows, the water provider is Cal Water, and the sewer provider is the City of Willows Public Works Department. At the outset of the Housing Element planning process, the city sent letters to both providers. The letters requested confirmation that the provider has written policies and procedures granting priority for the provision of their services to proposed developments that include low-income housing (per SB 1087, adopted in 2005). The letters also requested that providers review the Housing Element draft, and a keep a copy of the final Housing Element on file. Following adoption of the Housing Element, the city will continue to work with water and sewer providers to coordinate housing and infrastructure plans.

CHAPTER 2

Review of Previous Housing Element

OVERVIEW

The Willows City Council adopted the most recent Housing Element in January 2015 for the planning period of 2014-2019. This planning period was retroactively extended by the State Department of Housing & Community Development through November 2021. Key initiatives included:

- Partnering with affordable housing developers by identifying appropriate sites, applying for funding, and providing incentives to address the needs of: extremely-low, very-low, and low-income households; households with special needs, including seniors, persons with disabilities, homeless individuals, and female-headed households with children (Programs HD-1.1.1, HD-1.3.1, HD-1.4.4, HD-1.4.5, HD-1.4.6)
- Revision of the Zoning Ordinance to provide consistency with the General Plan residential densities by removing the 14-dwelling unit per acre maximum in the density established in the R-3 and R-P zoning districts (Program HD-1.1.3)
- Removing governmental constraints to the maintenance, improvement, and development of affordable housing by amending the City's zoning ordinance to bring it into compliance with State housing laws around transitional and supportive housing, and the definition of "family" (Program RC-1.3.1 and RC-1.3.2)

State Housing Element law (Government Code Section 65588) requires that Housing Elements review the previous Housing Element in the following ways:

- Progress in implementation, including a description of the actual results or outcomes of previous Housing Element goals, policies, and programs.
- Effectiveness, including a comparison of what was projected or planned in the previous Housing Element and what was achieved.
- Appropriateness of goals, policies, and programs, including a description of what has been learned based on the analysis of progress and effectiveness of the previous Housing Element.

This chapter of the Housing Element addresses these requirements below.

AFFORDABLE HOUSING PRODUCTION GOALS AND RESULTS (RHNA)

State law requires regions to plan for housing needs based on future growth projections through the Regional Housing Needs Allocation (RHNA), per Government Code Section 65584. For the City of Willows, the State Department of Housing and Community Development allocates numeric RHNA unit production goals to Glenn County and its two incorporated cities. The goals identify the housing units

needed over the planning period for each of four different income levels.

State law does not require that communities meet the RHNA production goals. Instead, State law requires that communities employ planning and funding mechanisms that enable them to achieve the goals. One mechanism that carries a specific State mandate is the Adequate Sites Inventory, described in Chapter 5, per Government Code Section 65583.2. This section requires that each community ensure that there is adequate appropriately zoned land within its jurisdiction to accommodate its RHNA. If a community did not comply with this requirement at the time of submission of the last Housing Element to the State, it must show how this was corrected in the next Housing Element planning period through re-zoning, annexation, or other means.

Willows' most recent Housing Element covered the period of 2014-2019, a five-year planning period. Although State HCD subsequently extended the planning period through 2021 to bring the city into an eight-year planning cycle, the RHNA allocation remained within a five-year period that covered June 30, 2014 through December 31, 2018. In addition, due to a rezone that was needed to accommodate 2009-2014 RHNA but not accomplished during the cycle, Willows had an unaccommodated need which was carried over into the 2014-2018 RHNA of 39 very low- and 30 low-income units.

Table 1 shows Willows' RHNA for the period of June 30, 2014, to December 31, 2018, the carryover from 2009-2014, and the number of units produced during that period that are affordable to each income level.

Table 1: Regional Housing Needs Allocation and Production, June 2014-December 2018

Income Level	RHNA	Unaccommodated Carryover	Units Produced	% of RHNA Produced
Very Low	15	39	49	90.7%
Low	11	30	2	4.8%
Moderate	22	0	1	4.5%
Above Moderate	26	0	2	7.7%
Total	63	69	54	40.9%

Source: City of Willows Housing Element APR Reports through December 2018

PROGRAM ACTIONS: PREVIOUS HOUSING ELEMENT AND RESULTS

The 2014 Housing Element included Goals, Policies and Programs. Below is a summary of the Goals and the number of Programs associated with each.

HD-1: Provide a variety of housing unit types and sizes to meet the Regional Housing Needs Allocation (RHNA) for the City of Willows (11 programs)

EC-1: Ensure increased energy self-sufficiency through use of energy conservation measures in all homes, including extremely low-, very low-, low- and moderate-income housing (3 programs)

MI-1: Ensure that the quality, safety, affordability, and livability of the housing stock in Willows is continually maintained or upgraded, and that dilapidated housing which cannot be improved is replaced (2 programs)

RC-1: Remove or eliminate governmental constraints on the maintenance, improvement, and development of housing, where appropriate and legally possible (4 programs)

EO-1: Ensure that housing programs maximize choice, avoid economic segregation, and avoid discrimination based on age, sex, race, and ethnic background (1 program)

The city completed all of the Programs associated with Goal RC-1, Removing Governmental Constraints. The city amended its Zoning Ordinance to allow transitional and supportive housing in all zones allowing residential units and removed all references limiting family household sizes for the definition of “family” (Programs RC-1.3.1 and 1.3.2). The city also maintains compliance with California Building Code through ongoing assessment of the Zoning Ordinance for needed amendments (Program RC-1.1.1) and will continue to regularly assess its local development fees in comparison to other jurisdictions within the region (Program RC-1.2.1). During this Housing Element update process, City staff determined that the City’s Municipal Code allows for the deferral of impact fees until the issuance of the final Certificate of Occupancy, which further removes a potential constraint to the development of housing.

The city also made significant progress in a number of the Programs associated with Goal HD-1, Provide a Variety of Housing Unit Types and Sizes to Meet the Regional Housing Needs Allocation (RHNA) for the City of Willows. The city partnered with two affordable housing developers to apply for State HOME funds to support the development of two projects: a 49-unit Senior project constructed in 2015 targeting very low-income seniors, and a 24-unit family project constructed in 2020 targeting both very low- and low-income households (Programs HD-1.1.1, HD-1.3.1, and HD-1.4.4). The city also completed a revision to the Zoning Ordinance to provide consistency with General Plan residential densities by removing the 14 dwelling unit per acre maximum density in the R-3 and R-P zoning districts.

In terms of addressing the needs of special needs populations, the City made significant progress in providing housing for low-income seniors with the completion in 2015 of 49 affordable units targeted to seniors. For housing to assist persons experiencing homelessness, regulatory constraints were alleviated with the allowance of permanent supportive housing and transitional housing in all residential zones, and some commercial zones, and the allowance for emergency shelters by right in at least one zone. Increases to maximum densities in the R-3 and R-P zoning districts will also help facilitate the development of supportive and affordable housing for special needs groups with very low or extremely low incomes. Despite these changes, no emergency shelter, transitional housing, or supportive housing was built in the City of Willows during the last Housing Element period.

The city did not make progress on the following Programs due to insufficient staff resources to carry them out:

- Energy Conservation, EC-1.1.1 and 1.1.2: These Programs were intended to promote weatherization and energy audit programs offered by the Glenn County Community Action Department and PG&E.
- Maintenance and Improvement of Existing Housing, MI-1.1.1: This Program directed City staff to apply for State Housing Rehabilitation funding available through CDBG and HOME to address single family housing in need of rehabilitation.
- Equal Opportunity, EO-1.1.1: This Program was intended to develop an equal housing opportunity brochure and tenant advocacy program in coordination with Glenn County.

A detailed assessment of the accomplishments and effectiveness of each 2014 Housing Element Program

can be found in **Appendix A**, with notes indicating if the Program is proposed to be deleted, continued, or modified.

IMPLICATION OF FINDINGS FOR THE 2021-2029 HOUSING ELEMENT

City staff conducted an initial review of the 2014 Housing Element Programs to document accomplishments, assess effectiveness and recommend whether the Program should be continued, modified, or deleted in the 2021 Housing Element update. Following this review, the Programs were discussed at Community Workshop #2, and public input on their relevance and feasibility was obtained. Based upon both the City and community review:

- The completed Programs which were intended to be one-time efforts have been removed;
- Some programs have been revised to bring them up to date with the most recent State legislation or to more appropriately address community resources that are available to support their execution; and
- New programs that were identified through community outreach, the Assessment of Fair Housing, the Needs Assessment, and/or are required by new State legislation have been added.

All of the programs are detailed in Chapter 3 and those which are new or modified are summarized below.

NEW PROGRAMS

- Housing Development (HD-1.1.1) A Program designed to assist the City in complying with the No Net Loss law which went into effect on January 1, 2019, by developing and implementing a formal ongoing Unit Production Evaluation. This will consist of a spreadsheet that tracks the number of residential units in each approved development from the RHNA to determine the remaining unmet RHNA by income category. This is then subtracted from the Housing Element's sites inventory site capacity by income category to determine remaining site capacity.
- Removing Constraints and Housing Development (RC-1.3.2 and HD-1.3.2) Programs designed to bring the City into compliance with State Accessory Dwelling Unit (ADU) laws that have become effective since 2014, including incentivizing the production of ADUs that can offer affordable rents to very low-, low- or moderate-income households.
- Housing Development (HD-1.4.2) A Program to support County efforts to address homelessness within the City of Willows by participating in the Dos Rios Continuum of Care meetings and supporting funding applications submitted by the Continuum of Care.
- Energy Conservation (EC-1.1.3, 1.2.1 and 1.2.2) Programs that promote additional opportunities for the use of solar energy, including for low-income households, and secure financial incentives for low-income residential buildings that use near zero-emissions technologies.
- Removing Constraints (RC-1.2.1) A Program to develop and adopt Design Review Guidelines to provide more transparency regarding the City's design standards and reduce review timelines.

- Affirmatively Furthering Fair Housing (FH-1.1.1 through FH-1.6.2) Programs to improve fair housing choice and equitable access to opportunity by:
 - Moving toward balanced and integrated living patterns by suggesting sites to affordable housing developers that are not in concentrations of affordable housing, low income households, and people of color, and increasing diversity of City staff and volunteers by conducting affirmative marketing and adding bilingual incentives; Providing increased opportunity for low income residents to reside in affordable housing units by engaging with the Housing Authority of the County of Butte and conducting affirmative marketing to residents. The City will also collaborate with Glenn County and the City of Orland to publish an annual Request for Proposal for Permanent Local Housing Allocation funds to attract developers to the region.
 - Moving toward balanced and integrated living patterns by addressing disproportionate impacts of Housing Problems on renters, especially renters of color, by developing a housing rehabilitation program. The city will also assist Community Housing Improvement Program and Yuba-Sutter Habitat for Humanity to develop multi-family housing for renters and/or sweat equity housing for homebuyers in the City. Providing increased opportunity for residents to seek employment that is full-time and year-round with a living wage to assist with alleviating housing cost-burden by assessing feasibility of an economic development program in collaboration with the City of Orland and Glenn County. Providing opportunity for all residents to engage with the City's planning activities regardless of language spoken at home by providing English/Spanish language access for community meetings and materials designed for the public.
 - Providing increased opportunity for residents to engage with fair housing materials by collaborating with North Valley Property Owners Association and Legal Services of Northern California to coordinate information, referrals, and outreach to residents. The city will also conduct special outreach activities during the month of April for National Fair Housing Month.

MODIFIED PROGRAMS

- Housing Development (HD-1.4.6): Encourages the development of Single-Room Occupancy (SRO) units, one-bedroom units, and supportive housing.
- Energy Conservation (EC: 1.1.1 and 1.1.2): Promotes energy efficiency and weatherization programs offered by Glenn County and PG&E.
- Maintenance and Improvement of Existing Housing (MI-1.1.1 and 1.1.2): Addresses the need for Housing Rehabilitation and the staff resources necessary to carry out a program.

CHAPTER 3

Goals, Policies, and Programs

BACKGROUND

This chapter describes a comprehensive set of goals, policies and programs designed to address the housing needs of the City of Willows. These needs have been identified through the assessment of fair housing, a needs assessment, a constraints analysis, and a resource inventory. The terms “goals, policies and programs” are defined as follows for the purpose of the Housing Element:

- **Goals:** The goals are broad statements of the community’s vision and values for itself and are not time dependent. They indicate the direction the community desires to move towards in providing healthy, safe, sustainable, and affordable housing for all of its residents.
- **Policies:** The policies are the commitments that the City is creating to achieve the related goal or vision and a statement of its operational philosophy around housing.
- **Programs:** The programs are specific actions or activities that will carry out the related policies and move the community towards its goals in a concrete and measurable way over time.

These goals, policies and programs are grouped by subject categories as follows:

- Housing Development (HD)
- Energy Conservation (EC)
- Maintenance and Improvement of Existing Housing (MI)
- Remove Constraints (RC)
- Affirmatively Further Fair Housing (FH)

Within each of these subject categories, the information is organized as follows, per State requirements:

- Statement of the goal
- Statement of the policy(ies) to achieve the goal
- Description of the program which is directly related to the policy
- The party(ies) responsible for the program’s implementation. This will include specific City staff, as well as community partners where appropriate. The responsibility for approving and directing all City actions rests with the City Council, which is then carried out by designated City staff.
- Potential financing or funding source(s). The availability of funding resources is not guaranteed and is subject to change. More or fewer resources may be available during the planning period. This will impact the feasibility of carrying out the programs stated.

- Timeframe for completion. These timeframes provide a reasonable expectation for starting and/or completing programs, given current staff resources and workloads. Like funding, these are subject to change due to circumstances beyond the control of the city.

HOUSING DEVELOPMENT (HD)

This section addresses how the city will meet the current and future housing development needs of its residents. Because the City does not build housing, the actions the City must take to support housing development are focused on land use policies, zoning, incentives, and applying for funding to support housing development which is carried out by private for-profit and non-profit developers.

GOAL: HD-1: *Provide a variety of housing unit types and sizes to meet the RHNA for the City of Willows*

POLICY: HD-1.1: Continue to maintain a sufficient supply of land designated for residential development to meet the RHNA for the planning period

PROGRAM: HD-1.1.1: Develop and implement a formal ongoing Unit Production Evaluation pursuant to Government Code section 65863 (No Net Loss law). The Unit Production Evaluation will track the number of extremely low-, very-low, low-, moderate- and above moderate-income units constructed to calculate the remaining unmet RHNA. It will also track the number of units built on the identified sites to determine the remaining site capacity by income category. If sites identified in the Housing Element to meet RHNA are developed with non-residential uses during the Housing Element planning period, the Unit Production Evaluation will include a plan to replace those sites, which may involve identification of new residentially zoned sites, rezoning of non-residential sites, and/or annexation of new sites. The evaluation procedure will be updated annually, and when sites identified in the Housing Element to meet RHNA are approved for development.

Responsible Party: City Manager and City Planner

Financing: Staff time, CDBG, General Fund

Time Frame: Within one year of adoption of the 2021-2029 Housing Element, and annually thereafter

POLICY: HD-1.2: Recognize Willows' housing needs (i.e. Population growth needs, employment needs, and regional housing needs) when considering non-residential development proposals

PROGRAM: HD-1.2.1: The City Planning Commission will meet once per year during the planning period to review the City's zoning map and land use map in consideration of meeting future housing needs with respect to both RHNA allocations and projected employment growth in the region. Work in close cooperation with Glenn County to ensure the orderly development of unincorporated lands adjacent to the City and consistency of land use policies and development standards, especially through the respective General Plan update and review processes.

Responsible Party: City Manager, City Planner and Glenn County Planning Department

Financing: Allocation of staff time

Time Frame: Planning Commission- Annually over the 8-year planning period.

Coordination with Glenn County: As applicable projects being planned in the County areas are agendaized for review and comment, and as each jurisdiction's General Plans are updated and reviewed.

POLICY: HD-1.3: Use the design review process to ensure that housing subdivisions are sensitive to the character and appearance of their surroundings and promote design flexibility for residential developments, particularly those located in unique settings.

PROGRAM: HD-1.3.1: The City's architectural design review process applies to all zoning districts in the city. Two specific areas of the city have overlay design guidelines— the "Historic Downtown" and "Wood Street". In these areas, guidelines are used to preserve historic design characteristics and guide future design to create buildings worth preserving. The city will continue to offer pre-application consultations for interested developers and make available public information handouts.

Responsible Party: City Manager, City Planner and Planning Commission

Financing: Allocation of staff time

Timeframe: Ongoing, as projects are processed by the Planning Department

PROGRAM HD-1.3.2: As part of a comprehensive ADU program, offer the public free "pre-approved" ADU plans which have been professionally designed and plan checked. This will provide a streamlined permit process and savings for an interested owner who wishes to construct an ADU on their property and will ensure that ADU designs complement the City's existing architectural styles.

Responsible Party: City Manager, City Planner, Building Official

Financing: REAP Phase 2, CDBG Planning & Technical Assistance

Timeframe: Within two years of adoption of the 2021-2029 Housing Element

POLICY: HD-1.4: Make maximum use of public and private resources to help meet identified housing needs

PROGRAM: HD-1.4.1: Assist in the development of affordable housing by working collaboratively with affordable housing developers who approach the city with potential projects. These efforts will include providing guidance on available sites, describing City incentives for the development of affordable housing, and applying for applicable State funding programs to support affordable housing development in areas throughout the city.

Responsible Party: City Manager, City Planner, and Independent Developers

Financing: Federal and State programs

Timeframe: The City will proactively reach out to 2 affordable housing developers per year to discuss available sites and funding, with the goal to develop 2 new affordable housing projects before the end of the Housing Element cycle (2029)

PROGRAM: HD-1.4.2: Support County efforts to address homelessness within the City of Willows by participating in the Dos Rios Continuum of Care meetings, and supporting funding

applications submitted by the Continuum of Care to address critical needs, such as Rental Assistance, Housing Navigation Services, Emergency Shelter, Rapid Rehousing, Transitional Housing, and Permanent Supportive Housing. As identified in the Assessment of Fair Housing, provide special attention to residents vulnerable to displacement. For the City of Willows this includes renter households with overpayment, which make up 40-60% of all renter households in the city with an objective of assisting 10 to 20 households in the planning period.

Responsible Party: City Manager, City Planner

Financing: Federal and State funds made available to the Dos Rios Continuum of Care

Timeframe: Ongoing throughout the planning period

PROGRAM: HD-1.4.3: Expand homeownership opportunities for very-low- and low-income first-time homebuyers through the use of CDBG and HOME funds to support self-help housing programs operated by agencies such as Community Housing Improvement Program (CHIP) and Habitat for Humanity.

Responsible Party: City Manager and Self-Help Developers

Financing: State CDBG and HOME

Timeline: Meet on an annual basis with CHIP and Habitat for Humanity to discuss development and funding opportunities. The goal will be the development of a minimum of 5 single family homes affordable to lower-income households using the self-help model by the end of the Housing Element cycle (2029). The city will target development opportunities throughout the city.

PROGRAM: HD-1.4.5: Work with housing providers and County partners to ensure that unmet special housing needs for seniors, large households, female-headed households, extremely-low-income households, persons with disabilities, and homeless individuals and families, are addressed. This will be accomplished through a combination of regulatory incentives, zoning standards, new housing construction programs, assistance programs, and supportive services. These will be described in an informational brochure that is offered at City Hall and on the City's website. The city will apply for or support applications for Federal and State funding programs which address these special housing needs.

Responsible Party: City Manager, City Planner, County partners

Financing: Staff time, Dos Rios Continuum of Care, Glenn County Community Action Department, various Federal and State programs, including but not limited to HOME, PLHA, NPLH, Homekey, etc.

Timeline: Brochure will be developed by December 2023. The city will proactively reach out to 2 partners annually.

PROGRAM: HD-1.4.6: Encourage the development of housing which will be affordable to extremely low-income households, including the development of Single-Room Occupancy (SRO), one-bedroom units, and supportive housing. The city will monitor the need for such housing, and actively work with housing developers, non-profit agencies, and the Dos Rios Continuum of Care

to promote and support its development, and evaluate opportunities for funding annually.

Responsible Party: City Manager, City Planner, Independent Developers, Dos Rios Continuum of Care, Glenn County Community Action Department

Financing: Dos Rios Continuum of Care, Glenn County Community Action Department, various Federal and State programs, including but not limited to HOME, PLHA, NPLH, Homekey, etc.

Timeline: Monitor the need for such housing on an annual basis and prioritize funding opportunities as they become available.

ENERGY CONSERVATION (EC)

The use of available energy conservation measures and programs directly impacts residents' monthly housing costs, by saving them money on their energy bills, increases their comfort and safety, and contributes to the conservation of limited resources.

GOAL: EC-1: Ensure increased energy self-sufficiency through use of energy conservation measures in all homes, including extremely low, very-low, low- and moderate- income housing

POLICY: EC -1.1: Promote the use of energy conservation measures and funding assistance programs in the development or rehabilitation of all housing, but especially for housing occupied by low- and moderate-income residents

PROGRAM: EC-1.1.1: Promote the energy assistance programs for low-income households offered by PG&E, including the California Alternate Rates for Energy Program (CARE) and the Family Electric Rates Assistance (FERA) program. The city will work with PG&E to obtain promotional materials for these programs that can be posted on the City's website, promoted on the City's Facebook page, and included with monthly sewer service invoices.

Responsible Party: City Manager, City Clerk

Financing: Staff time

Timeframe: Within one year of adoption of the 2021-2029 Housing Element, with annual updates as needed

PROGRAM: EC-1.1.2: Promote the weatherization programs offered by the Glenn County Community Action Department, including the Weatherization Assistance Program (WAP) and Low-Income Home Energy Assistance Program (LIHEAP). The city will work with the Community Action Department to obtain promotional materials for these programs that can be posted on the City's website, promoted on the City's Facebook page, and included with monthly sewer service invoices.

Responsible Party: City Manager, City Clerk

Financing: Staff time

Timeframe: Within one year of adoption of the 2021-2029 Housing Element, with annual updates as needed

PROGRAM: EC-1.1.3: The City will track the State's efforts to provide incentives for the deployment of near-zero emissions building technologies in low-income residential buildings

through the Building Initiative for Low Emissions Development Program (BUILD). As appropriate, consider applying for any incentive funding made available through the BUILD program.

Responsible Party: City Manager, Building Official

Financing: Staff time

Timeframe: The BUILD program guidelines are expected to be launched at the end of 2021. The city will evaluate the new guidelines and any incentive funding within one year of the program launch by the State, to determine whether the program is a good fit for the City of Willows.

POLICY: EC -1.2: Promote opportunities for use of solar energy

PROGRAM: EC -1.2.1: Encourage use of solar energy considerations in the planning and building permit process for housing rehabilitation.

Responsible Party: City Planner, Building Official

Financing: Staff time

Timeframe: Ongoing throughout the planning period

PROGRAM: EC-1.2.2: In order to help low-income homeowners access the benefits of solar power, the City will coordinate with GRID Alternatives to provide resources and information on solar rebate programs, such as the Disadvantaged Communities and Single-Family Solar Home Program (DAC-SASH). As appropriate, information will be made available through the Building Department and promoted on the City's website and Facebook page and included with monthly sewer service invoices.

Responsible Party: City Manager, Building Official, City Clerk

Financing: Staff time

Timeframe: Within one year of adoption of the 2021-2029 Housing Element update

MAINTENANCE AND IMPROVEMENT OF EXISTING HOUSING (MI)

One of the requirements of State Housing Element law is that local jurisdictions actively work to preserve and improve their existing housing stock. It is less expensive to maintain or rehabilitate what is already built than to build new. Investing in this way can allow seniors to age in place and provide safe and affordable housing to live in for those who are low- to moderate-income. It also maintains the character of the community and contributes positively to neighborhood revitalization efforts.

GOAL: MI-1: Ensure that the quality, safety, affordability, and livability of the housing stock in Willows is continually maintained or upgraded, and that dilapidated housing which cannot be improved is replaced

POLICY: ML-1.1: The City will apply for funding and develop program administration resources in order to provide an on-going housing rehabilitation program which improves and preserves the City's housing stock

PROGRAM: MI-1.1.1.: The city will communicate its interest and needs for housing rehabilitation program development and management to the Regional Housing Authority of Sutter and Nevada Counties, which operates such programs on behalf of several small cities and counties in the region.

Responsible Party: City Manager, City Planner

Financing: Staff time, CDBG, HOME

Timeframe: Within 6 months of the adoption of the 2021-2029 Housing Element update

PROGRAM: ML-1.1.2: The city will apply for rehabilitation funding as it becomes available through CDBG and/or HOME NOFAs issued by State HCD. Target neighborhoods areas of higher need (Block groups 1 and 2) as identified in the Housing Conditions Inventory for investment.

Responsible Party: City Manager, City Planner

Financing: CDBG, HOME

Timeframe: The city will fund the rehabilitation of a minimum of 6 properties by the end of the Housing Element cycle in 2029 to affordable to lower-income households.

POLICY: MI-1.2: Preserve the affordability of units that are at-risk of converting from affordable rent-restricted contracts to market rate rents.

PROGRAM: MI-1.2.1: The city will annually assess the status of projects with project-based rental subsidy contracts that restrict rents to affordable levels to determine the contract expiration dates and communicate with property owners regarding their noticing requirements to tenants under Government Code Section 65863.10. The city will maintain a list of projects with contracts that expire through the end of the planning period (2029), and the city will coordinate with qualified development entities, and provide education and support for tenants in potentially affected properties. For projects with contracts that will expire in the next 3 years, develop a proactive plan to preserve affordable rents at these projects, including initiation of discussion with owners and exploration of financial resources to extend contracts.

Responsible Party: City Manager, City Planner

Financing: HUD, HCD, CTCAC, CDLAC

Timeframe: Assess at-risk projects status annually and take necessary actions as described above.

REMOVE CONSTRAINTS (RC)

The provision of adequate and affordable housing can be constrained by a number of factors. Governmental constraints are those imposed by the government that either limit the number of housing units to be built or increase the costs of those units which are built. Non-governmental economic constraints are driven by the market (e.g. Land prices, construction costs, and the availability of financing). While these factors typically fall outside the direct control of the local jurisdiction, they can be positively influenced by proactive city efforts.

GOAL: RC-1: Remove or eliminate governmental constraints on the maintenance, improvement and development of housing, where appropriate and legally possible

POLICY: RC-1.1: Continue to charge development fees that do not unreasonably contribute to the cost of housing. If fees are found to be a constraint, city staff will recommend that the City Council take action to lower development fees.

PROGRAM: RC-1.1.1: Survey other cities in the Glenn County area to ensure that city development fees do not become a constraint on housing production

Responsible Party: City Manager, City Planner

Financing: Staff time

Timeframe: Survey by December 2023 and again in 2027

POLICY: RC-1.2: Adopt Objective Design Review Guidelines for the development of single-family and multi-family housing.

PROGRAM: RC-1.2.1: Develop and adopt Objective Design Review Guidelines to provide more transparency regarding the City's design standards and reduce review timelines and limit subjective decision making.

Responsible Party: City Manager, City Planner

Financing: Staff time

Timeframe: Adopt Design Review Guidelines by December 2023

POLICY: RC-1.3: Remove governmental constraints on the development of Accessory Dwelling Units (ADUs) and incentivize their production to provide affordable housing to targeted income groups

PROGRAM: RC-1.3.1: Establish a comprehensive program to remove constraints to the production of Accessory Dwelling Units (ADUs), in accordance with the State laws AB 3182, AB 68, AB 881, SB 13, AB 687, AB 680 and AB 681, as delineated in State HCD's "Accessory Dwelling Handbook" (December 2020 and any subsequent updates). This will require a thorough analysis of the City's zoning code, planning processes, and development standards, with subsequent amendments to bring the city into compliance with the stated laws.

Responsible Party: City Manager, City Planner

Financing: Staff time

Timeframe: Begin the analysis within one year of the adoption of the 2021-2029 Housing Element update and complete all necessary amendments within two years.

PROGRAM: RC-1.3.2: Develop a formal program that offers incentives to property owners who develop ADUs that offer affordable rents for very-low, low-, or moderate-income households, with recorded regulatory restrictions on rents. Incentives in the form of reduced fees, exceptions to customary development requirements, pre-approved and no cost plans, and funding sources to subsidize construction costs will be considered. The city will target 25 ADUs located throughout the city in a variety of neighborhoods in the planning period.

Responsible Party: City Manager, City Planner
Financing: Staff time
Timeframe: Within two years of the adoption of the 2021-2029 Housing Element update.

POLICY RC1.4: Adopt needed amendments to the City’s Zoning Code to address State legislation related to streamlining and ministerial approvals, as well as removing other constraints.

PROGRAM: RC1-4.1: Amend the City’s Zoning Code to allow By-right Permanent Supportive Housing and Low Barrier Navigation Center development as a use by right (without discretionary action) in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements, as defined, and delineated in AB 2162 (Government Code section 65651) and AB 101 (Government Code section 65662). Amend the City’s Zoning Code to comply with AB 139 in regards to parking standards for emergency shelters, by only requiring parking for staff who work at a shelter and not the guests of the shelter. Amend the City's zoning Code to state explicit language that employee housing is permitted in the same manner as a single-family dwelling and other dwellings of the same type in the same zone and comply with Health and Safety Code section 17021.5.

Responsible Party: City Manager, City Planner
Financing: Staff time
Timeframe: Within 18 months of adoption of the 2021-2029 Housing Element update

PROGRAM: RC1-4.2: Amend the City’s zoning code to address constraints on housing for persons with disabilities, including

- Reasonable Accommodation: Review and revise the reasonable accommodation ordinance section 18.110.113, to address constraints including removing findings on impacts to surrounding uses, & physical property.
- Family Definition: Amend the definition of family in zoning and land use. Consult California Department of Housing and Community Development for model family definitions.
- Group Homes: Amend zoning and permit procedures to allow group homes for seven or more persons in all residential zones as a permitted uses and only subject to objectives standards to facilitate approval certainty similar to other residential uses of the same type.

Responsible Party: City Planner
Financing: Staff time
Timeframe: Within 18 months of adoption of the 2021-2029 Housing Element update

PROGRAM: RC1-4.3: Amend zoning to permit 36 feet and 3 stories in the R-3 zone without a conditional use permit. Continue to allow 50 feet with a conditional use permit.

Responsible Party: City Planner

Financing: Staff time

Timeframe: Within 18 months of adoption of the 2021-2029 Housing Element update

PROGRAM: RC1-4.4: Amend the City's Zoning Code under the Environmental Review chapter to specifying who is responsible for making CEQA determinations and within the timeframes of PRC 21080.1 and PRC 21080.2; and determination of when the PSA is triggered per Government Code 65950(a)(5) the Permit Streamlining Act (PSA).

Responsible Party: City Manager, City Planner

Financing: Staff time

Timeframe: Within 18 months of adoption of the 2021-2029 Housing Element update

AFFIRMATIVELY FURTHERING FAIR HOUSING (FH)

With the passage of AB 686, state and local public agencies are required to affirmatively further fair housing through deliberate action to explicitly address, combat, and relieve disparities resulting from past and current patterns of segregation to foster more inclusive communities. This section includes the goal, policies, and programs which were formed by the Assessment of Fair Housing conducted as part of the needs assessment, as fully detailed in Chapter 4, as well as the Affirmatively Furthering Fair Housing subsections related to the outreach, site inventory, and constraints analysis sections.

GOAL: FH-1: *Improve fair housing choice and equitable access to opportunity.*

POLICY: FH-1.1: Move toward more balanced and integrated living patterns by addressing concentrations of affordable housing, low-income households, and people of color in Block Groups 1, 3, and 4 within Census Tract 104.

PROGRAM: FH-1.1.1: The city will actively suggest sites located outside of Block Groups 1, 3, and 4 when developers contact the city regarding development of an affordable housing project. The city will assist developers with considering sites in Block Group 5 in particular, as only 7.0% of its current residents live below the poverty level. The city may use its 2021 map of multi-family units to identify neighborhoods with concentrations of single-family or multi-family housing and use this data to suggest potential sites within block groups to developers to help create more balanced and integrated living patterns.

Responsible Party: Planning Department

Financing: Allocation of staff time

Timeframe: At least one affordable housing project to be in development by the end of

the Housing Element cycle and located in Block Groups 2, 5, 6, or 7. Map of multi-family units in the City of Willows to be updated at least once every two years, starting at the end of the 2nd year of the Housing Element cycle.

PROGRAM: FH-1.1.2: The City population is composed of approximately 50% people of color, 37% people who speak a language other than English at home, and 20% people living below the poverty level. For volunteer/stipend positions: the city will recruit residents from areas of concentrated poverty, especially people of color, to serve on boards, committees, task forces, and other local government decision-making bodies to inform more balanced and integrated living patterns. For paid employment positions: the city will affirmatively recruit bicultural and bilingual staff by adding a bilingual incentive for Hmong/English and Spanish/English languages to all employment opportunities at the city.

Responsible Party: City Manager, City Administrative Services

Financing: Allocation of staff time, cost of bilingual incentives, and cost of affirmative marketing methods

Timeframe: For paid employment positions: bilingual incentive added to all City employment opportunities by the end of the 2nd year of the Housing Element cycle. For volunteer/stipend positions: each decision-making body to be at least 35% people of color and people living below the poverty level by the end of the Housing Element cycle. City to evaluate its efforts at least annually by surveying decision-making bodies for accurate demographics and adjusting recruiting methods as vacancies arise.

POLICY: FH-1.2: Provide increased opportunity for low-income residents who qualify to reside in affordable housing units.

PROGRAM: FH-1.2.1: The city will meet with the Housing Authority of the County of Butte (HACB) at least twice per year to discuss Housing Choice Voucher and Project-Based Voucher needs, affirmative marketing and outreach activities, and methods of increasing the number of vouchers allocated to the city. The city will conduct outreach to residents to encourage them to apply for Housing Choice Vouchers. Outreach will be bilingual in English/Spanish languages and methods may include, but are not limited to social media, website, flyers, press releases, and email blasts.

Responsible Party: Planning Department

Financing: Allocation of staff time and cost of affirmative marketing materials

Timeframe: Increase the number of Willows applicants for Housing Choice Vouchers by at least 20% by the end of the Housing Element cycle. Have at least one affordable housing project in development with Project-Based Vouchers by the end of the Housing Element cycle

PROGRAM: FH-1.2.2: In collaboration with Glenn County and the City of Orland, assist with publishing an annual Request for Proposal (RFP) for Permanent Local Housing Allocation (PLHA) funds to attract affordable housing developers to the region.

Responsible Party: Planning Department and City Manager

Financing: Allocation of staff time

Timeframe: Starting in the first year and continuing throughout the Housing Element cycle, publish an annual RFP for PLHA funds

POLICY: FH-1.3: Move toward balanced and integrated living patterns by addressing disproportionate impacts of Housing Problems (as defined by the U.S. Department of Housing and Urban Development) on renters, especially renters of color.

PROGRAM: FH-1.3.1: Develop a housing rehabilitation program in collaboration with an experienced entity. Program will focus on areas of concentrated rehabilitation needs (Block Groups 1 and 2), resulting in repairs, and resulting in mitigated potential cost, displacement, and relocation impacts on residents.

Responsible Party: Planning Department

Financing: Allocation of staff time. Apply for HOME Investment Partnerships Program (HOME) or Community Development Block Grant (CDBG) funds through the California State Department of Housing and Community Development (State HCD)

Timeframe: Program to be operational by the end of the Housing Element cycle

PROGRAM: FH-1.3.2: Meet with Community Housing Improvement Program (CHIP) and Yuba-Sutter Habitat for Humanity (Habitat) at least twice per year to discuss development of affordable housing. Affordable housing may be either multi-family housing or sweat equity housing for homebuyers that includes low-interest loans and down payment assistance. City to assist developers to conduct affirmative outreach to people of color including active marketing to community advocates, and multilingual materials in English, Hmong, and Spanish.

Responsible Party: Planning Department

Financing: Allocation of staff time. May apply for funding through State HCD to assist developers with the cost of projects

Timeframe: CHIP and Habitat to be in development on at least one project each or in collaboration by the end of the Housing Element cycle

POLICY: FH-1.4: Provide increased opportunity for residents to seek employment that is full-time and year-round with a living wage to assist with alleviating housing cost-burden.

PROGRAM: FH-1.4.1: Meet with Glenn County and the City of Orland at least twice per year to assess feasibility of an economic development program, with an intentional focus on agricultural occupations due to the region’s economic activity. Focus on increasing opportunity for residents to seek employment that is full-time and year-round with a living wage to assist with alleviating housing cost-burden.

Responsible Party: Planning Department and City Manager

Financing: Allocation of staff time

Timeframe: Assess feasibility by the end of 3rd year of the Housing Element cycle and if the program is deemed feasible, apply for funding by the end of the 5th year of the Housing Element cycle with the goal of assisting opportunities for 50 residents in the planning period.

PROGRAM: FH-1.4.2: According to TCAC/HCD’s 2021 Opportunity Area Maps, most of the City of Willows is identified as having “less positive economic outcome,” “less positive education outcome,” and “less positive environmental outcome.” To address this, the City will conduct an analysis to assess the feasibility of applying to the Affordable Housing and Sustainable Communities (AHSC) Program. AHSC helps create holistic communities with affordable housing and transportation options near jobs and other key destinations and protecting agricultural land from sprawl development. This builds healthier communities and protects the environment by increasing the supply of affordable places to live near jobs, stores, transit, and other daily needs.

Responsible Party: Planning Department and City Manager

Financing: Local Early Action Planning (LEAP) Grant

Timeframe: Conduct an Affordable Housing and Sustainable Communities (AHSC) feasibility analysis by the end of the first year of the Housing Element cycle. If deemed feasible, apply for AHSC funds by February 2023.

POLICY: FH-1.5: Provide opportunity for all residents to engage with the City’s planning activities, regardless of language spoken at home.

PROGRAM: FH-1.5.1: Over one quarter (27%) of Willows residents speak Spanish at home. Expand access to community meetings by providing live interpretation in Spanish. Expand access to materials created for the public such as flyers, brochures, public notices, fact sheets, social media, etc. by providing materials in English and Spanish. Bilingual English/Spanish City staff members may conduct the live interpretation and written translation, or the City may contract with a professional translator.

Responsible Party: Planning Department and City Administrative Services

Financing: Allocation of staff time

Timeframe: Start providing English/Spanish language access as described in the program by the end of the 2nd year of the Housing Element cycle. Conduct an analysis of language spoken at home using data from the U.S. Census American Community Survey at least once every two years to evaluate if additional language access, such as Hmong, is needed.

POLICY: FH-1.6: Provide increased opportunities for residents to engage with fair housing materials.

PROGRAM: FH-1.6.1: Meet with North Valley Property Owners Association (NVPOA) and Legal Services of Northern California (LSNC) at least twice per year to coordinate information, referrals, and outreach to residents. This may include promoting NVPOA and LSNC’s fair housing workshops by posting links on the City’s website and Facebook page, posting physical flyers at City Hall, and sending an “email blast” to the City’s stakeholder contact list.

Responsible Party: Planning Department

Financing: Allocation of staff time. Apply for, or work with a consultant to apply for, CDBG funds through State HCD to support fair housing enforcement and outreach activities

Timeframe: Start coordinating information, referrals, and outreach by the end of the 1st year of the Housing Element cycle. By the end of the Housing Element cycle, have a 50% increase in fair housing workshop attendance by Willows residents

PROGRAM: FH-1.6.2: Conduct special outreach activities during the month of April for National Fair Housing Month, which celebrates the passage of the Fair Housing Act in 1968. This may include posting digital fair housing materials on the City’s website and Facebook page, posting physical flyers at City Hall, and sending an “email blast” to the City’s stakeholder contact list.

Responsible Party: Planning Department

Financing: Allocation of staff time. Apply for, or work with a consultant to apply for, CDBG funds through State HCD to support fair housing enforcement and outreach activities

Timeframe: Start conducting outreach by the end of the 1st year of the Housing Element cycle

QUANTIFIED OBJECTIVES

Based on the policies and actions outlined above, the following objectives in Table 2, represent a reasonable expectation of the maximum number of housing units that will be produced, rehabilitated, and preserved during this Housing Element cycle. Rehabilitation refers to low-income owner-occupied homes, and Preservation refers to affordable rental units at risk of losing affordability without City and/or developer intervention within this planning cycle.

Table 2: Quantified Objectives Table

	Income Level					
	Extremely Low	Very-Low	Low	Moderate	Above-Moderate	Total
New Construction	24	23	22	36	80	185
Rehabilitation	0	0	0	15	0	15
Preservations	0	0	0	0	0	0
Total	24	23	22	51	80	200

CHAPTER 4

HOUSING NEEDS ASSESSMENT

In order to determine the housing needs for the City of Willows, a comprehensive assessment of demographic, economic, and housing market data was conducted. This provides a baseline for identifying the City's greatest housing needs, and informs the development of goals, policies, and programs. Data sources for this assessment included the U.S. Census Bureau, the U.S. Department of Housing and Urban Development, the U.S. Department of Agriculture, the California Department of Finance, the California Economic Development Department, the California Department of Education, the Glenn County Planning Department, and the City of Willows.

The Housing Needs Assessment has been organized by topic into the following sections. In response to recent State Housing Element affirmative fair housing legislation, this update to the Housing Needs Assessment includes an Assessment of Fair Housing.

- Assessment of Fair Housing
- Demographics
- Employment
- Household Characteristics
- Housing Stock Characteristics
- Housing Affordability
- Extremely Low-Income Households
- Special Needs Households

AFFIRMATIVELY FURTHERING FAIR HOUSING: ASSESSMENT OF FAIR HOUSING

With the passage of AB 686, state and local public agencies are required to affirmatively further fair housing through deliberate action to explicitly address, combat, and relieve disparities resulting from past and current patterns of segregation to foster more inclusive communities. AB 686 requires all Housing Elements due January 1, 2021, or later to contain an Assessment of Fair Housing.

The Assessment of Fair Housing considers the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. The assessment includes identification and analysis of patterns and trends, local data and knowledge, other relevant factors, and conclusions and summary of issues (California State Department of Housing and Community Development, Affirmatively Furthering Fair Housing, 2021).

This Housing Element primarily used census tract and block group data for mapping analysis. Counties are subdivided into census tracts and each census tract is subdivided into block groups. All census tracts and block groups are uniquely numbered with a numerical code. The City of Willows is a small city and is fully encompassed by Census Tract 104, which also includes some unincorporated Glenn County land surrounding Willows. Census Tract 104 and its block groups are as approximate as one can get to analyze neighborhood level data in the City of Willows.

In addition, the Housing Element uses primary qualitative data such as interviews with key stakeholders. As defined by the California State Department of Housing and Community Development (HCD), key stakeholders include churches and community service organizations that serve ethnic/linguistic minorities, community-based and other organizations that represent protected class members, fair housing agencies, homeless services agencies, housing and community development providers, independent living centers, lower income community members and households that include persons in protected classes, public housing authorities, and regional centers (California State Department of Housing and Community Development, Affirmatively Furthering Fair Housing, 2021). Interviews with key stakeholders provide rich qualitative data that is added to quantitative and mapping data for a more complete analysis. Using this analysis, the city can prioritize fair housing issues and potential actions to address fair housing issues.

As guided by HCD, the Assessment of Fair Housing is organized by the following five topics:

- A. Fair Housing Enforcement and Outreach Capacity
- B. Segregation and Integration
- C. Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)
- D. Disparities in Access to Opportunity
- E. Disproportionate Housing Needs and Displacement Risk

HCD's guidance also describes the four subsections for each of the five topics. These are Local and Regional Patterns and Trends, Local Data and Knowledge, Other Relevant Factors, and Conclusions and Summary of Issues. The Assessment of Fair Housing is organized by the five topics and four subsections.

Fair Housing Enforcement and Outreach Capacity

Local and regional patterns and trends are identified through interviews with regional stakeholders who service areas include the City of Willows as well as geographic data on fair housing cases and inquiries in Glenn County.

Pursuant to the California Fair Employment and Housing Act [Government Code Section 12921 (a)], the opportunity to seek, obtain, and hold housing cannot be determined by an individual's "race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, genetic information, or any other basis prohibited by Section 51 of the Civil Code."

Maps of HUD's Fair Housing and Equal Opportunity's Title VIII fair housing cases and fair housing inquiries from residents provide information to identify areas with increased fair housing interest in Glenn County. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act) prohibits discrimination in housing due to race, color, religion, sex, gender identity, sexual orientation, familial status, national origin, and disability. It also requires that all federal programs related to housing and urban development be administered in a manner that affirmatively further fair housing (U.S Department of Housing and Urban Development, Fair Housing and Related Laws, 2022).

“Glenn County, FHEO Inquires by City Map, 2013-2021” depicts the geographic distribution of fair housing inquiries by residents in Glenn County per one-thousand people. This data is not official cases, but represents concerns that residents have about possible discrimination. Data by city is listed below (*HCD AFFH Data Resources and Mapping Tool: U.S. Housing and Urban Development*).

City of Orland: Less than 0.5 fair housing inquiries per one-thousand people.

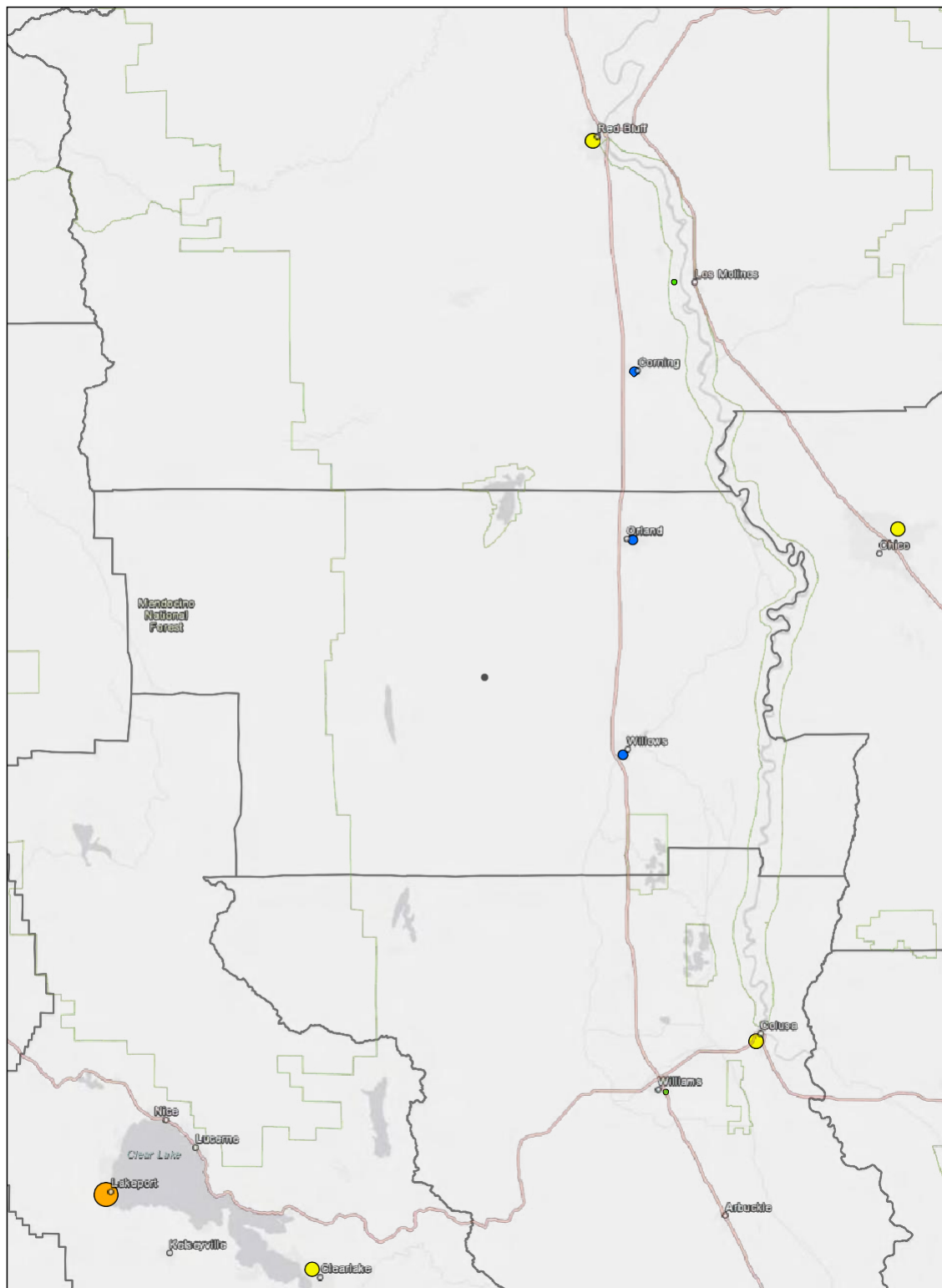
City of Willows: Less than 0.5 fair housing inquiries per one-thousand people.

“Glenn County, FHEO Cases - Total Map, 2020” depicts Title VIII fair housing cases filed by FHEO in Glenn County per one-thousand people. Glenn County had zero (0) cases filed (*HCD AFFH Data Resources and Mapping Tool: U.S. Housing and Urban Development*).

“Glenn County, FHEO Cases – Disability Bias Map, 2020” depicts the percent of total cases with a disability bias for Title VIII fair housing cases filed by FHEO in Glenn County per one-thousand people. Glenn County had zero (0) cases filed, thus the map shows 0% of total cases as having a disability bias (*HCD AFFH Data Resources and Mapping Tool: U.S. Housing and Urban Development*).

“Glenn County, FHEO Cases – Race Bias Map, 2020” depicts the percent of total cases with a race bias for Title VIII fair housing cases filed by FHEO in Glenn County per one-thousand people. Glenn County had zero (0) cases filed, thus the map shows 0% of total cases as having a race bias (*HCD AFFH Data Resources and Mapping Tool: U.S. Housing and Urban Development*).

Glenn County, FHEO Inquires by City Map, 2013-2021



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County Boundaries

(R) FHEO Inquiries by City (HUD, 2013-2021)

• < .5 Inquiries

• < 1 Inquiry

• < .25 Inquiries

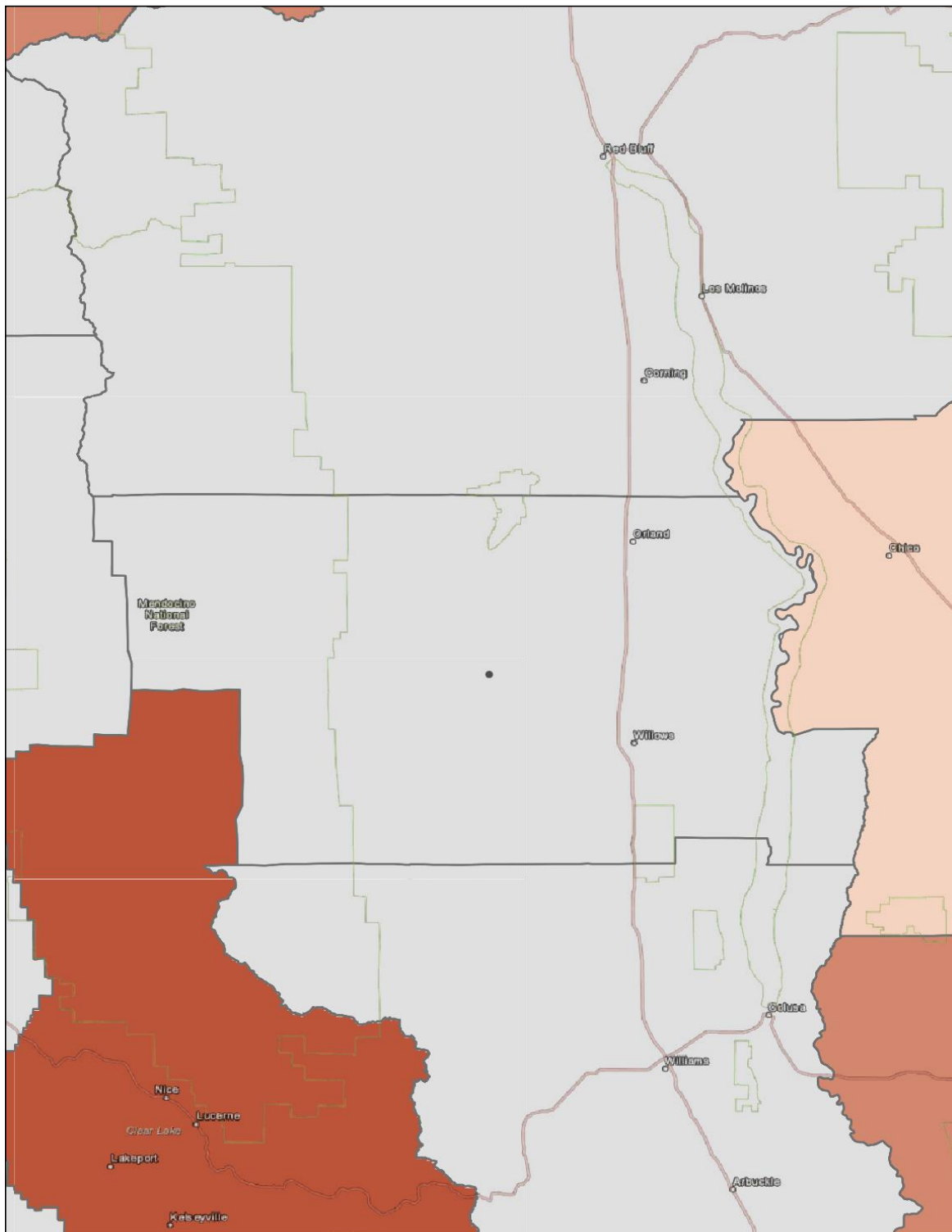
• Greater than 1 Inquiry

1:577,791

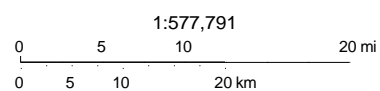
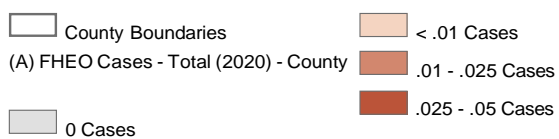
0 5 10 20 mi
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Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

Glenn County, FHEO Cases - Total Map, 2020

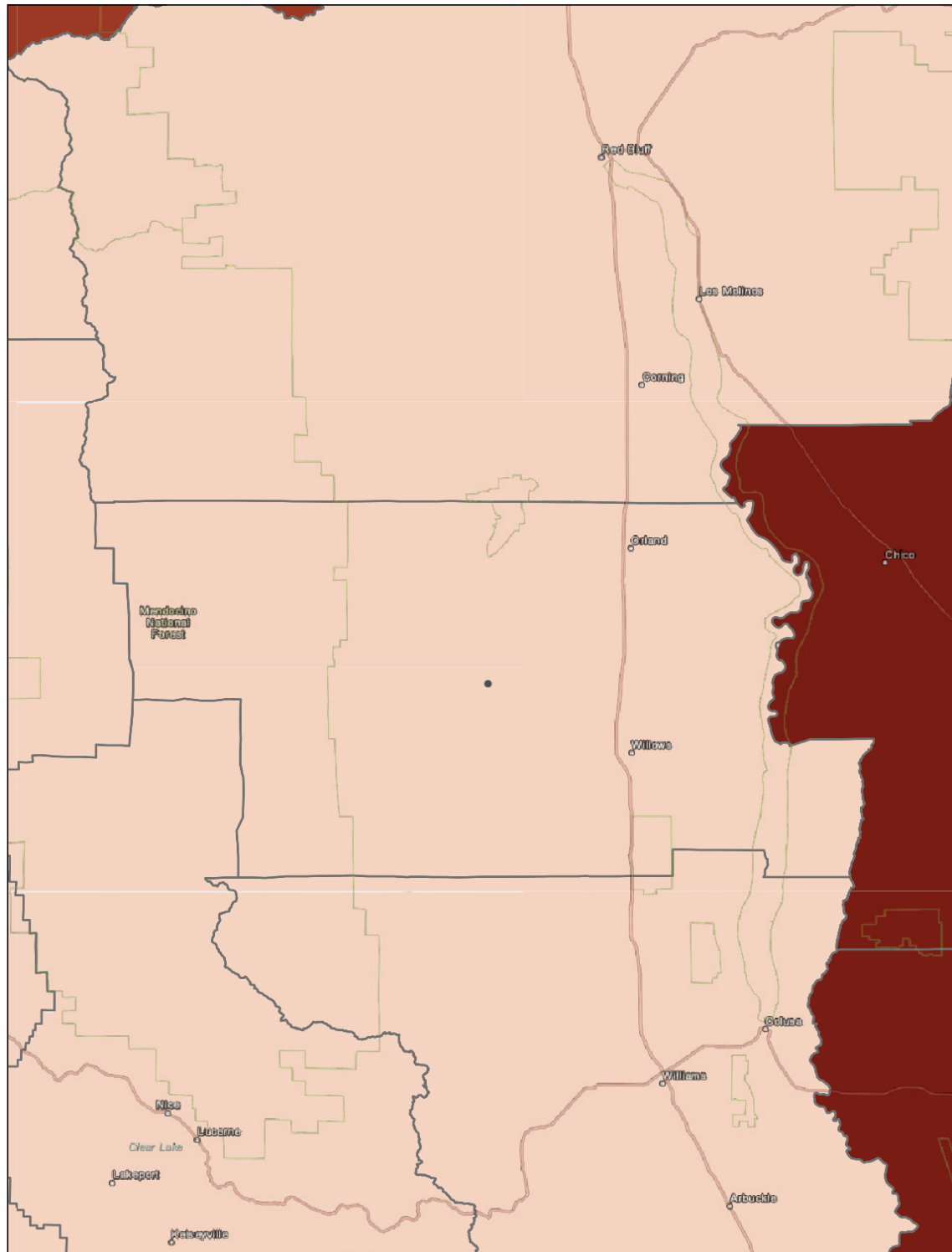


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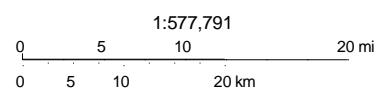
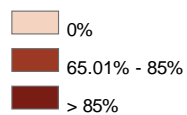
Glenn County, FHEO Cases – Disability Bias Map, 2020



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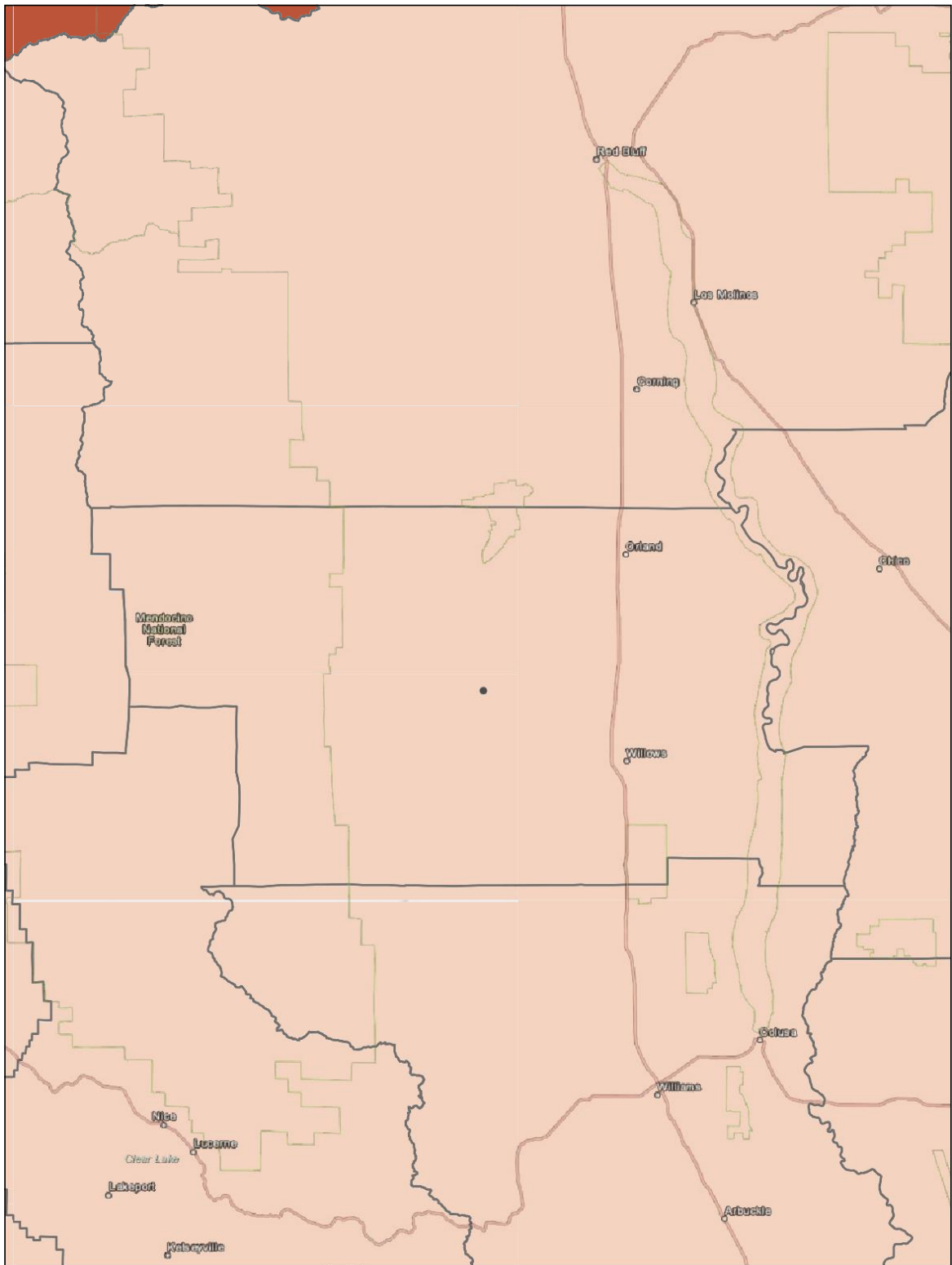
County Boundaries

(A) FHEO Cases - Disability Bias (2020) - County



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Glenn County, FHEO Cases – Race Bias Map, 2020



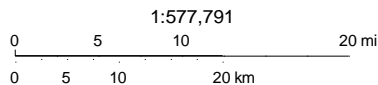
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County Boundaries

(A) FHEO Cases - Race Bias (2020) - County

0%

20.01% - 35%



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Local and Regional Patterns and Trends

Local and regional patterns and trends are identified through interviews with regional stakeholders whose service areas include the City of Willows.

North Valley Property Owners Association (NVPOA) works in the rental housing industry in Butte, Shasta, Yuba, Sutter, Tehama, Siskiyou, Glenn, Plumas, Lassen, Modoc, Trinity, and Colusa Counties. In an interview for this report on February 4, 2021, staff noted Willows has a need for both rental and low-income housing, as there is not enough housing for those living and working in the area. People are commuting to Willows for work but living elsewhere due to the lack of housing. Staff remarked that due to COVID-19 there are people moving from the Bay Area to more rural areas like Willows to work from home. Current market conditions are challenging as there are few available units. Regarding fair housing education in Willows, NVPOA staff host regional meetings and workshops and note that both Willows property managers such as Titus Properties, as well as private owners in Willows, attend.

Legal Services of Northern California (LSNC) serves low income and senior households in Butte, Glenn, Plumas, and Colusa Counties. In an interview for this report on February 3, 2021, staff noted a migration of people from Paradise and other communities affected by the 2018 Camp Fire moving out of the neighboring City of Chico and to more affordable and builder-friendly areas like Glenn County. Staff commented on a lack of supply of housing and of services in the greater North State area and a need for more supportive housing and affordable housing at various income levels, especially Housing First and wraparound services programs. LSNC staff have had limited cases in Willows but were able to provide general comments about housing barriers for protected classes via email correspondence on February 18, 2021. Staff remarked that similar to other areas, the Hmong community in Willows is likely to have faced discrimination and racism. In addition, transportation for people with disabilities is typically challenging in rural communities. LSNC staff recalled handling reasonable accommodation/modification requests in Willows and the housing providers all granted the requests. Staff have not had any fair housing cases regarding the City of Willows.

Local Data and Knowledge

An interview with the City of Willows provided insight on local data and knowledge. The previous City of Willows' Interim City Manager previously served as the Code Enforcement Officer, responding to code enforcement complaints, and was interviewed to obtain local knowledge. In an interview for this report on April 7, 2021, staff commented that major trends of these complaints include dilapidated buildings, cars parked in right of ways, overcrowded housing, and garbage and waste. Staff noted the City's housing shortage significantly contributes to overcrowding housing and disproportionately affects Hispanic/Latino and Hmong/Laotian residents. The new City Manager is hiring for a dedicated Code Enforcement position. The city contracts with a planning consultant for sixteen hours per week who also serves as the primary housing staff person. Due to time and resource constraints and a myriad of duties, the planning consultant's capacity for fair housing enforcement and outreach is limited. Staff commented via phone on September 29, 2021, that to their knowledge the city has not conducted fair housing outreach nor has anyone approached the city with a fair housing complaint within the last Housing Element period.

Other Relevant Factors

See Chapter 4 Housing Needs Assessment for more information on housing stock characteristics, including the 2021 Housing Conditions Survey. See Chapter 5 Resource Inventory for more information on energy conservation opportunities. These are related to fair housing enforcement and outreach

capacity as findings suggest recommendations for the city to consider regarding rehabilitation and preservation of existing housing units.

Conclusions and Summary of Issues

Based on local and regional patterns and trends, local data and knowledge, and other relevant factors, it is determined that the City of Willows has limited capacity for fair housing enforcement and outreach. There are, however, activities within the city and surrounding region regarding fair housing enforcement and outreach that the city could assist with.

- Fair housing cases and inquiries: According to available HUD data, the City of Willows had less than 0.5 fair housing inquiries per one-thousand people from 2013 to 2021. Glenn County had zero (0) fair housing cases filed in 2020. These findings provide insight on fair housing in the region; however, they are reflective of inquiries and cases reported to HUD, which may not encompass all fair housing issues in the region.
- There are regional agencies – North Valley Property Owners Association and Legal Services of Northern California – whose service areas include Willows and who are already conducting fair housing outreach. These regional agencies are not currently connected with City staff and therefore not promoting their outreach activities.
- The city is currently in the process of hiring a dedicated Code Enforcement Officer. Previously, the Interim City Manager also served as the Code Enforcement Officer. The City is not currently mapping activities to identify trends, patterns, and areas of opportunity for housing rehabilitation due to limited capacity, staff, and funding. The City recently completed a 2021 Housing Conditions Survey which can assist with determining which areas of Willows may benefit most from housing rehabilitation and fair housing enforcement and outreach efforts.
- Overcrowding is occurring and disproportionately impacting Hispanic/Latino and Hmong/Laotian households. The City of Willows and Glenn County Community Action Department (see Integration and Segregation section) identified a lack of affordable housing options as a major contributor to this condition. Two or three families may be doubling up in units, combining their incomes to make rent.

Segregation and Integration

The second section of the Assessment of Fair Housing is an assessment of segregation and integration in the jurisdiction. This section discusses levels of segregation and integration for race and ethnicity, language, familial status, persons with disabilities, and income, and identifies the groups that experience the highest levels of segregation.

Local and Regional Patterns and Trends

Data tables, narrative, and maps were used to illustrate local and regional patterns and trends regarding segregation and integration for race and ethnicity, language, familial status, persons with disabilities, and income.

Race and Ethnicity

Race and ethnicity are analyzed using data tables and narrative in this section. Please refer to the Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) section for maps at the block group level that depict race and ethnicity. Maps are as follows: “Census Tract 104 by Block Group, Number of

Hispanic and Latino Residents, 2019,” “Census Tract 104 by Block Group, Number of Asian Residents (not Hispanic nor Latino), 2019,” and “Census Tract 104 by Block Group, Number of White Residents (not Hispanic nor Latino), 2019.”

Table 3: City of Willows and Glenn County, Race and Ethnicity, 2010 and 2019

Race or Ethnicity	City of Willows					Glenn County				
	2010		2019		2010-2019	2010		2019		2010-2019
	Number of Persons	Percent of Total Population	Number of Persons	Percent of Total Population	Change	Number of Persons	Percent of Total Population	Number of Persons	Percent of Total Population	Change
Hispanic/Latino (of any race)	1,766	28.5%	1,993	33.1%	+4.6%	9,989	35.8%	11,680	41.8%	+6.0%
White, not Hispanic/Latino	3,752	60.5%	2,961	49.2%	-11.3%	16,033	57.4%	14,398	51.5%	-5.9%
Black or African American, not Hispanic/Latino	126	2.0%	111	1.8%	-0.2%	197	0.7%	193	0.7%	0.0%
American Indian and Alaska Native, not Hispanic/Latino	271	4.4%	56	0.9%	-3.5%	616	2.2%	391	1.4%	-0.8%
Asian, not Hispanic/Latino	181	2.9%	598	9.9%	+7.0%	629	2.3%	825	2.9%	+0.6%
Native Hawaiian and Other Pacific Islander, not Hispanic/Latino	0	0.0%	0	0.0%	0.0%	9	0.0%	11	0.0%	0.0%
Some other race, not Hispanic/Latino	0	0.0%	0	0.0%	0.0%	32	0.1%	0	0.0%	-0.1%
Two or more races, not Hispanic/Latino	109	1.8%	294	4.9%	+3.1%	430	1.5%	478	1.7%	-0.2%
Total	6,205	--	6,013	--	-3.1%	27,935	--	27,976	--	+0.1%

Source: U.S. Census 2006-2010 and 2015-2019 American Community Survey

Table 3 compares data on race and ethnicity for the City of Willows and Glenn County from 2010 to 2019. As of 2019, one-third of residents of the City of Willows identify as Hispanic or Latino (of any race). About half (49.2%) of Willows identifies as White (not Hispanic/Latino), 9.9% as Asian (not Hispanic/Latino), 4.9% as two or more races (not Hispanic/Latino), and 1.8% as Black or African American (not Hispanic/Latino). Most of the population that identifies as Asian is categorized by the U.S. Census American Community Survey as “Other Asian”, meaning not identifying as Chinese, Filipino, Indian, Japanese, Korean, or Vietnamese. Research and local knowledge point to Hmong and Laotian communities in Willows likely being reflected by the “Other Asian” category.

From 2010 to 2019, the Hispanic/Latino population increased by 4.6% in the City of Willows and 6.0% in Glenn County while simultaneously the White population decreased by 11.3% and 5.9% respectively. In addition to this trend, the City of Willows experienced a 7.0% increase in the total Asian population, whereas Glenn County experienced a 0.6% increase within the same time period. These findings indicate that the City of Willows and Glenn County are experiencing significant demographic changes in the racial and ethnic makeup of their populations. The City of Willows is becoming an increasingly diverse community in comparison to Glenn County.

Total population sizes in these jurisdictions have remained relatively steady, with the City of Willows experiencing a 3.1% decrease in population size between 2010 and 2019. While the demographics of the City of Willows and Glenn County have experienced notable changes, there has been no significant population growth within this same time period.

Language

Table 4 compares data on language and fluency for the City of Willows and Glenn County from 2010 to 2019. In 2019, over one-third of the population of the City of Willows over the age of five spoke a language at home other than English, with Spanish as the most common language at 27.4%, Asian and Pacific Islander languages at 8.5%, and other Indo-European languages at 0.8%. Of residents over the age of five, over 20% are not fluent in English. From 2010 to 2019, the percentage of people who speak a language other than English at home increased by 7.5% for the City of Willows and 5.4% for Glenn County. In addition, the number of persons over 5 years of age who are not fluent in English increased by 6.8% for the City of Willows and 0.5% for Glenn County. Overall, these findings suggest significant increases in linguistic isolation. Households that experience linguistic isolation speak limited English, which can make it difficult to access the information or services they need. More than one fifth of the population of the City of Willows is not fluent in English.

Familial Status

To assess segregation and integration of familial status, this report analyzes data on the percent of children in single parent, female households, and the percent of children in married-couple households within the City of Willows and Glenn County.

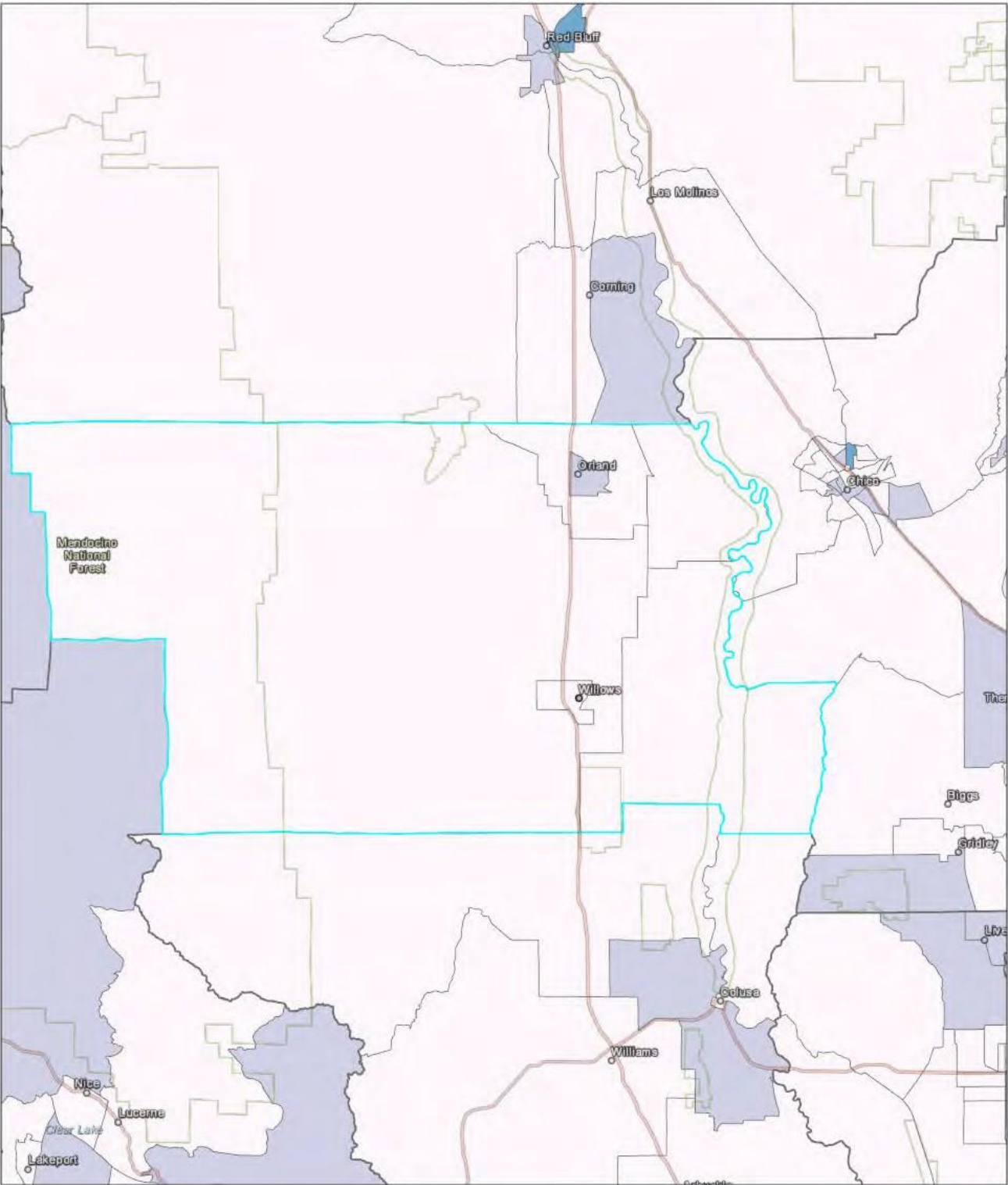
The maps “**City of Willows, Percent of Children in Single Parent, Female Households, 2019**” and “**Glenn County, Percent of Children in Single Parent, Female Households, 2019**” below indicate the percent of children residing in female householder, no spouse/partner present households in the City of Willows and Glenn County. Census tract data is used because block group data is not available. The findings indicate that less than 20% of children reside in households headed by single mothers in the City of Willows and the majority of Glenn County. However, 20% to 40% of children reside in households headed by single mothers in the City of Orland, which is significantly larger than both the City of Willows and Glenn County (HCD AFFH Data Resources and Mapping Tool: U.S. Census 2015-2019).

Table 4: City of Willows and Glenn County, Languages Spoken at Home, 2010 and 2019

Language & Fluency	City of Willows					Glenn County				
	2010		2019		2010-2019	2010		2019		2010-2019
	Number of Persons	Percent of Population	Number of Persons	Percent of Population	Change	Number of Persons	Percent of Population	Number of Persons	Percent of Population	Change
Persons 5 years and over that speak Spanish at home	1,428	25.0%	1,507	27.4%	+2.4%	7,597	29.6%	8,967	34.6%	+5.6%
Persons 5 years and over that speak Asian and Pacific Islander languages at home	84	1.5%	465	8.5%	+7.0%	204	0.8%	589	2.3%	+1.5%
Persons 5 years and over that speak other Indo-European languages	149	2.6%	43	0.8%	-1.8%	284	1.1%	215	0.8%	-0.3%
Total persons 5 years and over that speak a language other than English at home	1,660	29.1%	2,015	36.6%	+7.5%	8,381	32.6%	9,855	38.0%	+5.4%
Total persons 5 years and over that are not fluent in English	833	14.6%	1,179	21.4%	+6.8%	3,651	14.2%	3,807	14.7%	+0.5%

Source: U.S. Census 2006-2010 and 2015-2019 American Community Survey

City of Willows, Percent of Children in Single Parent, Female Households, 2019



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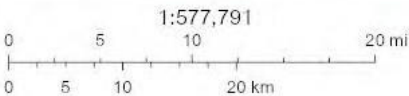
County Boundaries

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

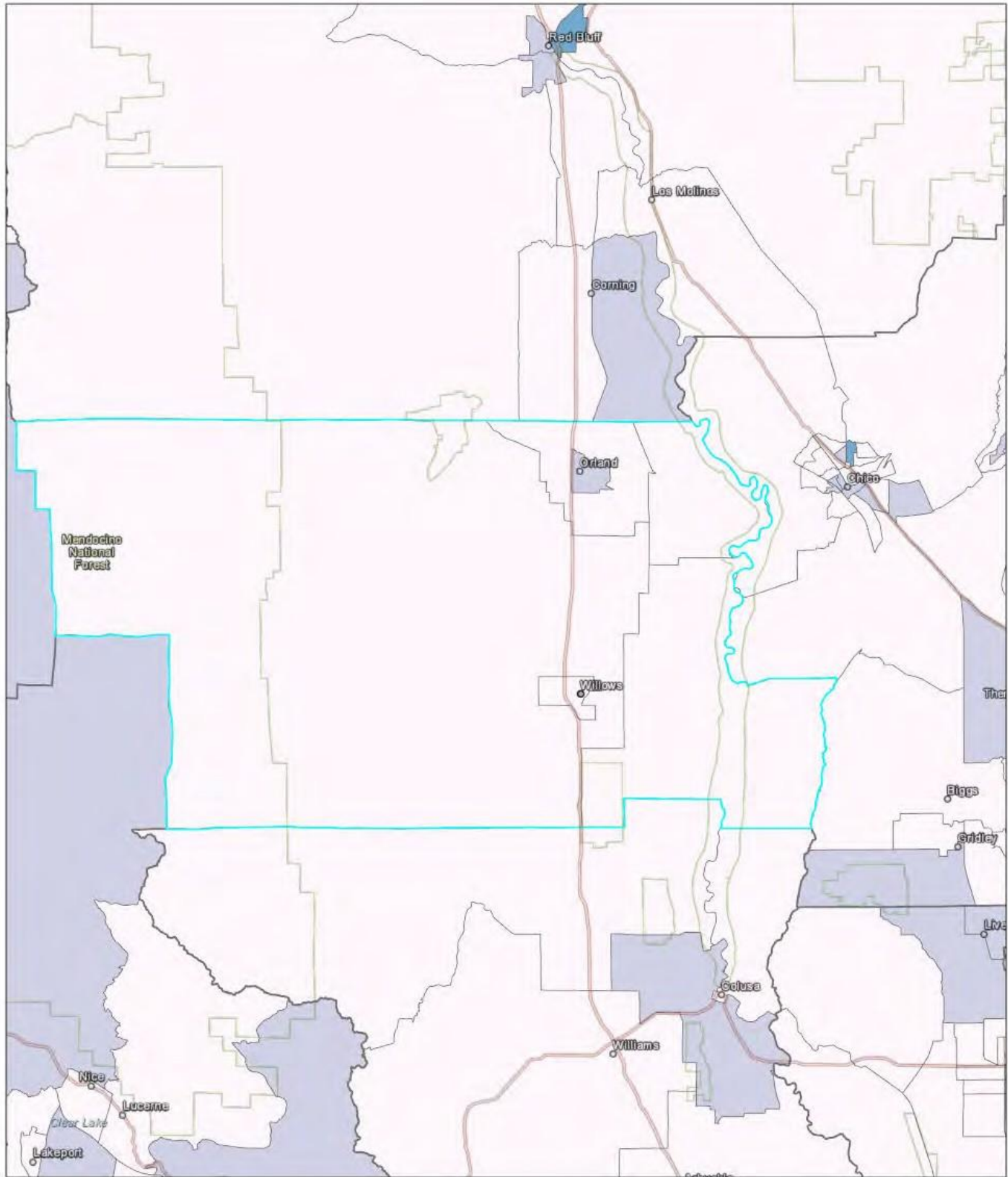
≤ 20%

20% - 40%

40% - 60%



Glenn County, Percent of Children in Single Parent, Female Households, 2019



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County Boundaries

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

≤ 20%

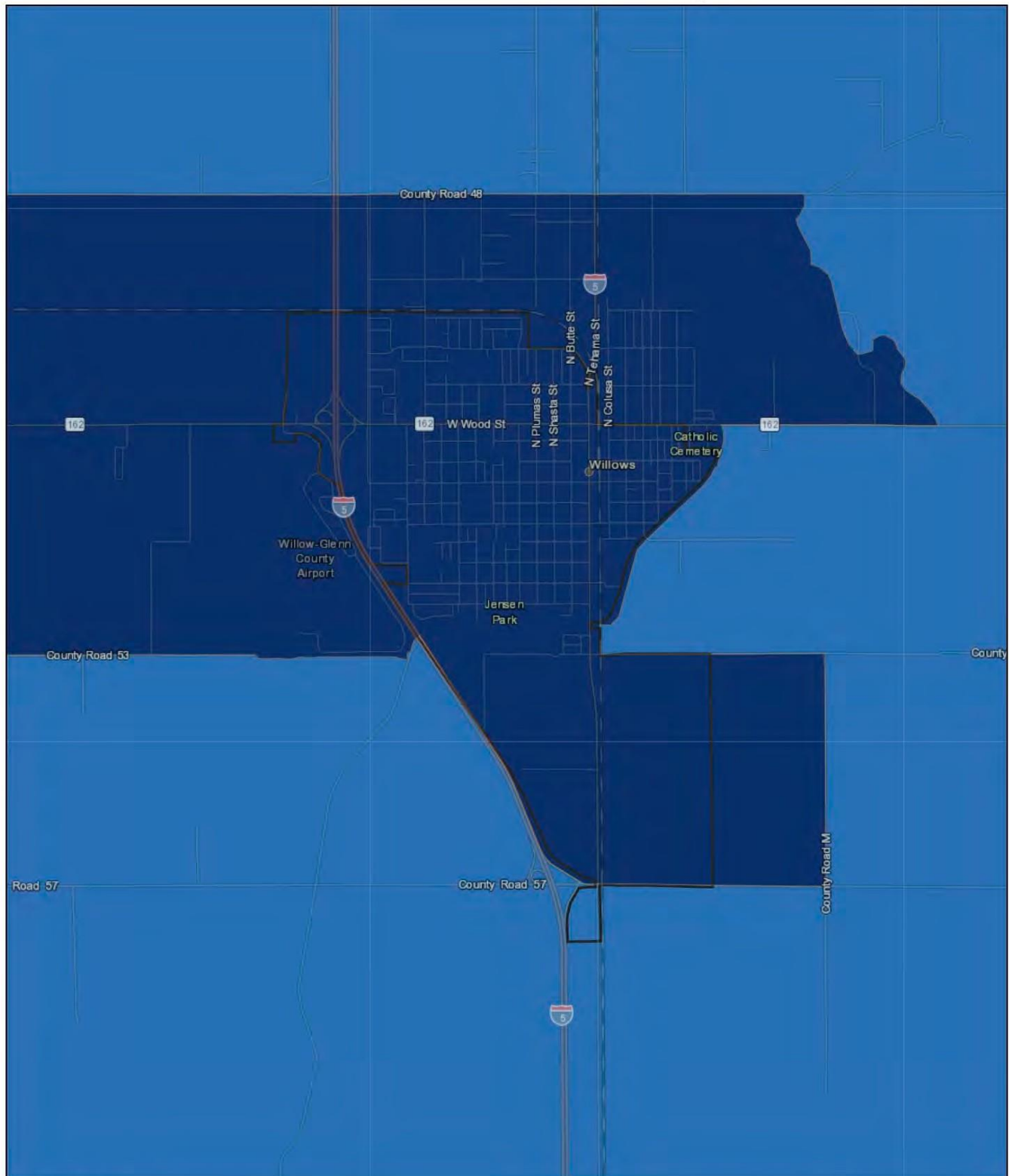
20% - 40%

40% - 60%

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The maps “**City of Willows, Married-Couple Households with Children, 2019**” and “**Glenn County, Married Couple Household with Children, 2019**” indicate the percent of children residing in married-couple households in the City of Willows and Glenn County. Census tract data is used because block group data is not available. In Census Tract 104, which encompasses the City of Willows, more than 80% of children reside in married-couple households. This is significantly higher than most of Glenn County, in which 60% to 80% of children reside in married-couple households (HCD AFFH Data Resources and Mapping Tool: U.S. Census 2015-2019 American Community Survey).

City of Willows, Percent of Children in Married-Couple Households, 2019



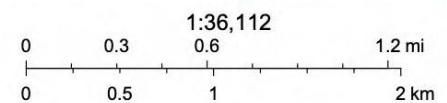
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City/Town Boundaries

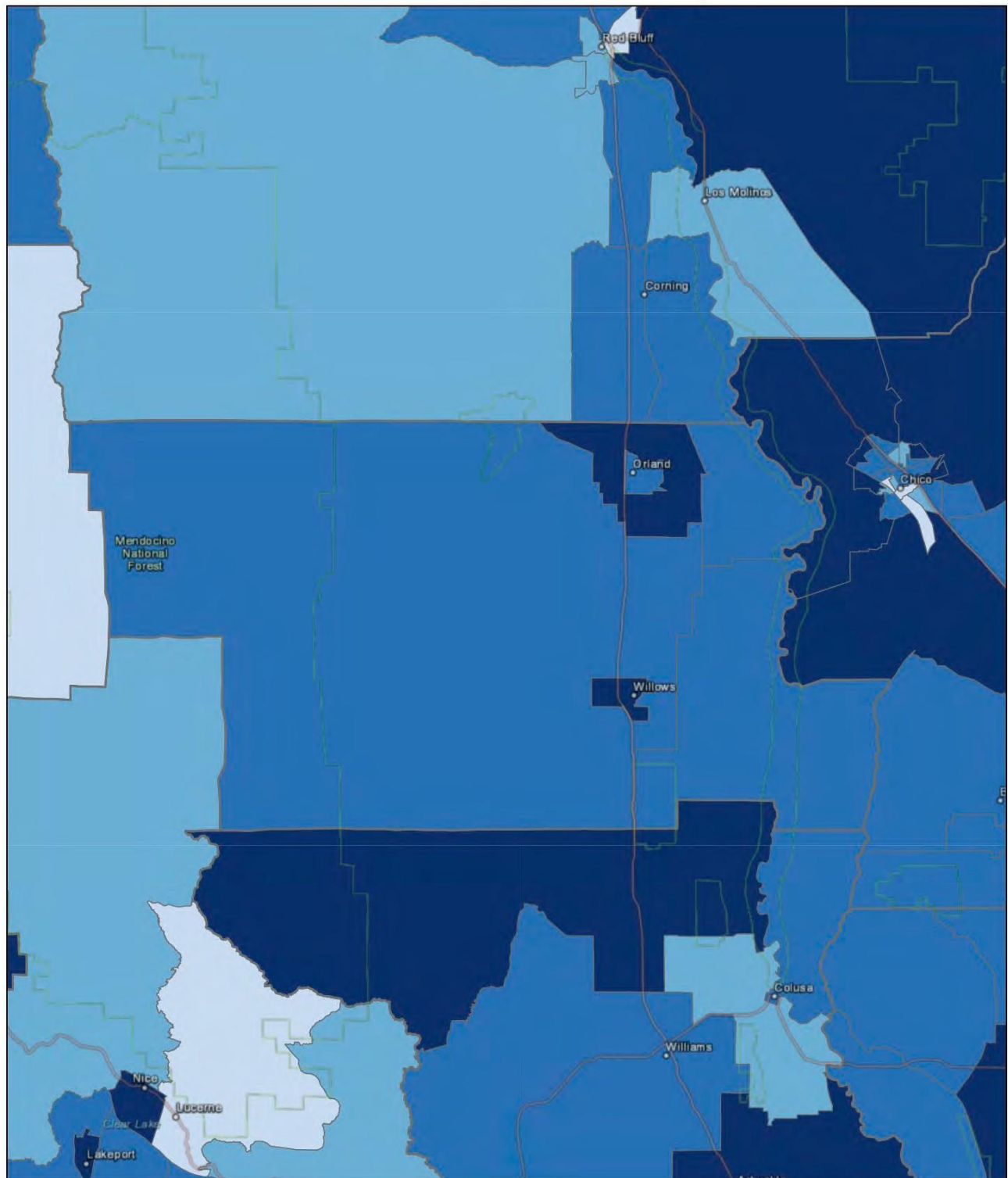
(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

60% - 80%

> 80%



Glenn County, Percent of Children in Married-Couple Households, 2019



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County Boundaries

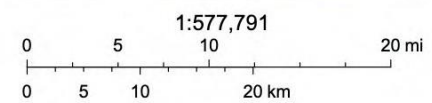
(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

20% - 40%

40% - 60%

60% - 80%

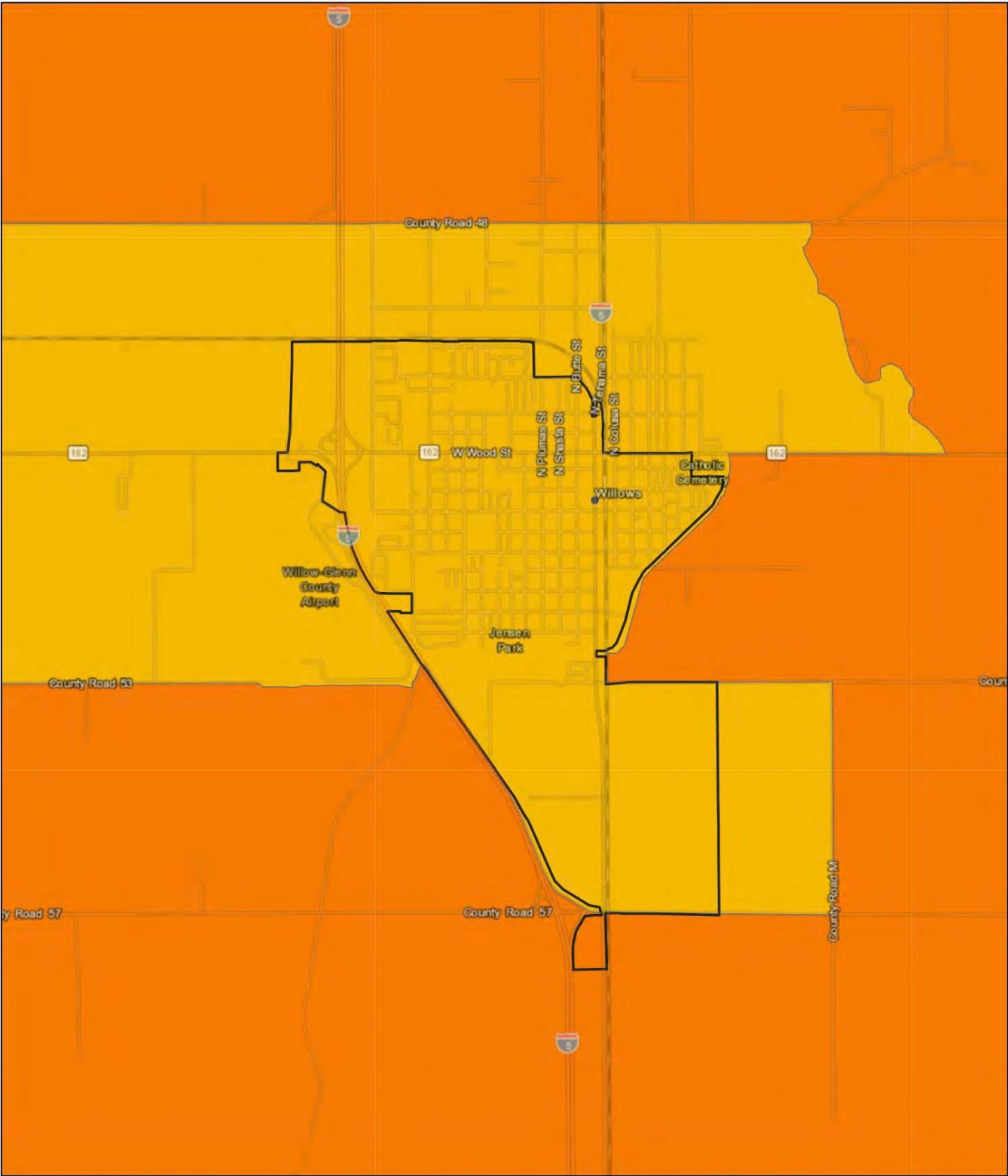
> 80%



People with Disabilities

The maps “**City of Willows, Percent of Population with a Disability, 2019**” and “**Glenn County, Percent of Population with a Disability, 2019**” indicate the percent of the population with a disability in the City of Willows and Glenn County. Census tract data is used because block group data is not available. As illustrated below, 10% to 20% of the population in the City of Willows and in the city of Orland has a disability, whereas the majority of unincorporated Glenn County has 20% to 30% individuals with disabilities. (HCD AFFH Data Resources and Mapping Tool: U.S. Census 2015-2019 American Community Survey).

City of Willows, Percent of Population with a Disability, 2019



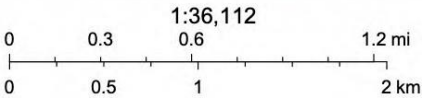
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City/Town Boundaries

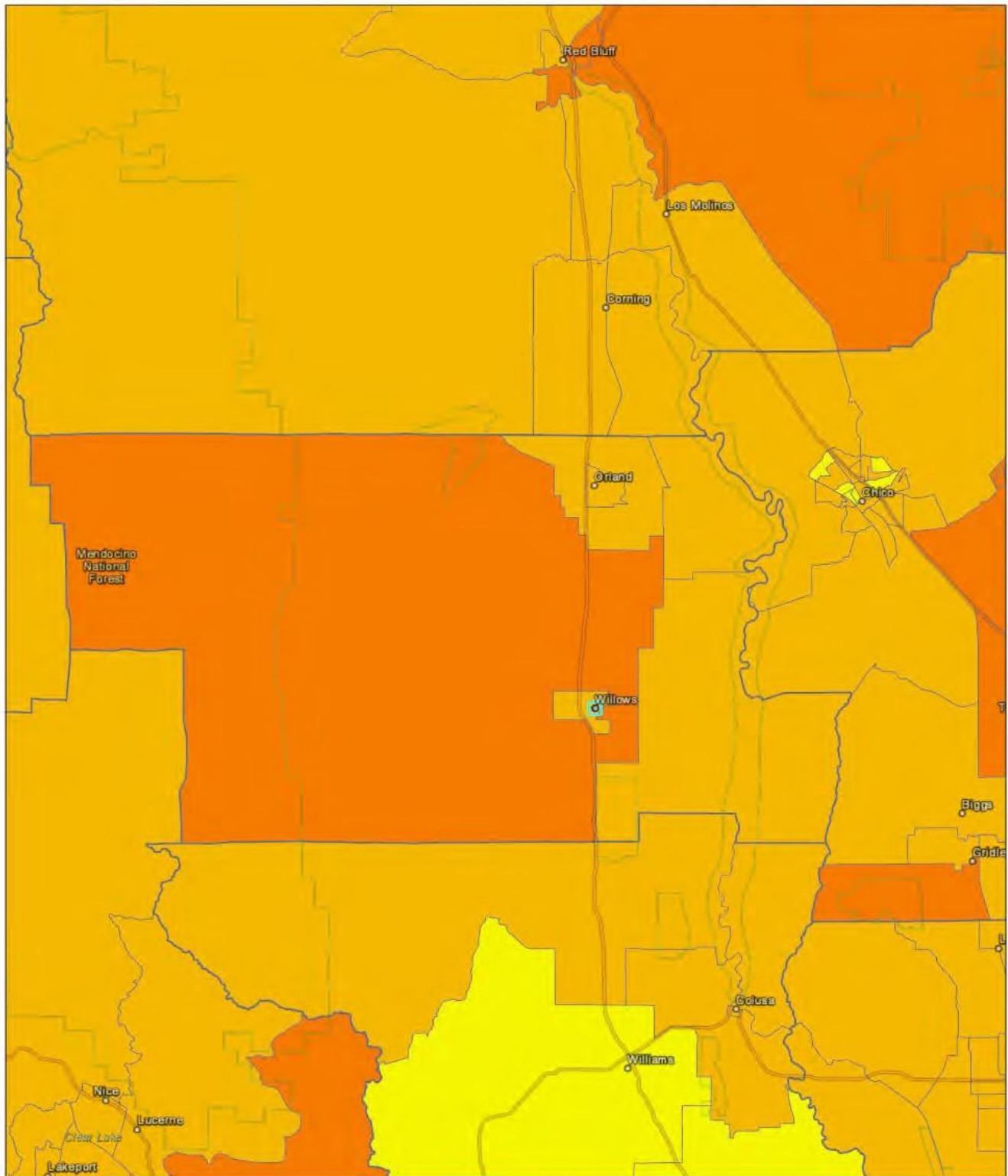
(R) Population with a Disability (ACS, 2015 - 2019) - Tract

10% - 20%

20% - 30%



Glenn County, Percent of Population with a Disability, 2019



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County Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%
- 20% - 30%

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0 5 10 20 km

Income

This section analyzes income data on poverty, number of households with a Housing Choice Voucher from the Housing Authority of the County of Butte (HACB), and the annual income needed to afford rental housing in Glenn County.

Table 5 compares data on individuals and families experiencing poverty for the City of Willows, Glenn County, and the State of California from 2012 to 2019. In this case, 2012 data was used for comparison over time instead of 2010 data because it was the oldest dataset available. For the City of Willows in 2019, the percent of families in poverty and individuals experiencing poverty is about the same, at 18.0% and 19.7% respectively. The percent of families experiencing poverty in Willows is almost double that of the State of California as a whole: 18.0% compared to 9.6%. For context, the average family size in Willows is 3.15 persons whereas the average family size for the State of California is 3.53 (U.S. Census, 2015-2019 American Community Survey).

From 2012 to 2019, the City of Willows had large decreases in the number of families and individuals experiencing poverty in comparison to Glenn County and the State of California. The number of families and individuals experiencing poverty in the City of Willows decreased by 2.2% and 6.8%, respectively. Glenn County had a 0.9% increase in the number of families experiencing poverty and a 2.0% decrease in the number of individuals experiencing poverty whereas the State of California had 1.9% and 1.9% decreases, respectively.

Table 5: City of Willows, Glenn County and State of California, Poverty, 2012 and 2019

Jurisdiction	Measure of Poverty	2012		2019		2012-2019
		Percent	Estimated Number	Percent	Estimated Number	Change
City of Willows	Families whose income in the past 12 months is below the poverty level	20.2%	281	18.0%	257	-2.2%
	Individuals whose income in the past 12 months is below the poverty level	26.5%	1,573	19.7%	1,141	-6.8%
Glenn County	Families whose income in the past 12 months is below the poverty level	13.7%	936	14.6%	1,079	+0.9%
	Individuals whose income in the past 12 months is below the poverty level	19.5%	5,383	17.5%	4,818	-2.0%
State of California	Families whose income in the past 12 months is below the poverty level	11.5%	983,254	9.6%	860,010	-1.9%
	Individuals whose income in the past 12 months is below the poverty level	15.3%	5,590,100	13.4%	5,149,742	-1.9%

Source: U.S. Census, 2007-2012 and 2015-2019 American Community Survey

Table 6 depicts the number of households who hold Housing Choice Vouchers from the Housing Authority of the County of Butte (HACB) in the City of Willows, City of Orland, and Glenn County in 2021. An estimated 27 households in the City of Willows have a Housing Choice Voucher (HCV) through the Housing Authority of the County of Butte (HACB). In comparison, 29 households hold HCVs in the City of Orland, and 67 households hold HCVs in Glenn County overall.

Table 6: City of Willows, City of Orland and Glenn County, Number of Households with Housing Choice Vouchers, 2021

Jurisdiction	Number of Households with Housing Choice Vouchers
City of Willows	27
City of Orland	29
Balance of County	11
Glenn County (Total)	67

Source: Housing Authority of the County of Butte, January 2021 Correspondence

Table 7 depicts the annual income needed to afford zero to four-bedroom rental units located in Glenn County as of 2020. The annual income needed to afford a two-bedroom unit is \$35,320.

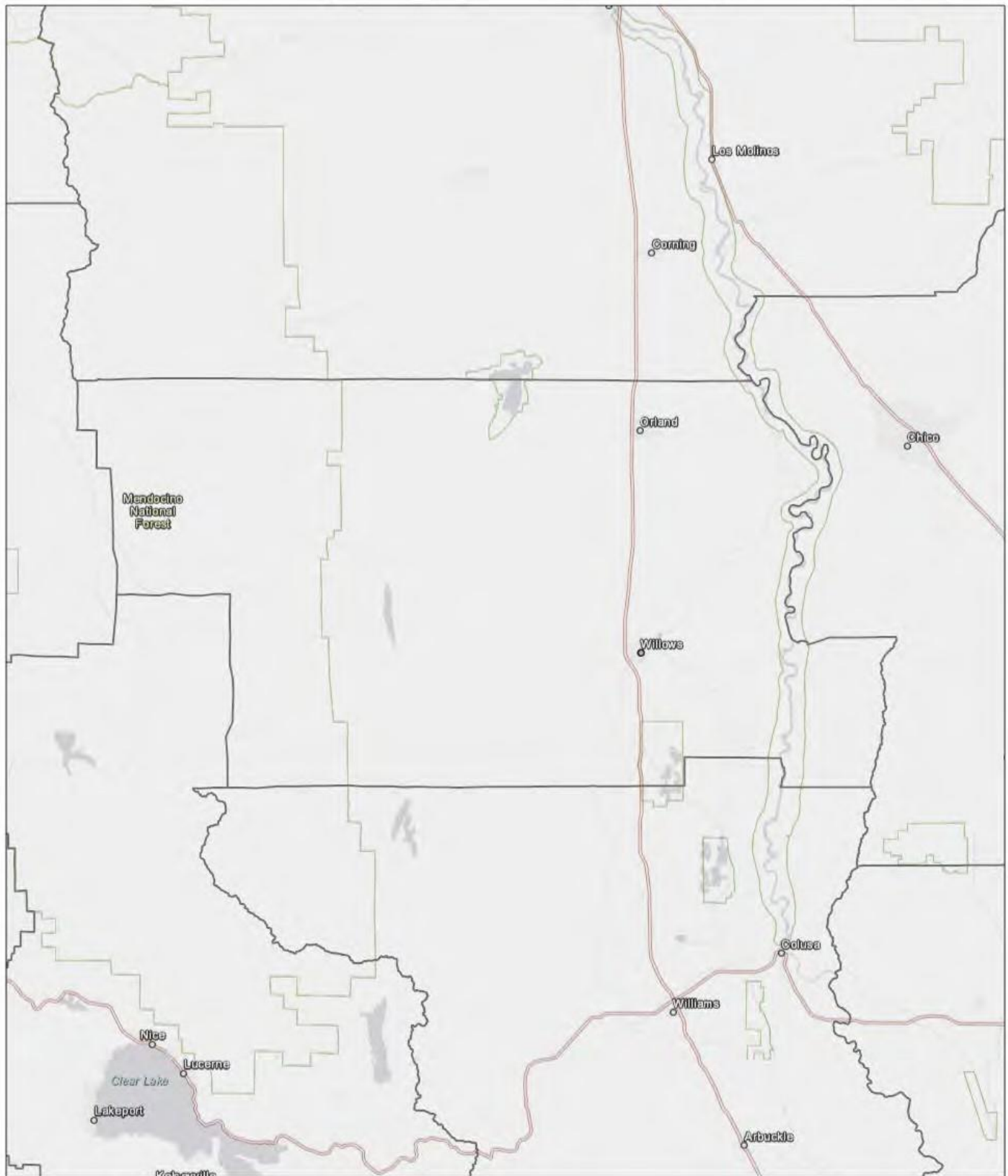
Table 7: Glenn County, Annual Income Needed to Afford Rental Housing, 2020

Unit Size	Annual Income Needed to Afford Unit
Zero-bedroom (studio)	\$23,880
One-bedroom	\$26,800
Two-bedroom	\$35,320
Three-bedroom	\$44,000
Four-bedroom	\$47,840

Source: National Low Income Housing Coalition, 2020 Out of Reach

The map “**Glenn County, Areas of High Segregation and Poverty, 2020**” depicts block group data for areas of high segregation and poverty. Areas outlined in red experience high levels of segregation and poverty. As depicted below, Glenn County does not have any of these areas (HCD AFFH Data Resources and Mapping Tool: U.S. Census 2015-2019 American Community Survey).

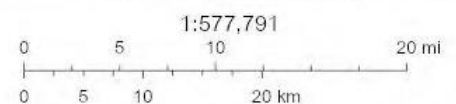
Glenn County, Areas of High Segregation and Poverty, 2020



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County Boundaries

(A) TCAC Area of High Segregation and Poverty (2020) - Block Group



Local Data and Knowledge

Glenn County Community Action Department staff provided insight on local data and knowledge regarding segregation and integration in the city.

Glenn County Community Action Department (CAD) serves as the lead agency for the Dos Rios Continuum of Care (Colusa, Glenn, and Trinity Counties) and provides emergency services, housing services, income and employment, and community services and development for vulnerable, low-income seniors, youth, and families. In an interview for this report on February 9, 2021, staff commented that Willows has a need for multi-family housing and affordable housing. The citywide median income is low, private rentals can be both expensive and low-quality (\$1,050 for a 3-bedroom unit), and there is a lack of housing that is affordable for staff's clients. Staff remarked that the four affordable housing complexes in Willows are not enough housing for the City's population. Income-based units would be helpful for fluctuating incomes, so if a resident loses their job, they would still be able to pay their rent. Regarding housing barriers, staff noted that finding employment can be a barrier to their clients becoming or staying housed. Staff have had no issues working with apartment complexes for accommodations for people with disabilities. Staff observed that Hispanic/Latino families may double-up in apartment units, with two to three families living together to make ends meet for a monthly rent of \$1,000. Generally, Hmong/Laotian and Hispanic/Latino residents may live in apartments, the Community Housing Improvement Program (CHIP) low-income subdivision or own their homes. Staff stated that people with low incomes tend to live at Cedar Hills Manor Apartments and Sycamore West Apartments, as well as CHIP properties. Until 2013, CAD ran the Housing Choice Voucher program for Colusa, Glenn, and Trinity Counties and staff remarked that private landlords would rent to residents with Housing Choice Vouchers, and thus low-income residents lived throughout the city.

Other Relevant Factors

See **Chapter 1 Introduction and Background** for details on the public participation process of the 2021 Housing Element, specifically the community workshops and online survey. Consistent themes were expressed by community members during these efforts and are summarized as follows:

1. Willows needs a greater supply of all types of housing units, both multi-family and single-family.
2. There is a significant lack of affordable units, resulting in many households being cost burdened with rent.
3. There is a mismatch between household sizes and available units. This was expressed as happening at both ends of the spectrum, i.e., large families (5 or more people) cannot find units with enough bedrooms, and single adults cannot find studio or one-bedroom apartments.
4. Both multi-family and single-family homes are in need of rehabilitation.
5. There are very few single-family affordable homes for sale.

Conclusions and Summary of Issues

Based on local and regional patterns and trends, local data and knowledge, and other relevant factors, the conclusions and summary of issues for integration and segregation are as follows:

- **Race, Ethnicity, and Language:** Just over half (51%) of the City's residents are people of color, 37% speak a language other than English at home, and over 20% are not fluent in English. This illustrates a need for both verbal interpreters and written multilingual materials so residents who

are not fluent in English have equitable access to information and resources. It also demonstrates the importance of having a diverse city staff and elected officials who reflect the demographics of the community they serve.

- **Familial Status:** Less than 20% of children reside in households headed by single mothers in both the City of Willows and the majority of Glenn County. However, 20% to 40% of children reside in households headed by single mothers in the City of Orland, which is significantly larger than both the City of Willows and Glenn County. More than 80% of children reside in married-couple households in Willows. This is significantly higher than most of Glenn County, in which 60% to 80% of children reside in married-couple households.
- **Disability:** Approximately 10% to 20% of the population in the City of Willows and the City of Orland has a disability.
- **Income:** There are approximately 257 families and 1,141 individuals in the City of Willows living below the poverty level, however, there are only 27 Housing Choice Vouchers in use in the city. This indicates a mismatch of need to available resources.
- **Stakeholder and Community Input:** There is need for all types of quality housing units, both multi-family and single-family, at varying levels of affordability and size.

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

The map “***Glenn County, Areas of High Segregation and Poverty, 2020***” in the Segregation and Integration section shows no areas of high segregation and poverty in the County. The third section of the Assessment of Fair Housing addresses racially and ethnically concentrated areas of poverty (R/ECAP) by providing an analysis of geographic concentrations of affordable housing, low-income households, and people of color.

Local and Regional Patterns and Trends

Maps and narrative on low-income households and people of color are used to illustrate local and regional patterns and trends regarding racially and ethnically concentrated areas of poverty.

Low Income Households

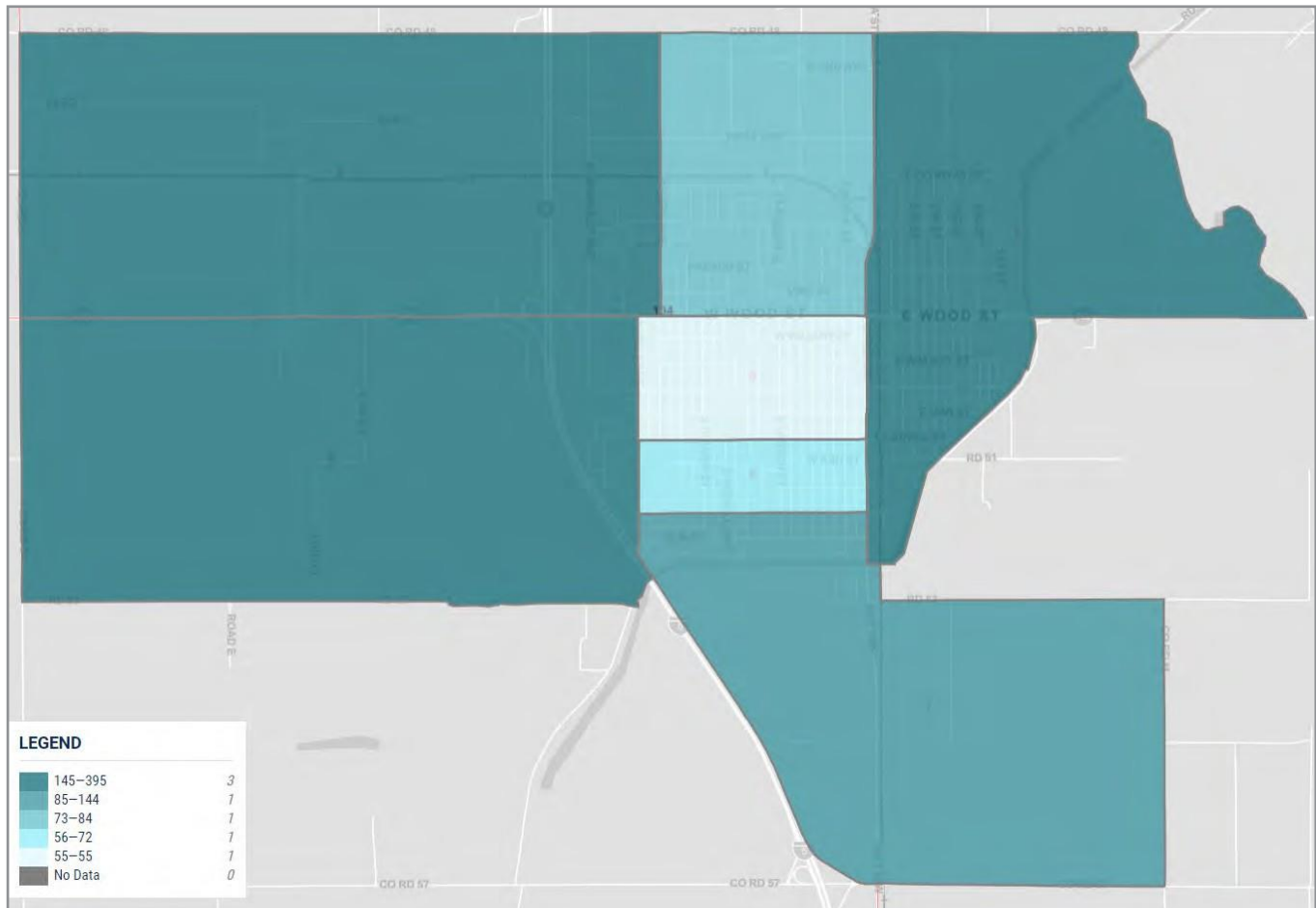
The map “***Census Tract 104 by Block Group, Number of Households Below Poverty Level, 2019***” depicts the number of households below the poverty level in Census Tract 104 by block group. As of 2019, the Census Tract 104 has an estimated 1,152 households that live below the poverty level. Block Group 5 in the center of the city just south of Wood Street has the fewest number of households in poverty (55 households) (U.S. Census 2015-2019 American Community Survey). The block groups with the highest number of households in poverty (145-395 households) are:

- Block Group 1 is on the northeast side of the city, bordered by County Road 53 to the south, County Road 48 to the north, and Tehama Street to the west. An estimated 198 households live below the poverty level (U.S. Census 2015-2019 American Community Survey).
- Block Group 3 is on the west side of the city, bordered by Highway 162 to the south, County Road 48 to the north, and Pacific Avenue to the east. An estimated 204 households live below the poverty level (U.S. Census 2015-2019 American Community Survey).
- Block Group 4 is on the west side of the city, bordered by County Road 53 to the south, Highway 162 to the north, and Villa Avenue to the east. An estimated 395 households live below the poverty level (U.S. Census 2015-2019 American Community Survey).

Block Groups 1, 3, and 4 combined have 797 of the total 1,152 households (69.2%) that live below the

poverty level in Census Tract 104. On its own, Block Group 4 has over a third of the total households in Census Tract 104 that live below the poverty level. Moreover, 38.3% of the households that live in Block Group 4 live below the poverty level, a larger proportion than any other block group in Census Tract 104 (U.S. Census 2015-2019 American Community Survey).

Census Tract 104 by Block Group, Number of Households Below Poverty Level, 2019



People of Color

As illustrated in the table “**City of Willows, Race and Ethnicity, 2019**” about half of Willows’ residents identify as White. The racial or ethnic groups with the next largest percentages are Hispanic/Latino at about one-third of the total population and Asian at about 10% of the total population. Therefore, when analyzing geographic concentration of people of color, this report focuses on Hispanic/Latino and Asian residents.

The map “**Census Tract 104 by Block Group, Number of Hispanic and Latino Residents, 2019**” depicts the number of Hispanic/Latino residents of any race in Census Tract 104 by block group. As of 2019, Census Tract 104 has 2,385 residents that identify as Hispanic/Latino. Block Group 6 in the southcentral part of the City just south of Sycamore Park has the fewest number of Hispanic/Latino residents (16) (U.S. Census 2015-2019 American Community Survey). The block groups with the highest number of Hispanic/Latino residents (408-676) are:

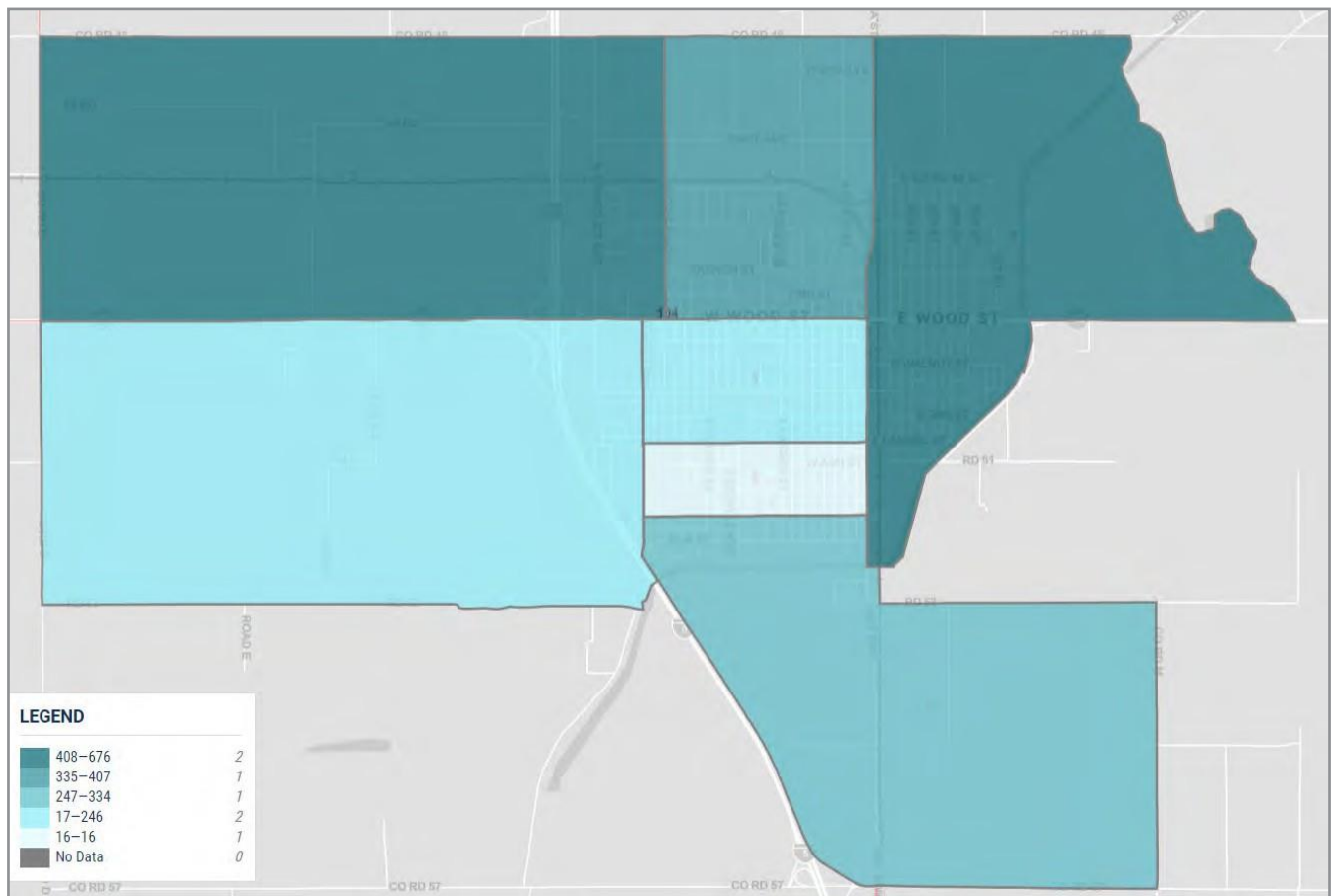
- Block Group 1 is on the northeast side of the city, bordered by County Road 53 to the south, County Road 48 to the north, and Tehama Street to the west. An estimated 676 residents are

Hispanic/Latino (U.S. Census 2015-2019 American Community Survey).

- Block Group 3 is on the west side of the city, bordered by Highway 162 to the south, County Road 48 to the north, and Pacific Avenue to the east. An estimated 517 residents are Hispanic/Latino (U.S. Census 2015-2019 American Community Survey).

Block Groups 1 and 3 combined have 1,193 of the 2,385 residents (50.0%) that identify as Hispanic/Latino in Census Tract 104. On its own, Block Group 1 has 28.3% of Census Tract 104's Hispanic/Latino residents. In addition, 58.3% of residents that live in Block Group 7 in the south/southeastern part of the city are Hispanic/Latino, a larger proportion than any other Block Group in Census Tract 104 (U.S. Census 2015-2019 American Community Survey).

Census Tract 104 by Block Group, Number of Hispanic and Latino Residents, 2019



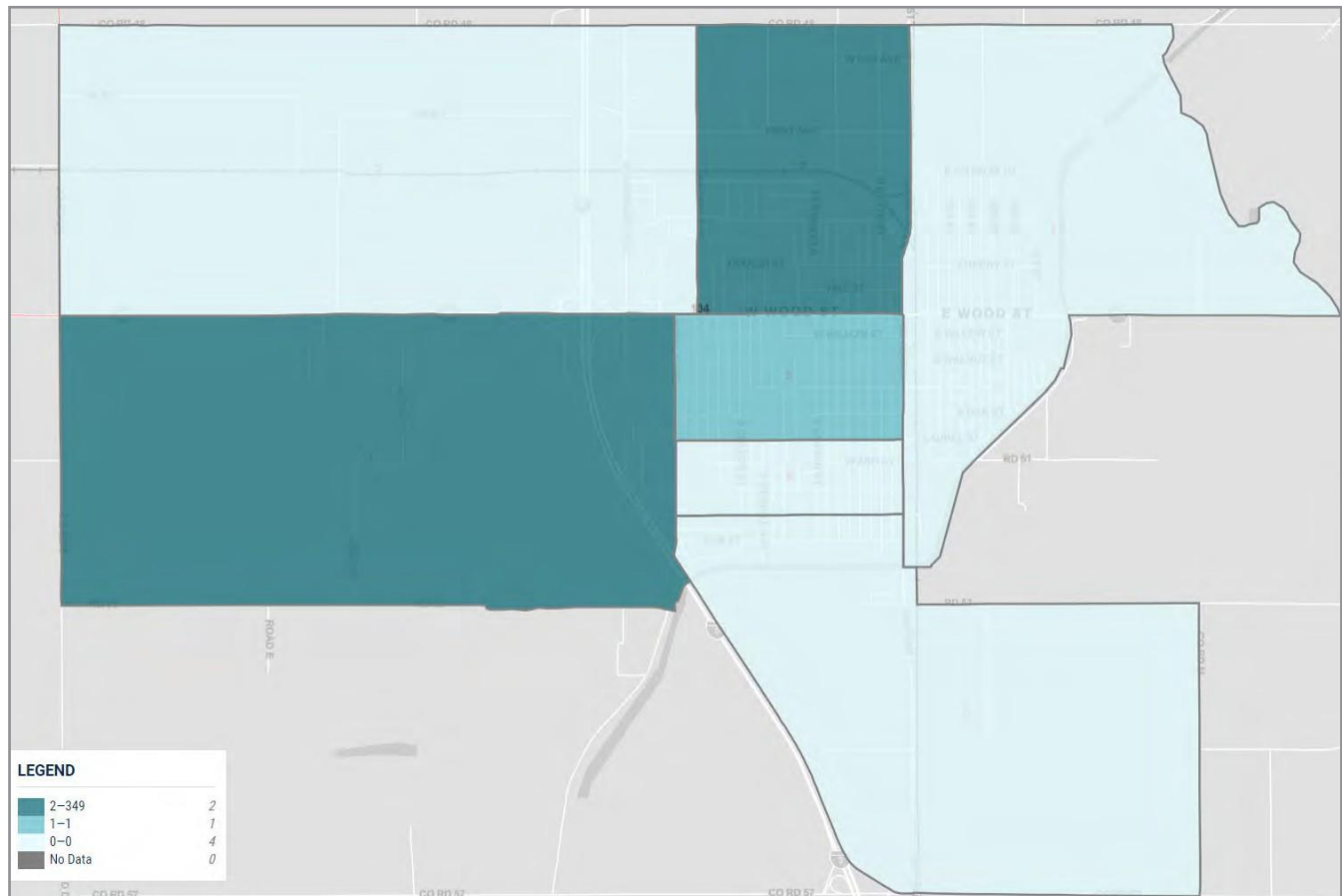
The map “**Census Tract 104 by Block Group, Number of Asian Residents (not Hispanic nor Latino), 2019**” depicts the number of Asian residents who do not identify as Hispanic or Latino in Census Tract 104 by block group. As of 2019, Census Tract 104 has 598 residents that identify as Asian. Block Groups 1, 3, 6, and 7 do not have any Asian residents and Block Group 5 has one Asian resident (U.S. Census 2015-2019 American Community Survey). The block groups with the highest number of Asian residents (2-349) are:

- Block Group 2 is the northcentral part of the city bordered by Wood Street to the south, County Road 48 to the north, Pacific Avenue to the west, and North Tehama Street to the east. An estimated 349 residents are Asian (U.S. Census 2015-2019 American Community Survey).
- Block Group 4 is on the west side of the city, bordered by County Road 53 to the south,

Highway 162 to the north, and Villa Avenue to the east. An estimated 248 residents are Asian (U.S. Census 2015-2019 American Community Survey).

Block Groups 2 and 4 combined have 597 of the 598 residents (99.8%) that identify as Asian in Census Tract 104. On its own, Block Group 2 has 58.4% of Census Tract 104's Asian residents. In addition, 24.0% of residents that live in Block Group 4 are Asian, a larger proportion than any other block group in Census Tract 104 (U.S. Census 2015-2019 American Community Survey).

Census Tract 104 by Block Group, Number of Asian Residents (not Hispanic nor Latino), 2019

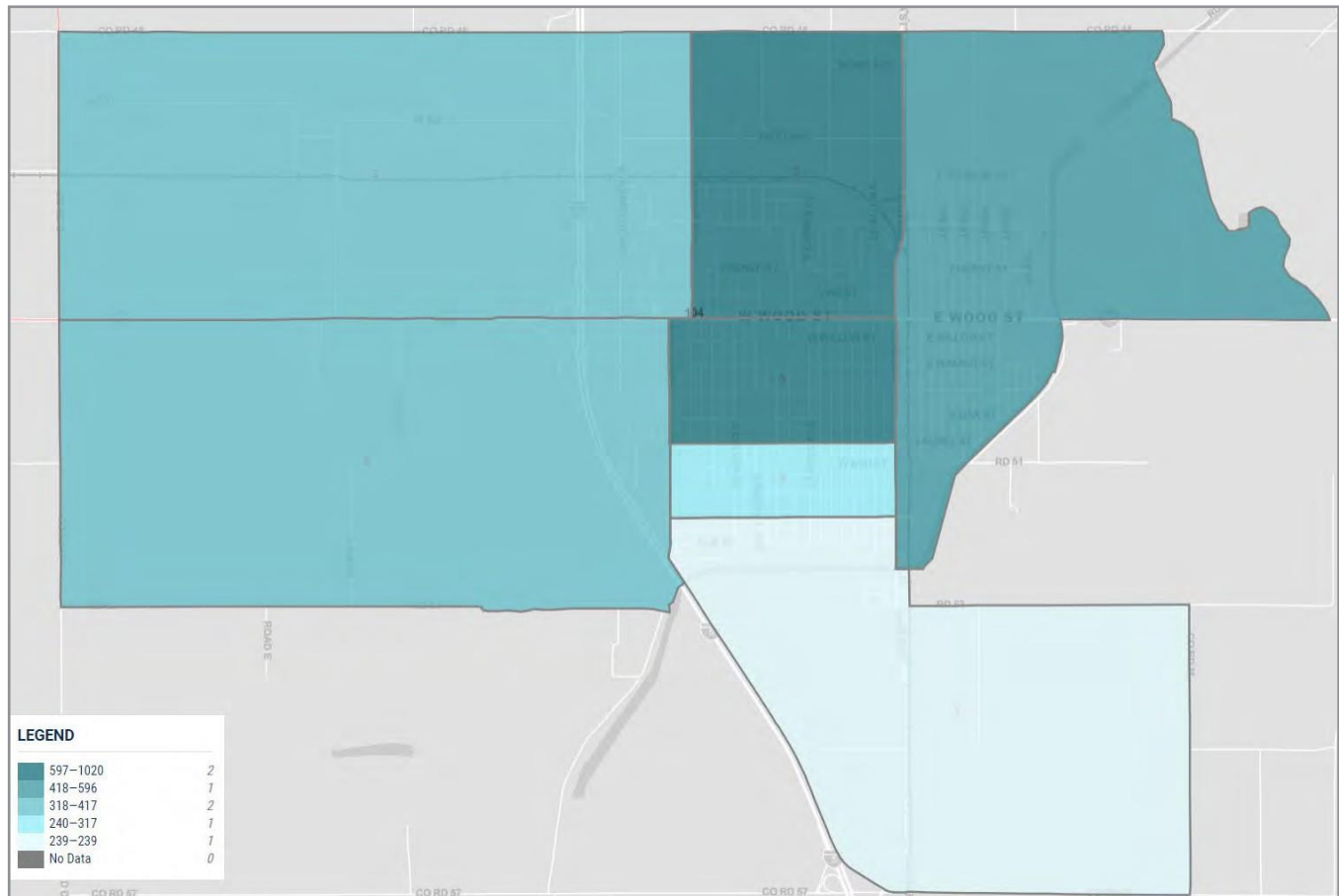


For context, this report also includes information about the number of White residents in Census Tract 104. The map, "**Census Tract 104 by Block Group, Number of White Residents (not Hispanic nor Latino), 2019**" depicts the number of White residents who do not identify as Hispanic or Latino in Census Tract 104 by block group. As of 2019, Census Tract 104 has 3,650 residents that identify as White. The block groups with the fewest number of White residents are Block Group 7 (239) and Block Group 6 (317) (U.S. Census 2015-2019 American Community Survey). The block groups with the highest number of White residents (597-1,020) are:

- Block Group 2 is the northcentral part of the city bordered by Wood Street to the south, County Road 48 to the north, Pacific Avenue to the west, and North Tehama Street to the east. An estimated 1,020 residents are White (U.S. Census 2015-2019 American Community Survey).
- Block Group 5 is the central part of the city bordered by W Laurel Street to the south, Wood Street to the north, Villa Avenue to the west, and Tehama Street to the east. An estimated 662 residents are White (U.S. Census 2015-2019 American Community Survey).

Block Group 4 on the west side of the city has the smallest proportion of White residents. An estimated 399 residents of Block Group 4 are White, which is 38.7% of the total 1,021 in Block Group 4. Block Groups 2 and 5 combined have 1,682 of the 3,650 residents (46.1%) that identify as White in Census Tract 104.

Census Tract 104 by Block Group, Number of White Residents (not Hispanic nor Latino), 2019



Affluence

Along with depicting concentrations of low-income households and people of color, the maps depict areas that are affluent and White. Block Group 5 in the central portion of the city has the fewest number of households living below the poverty line in Census Tract 104 - 55 households, 7.0% of the block group. Block Group 5 also has the second largest number of White residents in Census Tract 104 - 662 residents, 68.9% of the block group (U.S. Census, 2015-2019 American Community Survey).

Local Data and Knowledge

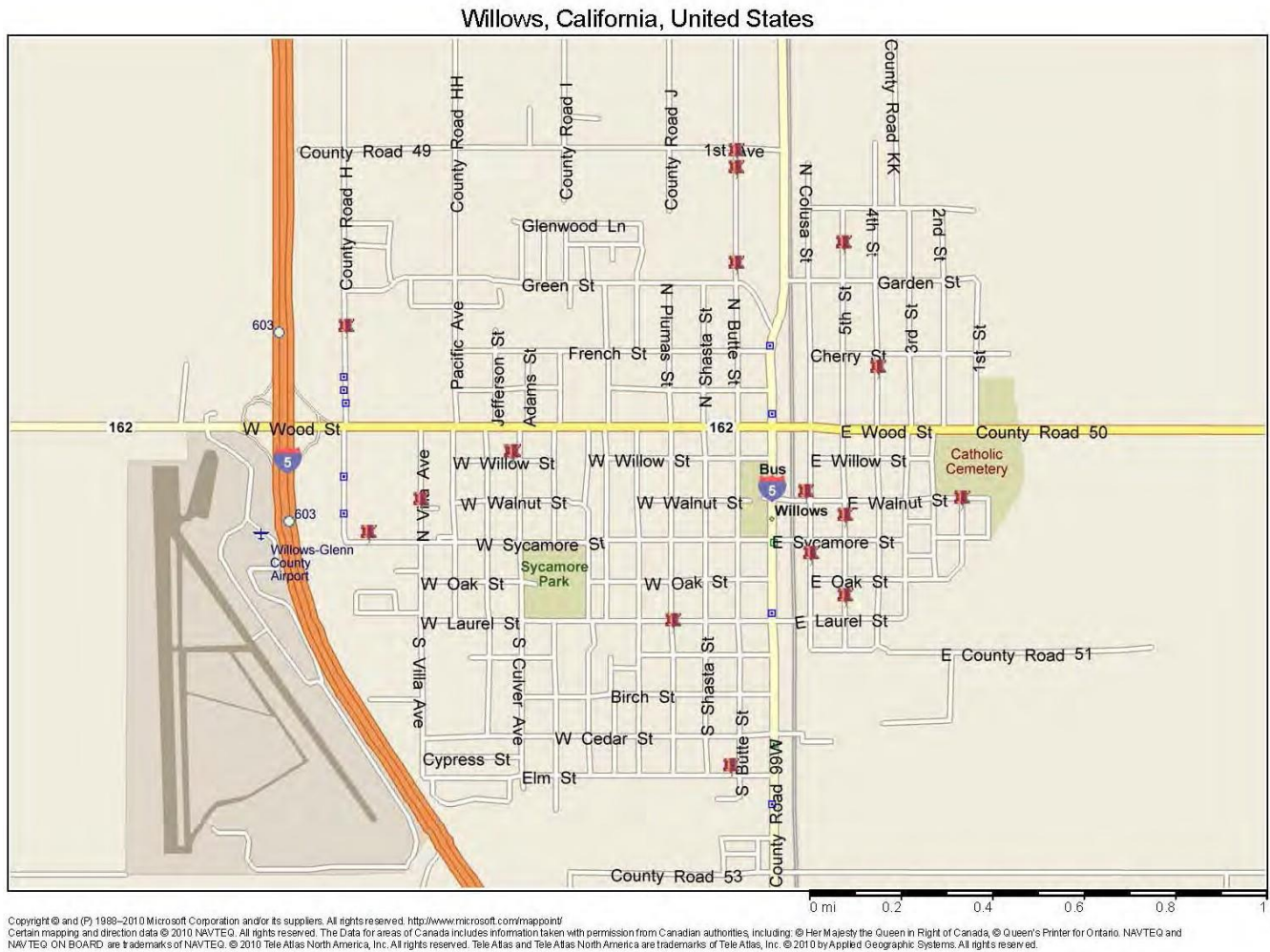
This section provides analysis on affordable housing using local data and knowledge.

Affordable Housing

Twenty-seven (27) households in the City of Willows have a Housing Choice Voucher (HCV) through the Housing Authority of the County of Butte (HACB). HACB provided the map ***“City of Willows, Housing Choice Vouchers, January 2021,”*** which depicts the geographic distribution of HCVs in the City of Willows as of January 2021. When this map is compared to the seven block groups that make up Census Tract 104, there is an uneven distribution of HCVs on the northeast side of town in Block Group

1. With seven block groups and 27 HCVs, an even distribution would be about four HCVs per block group, however, there are seven HCVs in use in Block Group 1. Block Group 1 is on the northeast side of the city, bordered by County Road 53 to the south, County Road 48 to the north, and Tehama Street to the west.

City of Willows, Housing Choice Vouchers, January 2021



The City of Willows has four affordable housing properties: Eskaton Kennedy Manor, Willow Oaks Apartments, Willow Springs Senior Apartments, and Willows Apartments. In addition, a new affordable housing property, Sycamore Ridge Family Apartments, will be completed in 2021. **Table 8 “City of Willows, Affordable Housing Properties by Funding Source and Year, 2021”** details each property, the funding source, and the year it was placed in service.

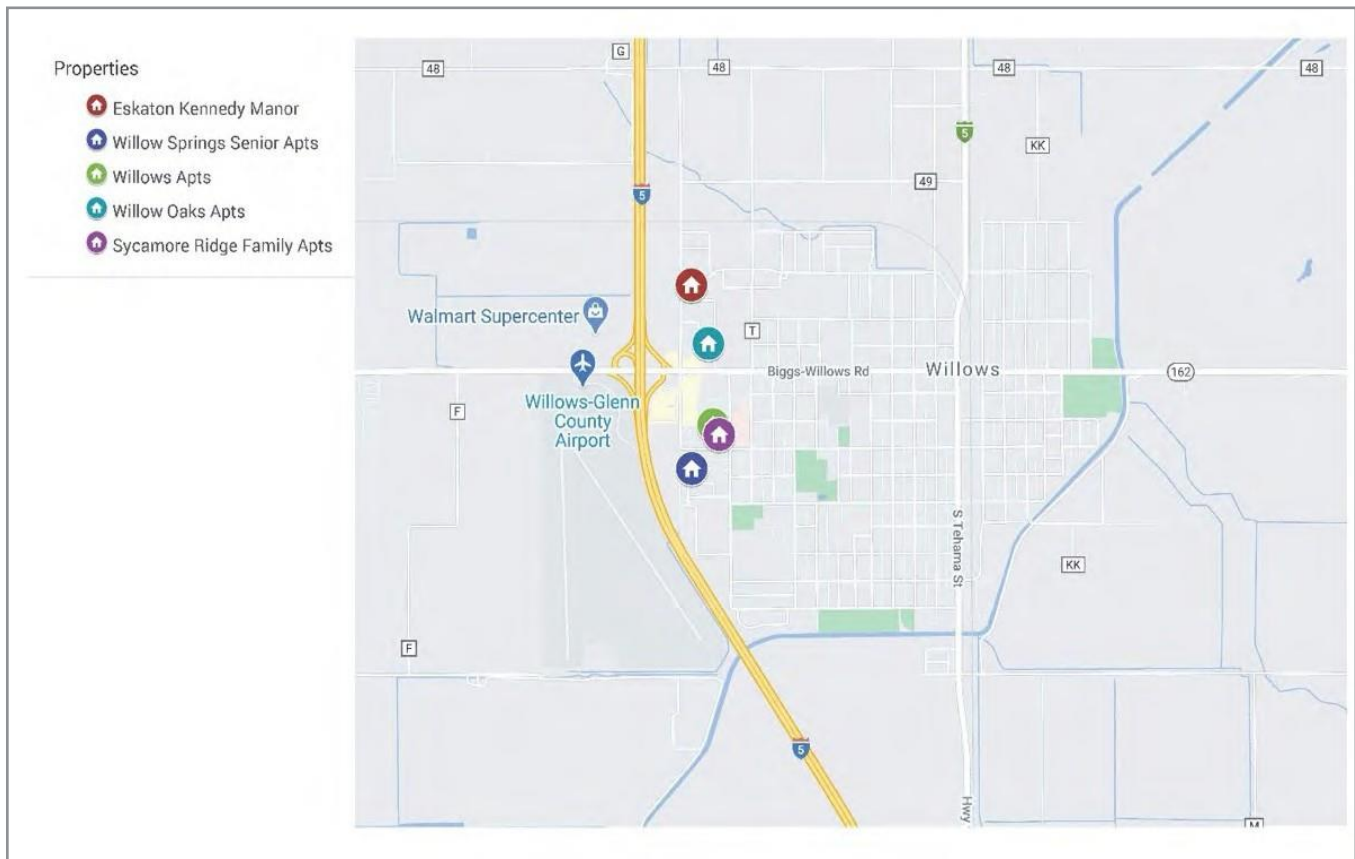
Table 8: City of Willows, Affordable Housing Properties by Funding Source and Year, 2021

Property Name	Address	Funding Source(s)	Year Placed in Service
Eskaton Kennedy Manor	714 N. Humboldt Avenue, Willows, CA 95988	HUD Multifamily	2006
Willow Oaks Apartments	1201 W. Wood Street, Willows, CA 95988	HUD Multifamily, Low-Income Housing Tax Credit (LIHTC), USDA Rural Development - Multi-family	2003
Willow Springs Senior Apartments	1340 W. Sycamore Street, Willows, CA 95988	HOME Investment Partnerships Program (HOME)	2015
Willows Apartments	175 N. Villa Avenue, Willows, CA 95988	USDA Rural Development - Multi-family	1977
Sycamore Ridge Family Apartments	1245 W. Sycamore Street, Willows, CA 95988	HOME Investment Partnerships Program (HOME)	2021

Source: City of Willows 2020, PolicyMap 2021

The map “City of Willows, Affordable Housing Properties, 2021” depicts the approximate location of affordable housing properties in the City of Willows (Policy Map 2021 data on Google Maps).

City of Willows, Affordable Housing Properties, 2021



The administering agencies for the funding sources listed in the table above typically score projects on proximity to amenities such as grocery stores, libraries, medical services, parks, pharmacies, and transit etc. This may be a contributing factor as to why all five affordable housing properties are concentrated on the west side of the City in a commercial/residential area near Interstate-5. Two properties are north of Wood Street and three are south of Wood Street. The two north of Wood Street – Eskaton Kennedy Manor and Willow Oaks Apartments are 0.5 miles apart. The three south of Wood Street – Willows Apartments, Willow Springs Senior Apartments, and Sycamore Ridge Family Apartments are within 0.2 miles of one another. The most northern property, Eskaton Kennedy Manor is 0.6 miles from the most southern property, Willows Springs Senior Apartments. Four of the five properties were placed in service since 2003, which indicates they may have been built in an area of new growth. All five properties are located in Block Groups 3 and 4.

Other Relevant Factors

See **Chapter 4 Housing Needs Assessment** for more information on affordable housing and at-risk units within the current planning period.

Conclusions and Summary of Issues

Based on local and regional patterns and trends, local data and knowledge, and other relevant factors,

the conclusions and summary of issues for racially and ethnically concentrated areas of poverty are as follows. Block Group 1 on the northeast side of the city and Block Groups 3 and 4 on the west side of the city have concentrations of affordable housing, low income households, and people of color.

- **Affordable Housing:** There is a geographic concentration of affordable housing properties on the west side of the City in Block Groups 3 and 4, and a geographic concentration of Housing Choice Vouchers (HCVs) in use on the northeast side of the city in Block Group 1.
- **Low Income Households:** There is a greater number of low-income households on the east and west sides of the city in Block Groups 1, 3, and 4. Block Group 4 has the highest number of low-income households in the city.
- **People of Color:** There are concentrations of Hispanic/Latino residents on the east and west sides of the city in Block Groups 1 and 3. There are concentrations of Asian residents in the northcentral and west parts of the city in Block Groups 2 and 4. Block Group 4 has the smallest proportion of White residents.

Disparities in Access to Opportunity

The fourth section of the Assessment of Fair Housing addresses disparities in access to opportunity. “Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to ‘high resource’ neighborhoods” (California State Department of Housing and Community Development, Affirmatively Furthering Fair Housing, 2021).

Local and Regional Patterns and Trends

Maps, data tables, and narratives were used to analyze local and regional patterns and trends regarding access to opportunity. Measures such as economic, education, environmental scores, job proximity, commuting, and work status were considered.

The map, “***City of Willows, Access to Opportunity, 2021***” depicts block group level data on disparity in access to opportunity in the City of Willows. The California Fair Housing Task Force created an opportunity map to identify regions 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. The map provides composite scores for each block group based on economic scores, education scores, and environmental scores. The map below indicates that four of the seven block groups in Census Tract 104 are low resource areas – Block Groups 1, 5, 6, and 7. Block Groups 2 and 3 are moderate resource areas, and Block Group 4 has insufficient data to make a conclusion (HCD AFFH Data Resources and Mapping Tool: TCAC Opportunity Areas, 2021).

“***Glenn County, TCAC Opportunity Areas – Composite Score Map, 2021***” depicts block group level data on disparity in access to opportunity in Glenn County. The highest resources areas in the County are located around the City of Orland and between Orland and Hamilton City in northeast Glenn County. The area surrounding much of the City of Willows and between Willows and Orland is identified as high resource. Much of the southern half of the County is identified as moderate resource whereas northwest Glenn County is low resource. It is important to note that Glenn County is geographically large and rural with two small cities. Many of the census tracts and block groups cover a significant geographic area. In addition, Mendocino National Forest makes up the west portion of the County (HCD AFFH Data Resources and Mapping Tool: TCAC Opportunity Areas, 2021).

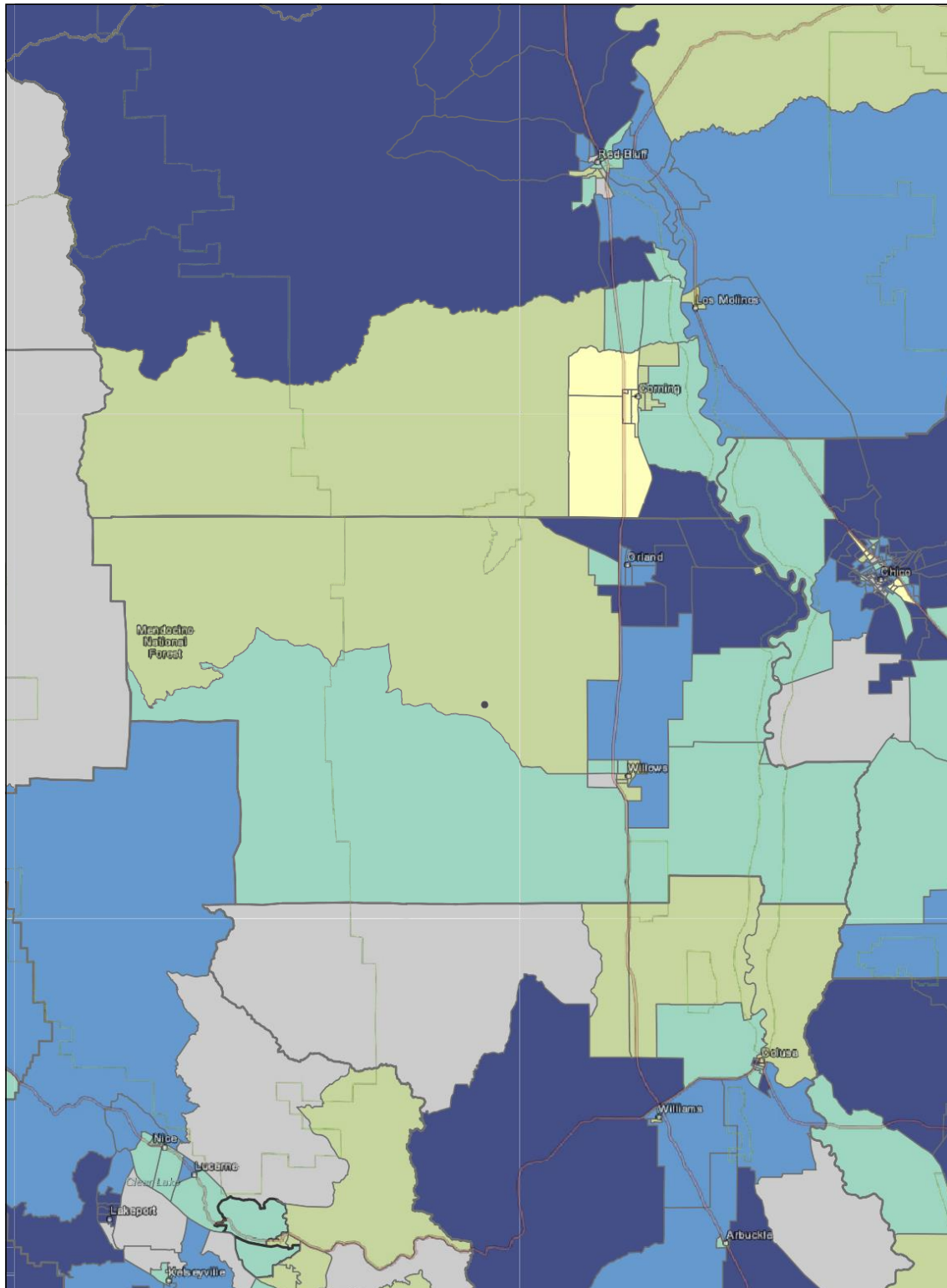
This map displays the city of Willow-Clean, California, and its surrounding regions. The city boundary is outlined in black. Major roads shown include County Road 48, County Road 43, County Road 57, County Road M, and Highway 162. The Willow-Clean County Airport is located to the west of the city. The Catholic Cemetery is situated to the east of the city. The map also shows the Willows area and Jensen Park. The background is color-coded by region: light green for the north and west, light blue for the east, and light yellow for the south and center.

0 0.3 0.6 1.2 mi

0 0.5 1 2 km

1:36,112

Glenn County, TCAC Opportunity Areas – Composite Score Map, 2021



4/19/2022, 10:13:43 AM

County Boundaries

(R) TCAC Opportunity Areas (2021) - Composite Score - Tract

Highest Resource

High Resource



Moderate Resource

Low Resource

High Segregation & Poverty



Moderate

1:577,791

0 5 10 20 mi
0 5 10 20 km

Resource (Rapidly Changing) Missing/Insufficient Data

Education

“Glenn County, TCAC Opportunity Areas – Education Score Map, 2021” depicts block group level data in Glenn County based on education scores. Education scores are calculated by data indicators of math proficiency, reading proficiency, high school graduation rates and student poverty rates from the 2018-2019 California Department of Education. How data indicators are measured is as follows:

- Math Proficiency: Percentage of 4th graders who meet or exceed math proficiency standards
- Reading Proficiency: Percentage of 4th graders who meet or exceed literacy standards
- High School Graduation Rates: Percentage of high school cohort that graduated on time
- Student Poverty Rate: Percentage of students not receiving free or reduced-price lunch

Scores based on these indicators range from less positive education outcome to more positive education outcome. Northeast Glenn County near the City of Orland and Hamilton City, and southwest Glenn County west of Willows are identified as “more positive education outcome.” The City of Willows and surrounding areas, and northwest Glenn County are identified as “less positive education outcome” (*HCD AFFH Data Resources and Mapping Tool: 2021 TCAC*).

HCD guidance for the Assessment of Fair Housing: Disparities in Access to Opportunity section calls for data on educational disparities using school performance data from the California Department of Education.

The map **“City of Willows, School Locations, 2022”** depicts the location of schools in Willows as of 2022. The colored icons correspond with the map legend (Google Maps, 2022).

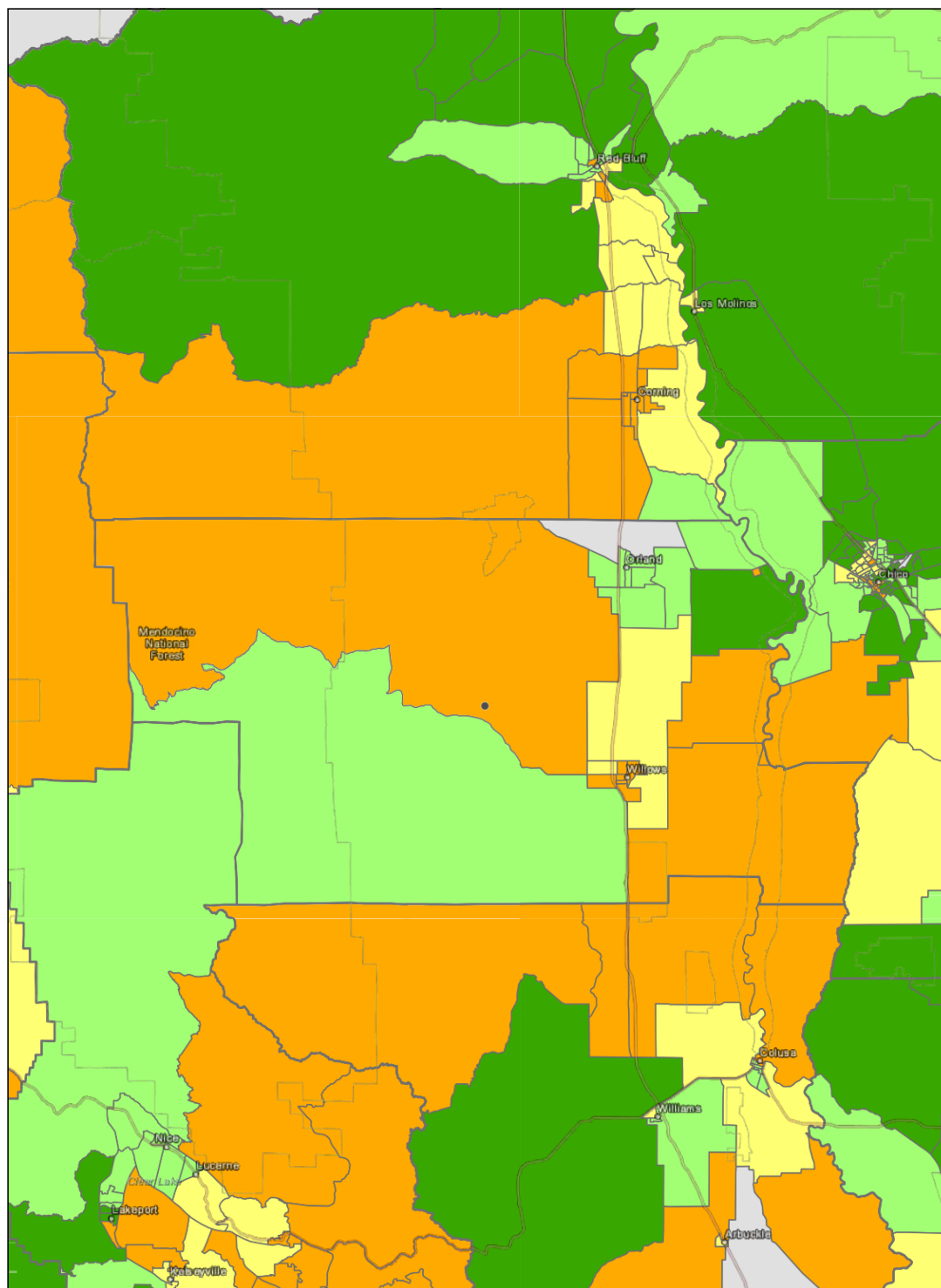
Table 8.1: City of Willows, Performance Level by State Indicator, 2019 shows grades served and performance level on six state indicators for Willows Unified School District and Glenn County Office of Education as well as each school within Willows. The most recent available data is from 2019. The six state indicators are as follows: chronic absenteeism, suspension rate, graduation rate, college/ career, and academic (which includes performance in English language arts/literacy and mathematics). Performance for these measures is based on current year results and whether results improved from the prior year. Performance on state measures, using comparable statewide data, is represented by one of five colors. The performance level (color) is not included when there are fewer than 30 students in any year (i.e., N/A). The order of colors from highest performance to lowest performance is as follows:

- Blue (highest performance)
- Green
- Yellow
- Orange
- Red (lowest performance)

(*California Department of Education, California School Dashboard, 2019*).

When using the locations of the schools from **“City of Willows, School Locations, 2022”** and performance levels of the schools from Table 8.1, the authors can then compare to **“City of Willows, Access to Opportunity, 2021”** to conduct an analysis on educational disparities as it relates to access to opportunity. **“City of Willows, Access to Opportunity, 2021”** depicts block level data on access to opportunity in the City of Willows based on composite scores of economic, education, and environmental scores.

Glenn County, TCAC Opportunity Areas – Education Score Map, 2021



4/19/2022, 10:16:28 AM

County Boundaries

(R) TCAC Opportunity Areas (2021) - Education Score -Tract

< 0.25 (Less Positive Education Outcomes)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Education Outcomes)

No Data

1:577,791

0 5 10 20 mi

0 5 10 20 km

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City of Willows, School Locations, 2022

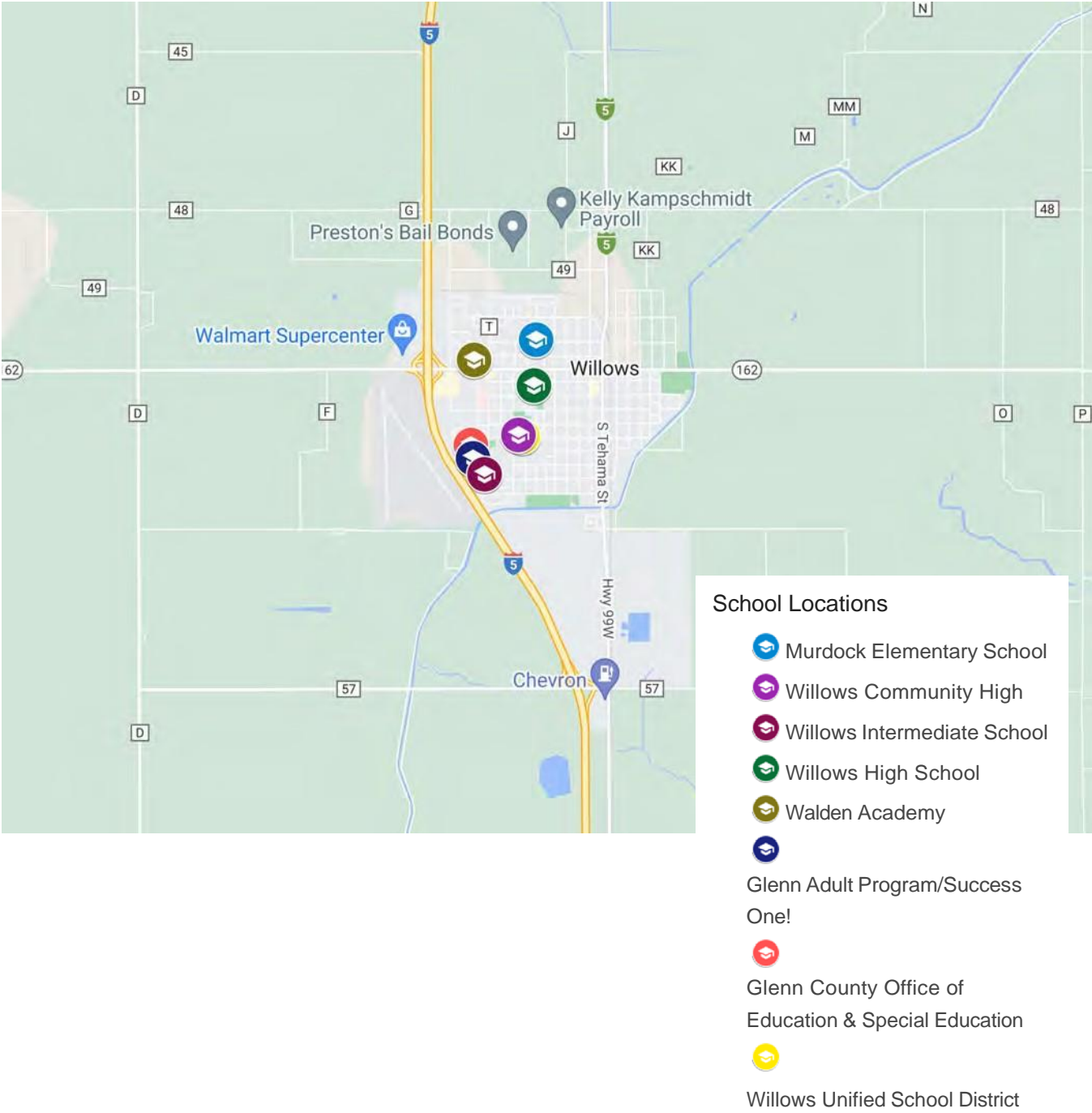


Table 8.1: City of Willows, School Performance Level by State Indicator, 2019

SCHOOL NAME	Grades Served	Chronic Absenteeism	Suspension Rate	English Learner Progress	Graduation Rate	College/ Career	English/ Language Arts	Mathematics
Murdock Elementary	K-5	Orange	Green	N/A	N/A	N/A	Orange	Orange
Willows Community High	10-12	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Willows Intermediate	6-8	Red	Yellow	N/A	N/A	N/A	Yellow	Yellow
Willows High	9-12	N/A	Orange	N/A	Yellow	Orange	Yellow	Orange
Walden Academy	K-8	Red	Orange	N/A	N/A	N/A	Orange	Orange
Glenn Adult Program/Success One!	Adult	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Glenn County Office of Education	K-Adult	Orange	Red	N/A	N/A	N/A	N/A	N/A
Glenn County Special Education	K-12	Orange	Red	N/A	N/A	N/A	N/A	N/A
Willows Unified	K-12	Orange	Yellow	N/A	Orange	Orange	Yellow	Orange

There are no “high resource” areas as defined by TCAC within the city limits of Willows. When comparing school locations and access to opportunity maps, the schools that are located in “moderate resource” areas as defined by TCAC are Murdock Elementary and Walden Academy. Murdock Elementary has low performance for chronic absenteeism, English language arts, and mathematics, and high performance for suspension rate. Walden Academy has low performance for chronic absenteeism, suspension rate, English language arts, and mathematics.

When comparing school locations and access to opportunity maps, the remaining schools are located in “low resource” areas, or “missing/insufficient data” areas as defined by TCAC. These schools include Willows Community High, Willows Intermediate, Willows High, Glenn Adult Program/Success One!, Glenn County Office of Education, Glenn County Special Education, and Willows Unified. All of these schools have average to low performance on all indicators.

From this analysis, there does not appear to be significant educational disparities that correlate to access to opportunity as defined by TCAC. As shown in Table 8.1, most of data for state educational indicators is not available for the schools. Most schools have average to low performance for state indicators with data available. Murdock Elementary is the only school to achieve high performance for one indicator: suspension rate. Murdock Elementary is located in a “moderate resource” area as defined by TCAC, however, due to the small number of schools and lacking data for those schools, there are no findings for significant educational disparities in the City of Willows.

Transportation

The City of Willows is served by Glenn Ride, an affordable public transportation system. Glenn Ride has seven round trips every weekday and three round trips on Saturday from Willows to Chico with enroute service to Artois, Orland, and Hamilton City. All buses are equipped with accessible lifts and bicycle racks. There are 11 bus stop locations in Willows (Glenn County, Public Transit & Transportation, 2021).

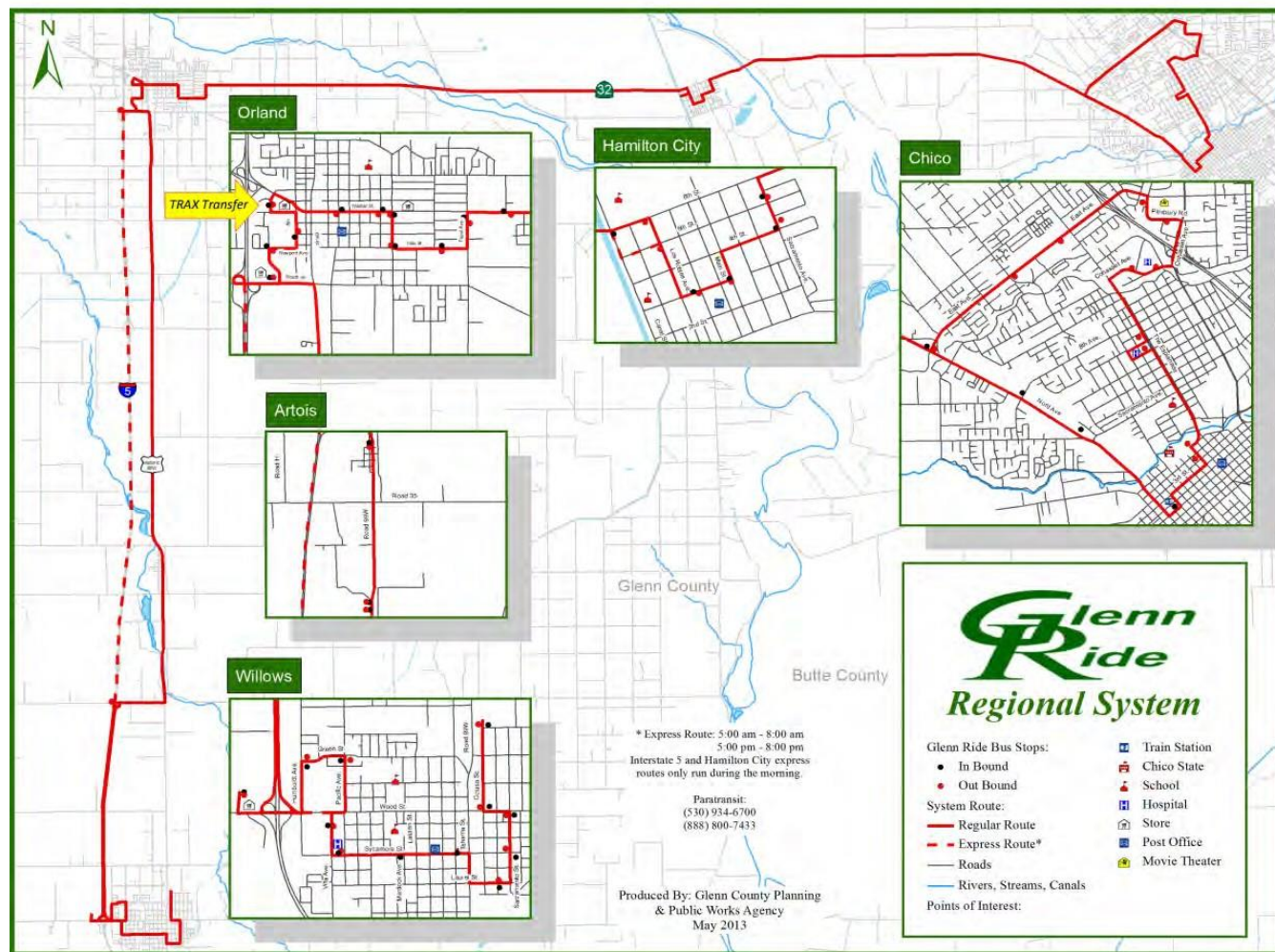
“Glenn Ride Regional System, Bus Stops and Routes Map, 2019” depicts the bus stops and routes for the Glenn Ride Regional System as of 2019. This is the most recent map available. The cities of Chico, Orland, and Willows as well as the communities of Hamilton City and Artois are depicted on the map. Willows is a small city of approximately 6,000 people and comprised of one census tract. The 11 bus stops in Willows are located both east and west of Interstate-5, north and south of the main thoroughfare Wood Street, and east and west of another main road, Tehama Street. The bus stops are located throughout the city, covering most neighborhoods. The neighborhoods to the very north (“moderate resource” as defined by TCAC) and very south (“low resource” as defined by TCAC) of the city do not have bus stop locations (*Glenn County, Glenn Ride Bus Schedule, 2019*).

When comparing to the map ***“City of Willows, Access to Opportunity, 2021,”*** bus stop locations can be found in “moderate resource,” “low resource,” and “missing/insufficient” data areas as defined by TCAC. There are no “high resource” areas in the city as defined by TCAC.

Local knowledge on transportation was provided via email on April 28, 2022, for the Housing Element from the City of Willows staff. City staff noted that the Glenn Ride bus transportation system makes available a variety of programs to Glenn County residents, including programs designed to meet the needs of the general public, and those with special transportation needs.

Transportation assistance such as Dial-A-Ride Service and Volunteer Medical Transport are special service programs for Glenn County residents. Users of the special service programs must be eligible for a transit service card. Eligibility criteria include seniors 60 years of age or older, permanent disability, low income individual receiving social service assistance or low income non-assisted (based on current federal poverty income guidelines). Users of the Glenn Ride fixed route transit system may request deviations, within Glenn County, from the regular route for up to three quarters of a mile, assuming reasonable accessibility for the vehicle.

Glenn Ride Regional System, Bus Stops and Routes Map, 2019



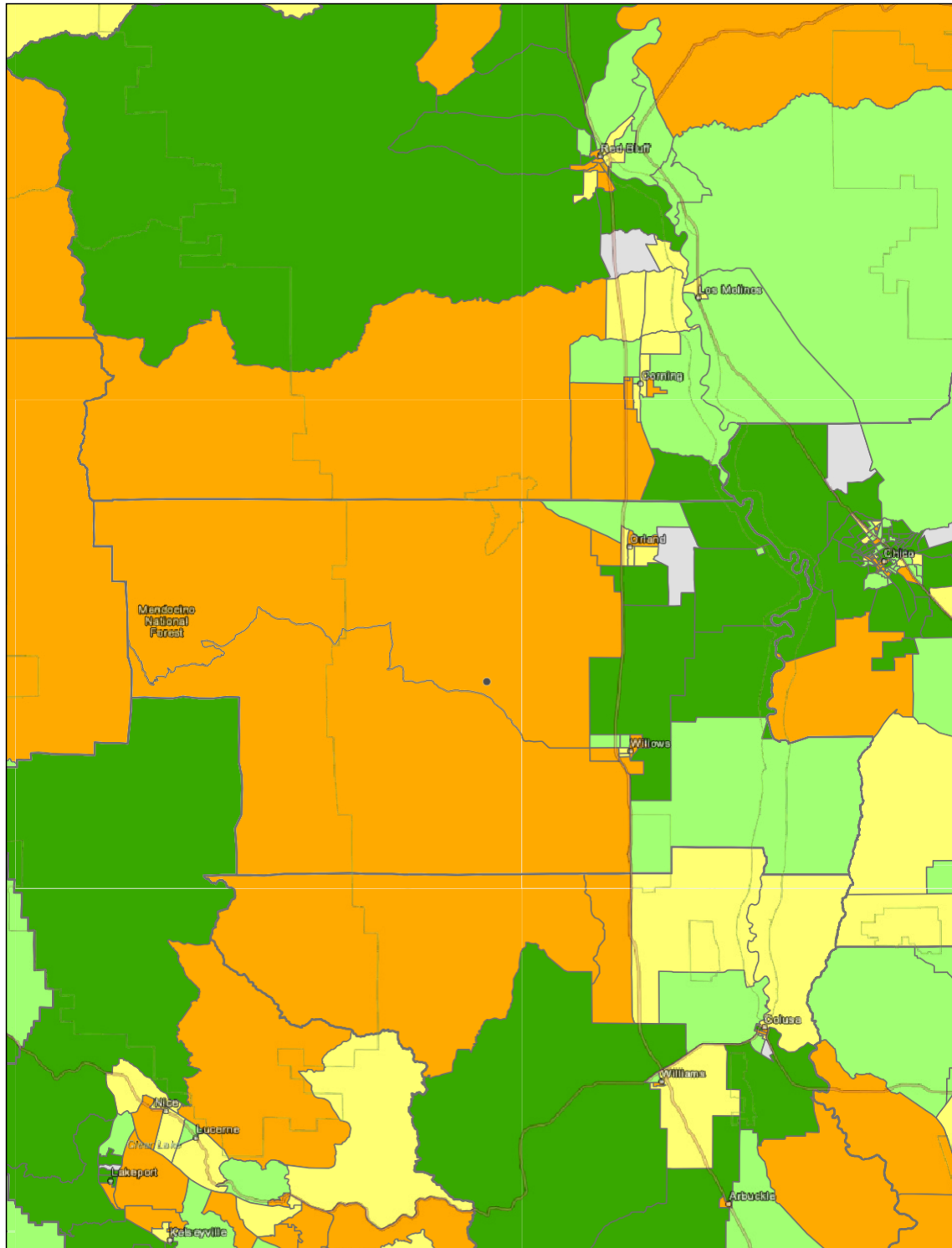
Economics

“Glenn County, TCAC Opportunity Areas – Economic Score Map, 2021” depicts block group level data in Glenn County based on economic scores. Economic scores are calculated by data indicators of poverty, adult education, employment, job proximity, and median home value found in the U.S. Census 2014-2018 American Community Survey and the U.S. Census 2017 Longitudinal Employer-Household Dynamics. How the various data indicators are measured is as follows:

- Poverty: Percentage of population with income above 200% of federal poverty line
- Adult Education: Percentage of adults with a bachelor’s degree or above
- Employment: Percentage of adults aged 20-64 who are employed in the civilian labor force or the armed forces
- Job Proximity: Number of jobs filled by workers with less than a bachelor’s degree that fall within a given radius (determined by the typical commute distance of low-wage workers in each region) of each census tract population-weighted centroid
- Median Home Value: Median value of owner-occupied homes

Scores based on these indicators range from less positive economic outcome to more positive economic outcome. Generally, the areas of Glenn County near Interstate-5 and east of Interstate-5 are identified of “more positive economic outcome,” whereas the areas of Glenn County west of Interstate-5 are identified as “less positive economic outcome.” West Glenn County is more rural and remote and less populated, with Mendocino National Forest making up the very west portion. East Glenn County includes the population centers of Orland, Willows, Hamilton City, and Artois, as well as significant agricultural land. The majority of the block groups within the city limits of Orland and Willows also are identified as “less positive economic outcome” (*HCD AFFH Data Resources and Mapping Tool: 2021 TCAC*).

Glenn County, TCAC Opportunity Areas - Economic Score Map, 2021



4/19/2022, 10:15:24 AM

County Boundaries

(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

< 0.25 (Less Positive Economic Outcome)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Economic Outcome)

No Data

1:577,791

0 5 10 20 mi

0 5 10 20 km

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Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

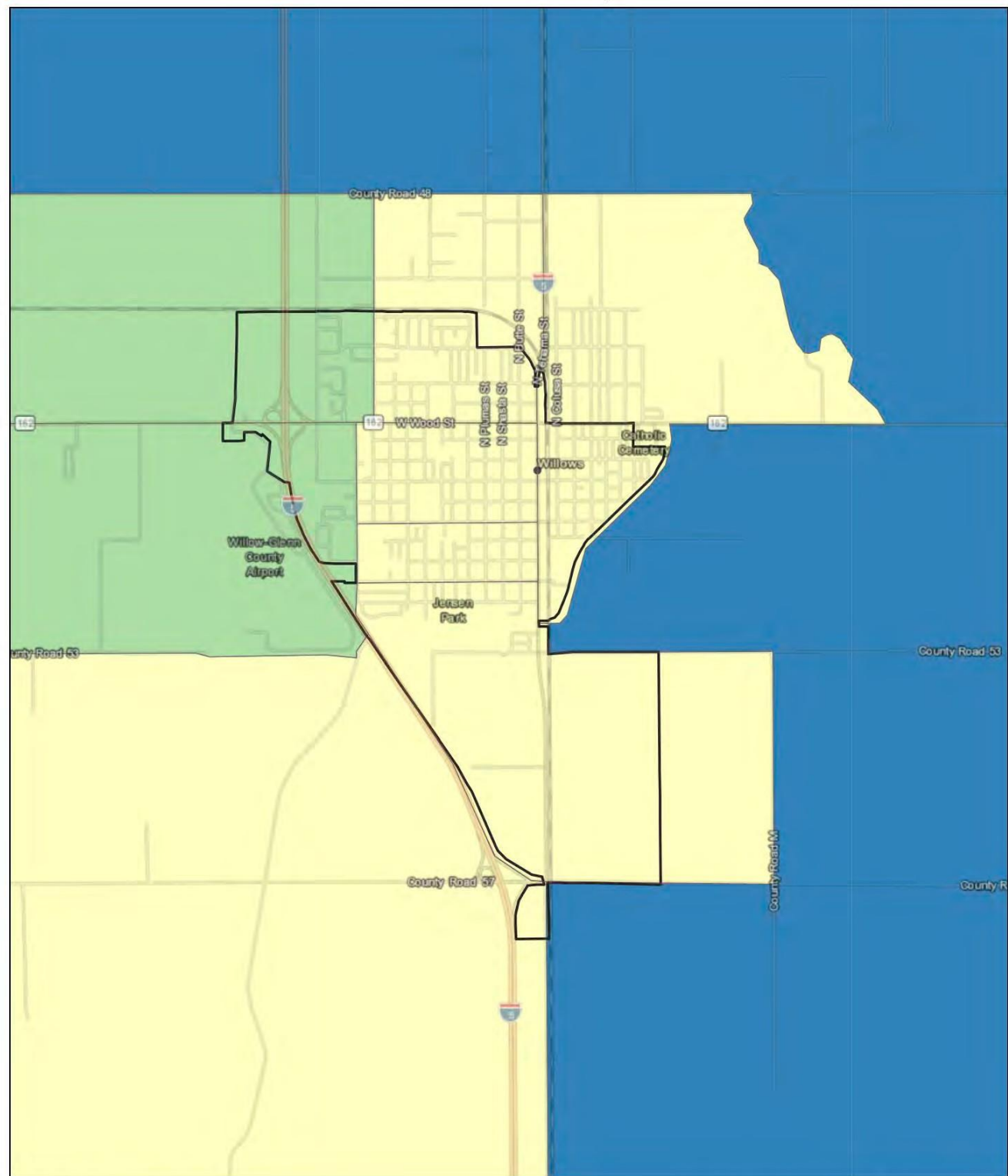
CA HCD

Employment

The map “**City of Willows, Job Proximity Index, 2017**” depicts block group data on residents’ proximity to jobs in the City of Willows. The Jobs Proximity Index scores the accessibility of a given neighborhood to all job locations within an area. The index weighs the distance to employment centers, the amount of employment opportunities, and the competition for jobs. The map below indicates that most residents in the City of Willows have moderate access to jobs, with index scores ranging between 40-60 for Block Groups 1, 2, 5, 6, and 7. Block Groups 3 and 4 have higher proximity to jobs with scores ranging between 60-80. Those that live closest to the city center appear to have the least access to jobs.

The map “**Glenn County, Job Proximity Index, 2017**” illustrates that nearly half of Glenn County has the closest proximity to jobs with index scores of 80 and higher while the other half has moderate to higher proximity to jobs with index scores ranging between 40-80 (HCD AFFH Data Resources and Mapping Tool: U.S. Department of Housing and Urban Development, 2017). Of note, the block groups that cover unincorporated Glenn County land, especially on the west side of the County, are geographically larger than the block groups closer to the Cities of Orland and Willows. Thus, though a resident may reside in a block group with a high index score, they may still have a significant commute to work.

City of Willows, Job Proximity Index, 2017



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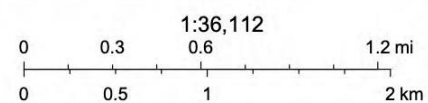
City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

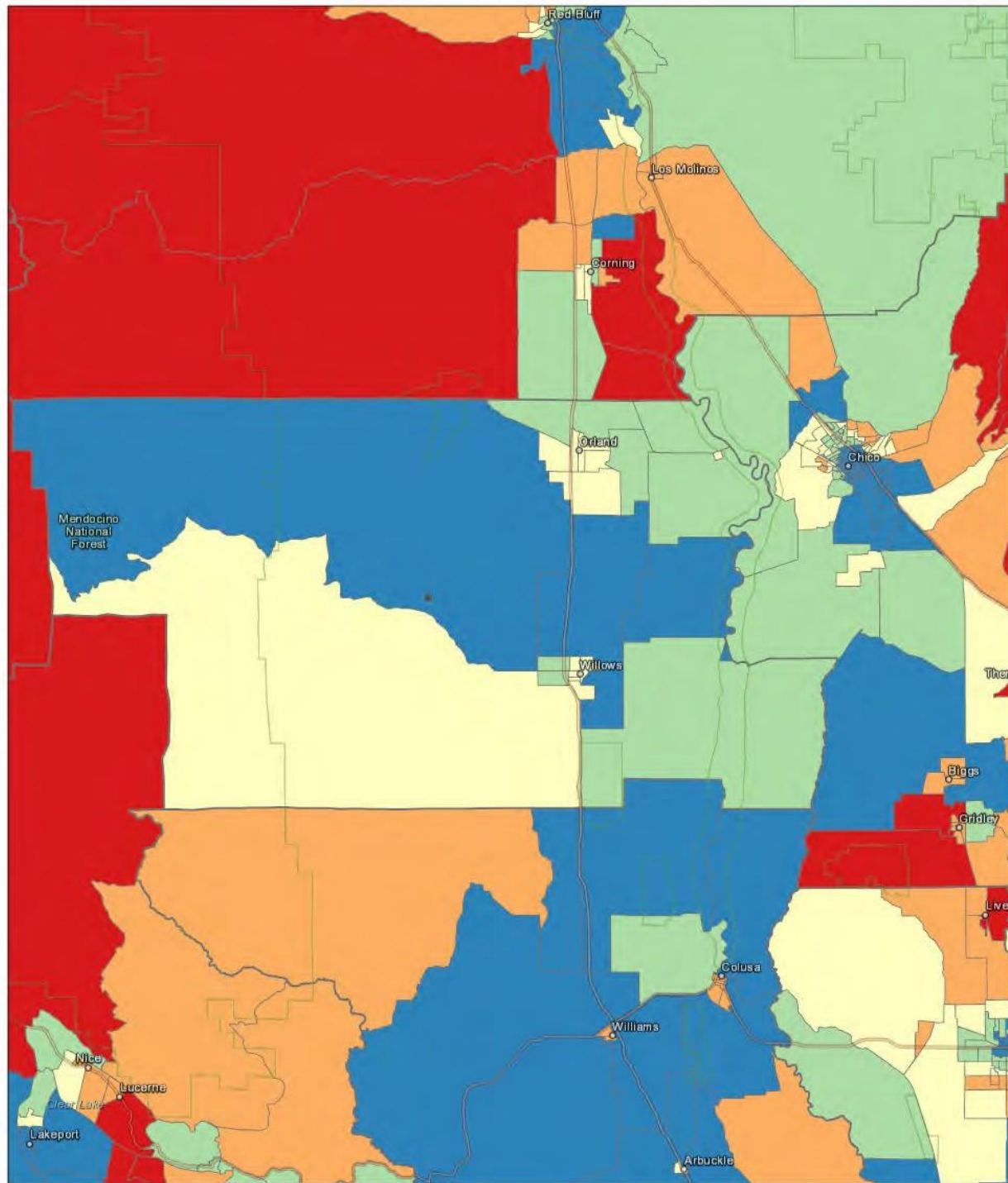
40 - 60

60 - 80

> 80 (Closest Proximity)



Glenn County, Job Proximity Index, 2017



7/1/2021, 4:26:26 PM

County Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

< 20 (Furthest Proximity)

20 - 40

40 - 60

60 - 80

> 80 (Closest Proximity)

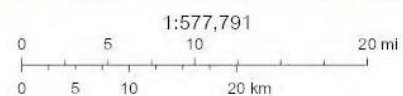


Table 9 “City of Willows and Glenn County, Commuting Data, 2019” depicts data on commuting patterns for residents in the City of Willows and Glenn County in 2019. In both the City of Willows and Glenn County, approximately 80% of the working population drove alone to work. Approximately 14.9% of workers carpooled in the City of Willows, whereas in Glenn County only 10.7% of workers carpooled. The percent of people that worked within their county of residence was significantly higher for the City of Willows than Glenn County (78.8% compared to 68.0% of working residents). Furthermore, a significantly higher portion of Willows residents worked in their place of residence than Glenn County residents (51.4% compared to 20.0%). The mean travel time to work is 15.9 minutes in the City of Willows and 22.2 minutes in Glenn County. Approximately 57.2% of workers in the City of Willows and 41.1% in Glenn County have a commute time of 14 minutes or less. In Glenn County, 46.3% of workers live outside of a city, town, or census-designated place (U.S. Census Bureau, 2015-2019 American Community Survey).

Table 9: City of Willows and Glenn County, Commuting Data, 2019

	City of Willows	Glenn County
WORKERS 16 YEARS AND OVER	2,000	10,994
MEANS OF TRANSPORTATION TO WORK		
Drove alone in a car, truck, or van	79.9%	79.0%
Carpooled	14.9%	10.7%
PLACE OF WORK		
Worked in county of residence	78.8%	68.0%
Worked outside county of residence	21.3%	31.2%
Worked in place of residence	51.4%	20.0%
Worked outside place of residence	48.6%	33.7%
Not living in a city, town, or census-designated place	0.0%	46.3%
TRAVEL TIME TO WORK		
Less than 10 minutes	31.5%	28.0%
10 to 14 minutes	25.7%	13.1%
15 to 19 minutes	7.6%	9.6%
20 to 24 minutes	8.4%	12.7%
25 to 29 minutes	8.3%	5.7%
30 to 34 minutes	7.2%	13.8%
35 to 44 minutes	6.0%	6.7%
45 to 59 minutes	4.6%	6.2%
60 or more minutes	0.7%	4.1%
Mean travel time to work (minutes)	15.9	22.2

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Table 10 “City of Willows and Glenn County, Occupations by Number of Persons and Median Earnings, 2015 and 2019” compares data on occupation and median earnings for the City of Willows and Glenn County from 2015 to 2019. In this case, 2015 data was used instead of 2010 data because it was the oldest dataset available. According to the U.S. Bureau of Labor Statistics, the rate of inflation increased by 7.7% from 2015 to 2019. As of 2019, Willows had 2,139 employed persons over 16 years of age with median earnings of \$27,300. Of the occupations listed in the table below, “management, business, science, and arts occupations” earned the highest median earnings at \$62,546 whereas. “service occupations” earned the lowest at \$16,117. The category with the largest number of persons is “production, transportation, and material moving occupations” with 529 people and median earnings of \$32,019.

From 2015 to 2019, the total civilian employed population 16 years and over in the City of Willows decreased. Median earnings also decreased by \$133 in that same time period. In the City of Willows, median earnings for the civilian population 16 years and over should have increased by \$2,112.34 to account for inflation. In contrast to the City of Willows, Glenn County observed an overall increase in the median earnings of the employed population by \$1,534 and an increase in the amount of employed individuals.

In the City of Willows, all occupations except the “production, transportation, and material moving occupations” experienced decreases in the employed population. “Service occupations” and “natural resources, construction, and maintenance occupations” experienced significant decreases in median earnings of \$7,544 and \$6,002, respectively. However, “management, business, science, and arts occupations,” “sales and office occupations,” and “production, transportation and material moving occupations” experienced significant increases in median earnings of \$6,675, \$13,448, and \$10,384, respectively. In comparison, Glenn County experienced gains in median earnings in all occupations except the “natural resources, construction, and maintenance occupations” and “production, transportation and material moving occupations,” which experienced moderate decreases in median earnings of \$577 and \$655, respectively.

Table 10: City of Willows and Glenn County, Occupations by Number of Persons and Median Earnings, 2015 and 2019

Occupation	City of Willows					Glenn County				
	2015		2019		2015-2019	2015		2019		2015-2019
	Number of Persons	Median Earnings	Number of Persons	Median Earnings	Total Change	Number of Persons	Median Earnings	Number of Persons	Median Earnings	Total Change
Civilian employed population 16 years and over	2,244	\$27,433	2,139	\$27,300	-\$133	10,523	\$27,118	11,279	\$28,652	+\$1,534
Management, business, science, and arts occupations	525	\$55,871	499	\$62,546	+\$6,675	2,300	\$48,842	2,555	\$54,250	+\$5,408
Service occupations	397	\$23,661	387	\$16,117	-\$7,544	2,225	\$14,409	2,090	\$19,662	+\$5,253
Sales and office occupations	554	\$25,652	302	\$39,100	+\$13,448	1,965	\$22,265	1,992	\$27,351	+\$5,086
Natural resources, construction, and maintenance occupations	548	\$25,868	422	\$19,866	-\$6,002	2,597	\$26,556	2,323	\$25,979	-\$577
Production, transportation, and material moving occupations	220	\$21,635	529	\$32,019	+\$10,384	1,436	\$30,117	2,319	\$29,462	-\$655

Source: U.S. Census Bureau, 2011-2015 and 2015-2019 American Community Survey

Table 11 “City of Willows and Glenn County, Work Status in the Past 12 Months by Weeks Worked, 2010 and 2019” compares data on work status for the City of Willows and Glenn County from 2010 to 2019. As of 2019, about 43% of Willows residents ages 16 to 64 worked 50-52 weeks per year, and about 18% worked 39-49 weeks per year. Just under 40% worked half the year or less, including about 28% of residents who did not work.

From 2010 to 2019, employed individuals working 50-52 weeks and 40-49 weeks decreased substantially for the City of Willows and Glenn County by 623 and 505 individuals, respectively. During that same time period, the City of Willows saw an increase in employed individuals who worked 27-39 weeks by 5.1% and a decrease of individuals who did not work by 1.9%. In contrast, Glenn County experienced an increase of individuals who did not work by 3.1%. This data indicates that the number full-time jobs decreased, and the number of part-time jobs increased, in the City of Willows.

Table 11: City of Willows and Glenn County, Work Status in the Past 12 Months by Weeks Worked, 2010 and 2019

Weeks Worked Persons 16-64	City of Willows					Glenn County				
	2010		2019		2010- 2019	2010		2019		2010- 2019
	Number of Persons	Percent	Number of Persons	Percent	Change	Number of Persons	Percent	Number of Persons	Percent	Change
Worked 50 to 52 weeks	2,022	46.4%	1,501	42.9%	-3.5%	8,351	48.0%	8,224	48.5%	+0.5%
Worked 40 to 49 weeks	301	6.9%	199	5.7%	-1.2%	1,461	8.4%	1,083	6.3%	-2.1%
Worked 27 to 39 weeks	296	6.8%	415	11.9%	+5.1%	1,200	6.9%	1,064	6.3%	-0.6%
Worked 14 to 26 weeks	235	5.4%	152	4.3%	-1.1%	678	3.9%	543	3.2%	-0.7%
Worked 1 to 13 weeks	222	5.1%	264	7.5%	+2.4%	1,009	5.8%	939	5.5%	-0.3%
Did not work	1,285	29.5%	967	27.6%	-1.9%	4,697	27.0%	5,094	30.1%	+3.1%

Source: U.S. Census 2006-2010 and 2015-2019 American Community Survey

Table 12 “City of Willows and Glenn County, Work Status in the Past 12 Months by Usual Hours Worked, 2010 and 2019”

compares data on work status for the City of Willows and Glenn County from 2010 to 2019. As of 2019, approximately 58% of Willows residents ages 16 to 64 worked full-time (35 or more hours per week). Approximately 12% worked 15-34 hours per week and about 3% worked 1-14 hours per week. Approximately 28% of residents did not work.

From 2010 to 2019, the number of individuals who worked 35 more hours a week increased by 6.5% for the City of Willows and the number of individuals who worked 15-34 hours per week decreased by 5.6%. A similar data trend is observed in Glenn County.

The findings indicate that individuals are working more hours per a week in both the City of Willows and Glenn County. However, as the previous data table indicates, the number of year-round positions significantly decreased during that period and the number of positions 27-39 weeks a year increased by 5.1% for the City of Willows. This indicates a significant shift in positions from year-round to more seasonal positions. In addition, this trend could indicate an increase in underemployment, or an increase in the number of individuals who have the skills, education, or need to work in year-round positions but do not have access to those opportunities.

Table 12: City of Willows and Glenn County, Work Status in the Past 12 Months by Usual Hours Worked, 2010 and 2019

Hours Worked Persons 16-64	City of Willows					Glenn County				
	2010		2019		2010- 2019	2010		2019		2010- 2019
	Number of Persons	Percent	Number of Persons	Percent	Change	Number of Persons	Percent	Number of Persons	Percent	Change
Usually worked 35 or more hours per week	2,226	51.1%	2,014	57.6%	+6.5%	9,429	54.2%	9,382	55.4%	+1.2%
Usually worked 15 to 34 hours per week	780	17.9%	430	12.3%	-5.6%	2,766	15.9%	1,929	11.4%	-4.5%
Usually worked 1 to 14 hours per week	65	1.5%	87	2.5%	+1.0%	505	2.9%	542	3.2%	+0.3%
Did not work	1,285	29.5%	967	27.6%	-1.9%	4,697	27.0%	5,094	30.1%	+3.1%

Source: U.S. Census 2006-2010 and 2015-2019 American Community Survey

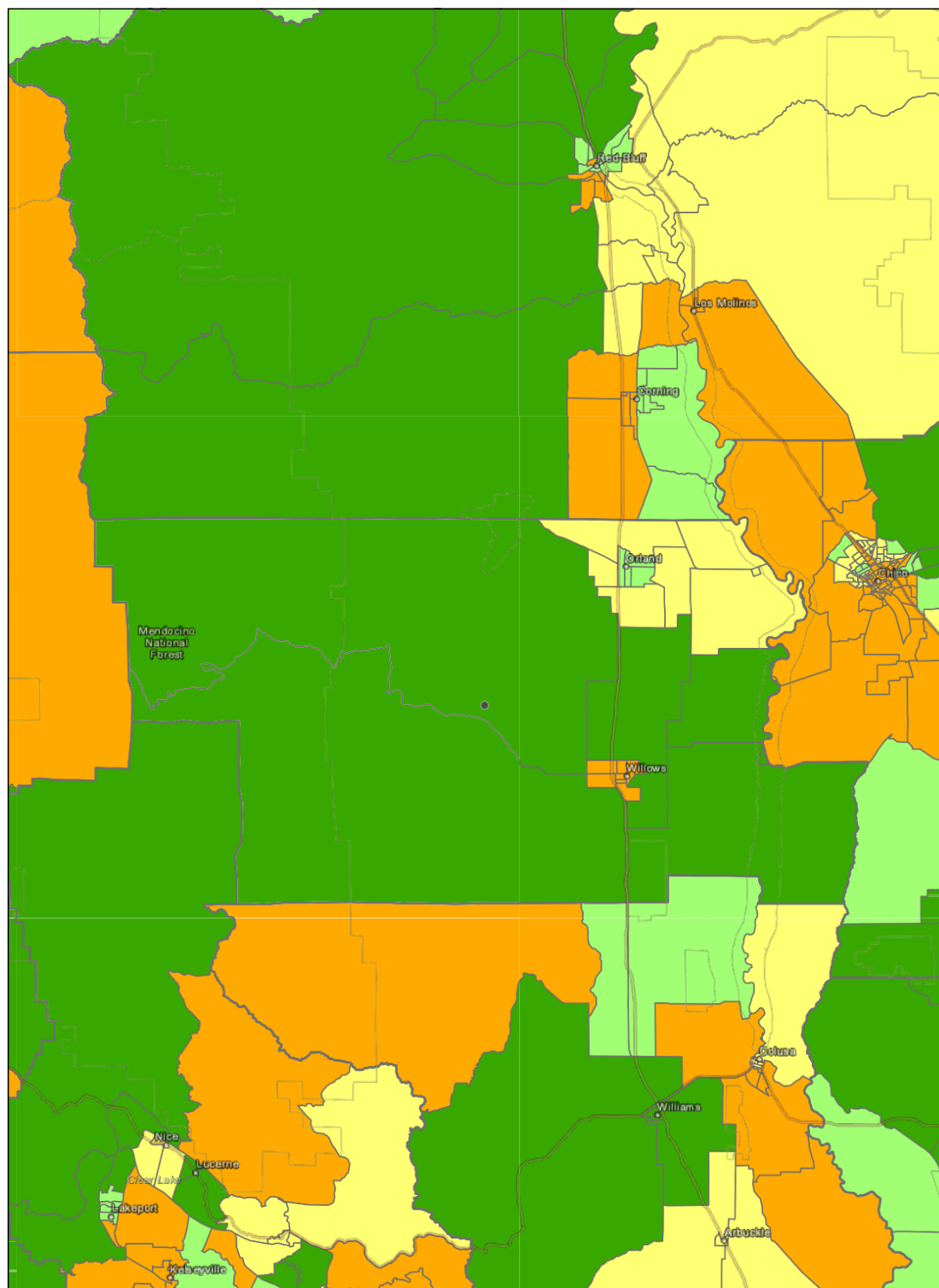
Environment

“Glenn County TCAC Opportunity Areas – Environmental Score Map, 2021” depicts block group level data in the Glenn County based on environmental scores. Environmental scores are calculated by data indicators of pollution, exposure, and environmental effect from CalEnviroScreen 3.0. These data indicators are measured as follows:

- CalEnviroScreen 3.0: Variables include Ozone, PM2.5, Diesel PM, Drinking Water, Pesticides, Toxic Releases, Traffic, Cleanup Sites, Groundwater Threats, Hazardous Waste, Impaired Water Bodies and Solid Waste Sites.

Scores based on these indicators range from less positive environmental outcomes to more positive environmental outcomes. The majority of Glenn County is identified as “more positive environmental outcome.” The City of Willows as well as the areas around the City of Orland and Hamilton City are identified as “less positive environmental outcome” (*HCD AFFH Data Resources and Mapping Tool: 2021 TCAC*).

Glenn County TCAC Opportunity Areas – Environmental Score Map, 2021



4/19/2022, 10:17:10 AM

County Boundaries

(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract

< .25 (Less Positive Environmental Outcomes)

.25 - .50

.50 - .75

.75 - 1 (More Positive Environmental Outcomes)

1:577,791
0 5 10 20 mi
0 5 10 20 km

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community
Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD

Local Data and Knowledge

Local data and knowledge regarding access to opportunity is provided through interviews with the City of Willows and Passages.

City of Willows is the municipal government and provides services to residents including administration, building, community development, fire, library, parks, planning, public works, recreation, and utilities. The Planning Department leads the City's housing activities in concert with the City Manager. In an interview for this report on April 7, 2021, staff commented that recent residential development activity includes subdivisions, senior and multi-family affordable housing, and two motel conversions to apartments. Staff remarked that Willows has a need for additional affordable housing for low-income residents, especially studio and one-bedroom units. Moreover, there were only eight houses available on the for-sale market or about to go on the market on the day of the interview.

The city provided information for this report on April 7, 2021, regarding low-income residents, Hispanic/Latino residents, Hmong/Laotian residents, and residents experiencing homelessness. City residents with low incomes tend to live at Cedar Hills Manor Apartments and Sycamore West Apartments, and Hispanic/Latino and Hmong/Laotian residents tend to live at Cedar Hills Manor Apartments and neighborhoods in the northcentral part of the city – north of Wood Street, near Green Street and Southgate Drive. Staff noted that about a dozen people experiencing homelessness are living outdoors in an encampment in the southeastern portion of the city and have been contacted by service providers and offered services.

Regarding housing barriers, staff remarked that overcrowding is occurring due to a lack of affordable housing options and is disproportionately affecting Hispanic/Latino and Hmong/Laotian residents. After the 2018 Camp Fire in neighboring Butte County to the east, people migrated to Willows, increasing the need for additional housing units. In the year following the Camp Fire, the City instituted a policy to allow parking of trailers on properties without obtaining a permit, due to the immediate need for housing for fire-displaced persons.

Staff noted gaps in assistance for helping residents, who are precariously housed, find and maintain permanent housing (e.g. utility assistance). In addition, there is a lack of year-round full-time employment opportunities in Willows. Agriculture is a significant portion of the City's economic activity, and many jobs are seasonal, part-time, or extra help on farms, rice fields, walnut orchards, and vineyards. Seasonal work contributes to overcrowding, with the number of people living in a unit fluctuating, depending on the time of year. City staff are partnering with commercial developers to help create more full-time jobs in the area.

Additional local knowledge on access to opportunity throughout the city was provided via email on April 28, 2022, for the Housing Element from the City of Willows staff. This was provided per request by the California State Department of Housing and Community Development (HCD). City staff noted that the location of the parks, schools, and hospital within Willows is safely accessible for residents and users of these amenities and services. The four schools within the city have sidewalks to them, and the city has improved some of these areas through State gas tax funding. There will be two sidewalk/curb/gutter projects underway in 2022 which will aid in providing quality of life access to services, library, and schools in the area of the projects.

Moreover, City of Willows staff provided information on areas of new growth in regard to access to opportunity. The area of Willows near Green Street is referred to as the Willowglen Subdivision and was mapped and developed over a period of time with custom houses. The planning for

this subdivision development for this area has been ongoing since approximately 2003. This infill development resulted in 25 homes constructed. One lot is still vacant, however, a recent development inquiry into this lot will result in this lot being developed. A portion of the Willowglen Subdivision was sold to Community Housing Improvement Program (CHIP). Approximately 12 home sites were developed by CHIP for low-income households. This infill development resulted in adding affordable homes to the area and aided in the city with meeting RHNA numbers.

In addition, staff commented that a nine-acre rezone was approved by the City Council in 2021. This rezone will allow for the combined residential uses in an area of the city that has been planned for residential infill development since the city annexed the property in 1989.

Passages is the local Area Agency on Aging serving caregivers and older adults in Butte, Colusa, Glenn, Plumas, and Tehama Counties. In an interview for this report on February 2, 2021, staff commented that Willows' population of older adults is growing and will continue to do so over the next 20 years due to the Baby Boomer generation reaching their senior years. In general, staff notes that accessible housing such as smaller homes, one-story homes, wide doorways, and grab bars in bathrooms and shower areas, as well as homes in walkable neighborhoods or near public transportation, are beneficial for seniors.

Other Relevant Factors

In correspondence on July 2, 2021, City staff confirmed they have not received any requests for variance of zoning or building code standards to accommodate a person with a disability. See Chapter 6 Constraints Analysis for information on housing for people with disabilities and the City's reasonable accommodation ordinance.

See Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) section in the Assessment of Fair Housing as well as the Affirmatively Furthering Fair Housing analysis of the Site Inventory for narratives on location of affordable housing and concentrations of affordable housing.

Conclusions and Summary of Issues

Based on local and regional patterns and trends, local data and knowledge, and other relevant factors, the conclusions and summary of issues for disparities in access to opportunity is as follows.

- **Access to Opportunity:** For the City of Willows in 2021, four of the seven block groups in Census Tract 104 are low resource areas – Block Groups 1, 5, 6, and 7. Block Groups 2 and 3 are moderate resource areas, and Block Group 4 has insufficient data to make a conclusion. The highest resources areas in Glenn County are located around the City of Orland and between Orland and Hamilton City in northeast Glenn County. The area surrounding much of the City of Willows and between Willows and Orland is identified as high resource. Much of the southern half of the County is identified as moderate resource whereas northwest Glenn County is low resource.
- **Education:** As of 2021, northeast Glenn County near the City of Orland and Hamilton City, and southwest Glenn County west of Willows are identified as "more positive education outcomes." The City of Willows and surrounding areas, and northwest Glenn County are identified as "less positive education outcomes." In addition, when considering disparities within the City of Willows, there does not appear to be significant educational disparities that correlate to access to opportunity as defined by TCAC within the city.

- **Transportation:** There are 11 bus stops in Willows located throughout the city, covering most neighborhoods and main thoroughfares as well as moderate and low resource areas as defined by TCAC. The neighborhoods to the very north (“moderate resource” as defined by TCAC) and very south (“low resource” as defined by TCAC) of the city do not have bus stop locations. There are programs for Glenn County residents designed to meet the needs of the general public and those with special transportation needs.
- **Economics:** As of 2021, the areas of Glenn County near Interstate-5 and east of Interstate-5 are identified as “more positive economic outcome,” whereas the areas of Glenn County west of Interstate-5 are identified as “less positive economic outcome.” The majority of the block groups within the city limits of Orland and Willows also are identified as “less positive economic outcome.”
- **Job Proximity and Commuting:** Most residents in the City of Willows have moderate access to jobs, with index scores ranging between 40-60 for Block Groups 1, 2, 5, 6, and 7. Block Groups 3 and 4 (closest to Interstate 5) have higher proximity to jobs with scores ranging between 60-80.

Those that live closest to the city center appear to have the least access to jobs. A higher percentage of Willows residents worked in either their place or county of residence compared to Glenn County residents overall. The mean travel time to work is 15.9 minutes in the City of Willows and 22.2 minutes in Glenn County.

- **Work Status:** Individuals are working more hours per a week in 2019 compared to 2010 in both the City of Willows and Glenn County. The number of year-round positions significantly decreased during that period and the number of positions 27-39 weeks a year increased by 5.1% for the City of Willows. This indicates a significant shift in positions from year-round to more seasonal positions. In addition, this trend could indicate an increase in underemployment, or an increase in the number of individuals who have the skills, education, or need to work in year-round positions but do not have access to those opportunities.
- **Environment:** As of 2021, the majority of Glenn County is identified as “more positive environmental outcome.” The City of Willows as well as the areas around the City of Orland and Hamilton City, are identified as “less positive environmental outcome.”
- **Stakeholder Input from the City of Willows:** There is a lack of year-round full-time employment opportunities in the city. Agriculture is a significant portion of the city’s economic activity, and many jobs are seasonal, part-time, or extra help. In addition, there are a lack of for-sale housing opportunities in the city. On April 7, 2021, only eight houses were available on the for-sale market or about to go on the market.

In addition, as of April 28, 2022, the location of amenities such as parks, schools, and the hospital are safely accessible to residents. There are improvement projects planned for sidewalks, curbs, and gutters in 2022. Areas of new growth include single-family market-rate, single-family affordable, and multi-family housing.

- **Stakeholder Input from Passages:** Willows’ population of older adults is growing and will continue to do so over the next 20 years due to the Baby Boomer generation reaching their senior years. Accessible housing such as smaller homes, one-story homes, wide doorways, and grab bars in bathrooms and shower areas, as well as homes in walkable neighborhoods or near public transportation are beneficial for seniors.

Disproportionate Housing Needs and Displacement Risk

The fifth and final section of the Assessment of Fair Housing is disproportionate housing needs and displacement risk. A significant portion of this section considers disaster-driven displacement from the 2018 Camp Fire in Butte County, east of Willows. Displacement risk due to cost burden, overcrowding, housing conditions, and homelessness are also considered.

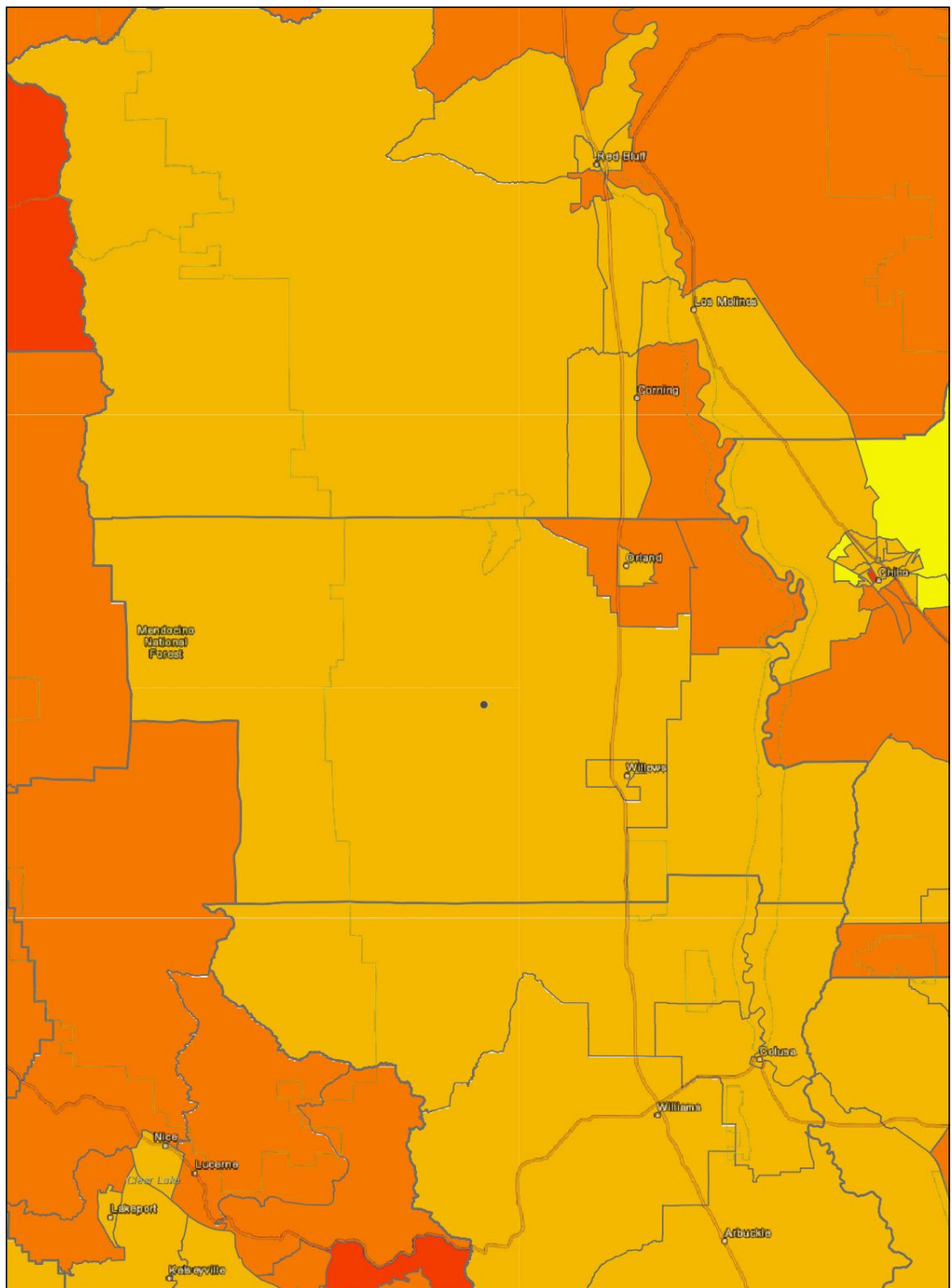
Local and Regional Patterns and Trends

Data on overpayment, overcrowding, vulnerable communities, housing tenure (own versus rent) in the context of race and ethnicity, and Housing Problems provides insight on local and regional patterns and trends for disproportionate housing needs, including displacement risk.

“Glenn County, Overpayment by Owners Map, 2019” depicts the percentage of owner households with mortgages whose monthly owner costs are 30% or more of household income. Household income is based on earnings in the past 12 months prior to the survey. The majority of Glenn County, including the City of Willows, has 20-40% of owner households with overpayment in any given census tract. The census tracts with 40-60% of owner households with overpayment are located surrounding the City of Orland and east to the Butte County border, including the community of Hamilton City. (HCD AFFH Data Resources and Mapping Tool: 2015-2019 American Community Survey).

“Glenn County, Overpayment by Renters Map, 2019” depicts the percentage of renter households for whom gross rent (contract rent plus tenant-paid utilities) is 30% or more of household income. Household income is based on earnings in the past 12 months prior to the survey. The majority of Glenn County has less than 20% of renter households with overpayment in any given census tract. The census tract that includes the community of Hamilton City has 20-40% of renter households with overpayment. The census tracts that make up the Cities of Orland and Willows have 40-60% of renter households with overpayment. (HCD AFFH Data Resources and Mapping Tool: 2015-2019 American Community Survey).

Glenn County, Overpayment by Owners Map, 2019



4/19/2022, 10:20:50 AM

County Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

< 20%

20% - 40%

40% - 60%

60% - 80%

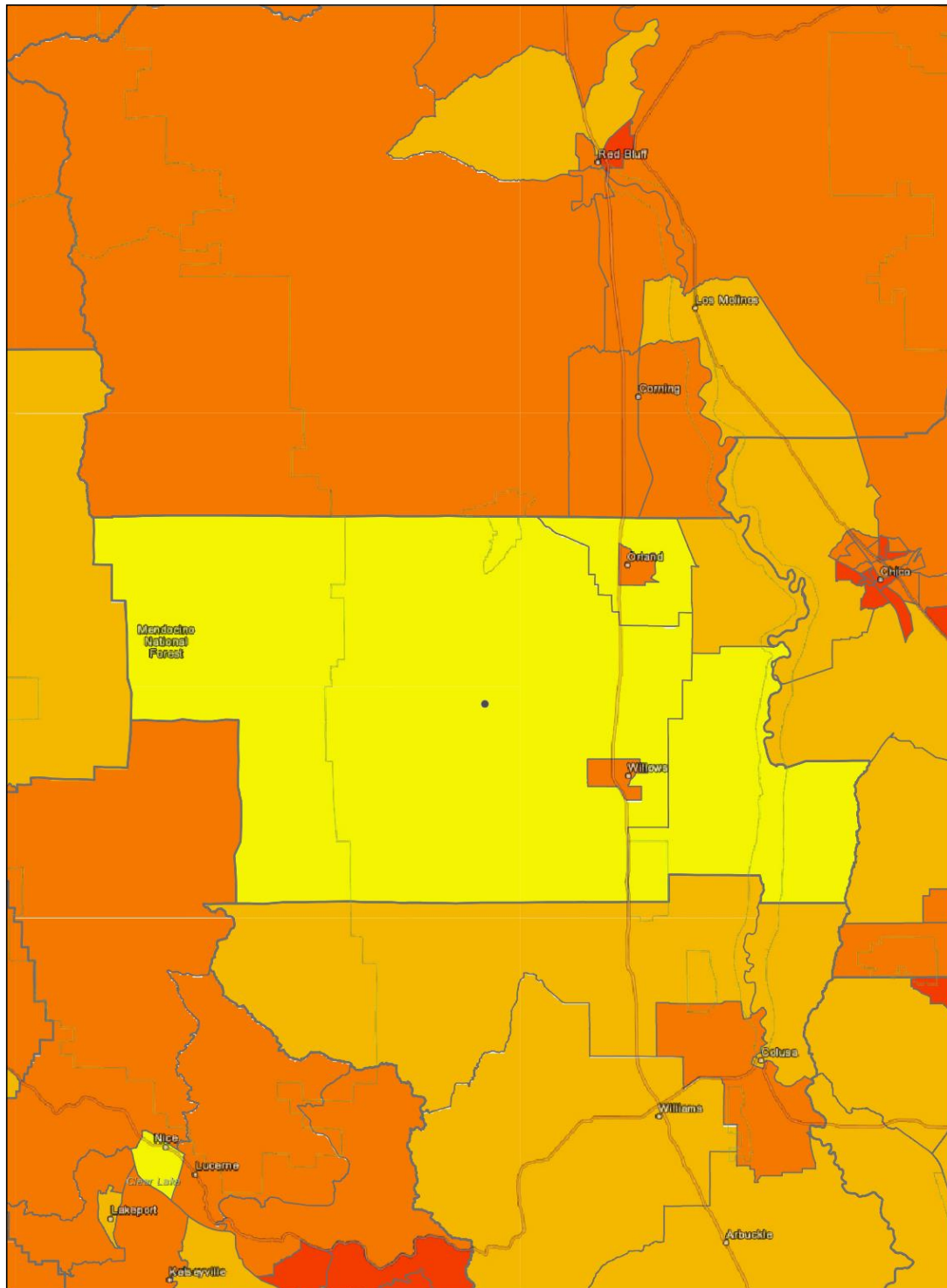
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Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community
Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

CA HCD

Glenn County, Overpayment by Renters Map, 2019



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County Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

< 20%

20% - 40%

40% - 60%

60% - 80%

1:577,791
0 5 10 20 mi
0 5 10 20 km

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community
Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD

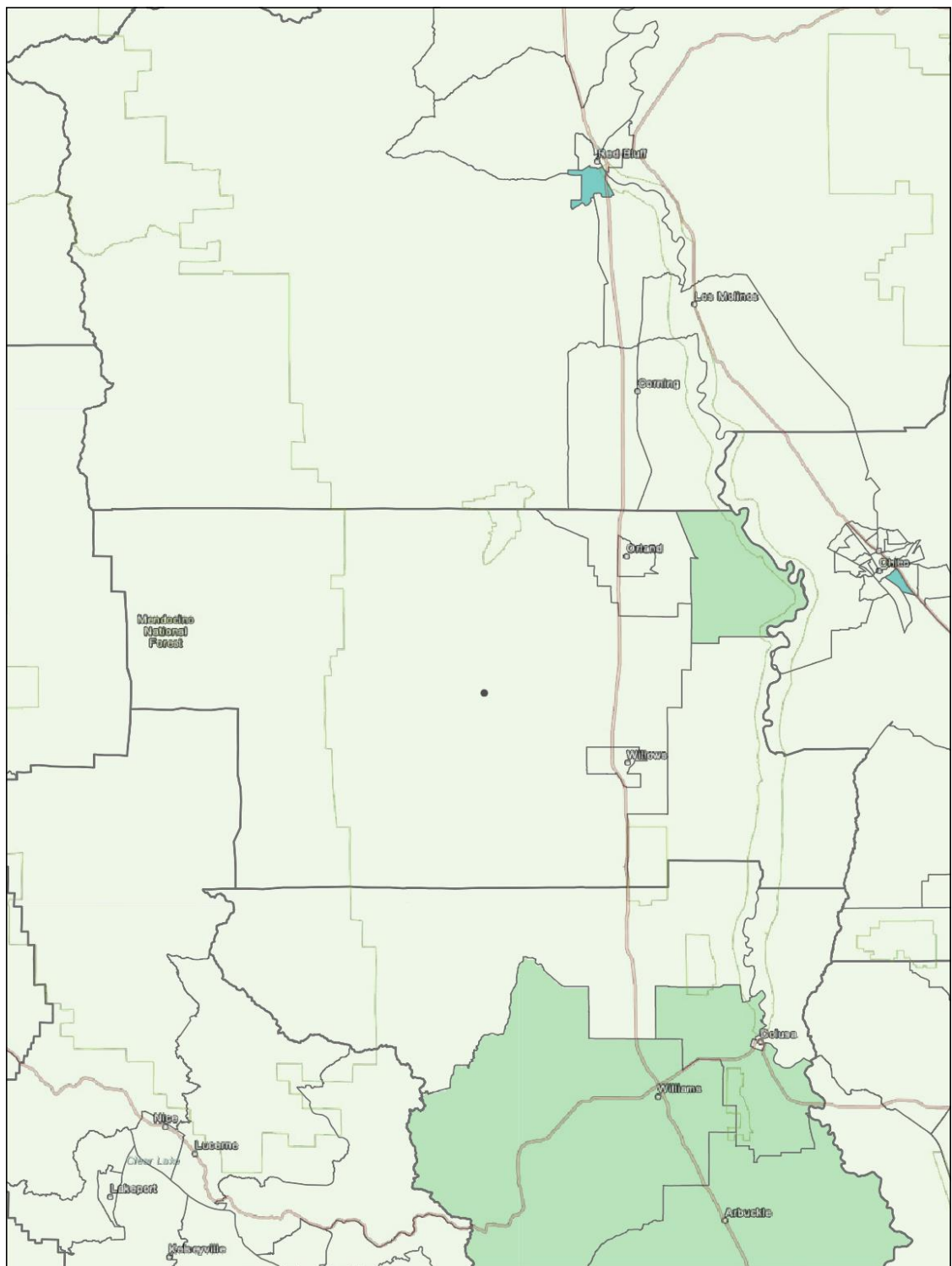
Glenn County, Overcrowded Households Map, 2015 shows the percentage of overcrowded households (more than 1.0 persons per room) by census tract in Glenn County. The most recent available data is from 2015. Most census tracts in the county, include the City of Willows, are at or below the statewide average of 8.2% overcrowded households. The census tract that includes the community of Hamilton City in eastern Glenn County has higher than average overcrowded households – between 8.3% to 12% of all households in those census tracts. (*HCD AFFH Data Resources and Mapping Tool: 2015 Healthy Communities Data and Indicators Project*).

Glenn County, Vulnerable Communities Map, 2017 shows sensitive communities where residents may be particularly vulnerable to displacement. These communities include the Cities of Orland and Willows. There are no vulnerable communities located in unincorporated Glenn County, as defined by the data source (*HCD AFFH Data Resources and Mapping Tool: 2017 University of California Berkeley Urban Displacement Project*).

These communities are designated vulnerable if they meet certain criteria (*HCD AFFH Data Resources and Mapping Tool: 2017 University of California Berkeley Urban Displacement Project*). The criteria are:

- Share of very low-income residents is above 20% in 2017 and the census tract meets two of the following criteria:
 - o Share of renters is above 40%, 2017
 - o Share of people of color is above 50%, 2017
 - o Share of very low-income households (50% area median income or below) that are severely rent burdened households is above the county median, 2017
 - o They or areas in close proximity have been experiencing displacement pressures. Displacement pressure is defined as: Percent change in rent above county median for rent increases, 2012-2017 or difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap), 2017

Glenn County, Overcrowded Households Map, 2015



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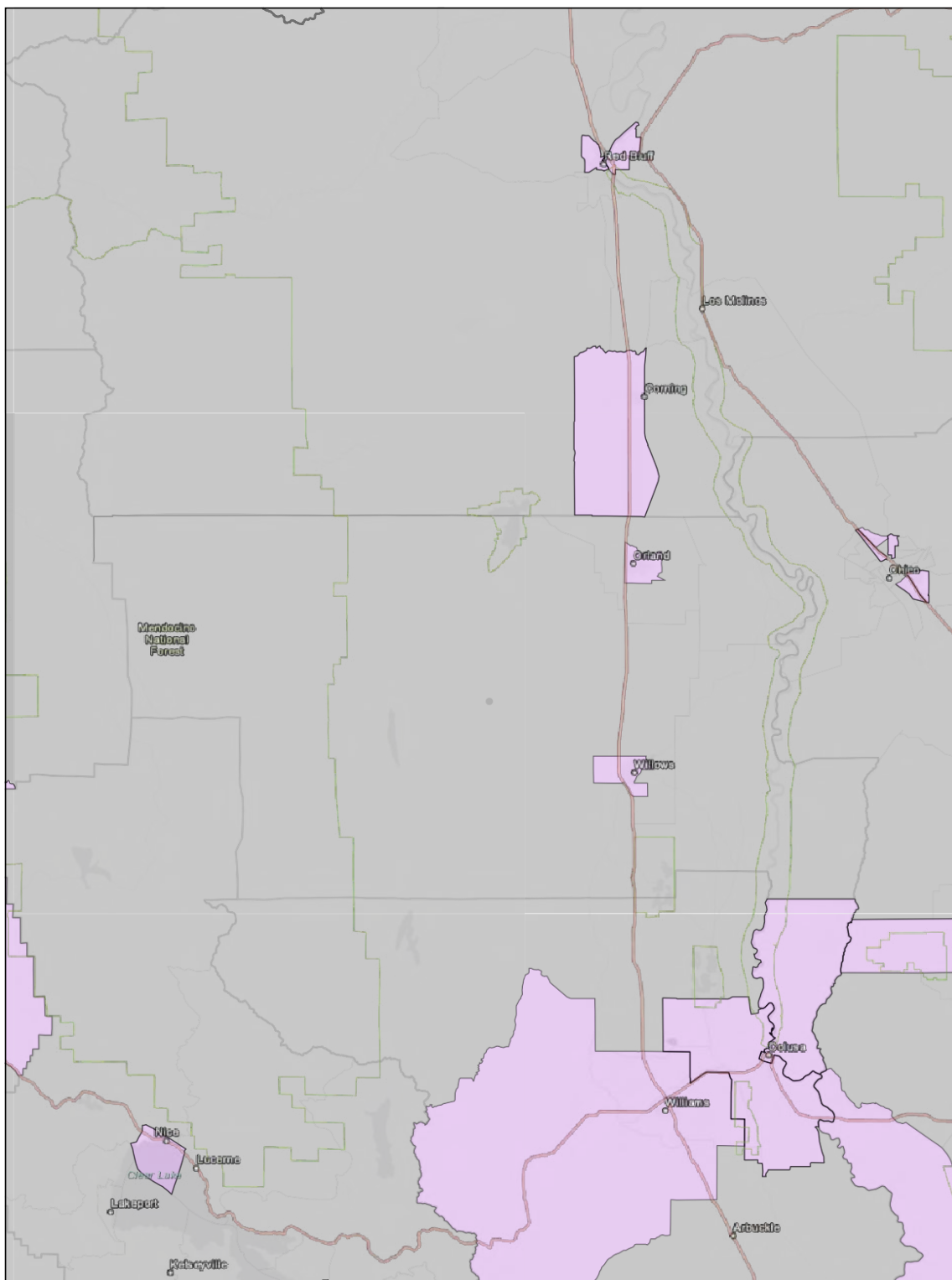
County Boundaries
(R) Overcrowded Households (CHHS) - Tract

≤ 8.2% (Statewide Average)
8.3% - 12%
12.01% - 15%

1:577,791
0 5 10 20 mi
0 5 10 20 km

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Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

Glenn County, Vulnerable Communities Map, 2017



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County Boundaries

(A) Sensitive Communities (UCB, Urban Displacement Project)

Vulnerable

Other

1:577,791

0 5 10 20 mi
0 5 10 20 km

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The table “**City of Willows, Housing Tenure by Race and Ethnicity, 2010 and 2019**” depicts housing tenure (own versus rent) for the City of Willows from 2010 to 2019. The table “**Glenn County, Housing Tenure Race and Ethnicity, 2010 and 2019**” depicts housing tenure (own versus rent) for Glenn County from 2010 to 2019. As of 2019 in the City of Willows, the percent of renter-occupied housing units that are occupied by householders of color is about double that of owner-occupied housing units (23% compared to 12%). All householders that identify as American Indian and Alaska Native or two or more races are renters whereas none are owners. About 88% of owner-occupied housing units are occupied by White householders whereas about 77% of renter-occupied housing units are occupied by White householders.

From 2010 to 2019, the number of owner-occupied units for Hispanic or Latino populations increased by 6.8% and the number of renter-occupied units decreased by 2.3% for the City of Willows. In contrast to this trend, the number of owner-occupied units decreased for White populations by 6.3% and the number of renter-occupied units increased by 6.3%. A similar trend is observed in Glenn County, where the number of owner-occupied units increased for Hispanic or Latino populations by 9.2% and the number of renter-occupied units increased by 0.2%. In addition, the number of owner-occupied units decreased for White populations by 7.4% and the number of renter-occupied units decreased by 2.4%.

Table 13: City of Willows, Housing Tenure by Race and Ethnicity, 2010 and 2019

Race/Ethnicity	City of Willows									
	2010				2019				2010-2019	
	Owner-occupied Housing Units		Renter-occupied Housing Units		Owner-occupied Housing Units		Renter-occupied Housing Units		Owner-occupied	Renter-occupied
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Change	
One Race										
White	1,187	84.7%	757	72.7%	883	87.6%	1,002	76.8%	+2.9%	+4.1%
Black or African American	0	0.0%	72	6.9%	0	0.0%	0	0.0%	0.0%	-6.9%
American Indian and Alaska Native	42	3.0%	42	4.0%	0	0.0%	28	2.1%	-3.0%	-1.9%
Asian	66	4.7%	19	1.8%	73	7.2%	77	5.9%	2.5%	+4.1%
Native Hawaiian or Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%
Some Other Race	106	7.6%	95	9.1%	52	5.2%	101	7.7%	-2.4%	-1.4%
Two or More Races	0	0.0%	56	5.4%	0	0.0%	96	7.4%	0.0%	+2.0%
Ethnicity										
Hispanic or Latino Origin	296	21.1%	249	23.9%	281	27.9%	282	21.6%	6.8%	-2.3%
White, not Hispanic/Latino	998	71.2%	603	57.9%	654	64.9%	837	64.2%	-6.3%	+6.3%

Source: U.S. Census 2006-2010 and 2015-2019 American Community Survey

Table 14: Glenn County, Housing Tenure by Race and Ethnicity, 2010 and 2019

Race/Ethnicity	Glenn County									
	2010				2019				2010-2019	
	Owner-occupied Housing Units		Renter-occupied Housing Units		Owner-occupied Housing Units		Renter-occupied Housing Units		Owner-occupied	Renter-occupied
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Change	
One Race										
White	5,488	84.2%	2444	77.8%	5,448	91.0%	3,160	77.1%	+6.80%	-0.70%
Black or African American	39	0.6%	72	2.3%	16	0.3%	36	0.9%	-0.3%	-1.4%
American Indian and Alaska Native	104	1.6%	63	2.0%	130	2.2%	84	2.1%	+0.6%	+0.1%
Asian	111	1.7%	35	1.1%	94	1.6%	143	3.5%	-0.1%	+2.4%
Native Hawaiian or Pacific Islander	7	0.1%	0	0.0%	0	0.0%	0	0.0%	-0.1%	0.0%
Some Other Race	626	9.6%	434	13.8%	260	4.3%	482	11.8%	-5.3%	-2.0%
Two or More Races	143	2.2%	91	2.9%	40	0.7%	192	4.7%	-1.5%	+1.8%
Ethnicity										
Hispanic or Latino Origin	1251	19.2%	1175	37.4%	1,701	28.4%	1,540	37.6%	+9.2%	+0.2%
White, not Hispanic/Latino	4921	75.5%	1734	55.2%	4,077	68.1%	2,162	52.8%	-7.4%	-2.4%

Source: U.S. Census 2006-2010 and 2015-2019 American Community Survey

The table “*City of Willows, Housing Problems, 2010 and 2017*” and the table “*Glenn County, Housing Problems, 2010 and 2017*” compare the number of owners and renters in the City of Willows and Glenn County from 2010 to 2017. Data from 2017 is used as it is the most recent available data as of June 2021.

As of 2017, of households in Willows that have at least 1 of 4 Housing Problems or Severe Housing Problems, the majority are renters at 71.1% and 81.7% respectively. A Housing Problem, as defined by HUD, is a unit that: 1) Lacks complete kitchen facilities; 2) Lacks complete plumbing facilities; 3) Has more than 1 person per room; or 4) Has a housing cost burden over 30% of income. A Severe Housing Problem, as defined by HUD, is a unit that: 1) Lacks complete kitchen facilities; 2) Lacks complete plumbing facilities; 3) Has more than 1.5 persons per room; or 4) Has a housing cost burden over 50% of income.

From 2010 to 2017, the number of households experiencing at least 1 of 4 Housing Problems in the City of Willows decreased by 14.4% for owners but increased by 14.4% for renters. Similarly, the number of households experiencing at least 1 of 4 Severe Housing Problems decreased by 11.9% for owners and increased by 11.9% for renters. A similar trend is also observed in Glenn County. These findings indicate the renters are more likely to experience Housing Problems and the number of renters experiencing Housing Problems is increasing. This in turn increases the displacement risk renters experience.

The Housing Element also considers displacement risk due to disasters, cost burden, overcrowding, homelessness, and housing conditions, mainly from data reported and analyzed in Chapter 4 Housing Needs Assessment.

- **Disasters:** The 2018 Camp Fire in Butte County continues to have a significant impact on the tri-county region of Butte, Glenn, and Tehama Counties. Willows residents experienced an increased risk of displacement due to population shifts and economic impacts following this type of disaster.
- **Cost burden:** *Table 38 in Chapter 4 Housing Needs Assessment* shows households by percent of income paid toward housing costs. An estimated 733 households earn less than \$35,000 and are rent burdened, which is about one in every three households in Willows. About 18% of households in owner-occupied units pay 30% or more of their income toward housing costs, while about 57% of households in renter-occupied units fall into this category. Cost-burdened households, especially renter households, are at an increased risk of displacement.
- **Overcrowding:** *Table 29 in Chapter 4 Housing Needs Assessment* depicts the number of owner-occupied and renter-occupied units that are overcrowded and severely overcrowded. In 2019, there were an estimated 178 Overcrowded housing units in Willows, which was 7.7% of all units. There were about twice as many Overcrowded renter-occupied units as Overcrowded owner-occupied units. There were no Severely Overcrowded housing units estimated. Overcrowded renter-occupied units are at an increased risk of displacement.
- **Homelessness:** It is challenging to obtain an accurate count of people experiencing homelessness, especially in a rural community. *Chapter 4 Housing Needs Assessment* considers multiple data sets on homelessness. Nine persons were counted in the 2019 Point-in-Time Homeless Census. Table 54 shows homelessness in public school students by nighttime residence. In 2018, 193 students in Willows Unified School District were experiencing homelessness, 137 of those were doubled-up with friends or relatives. People experiencing homelessness, especially those doubled-up, are at an increased risk of displacement.

- **Housing conditions and development:** According to the Housing Conditions Survey completed in 2021 as part of the Housing Element Update, the block groups with concentrated rehabilitation needs are Block Groups 1 and 2, located in the northeast and northcentral portions of the city. See Program FH-1.3.1 that addresses this concentration of rehabilitation needs. City of Willows staff provided insight on housing conditions and development via email on April 28, 2022, per request by HCD. Staff noted that since 2020, there has been a noticeable increase in new roofing permits for residential dwellings, addressing previously substandard housing conditions. Since 2015, the city has added two affordable housing developments in Willows. One is a 49-unit senior project, and the other is a 24-unit family project. Additionally, there have been two change-of-use projects resulting in closed motels converted into multi-family projects and several single-family dwellings constructed on infill lots.

Table 15: City of Willows, Housing Problems, 2010 and 2017

Housing Problems	2010					2017					2010-2017	
	Owners	Owner % of Total	Renters	Renter % of Total	Total	Owners	Owner % of Total	Renters	Renter % of Total	Total	Owner Change	Renter Change
Household has at least 1 of 4 Housing Problems	440	43.3%	575	56.7%	1,015	275	28.9%	675	71.1%	950	-14.4%	+14.4%
Household has at least 1 of 4 Severe Housing Problems	190	30.2%	440	69.8%	630	105	18.3%	470	81.7%	575	-11.9%	+11.9%

Source: U.S. Department of Housing and Urban Development, 2006-2010 and 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) Data

Table 16: Glenn County, Housing Problems, 2010 and 2017

	2010					2017					2010-2017	
	Owners	Owner % of Total	Renters	Renter % of Total	Total	Owners	Owner % of Total	Renters	Renter % of Total	Total	Owner Change	Renter Change
Household has at least 1 of 4 Housing Problems	2,375	60.3%	1,565	39.7%	3,940	1,540	43.9%	1,965	56.1%	3,505	-16.4%	+16.4%
Household has at least 1 of 4 Severe Housing Problems	1,020	52.6%	920	47.4%	1,940	775	37.1%	1,315	62.9%	2,090	-15.5%	+15.5%

Source: U.S. Department of Housing and Urban Development, 2006-2010 and 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) Data

Local Data and Knowledge

Local data and knowledge provide insight on the impacts of the Camp Fire in Willows on displacement, disproportionate housing needs, access to opportunity, and additional resources to assist people of color and low-income households.

The majority of data for this section is from two studies: 1. The Impacts of the Camp Fire Disaster on Housing Market Conditions and Housing Opportunities in the Tri-County Region, produced by North Valley Community Foundation, a local community foundation; and 2. The Camp Fire Regional Economic Impact Analysis, produced by 3CORE, a local economic development organization. These two studies, the former on housing impacts and the latter on economic impacts, focus on the tri-county region of Butte, Glenn, and Tehama Counties. This section also includes related data from a local non-profit and newspaper.

The Impacts of the Camp Fire Disaster on Housing Market Conditions and Housing Opportunities in the Tri-County Region, North Valley Community Foundation, September 2020

Prior to the 2018 Camp Fire, the tri-county region of Butte, Glenn, and Tehama Counties was already experiencing housing challenges including rising housing costs, rising building costs, low vacancies, limited workforce housing, lack of affordable housing production, and limited types of housing, coupled with economic challenges of slow wage growth, limited number of higher paying jobs, and challenges attracting and retaining employees.

After the 2018 Camp Fire, the tri-county region experienced additional housing challenges including lack of available housing inventory, record high rental rates and housing costs, insufficient assistance for fire survivors, and lack of insurance or underinsurance for many residents. Disaster case management intake records from Butte-Glenn 211 and the Camp Fire Collaborative illustrate unmet needs for fire survivors experiencing homelessness or in precarious housing situations. A substantial surge in home prices and monthly rent rates in the tri-county region in the six months following the Camp Fire disproportionately affected senior households – single people and couples – who had lived in older, lower-cost housing in the burn scar of Concow, Magalia, Paradise, Yankee Hill, and surrounding communities. These households experienced challenges finding homes within their budgets that matched the needs of their families. Glenn County's limited housing inventory went to near record lows and home prices in the County went up 46.7% from November 2018 to September 2019.

There is a shortage of affordable and market-rate multi-family units in the region. The Housing Authority of the County of Butte (HACB) which also serves Glenn County, had a waitlist of 300 households for Butte and Glenn Counties combined prior to the Camp Fire. Openings for available affordable units are limited and the waitlist increased to over 2,800 households in August 2019. Development of multi-family units in the tri-county region apart from the City of Chico, has been primarily driven by affordable housing developers and non-profits. The Cities of Willows and Orland in Glenn County and Corning and Red Bluff in Tehama County tend to attract more demand for market-rate single-family development activity rather than market-rate multi-family development activity.

The study identifies opportunities to address housing challenges in the region. One of the larger potential development sites is in Willows. The South Willows Residential Development, planned by Basin Street Development, is located east of 1-5, south of Jensen Park and the Central Canal. The proposed subdivision could include 416 single-family units as well as 130 multi-family units. The infrastructure costs would be a minimum of \$20 million.

There is site availability in the tri-county region for large-scale projects. However, developers express challenges for moving projects forward due to high development costs relative to household incomes, including the needed infrastructure required to build, and the imbalance between the cost of delivering homes and homebuyers who have the ability to pay for these homes. Additional housing solutions in the region include alternative building techniques such as modular options; manufactured homes; Accessory Dwelling Units (ADUs); tiny homes; better financing options for alternative housing types; and community land trusts, housing trusts, and private bonds.

The Camp Fire Regional Economic Impact Analysis, 3CORE, January 2021

The tri-county region of Butte, Glenn, and Tehama Counties is predominantly rural with an economy propelled by agriculture and related activities, such as processing, packaging, and wholesale trade of row and field crops, orchard and tree products, and livestock. Higher education and health care services, primarily located in Butte County, contribute to the economic landscape. Short-term growth projections for Glenn County expect employment gains to be centered in agriculture, manufacturing, and leisure.

The 2018 Camp Fire resulted in substantial inter-regional and extra-regional population shifts. Residents displaced by the Camp Fire relocated primarily to Chico and Oroville in Butte County and to a lesser extent, Glenn, and Tehama Counties. Overall, the tri-county region's population declined by 4.5% between 2018 and 2020. The region lost about 10% of its housing supply in the Camp Fire.

The study concludes that based on available information, the Camp Fire resulted in the loss of many middle-income workers who are unlikely to return to the region. This may result in a demographic distribution that is skewed to lower- and higher-income groups. The study suggests the key to replacing workers and re-balancing income groups is the ability to produce new, affordable housing in the region.

Butte-Glenn 211 Informational and Referral Data, July 2021

Butte-Glenn 211 is an information and referral non-profit agency serving Butte and Glenn Counties by connecting people in need with services that offer help. The total number of calls from Glenn County residents to 211 from November 2018 to July 2021 was 261, and a portion of these calls were from Camp Fire survivors. The table ***“Glenn County, 211 Information and Referrals Provided to Camp Fire Survivors, November 2018 to July 2021”*** depicts information and referrals provided to Camp Fire survivors residing in Glenn County who contacted Butte-Glenn 211 between November 2018 to July 2021. Information and referrals centered on basic needs, financial, housing, legal, and mental health assistance.

Table 17: Glenn County, 211 Information and Referrals Provided to Camp Fire Survivors, November 2018 to July 2021

Time Period	November 2018 to July 2021
Zip Code Location	Glenn County
Caller Identification	Camp Fire survivor
Information and Referrals Provided (In alphabetical order)	Automobile payment assistance Camp Fire resource center Disaster case management Emergency shelter Financial assistance Food and clothing distribution Furniture and appliances HUD resource locator Legal assistance Letter of priority entitlement Mental health services Pet supplies Post disaster rebuilding assistance Rebuilding reimbursements Rental deposit assistance Rural home loans Transportation

Spanish-Speaking Camp Fire Survivors Face Language, Immigration Barriers, Chico Enterprise-Record, December 2019

This article highlights additional resources created to assist Hispanic/Latino and Spanish-speaking residents affected by the Camp Fire. Residents from households with mixed immigration status or are not fluent in English struggled with accessing recovery-related resources during and after the Camp Fire. Bilingual counselors from North Valley Catholic Social Service’s California Hope (now Butte Hope) program started a support group for Spanish-speaking residents affected by the Camp Fire and researched available resources and translated them to Spanish.

Other Relevant Factors

Other relevant factors for this section include a stakeholder interview with Titus/Almond Blossom Properties.

Titus/Almond Blossom Properties, residential property management company, and Titus Properties-

Real Estate Sales and Services, real estate company, serve the Glenn County area. In an interview for this report on February 2, 2021, staff commented that all sizes of rental units are in demand. Titus manages 220 rentals and as of March 2021, had an estimated 25 applicants on file waiting for a unit that fits their needs and others who choose not to put an application on file and are waiting for an available unit to apply. Staff noted they may receive up to 10 or more applications for their rental houses (email correspondence March 27-29, 2021).

Almond Blossom Staff noted that Willows has a need for all types of for-sale and rental housing, and at the time of the interview on February 2, 2021, there were only five homes for sale in the city despite a list of qualified buyers ready to buy in all price ranges. Housing supply is limited and what is on the market is generally more affordable for out-of-towners than local residents. Homeowners are selling their properties in other cities for a profit and purchasing a home in Willows that is more affordable to them, whereas some Willows residents are unable to successfully bid on the limited number of homes due to the listing price. Homeownership is out of reach for some Willows residents due to closing, down payment, and loan costs. Staff remarked that down payment assistance programs are helpful for residents who have good jobs and credit scores but lack the \$12,000-\$20,000 down payment and closing costs needed for a home purchase.

Regarding housing barriers, staff noted there is a limited amount of developable land in Willows. Some parcels are in flood zones or are in the unincorporated area of Glenn County instead of the city. In addition, staff commented that building costs are higher than in the past due to government requirements of fire sprinklers and solar panels, as well as materials costs increases after recent wildfires. Limited time, availability, and resources in the City's building and planning departments are also challenges for developers. Staff remarked that financially, builders are unable to build homes in Willows that local residents could afford. Staff suggested that the city annex more land and expand its sphere of influence to provide more opportunities for housing to be built.

Staff commented that Willows continues to be affected by the 2018 Camp Fire. Those who migrated to Willows directly after the Camp Fire moved into any available vacant rental or for-sale home, and some have since moved out of Willows to other areas. Staff notes a migration of Chico residents to Willows following the Camp Fire, citing increases in crime, population, and traffic, decreases in home availability, and changing demographics in Chico, as reasons for this migration. Staff remarks that some of their clients are retirees and moved to Willows for a simpler, small-town life that they did not have in Chico.

Conclusions and Summary of Issues

- **Overpayment by Owners:** As of 2019, the majority of Glenn County, including the City of Willows, has 20-40% of owner households with overpayment in any given census tract. The census tracts with 40-60% of owner households with overpayment are located surrounding the City of Orland and east to the Butte County border, including the community of Hamilton City.
- **Overpayment by Renters:** As of 2019, the majority of Glenn County has less than 20% of renter households with overpayment in any given census tract. The census tract that includes the community of Hamilton City has 20-40% of renter households with overpayment. The census tracts that make up the Cities of Orland and Willows have 40-60% of renter households with overpayment.
- **Overcrowding:** As of 2015, most census tracts in the county, including the City of Willows, are at

or below the statewide average of 8.2% overcrowded households. The census tract that includes the community of Hamilton City in eastern Glenn County has higher than average overcrowded households – between 8.3% to 12% of all households in those census tracts.

- **Vulnerable Communities:** As of 2017, vulnerable communities where residents may be particularly vulnerable to displacement, include the Cities of Orland and Willows. There are no vulnerable communities as identified by the data source located in unincorporated Glenn County.

- **Housing Tenure:** People of color are disproportionately represented in rental housing, and renters are much more likely than owners to experience a Housing Problem as defined by the U.S. Department of Housing and Urban Development. The percent of renter-occupied housing units in Willows that are occupied by householders of color is about double that of owner-occupied housing units (23% compared to 12%). Of households in that have at least 1 of 4 Housing Problems, 71.1% are renters. A Housing Problem is a unit that: 1) Lacks complete kitchen facilities; 2) Lacks complete plumbing facilities; 3) Has more than 1 person per room; or 4) Has a housing cost burden over 30% of income.

- **Homelessness:** In 2018, 193 students in Willows Unified School District were experiencing homelessness, 137 of those were doubled-up with friends or relatives. Nine persons in Willows were counted in the 2019 Point-in-Time Homeless Census.

- **Housing Conditions and Development:** According to the Housing Conditions Survey completed in 2021 as part of the Housing Element Update, the block groups with concentrated rehabilitation needs are Block Groups 1 and 2, located in the northeast and northcentral portions of the City. City staff noted an increase in new roofing permits since 2020 and increase in housing development activity in Willows since 2015.

- **Camp Fire:**

- There is a shortage of affordable and market-rate multi-family units in the tri-county region of Butte, Glenn, and Tehama Counties. After the 2018 Camp Fire, the region experienced housing challenges including lack of available housing inventory, record high rental rates and housing costs, insufficient assistance for fire survivors, and lack of insurance or underinsurance for many residents. In the six months following the fire, a substantial surge in home prices and monthly rent rates disproportionately affected senior households – single people and couples – who had lived in older, lower-cost housing in the burn scar of Concow, Magalia, Paradise, Yankee Hill, and surrounding communities. These households experienced challenges finding homes within their budgets that matched the needs of their families.
- The Camp Fire resulted in substantial inter-regional and extra-regional population shifts. Residents displaced by the fire relocated primarily to Chico and Oroville in Butte County and to a lesser extent, Glenn, and Tehama Counties. Overall, the tri-county region lost about 10% of its housing supply in the fire and its population declined by 4.5% between 2018 and 2020. The fire resulted in the loss of many middle-income workers who are unlikely to return to the region. This may result in a demographic distribution that is skewed to lower- and higher-income groups.
- Butte-Glenn 211 provided information and referrals centered on basic needs, financial, housing, legal, and mental health assistance to Camp Fire survivors residing in Glenn County who called 211 from November 2018 to July 2021.

- Residents from households with mixed immigration status or are not fluent in English struggled with accessing recovery-related resources during and after the Camp Fire. Bilingual counselors from North Valley Catholic Social Service’s California Hope (now Butte Hope) program started a support group for Spanish-speaking residents affected by the Camp Fire and researched available resources and translated them to Spanish.

• **Stakeholder Input from Titus/Almond Blossom Properties:** Homeownership is out of reach for some Willows residents due to closing, down payment, and loan costs. Financially, builders are unable to build homes in Willows that local residents could afford. The city also continues to be affected by the 2018 Camp Fire. Those who migrated to Willows directly after the Camp Fire moved into any vacant rental or for-sale homes, and some have since moved out of Willows to other areas. Staff notes a migration of Chico residents to Willows following the Camp Fire, citing increases in crime, population, and traffic, decreases in home availability, and changing demographics in Chico, as reasons for this migration.

DEMOGRAPHICS

As of January 1, 2021, the population of Willows was estimated at 6,233 by the California Department of Finance. Willows is the second largest city in Glenn County. (Table 18: Population Growth, 2016-2021) shows that the population of Willows has changed little over the past six years, with a net increase of 124 persons and an average annual increase of 21 persons between 2016 and 2021. By comparison, Glenn County grew by 1,504 persons between 2016 and 2021, with an average annual increase of 251 over that span. Both Willows and Glenn County experienced a spike in population from 2019 to 2020, which was an increase of 170 persons in Willows and 921 persons in Glenn County.

Table 18: City of Willows, Population Growth, 2016-2021

	2016	2017	2018	2019	2020	2021	Average Annual Change
Willows	6,109	6,106	6,107	6,073	6,243	6,233	
Glenn County	28,175	28,328	28,476	28,661	29,582	29,679	
Willows-Yearly Change		-3	1	-34	170	-10	21
Glenn-Yearly Change		153	148	185	921	97	251

Source: California Department of Finance, 2020

Table 19: Population Forecast, 2020-2045 shows the population forecast for Glenn County. While this projection is not available for Willows, this data provides a general idea of the projected rate of growth. Glenn County population is projected to grow by 1,368 between 2020 and 2045, an overall increase of 4.6% and an average annual growth rate of 0.2%.

Table 19: Glenn County, Population Forecast, 2020-2045

	2020	2025	2030	2035	2040	2045	Total Increase	Percent Increase	Annual Growth Rate
Glenn County	29,348	29,969	30,476	30,754	30,795	30,716	1,368	4.6%	0.2%

Source: California Department of Finance, 2019 Total Population Projections for Years 2010-2060

Table 20: Population by Age, 2019 shows the distribution of the population by age for Willows. The largest 10-year age cohort is 9 years and younger, with 1,044 at 17.4% of the population, followed by 35-44 years, 45-54 years, and 25-34 years, with 850, 781, and 754, respectively. The median age of the Willows population as of 2019 was 39.8, which was higher than the State of California median age of 36.5.

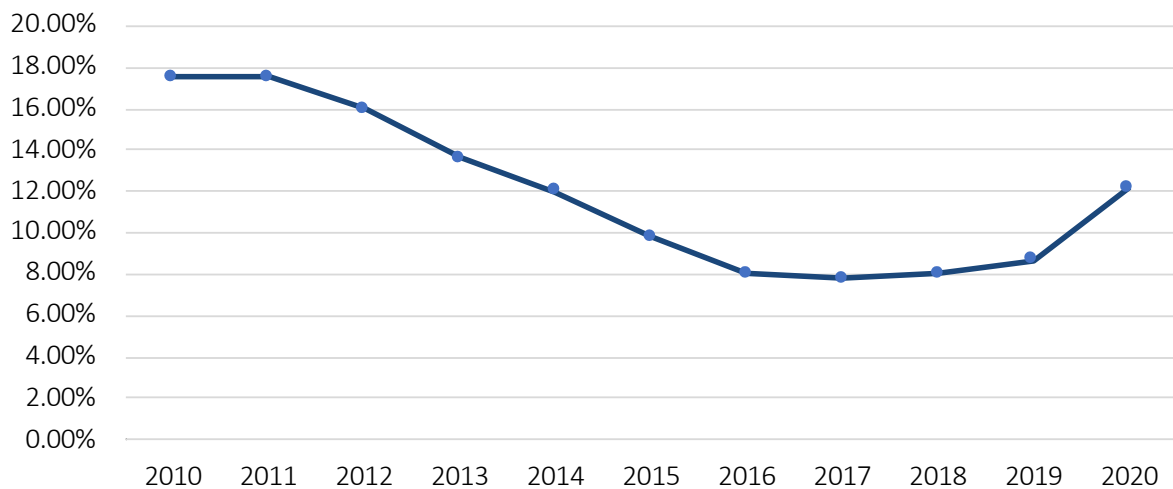
Table 20: City of Willows, Population by Age, 2019

Age	Persons	Percent of Total
Under 5 years	515	8.6%
5 to 9 years	529	8.8%
10 to 14 years	315	5.2%
15 to 19 years	332	5.5%
20 to 24 years	192	3.2%
25 to 34 years	754	12.5%
35 to 44 years	850	14.1%
45 to 54 years	781	13.0%
55 to 59 years	211	3.5%
60 to 64 years	479	8.0%
65 to 74 years	487	8.1%
75 to 84 years	456	7.6%
85 years and over	112	1.9%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

EMPLOYMENT

Total employment in Willows was 2,170 in 2020. Employment decreased from 2010 to 2020 by 350, an average annual percent decrease of 1.26%. The Labor Force, which is the population that is actively seeking employment, decreased by more than Employment, at an average annual percent decrease of 1.72%. The unemployment rate also decreased from 17.5% in 2010 to 12.2% in 2020, at an average annual percent decrease of 2.75%. The decrease in the unemployment rate followed national and state trends. Interestingly, from 2019 to 2020, the labor force and employment declined by 50 and 140, respectively, despite an increase of 170 in the population. The unemployment rate also jumped from 8.7% to 12.2% over this period. **(Table 21: Total Employment, 2010-2020) (Chart 1: Unemployment Rate, 2010-2020)**

Chart 1: City of Willows, Unemployment Rate, 2010-2020

Source: State of California Employment Development Department, 2021

Table 21: City of Willows, Total Employment and Unemployment, 2010-2020

	Labor Force	Employment	Unemployment	Unemployment Rate
2010	3,060	2,520	540	17.5%
2011	3,030	2,500	530	17.5%
2012	3,020	2,540	480	16.0%
2013	2,970	2,560	400	13.6%
2014	2,920	2,570	350	12.0%
2015	2,940	2,650	290	9.8%
2016	2,740	2,520	220	8.0%
2017	2,610	2,410	210	7.8%
2018	2,520	2,320	200	8.0%
2019	2,530	2,310	220	8.7%
2020	2,480	2,170	300	12.2%
Ave. Annual Percent Change	-1.72%	-1.26%	-4.04%	-2.75%

Source: State of California Employment Development Department, 2021

“Agriculture, forestry, fishing and hunting, and mining” industry accounts for well over one-quarter (28.6%) of the employed civilian population in the City of Willows that is 16 years of age or older. The second largest industry is “Educational services, and health care and social assistance” at 19.9%, followed by “Manufacturing” at 13.6% and “Retail trade” at 11.3% (**Table 22: Employment by Industry, 2019**).

Table 22: City of Willows, Employment by Industry, 2019

Industry	Estimate	Percent
Civilian employed population 16 years and over	2,139	100%
Agriculture, forestry, fishing and hunting, and mining	611	28.6%
Construction	21	1.0%
Manufacturing	291	13.6%
Wholesale trade	65	3.0%
Retail trade	242	11.3%
Transportation and warehousing, and utilities	97	4.5%
Information	0	0.0%
Finance and insurance, and real estate and rental and leasing	12	0.6%
Professional, scientific, and management, and administrative and waste management services	64	3.0%
Educational services, and health care and social assistance	426	19.9%
Arts, entertainment, and recreation, and accommodation and food services	145	6.8%
Other services, except public administration	40	1.9%
Public administration	125	5.8%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

HOUSEHOLD CHARACTERISTICS

Table 23: State Income Categories, 2020 shows household incomes by category and percent of area income for Glenn County, as calculated by the State Department of Housing and Community Development. The income categories are referenced in the RHNA Sites Inventory that is part of this Housing Element and are also used in setting target rents for affordable housing programs and projects.

Table 23: Glenn County, State Income Categories, 2020

Income Category	% of Area Median Income	Maximum Income by Persons in the Household				
		1	2	3	4	5
Extremely Low	0-30%	\$14,700	\$17,240	\$21,720	\$26,200	\$30,680
Very Low	31-50%	\$24,500	\$28,000	\$31,500	\$34,950	\$37,750
Low	51-80%	\$39,150	\$44,750	\$50,350	\$55,900	\$60,400
Median	100%	\$49,500	\$56,550	\$63,650	\$70,700	\$76,350
Moderate	81-120%	\$59,400	\$67,900	\$76,350	\$84,850	\$91,650

Source: California Department of Housing and Community Development, 2020 State Income Limits

Table 24: Household Income by Housing Tenure, 2019 provides a breakdown of households by income category for households occupying owner-occupied units, and households occupying renter-occupied units. The income category with the largest number of households overall is \$20,000-\$34,999 with 470 households. The income category with the next largest number of households overall is \$50,000-\$74,999 with 429 households. Over one-quarter of households in owner-occupied units (25.4%) earn between \$50,000 and \$74,999 annually, which is the largest owner-occupied income category. Over one-quarter of households in renter-occupied units (27.7%) earn less than \$15,000 annually. The median household income for households in owner-occupied units is more than double the median household income for households in renter-occupied units.

Table 24: City of Willows, Household Income by Housing Tenure, 2019

Household Income (in past 12 Months)	Owner-occupied Housing Units	Percentage Owner-occupied	Renter-occupied Housing Units	Percentage Renter-occupied
Less than \$5,000	0	0.0%	120	9.2%
\$5,000 to \$9,999	0	0.0%	36	2.8%
\$10,000 to \$14,999	14	1.4%	205	15.7%
\$15,000 to \$19,999	14	1.4%	180	13.8%
\$20,000 to \$24,999	108	10.7%	54	4.1%
\$25,000 to \$34,999	50	5.0%	258	19.8%
\$35,000 to \$49,999	107	10.6%	113	8.7%
\$50,000 to \$74,999	256	25.4%	173	13.3%
\$75,000 to \$99,999	188	18.7%	60	4.6%
\$100,000 to \$149,999	233	23.1%	105	8.1%
\$150,000 or more	38	3.8%	0	0.0%
Median household income (dollars)	\$66,974		\$25,874	
Occupied housing units	1,008		1,304	

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Table 25: Households by Tenure illustrates that the majority of units in Willows are renter-occupied, at 56.4%. Since 2010, the percent of owner-occupied housing units and renter-occupied housing units has flipped, from 54.7% owner-occupied in 2010 to 56.4% renter-occupied in 2019. The State of California has a higher percentage of owner-occupied housing units than Willows, with 54.8%. There are many more seniors over 55 years old that are renters than are owners, as shown in **Table 26: Tenure by Age of Householder, 2019**.

Table 25: City of Willows, Households by Tenure, 2019

	Number	Percent
Owner-occupied housing units	1,008	43.6%
Renter-occupied housing units	1,304	56.4%
Total	2,312	100%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Table 26: City of Willows, Tenure by Age of Householder, 2019

Householder	Owner-occupied	Renter-occupied	Total
Under 35 years	163	159	322
35 to 44 years	167	271	438
45 to 54 years	216	195	411
55 to 64 years	187	292	479
65 to 74 years	80	230	310
75 to 84 years	166	143	309
85 years and over	29	14	43

Source: U.S. Census Bureau, 2015-2019 American Community Survey

HOUSING STOCK CHARACTERISTICS

Number and Type of Units, Persons Per Household

There were an estimated 2,458 housing units in Willows as of 2020, as shown in **Table 27: Housing Units by Type, 2010 and 2020**. This was an increase of 59 units, or 2.5%, from 2010. Multi-family units accounted for most of the increase over that 10-year period, with 49 units. Only 10 single-family units were built over that period, and no single-family units were built from 2014 to 2020. As of 2020, 68% of units were single-family, 31% were multi-family, and 1% were mobile homes. The number of households increased by 25 from 5,976 in 2010 to 6,001 in 2020, with persons per household declining slightly from 2.75 to 2.70.

Table 27: City of Willows, Housing Units by Type, 2010 and 2020

Year	Total Housing Units	Single Family Detached Units	Multi-Family Units	Mobile Homes		Occupied Housing Units	Vacant Units	Vacancy Rate	Persons Per Household
2010	2,399	1,672	703	24	5,976	2,173	226	9.4%	2.75
2020	2,458	1,682	752	24	6,001	2,220	238	9.7%	2.70
Change	59	10	49	0	25	47	12	0.3%	N/A
Percent Change	2.5%	0.6%	7.0%	0.0%	0.4%	2.2%	5.3%	3.2%	-1.8%

Source: California Department of Finance, 2020, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark

Table 28: City of Willows, Population and Housing Units, 2020

Population	Persons in Households	Persons in Group Quarters	Total Housing Units	Single Detached	Single Attached, Two to Four	5 Plus	Mobile Homes	Occupied	Vacancy Rate	Person per Household
6,208	6,001	207	2,458	1,682	385	367	24	2,220	9.7%	2.7

Source: California Department of Finance, 2020

Table 28: Population and Housing Units, 2020 show housing units by type of structure: single detached, single attached or 2-4 units, 5+ units, and mobile homes. After single detached structures, the next largest number of units by type of structure is single attached and 2-4 units, followed closely by 5+ unit structures.

Table 29 shows vacancy status of units as estimated by the U.S. Census 2014-2019 American Community Survey. It is estimated that there were 69 vacant rental units, including 32 for rent and 37 seasonal, recreational, or occasional use, and 47 Other vacant owner-occupied units. The total number of estimated vacant units was 116. This is 4.7% of the total housing units shown in the 2020 California Department of Finance estimate (Table 28).

Table 29: Vacancy Status, City of Willows, 2019

Vacancy Status	Number of Units
For rent	32
Rented, not occupied	0
For sale only	0
Sold, not occupied	0
For seasonal, recreational, or occasional use	37
For migrant workers	0
Other vacant	47
Total Vacant Units	116

Source: ACS 2019 5-Year Estimates, Table B25004

Overcrowding

Overcrowding is an important measure to help determine if there is adequate housing stock for the population. **Table 30: Occupants per Room by Tenure, 2019** identifies the number of units that are considered by the federal government as Overcrowded (more than one occupant per room) and Severely Overcrowded (1.5 or more occupants per room). In 2019, there were an estimated 178 Overcrowded housing units in Willows, which was 7.7% of all units. There were about twice as many Overcrowded renter-occupied units as Overcrowded owner-occupied units. There were no Severely Overcrowded housing units estimated. (Note that the 2,312 estimated total number of housing units is for a different year (2019) and from a different source (U.S. Census Bureau) than the estimated number of housing units in **Table 27: Housing Units by Type, 2010 and 2020**.

Table 30: City of Willows, Occupants per Room by Tenure, 2019

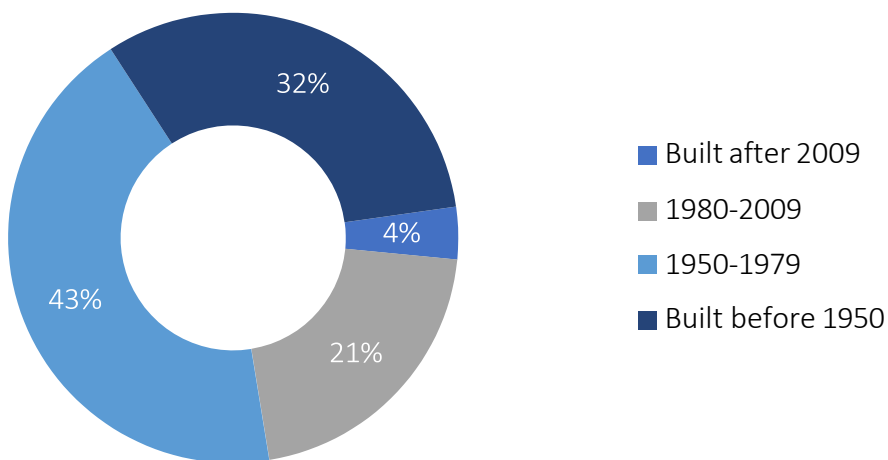
Occupants per Room	Owner-occupied	Renter-occupied	Total
0.50 or less occupants per room	604	774	1,378
0.51 to 1.00 occupants per room	347	409	756
1.01 to 1.50 occupants per room	57	121	178
1.51 to 2.00 occupants per room	0	0	0
2.01 or more occupants per room	0	0	0
Total	1,008	1,304	2,312
Overcrowded (1.01 or more)	57	121	178
Severely overcrowded (1.5 or more)	0	0	0

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Age of Units

Chart 2: Units by Year Structure Built, 2019 shows a breakdown of the number of units by the year in which their structure was built. The large majority of units in Willows are older in age, with an estimated 70.6% of all housing units built before 1980. Furthermore, almost one in five were built before 1950. Only an estimated 72 units, or 3% of all units in Willows, have been built after 2009. This chart illustrates that Willows has a high proportion of older units and indicates that there is a high need for ongoing rehabilitation and maintenance of most of the structures in the city.

Chart 2: City of Willows, Year Structure Built, 2019



Source: U.S. Census Bureau, 2015-2019 American Community Survey

Housing Conditions

In May 2014, Pacific Municipal Consultants (PMC) conducted a windshield survey of housing conditions for the City of Willows, consisting of 1,733 residential parcels throughout the city. Housing conditions were assessed by an exterior survey of quality, condition, and improvement action. Each parcel was placed in one of the following classifications based on the survey observations: Sound (sound conditions; no need for improvements); Minor (in need of minor improvements); Moderate (in need of moderate

improvements); Substantial (in need of substantial improvements); and Dilapidated (dilapidated condition).

The 2014 Housing Conditions Survey was updated as part of the 2021-2029 Housing Element. Parcels with residential structures classified as Substantial or Dilapidated were re-surveyed to assess any changes to their conditions. In addition, the updated survey identified properties that could be classified as Substantial or Dilapidated that were not identified as such in the 2014 survey. Below is a table that summarizes the findings from the updated 2021 survey in comparison to the 2014 survey (Table 31: 2021 Housing Conditions Survey Results, 2014 and 2021). The number of residential structures classified as Substantial declined dramatically, by almost 80%. The number of structures classified as Dilapidated also declined significantly by about 44%. A review of 2020 building permits confirms a high level of investment in existing housing stock. There were 242 permits processed for repairs by the City of Willows, and almost one in five were for roofing.

Table 31: City of Willows, Housing Conditions Survey Results, 2014 and 2021

	2014	2021	Percent Change
Substantial	114	23	79.82% decrease
Dilapidated	34	19	44.11% decrease
No longer Substantial or Dilapidated		105	
Not Surveyed--Unable to view from street		1	
No units on site--Demolished		1	
Not Surveyed		12	

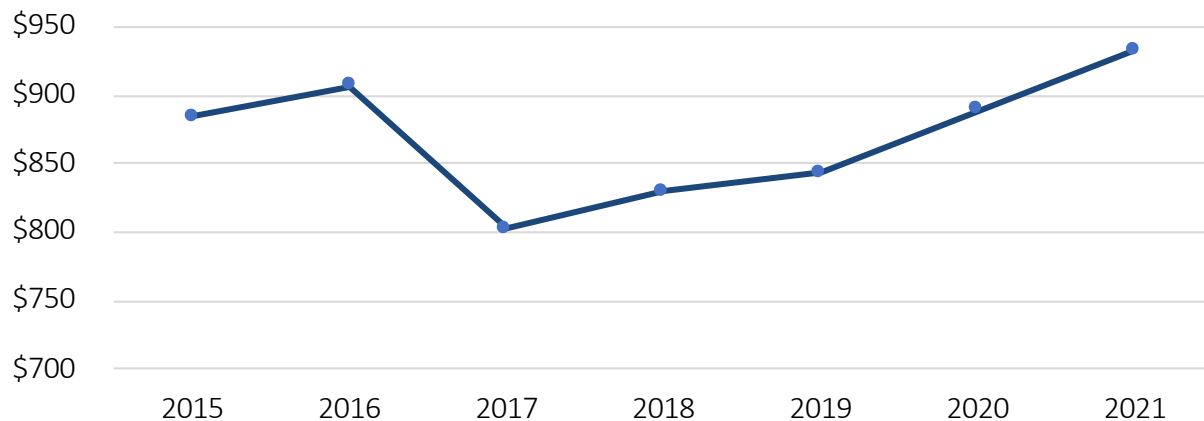
Sources: Housing Conditions Surveys, Pacific Municipal Consultants (2014) and Housing Tools (2021)

The 2021 Housing Conditions Survey found that Block Groups 1 and 2 have concentrations of structures that are in need of rehabilitation. In addition, Block Group 1 has higher concentrations of low-income households and Hispanic/Latino residents than the city as a whole. Block Group 2 has higher concentrations of Asian residents than the city as a whole. The 2021 Housing Conditions Survey concludes with recommendations to improve these areas with targeted public investments.

The data in Table 31 showing the results of the 2021 Housing Conditions Survey Update indicates that there are 23 units that are in need of substantial rehabilitation and 19 units that are dilapidated. Therefore, the estimated substantial rehabilitation need in the City of Willows is the sum of these two figures, or 42 units.

Rental Market

Table 32: Fair Market Rent, 2015-2021 and **Chart 3: Average Fair Market Rent, 2015-2021** shows Fair Market Rents by unit size for Glenn County, as calculated by the U.S. Department of Housing and Urban Development. Average Fair Market Rent has increased at a gradual rate over the past seven years, falling more than \$100 from 2016 and 2017, then increasing again to \$933 in 2021. Rents for one-bedrooms and two-bedrooms have increased more rapidly than other unit sizes over this timeframe.

Chart 3: Average Fair Market Rent, 2015-2021**Table 32: City of Willows, Fair Market Rent, 2015-2021**

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Average
2015	\$570	\$574	\$777	\$1,121	\$1,376	\$884
2016	\$611	\$615	\$823	\$1,144	\$1,336	\$906
2017	\$537	\$583	\$775	\$1,049	\$1,068	\$802
2018	\$558	\$611	\$813	\$1,060	\$1,107	\$830
2019	\$569	\$632	\$836	\$1,047	\$1,130	\$843
2020	\$597	\$670	\$883	\$1,100	\$1,196	\$889
2021	\$627	\$703	\$926	\$1,152	\$1,256	\$933

Source: U.S. Department of Housing and Urban Development, Fair Market Rents 2015-2021

Average asking rent by building age is shown in **Table 33: Average Asking Rent by Building Age, 2020**. No rental apartments were built in Willows prior to 1970 and during the 1990s. Newer units built after 2000 actually have lower average asking rents than older properties because most of these units are in affordable rent-restricted properties. Average asking rents for all properties in Willows (\$785) are much lower than in nearby Chico (\$1,104) by comparison.

Table 33: Average Asking Rent by Building Age, 2020

Year Built	Rent
Before 1970	\$0
1970-1979	\$854
1980-1989	\$842
1990-1999	\$0
2000-2009	\$722
2010+	\$722
All	\$785

Source: Property Dynamics Market Study, 2019, California State Department of Housing and Community Development 2020 Rents

In December of 2019, Housing Tools, a housing consultant, did a survey of all multifamily rental complexes in Glenn County, including all of the complexes in Willows. The survey found that all the market rate complexes, which totaled 77 units, had a vacancy rate of 0%. Of the six market rate properties that were surveyed, four were located in Willows. For all the affordable rental complexes, with a total of 423 units, there was a vacancy of 3.3%. Of the eleven affordable complexes, four were located in Willows. The vacancy rate for the combined units was 2.8%. As a rule of thumb, a healthy rental market is defined as having a vacancy rate of 5%. In addition, the affordable complexes maintained a waiting list. The survey found that the affordable complexes have 487 households on their waiting list.

For-Sale Market

The number of single-family residential building permits pulled for new construction is shown in **Table 34: Residential Building Permits, 2015-2020**.

Table 34: City of Willows and Glenn County, Residential Building Permits, 2015-2020

Year	Single Family		
	City of Willows	Glenn County	Total
2015	1	2	3
2016	2	9	11
2017	0	18	18
2018	0	5	5
2019	4	22	26
2020	1	5	6
Total	7	56	63

Source: City of Willows, 2021 & Glenn County Housing Study, 2020

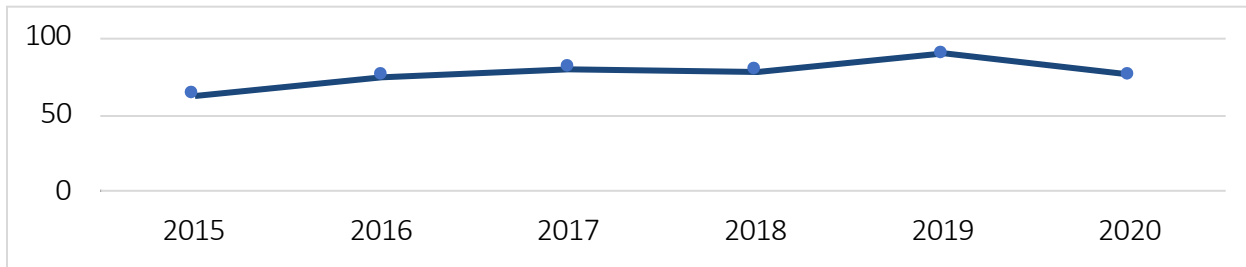
The number of homes sold each year is a good indicator of market demand for homes, as well as the availability of homes for sale. **Table 35: Number of Homes Sold by Type, 2015-2020** illustrates fairly consistent levels of home sales for most of the past six years. There was a spike in home sales between 2018 and 2019 of 18%, most likely due to the Camp Fire. The number of sales then dropped back down close to the 2018 level in 2020. Almost all of the sales were single-family homes, with 1-4 manufactured homes sold each year.

Table 35: City of Willows, Number of Homes Sold by Type, 2015-2020

	Single-Family	Manufactured	Other	Total
2015	62	1	0	63
2016	72	2	1	75
2017	76	3	1	80
2018	71	4	3	78
2019	84	3	3	90
2020	74	2	0	76

Source: Sierra North Valley Realtors, December 2020 Multiple Listing Service

Chart 4: City of Willows, Total Number of Homes Sold, 2015-2020



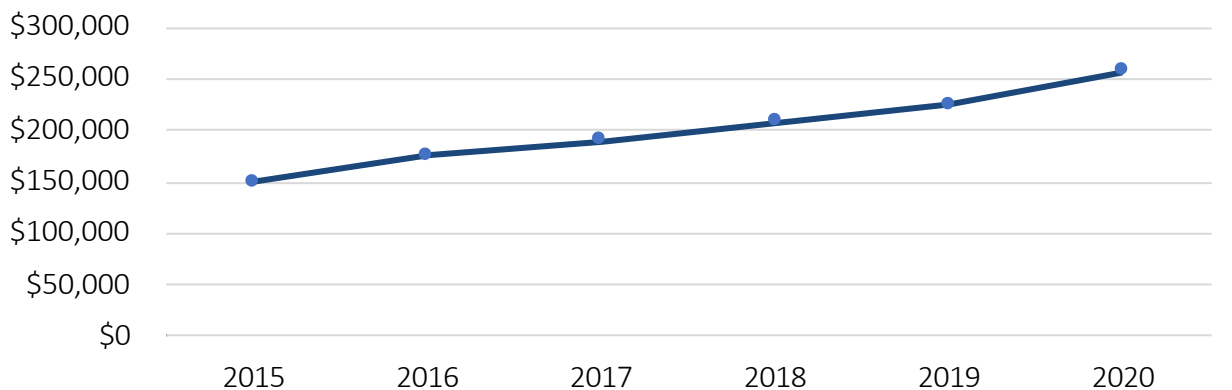
The median sale price of homes has increased dramatically over the last six years. The 2015 median sale price of \$150,000 grew by 71% to \$257,000 in 2020. Short sales accounted for less than 5% of sales in each of those years. **(Chart 5: Median Sale Price by Type of Sale, 2015-2020)**

Table 36: City of Willows, Median Sales Price by Type of Sale, 2015-2020

	All	Standard	Short Sale	Real Estate Owned (REO)
2015	\$150,000	\$154,500	\$200,750	\$93,450
2016	\$175,000	\$175,000	\$0	\$144,212
2017	\$190,000	\$190,000	\$235,000	\$108,000
2018	\$208,000	\$208,000	\$232,000	\$170,000
2019	\$225,000	\$230,000	\$0	\$136,000
2020	\$257,000	\$257,000	\$0	\$0

Source: Sierra North Valley Realtors, December 2020 Multiple Listing Service

Chart 5: Median Sale Price by All Types of Sale, 2015-2020



At-Risk Units

Below market-rate, or affordable, housing usually has long-term rental assistance contracts that pay the difference between 30% of tenant incomes and Fair Market Rents. Housing Element law (Government Code Section 65583(a)(9)) requires that Housing Elements identify affordable projects with rental assistance contracts that will expire within the next 10 years. The Eskaton Kennedy Manor project described below has a contract that is the soonest to expire, in October of 2031. Eskaton Kennedy Manor has 54 units, accounting for 27% of all affordable units in Willows. The project serves seniors and persons with disabilities.

Table 37: City of Willows, At-risk Assisted Housing Projects, 2020

Project Name	Address	Number of At-risk Units	Target Population	Subsidy Source	Contract Expiration Date
Eskaton Kennedy Manor	714 N Humboldt Ave	54	Seniors/People with Disabilities	HUD/Section 8	10/31/31

Source: National Housing Preservation Database, December 2020

Government Code, Section 65583(a)(9)(B) requires that Housing Elements estimate the cost of preserving at-risk units or constructing new replacement units. The feasibility of preserving the units depends on the willingness of the owner to sell the property, the existence of qualified nonprofit purchasers and the availability of funding. The cost of acquiring a multi-family complex was estimated by surveying similar projects in rural Northern California. Based on a review of eight sales that are listed for sale or that closed in within the last three years, the average per unit cost was about \$100,000. To estimate rehabilitation costs, similar rehabilitation projects located in Corning and Clearlake that received tax-exempt bond allocations in August 2021 were analyzed. Based on these comparables, the typical rehabilitation cost for a project like Kennedy Manor is roughly \$70,000 per unit. A review of the projects in Corning and Clearlake indicates that soft costs (design, permits, developer fee, financing costs, etc.) account for about 23% of total development costs, or \$50,000 per unit. Using these estimates, the total development costs for acquiring and rehabilitating Kennedy Manor in order to preserve affordability would be about \$220,000 per unit. The assumed cost to preserve all 54 at-risk units is estimated at \$11,880,000.

If the owners of a property choose to keep the project and convert the units to market-rate rents, it would be necessary for the city or its partners to replace the converted units with newly constructed assisted units. The recently built Sycamore Ridge Apartments is a recent example of an affordable multi-family project in the city that was built in 2021. Sycamore Ridge Apartments has a per unit total development cost of \$411,917. Using this estimate, the cost to replace the 54 at-risk units at Eskaton Kennedy Manor would be approximately \$22,243,493, or roughly twice the cost of acquiring and rehabilitating them.

Potential development entities qualified to acquire and preserve any units at risk include Dawson Holdings, Inc; Pacific West Communities; Rural Community Housing and Development Corporation and Community Housing Improvement Program. Typical funding sources would include tax credits, tax exempt bonds, State MHP, State HOME and USDA.

HOUSING AFFORDABILITY

Overpayment

Housing affordability can be measured by the percent of income paid toward housing costs. HUD considers households that pay over 30% of their income to housing as rent burdened. Households that pay over 50% of their income to housing are considered severely rent burdened. This metric indicates the extent of household overpayment.

Table 38: Households by Percent of Income Paid Toward Housing Costs, 2019 shows the number and percent of households that are overpaying for housing by income level and tenure. Just over one-third of households in renter-occupied units (34%) earn less than \$20,000 per year and pay 30% or more of their income toward rent. About 22% of households in renter-occupied units earn between \$20,000 and \$34,999 and pay 30% or more of their income toward rent. This represents an estimated 733 households

that earn less than \$35,000 and are rent burdened, which is about one in every three households in Willows.

About 18% of households in owner-occupied units pay 30% or more of their income toward housing costs, while about 57% of households in renter-occupied units fall into this category. About 44% of households in owner-occupied units pay less than 20% of their income toward housing costs, while about 20% of households in renter-occupied units fall into this category. Of the estimated 186 Low Income homeowners earning less than \$35,000, 102 pay 30% or more of their income to housing costs.

Table 38: City of Willows, Households by Percent of Income Paid Toward Housing Costs, 2019

Monthly housing costs as a percentage of household income in the past 12 months	Owner-occupied housing units	Percent owner-occupied housing units	Renter-occupied housing units	Percent renter-occupied housing units
Incomes Less than \$20,000	28	2.8%	523	40.1%
Less than 20 percent	0	0.0%	0	0.0%
20 to 29 percent	28	2.8%	75	5.8%
30 percent or more	0	0.0%	448	34.4%
Incomes \$20,000 to \$34,999	158	15.7%	312	23.9%
Less than 20 percent	35	3.5%	0	0.0%
20 to 29 percent	21	2.1%	27	2.1%
30 percent or more	102	10.1%	285	21.9%
Incomes \$35,000 to \$49,999	107	10.6%	77	5.9%
Less than 20 percent	35	3.5%	0	0.0%
20 to 29 percent	59	5.9%	77	5.9%
30 percent or more	13	1.3%	0	0.0%
Incomes \$50,000 to \$74,999	256	25.4%	173	13.3%
Less than 20 percent	143	14.2%	100	7.7%
20 to 29 percent	102	10.1%	59	4.5%
30 percent or more	11	1.1%	14	1.1%
Incomes \$75,000 or more	459	45.5%	165	12.7%
Less than 20 percent	229	22.7%	165	12.7%
20 to 29 percent	176	17.5%	0	0.0%
30 percent or more	54	5.4%	0	0.0%
Zero or negative income	0	0.0%	18	1.4%
No cash rent			36	2.8%

Source: US Census, 2015-2019 American Community Survey

Table 39: Market Rent Compared to Affordable Rent, 2021 shows market rent compared to affordable rent by income level. A three-person Very Low-Income households earning 50% of Area Median Income can afford rent at \$785, which is \$141 less than the Fair Market Rent for a two-bedroom unit in Glenn

County. An Extremely Low-Income Household earning 30% of Area Median Income can afford rent at \$549, which is \$377 less than the Fair Market Rent for a two-bedroom unit in Glenn County.

Table 39: Glenn County, Market Rent Compared to Affordable Rent, 2021

Affordability Category	Affordable Rent	Income (3 Person Households)	Affordability Gap
Glenn County 2-bdrm Fair Market Rent	\$926	\$37,040	
Low Income Household	\$1,255	\$50,200	
Very Low-Income Household	\$785	\$31,400	\$141
Extremely Low-Income Household	\$549	\$21,960	\$377

Source: U.S. Department of Housing and Urban Development, 2021 Fair Market Rent and Section 8 Income Limits

Availability of Affordable Units

Table 40: Publicly Subsidized Rent-Restricted Units, 2021 lists all of the publicly subsidized rent-restricted units in Willows. In addition to these 200 units, there are 27 households utilizing Housing Choice Vouchers administered by the Housing Authority of the County of Butte in Willows, which pay the difference between 30% of household income and the Fair Market Rent.

Table 40: City of Willows, Publicly Subsidized Rent-Restricted Units, 2020

Project Name	Tenancy Restricted / Target Population	1BR	2 BR	3 BR	4 BR	Total Subsidized Units	Rent	Number on Wait List
Eskaton Kennedy Manor	Age 62 or older, or person with a disability	53	2			55	30% Income	52
Willow Oaks Apartments	Low Income; Sec 8 Project Based; Section 515 Rural Rental Housing	20	32	8		60	30% of Gross Income to Rent	
Willow Springs Senior Apartments	Must be age 55 or older	39	10			49	\$438-\$525	15
Willows Apartments	Low Income	16	16	4		36	\$621-\$1,168	69
Total		128	60	12	0	200		136

Source: Glenn County Housing Study

Chart 6: Low Income Households and Subsidized Units compares the number of subsidized rent-restricted units and households with Housing Choice Vouchers to the number of low-income households in need of such housing. There are 227 affordable rent-restricted units available to house an estimated 1,039 low-income households earning less than \$35,000 in Willows, which is a shortfall of 812 affordable units.

Chart 6: Low Income Households and Subsidized Units

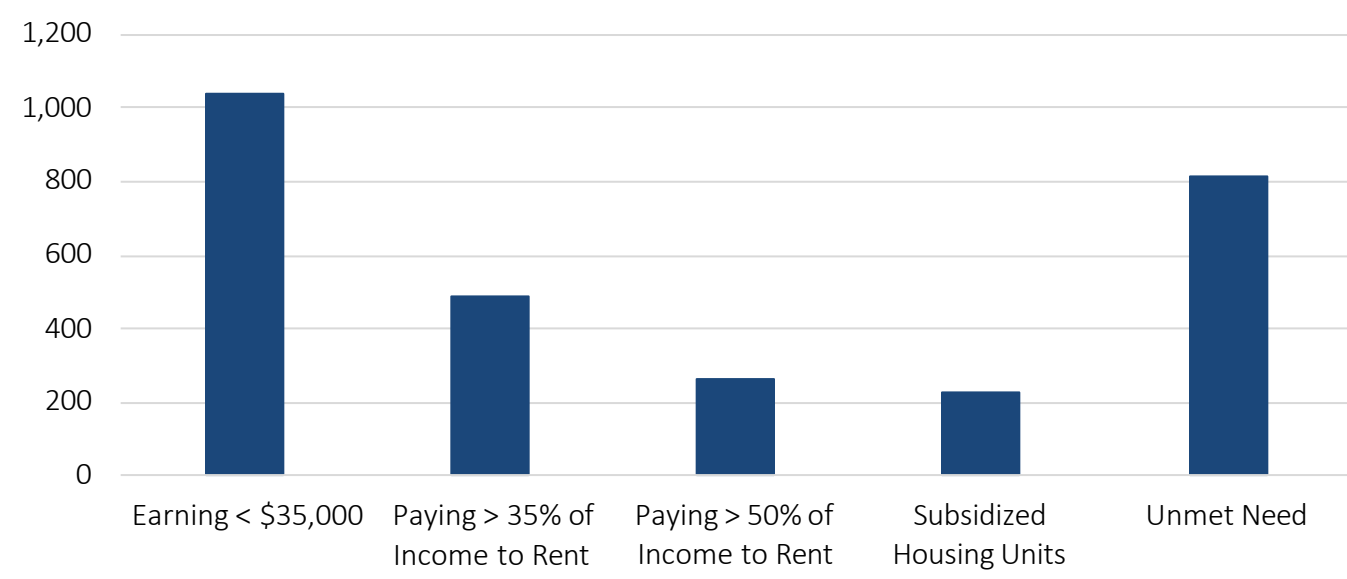


Table 41: City of Willows, Low Income Households Relative to Subsidized Housing Units, 2019

	Number of Households
Earning < \$35,000	1,039
Paying > 35% of Income to Rent	488
Paying > 50% of Income to Rent	265
Subsidized Housing Units	227
Unmet Need	812

Source: Glenn County Housing Study, 2020; Housing Authority of the County of Butte, 2021; U.S. Census Bureau, 2015-2019 American Community Survey

For-Sale Home Affordability

Table 42: For-sale Home Affordability, 2020 calculates the price of a home that is affordable to a four-person household earning median income in Willows. That price exceeds the median home price, and estimated prices for a new 1,200 square foot starter home, and a new mid-range 2,000 square foot home. Approximately one-third of the homes sold in Willows in 2020 were priced \$225,000 and below. The current assumed mortgage interest rate of 3.25% helps make home prices affordable to households in the median income range.

Table 42: City of Willows, Affordability of For-Sale Homes, 2020

	Median 4-Person Hsld Income Affordable Home Price	Typical New Starter Home Price (1,200 sq. ft.)	Median Home Price	Starting Mid- Range New Home Price (2,000 sq. ft.)
Household Income	\$70,700	\$41,449	\$51,708	\$68,853
Affordable Monthly Housing Payment	\$2,062	\$1,209	\$1,508	\$2,008
Subtract Taxes, MI, and Property Insurance	\$496	\$326	\$446	\$536
Mortgage Payment	\$1,547	\$883	\$1,063	\$1,472
Affordable Mortgage	\$355,363	\$202,920	\$244,150	\$338,200
Down Payment	\$18,703	\$10,680	\$12,850	\$17,800
Affordable Home Price	\$374,066	\$213,600	\$257,000	\$356,000

Assumes affordable housing payment at 35% of monthly income, 3.25% interest rate, 30-year fixed-rate mortgage, 5% down payment, property taxes at 1.1%, monthly mortgage insurance payments of \$80-\$130, monthly property insurance payments of \$50-\$80. Per square foot cost of \$178 per square foot based on average per square foot cost for 2020 sales.

Source: Sierra North Valley Realtors, December 2020 Multiple Listing Service, California Department of Housing and Community Development, April 2020

EXTREMELY LOW-INCOME HOUSEHOLDS

Extremely Low Income (ELI) households earn less than 30% of the Area Median Income, as defined by federal and state governments. In Glenn County, 30% of Area Median Income ranges from \$14,700 for a one-person household to \$30,680 for a five-person household. As of 2019, the U.S. Census estimated that there were 731 households in Willows earning less than \$25,000 annually, which is just over 30% of all households, as shown in **Table 43: Annual Household Income, 2019**. Almost all households in this income range fall into the ELI category. In addition, most households with four or more persons in the \$25,000 to \$34,999 income range fall into the ELI category. Almost half of all Willows households earn less than \$35,000. These income category percentages are similar to the 2012 data included in the 2014 Housing Element update.

As shown in **Table 38**, there are an estimated 551 households earn less than \$20,000 annually, which are Extremely Low-Income Households. Of these households, 28 are homeowners and 523 are renters. A portion of the 470 households earning between \$20,000 and \$34,999 are also Extremely Low Income. Of these households, 158 are homeowners and 312 are renters.

Table 43: City of Willows, Household Income by Housing Tenure, 2019

Household Income (in past 12 Months)	Owner-occupied Housing Units	Percentage Owner-occupied	Renter-occupied Housing Unit	Percentage Renter-occupied
Less than \$5,000	0	0.0%	120	9.2%
\$5,000 to \$9,999	0	0.0%	36	2.8%
\$10,000 to \$14,999	14	1.4%	205	15.7%
\$15,000 to \$19,999	14	1.4%	180	13.8%
\$20,000 to \$24,999	108	10.7%	54	4.1%
\$25,000 to \$34,999	50	5.0%	258	19.8%
\$35,000 to \$49,999	107	10.6%	113	8.7%
\$50,000 to \$74,999	256	25.4%	173	13.3%
\$75,000 to \$99,999	188	18.7%	60	4.6%
\$100,000 to \$149,999	233	23.1%	105	8.1%
\$150,000 or more	38	3.8%	0	0.0%
Median household income (dollars)	\$66,974		\$25,874	
Occupied housing units	1,008		1,304	

Source: U.S. Census Bureau, 2015-2019 American Community Survey

The Federal Poverty Threshold is a measure of material need used by federal agencies to determine eligibility for certain programs and benefits. For 2021, the Federal Poverty Threshold ranged from \$12,880 for a one-person household to \$31,040 for a five-person household, which closely aligns with ELI incomes for Willows. In 2019, there were an estimated 424 households living below the Poverty Threshold in Willows according to the U.S. Census. **(Table 44: Households Living Below the Poverty Threshold, 2019)**

Table 44: City of Willows, Households Living Below the Poverty Threshold, 2019

	Number of Households	% of Total
Income below poverty	424	18.3%
Income below poverty, nonfamily, female householder	142	6.1%
Income below poverty, family, married-couple family	133	5.8%
Income below poverty, all other	149	6.4%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Overpayment

Most ELI households are rent burdened, many live in overcrowded conditions, and many are at-risk of becoming homeless. **Table 45: Renter Households Paying Over 30% of Income Toward Housing Costs** shows that 88% of renter households earning less than \$35,000 annually, a total of 733 households, pay 30% or more of their income toward housing costs.

Table 45: City of Willows, Renters Households Paying Over 30% of Income Toward Housing Costs, 2019

Household Income	Less than 30% of Income Toward Housing Cost	30% or More of Income Toward Housing Costs	Total Renter Occupied Housing Units
Less than \$35,000	102	733	835
\$35,000-49,999	77	0	77
\$50,000-74,999	159	14	173
\$75,000 or more	165	0	165
Zero or Negative Income, No Cash Rent	X	X	54

Source: US Census, 2015-2019 American Community Survey

Overcrowding

As defined by HUD, an “Overcrowded” household is defined as a household living in a unit with more than one occupant per room. A “Severely Overcrowded” household is defined as a household living in a unit with more than 1.5 occupants per room. **Table 46: Occupants per Room by Tenure, 2019** shows that there 178 Overcrowded households in Willows in 2019, which was 7.7% of all households. There were no Severely Overcrowded households estimated in this data set. Given the limited purchasing power of ELI households, and the large proportion of ELI households that are rent burdened, it is likely that a large proportion of Overcrowded households are ELI.

Table 46: City of Willows, Tenure by Occupants per Room, 2019

Occupants per Room	Owner-occupied	Renter-occupied	Total
0.50 or less occupants per room	604	774	1,378
0.51 to 1.00 occupants per room	347	409	756
1.01 to 1.50 occupants per room	57	121	178
1.51 to 2.00 occupants per room	0	0	0
2.01 or more occupants per room	0	0	0
Total	1,008	1,304	2,312
Overcrowded (1.01 or more)	57	121	178
Severely overcrowded (1.5 or more)	0	0	0

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Available Units, Resources, and Policies

The Regional Housing Needs Allocation for Willows estimates a need for the production of 47 units affordable to Very Low-income households, half of which should be affordable to ELI households, over the 2021-2029 Housing Element planning period. The provision of ELI affordable housing usually requires significant public subsidy for capital costs as well as operations. The very low ELI affordable rents usually necessitate rental assistance such as Section 8 Project Based Vouchers to cover operating expenses. This type of rental assistance pays the landlord the difference between 30% of tenant income and Fair Market Rents as set by HUD. In addition to financing, various local policies can help facilitate the production of

ELI housing. These are listed below:

- Allowance for Single-Room Occupancy (SRO), group homes, and/or tiny home projects as permitted uses in the zoning code;
- Allowance for Transitional and Supportive Housing in all residentially zoned districts as well as the Community Commercial (CC) and General Commercial (GC) zoning districts, with no restrictions beyond what would apply to any other types of residential development;
- Impact fees with sliding scales based on unit size so as not to place an undue financial burden on projects with small units; and
- Impact fee waivers or deferrals for projects with low income or ELI affordable rents.

The City of Willows currently allows “residences, boardinghouses, transitional and supportive housing, and group dwellings” as permitted uses in its R-2, R-3, R-P and CC Central Commercial and CG General Commercial Districts. The CC and CG zoning districts cover an area 2-3 blocks wide that stretches parallel to the railroad from the Central Canal on the south end of town to the north end of town at Eureka Street. Group dwellings or group homes are permitted uses in the R-2, R-3 and R-P zoning districts. Transitional and Supportive Housing are allowed as permitted uses in all residential zoned districts. Willows does not have sliding scale impact fees based on unit size, or impact fee deferrals, but it does waive impact fees for development in the historic central area and defers payment of impact fees till receipt of certificate of occupancy.

SPECIAL NEEDS HOUSEHOLDS

Seniors

There are an estimated 1,534 people 60 years and older in Willows. This is approximately 26% of the population. Of the estimated 662 households with the householder 65 years or older in Willows, almost two-thirds (64%) earn less than \$30,000, and almost one-third (32%) earn less than \$15,000. This points to the high need for affordable housing for seniors. A majority of seniors have extremely low or very low incomes, and most have fixed incomes because they are no longer employed. Seniors with limited fixed incomes require restricted affordable rents that provide predictability, security, and stability (**Table 47: Income for Householders 65 Years and Over, 2019**).

Table 47: City of Willows, Income for Householders 65 Years and Over, 2019

	Number of Households	% of All Senior Householders
Less than \$15,000	213	32.2%
\$15,000 to \$29,999	210	31.7%
\$30,000 to \$44,999	60	9.1%
\$45,000 to \$59,999	76	11.5%
\$60,000 to 74,999	51	7.7%
\$75,000 to \$99,999	13	2.0%
Over \$100,000	39	5.9%
Total	662	100%

Source: U.S. Census Bureau, 2015-2019 American Community Survey | Table: B19037

As shown in **Table 48: Persons with a Disability by Age, 2019**, almost half of the civilian noninstitutionalized population in Willows age 65 and over (45.5%) has a disability. This is a higher proportion than the State of California as a whole for the same age group.

Table 48: City of Willows, Persons with a Disability by Age, 2019

	Persons with a Disability	% of Population by Category
Total population	1,103	18.9%
Under 18 years	109	6.9%
Age 18 to 64	532	16.4%
65 years and over	462	45.5%

Source: U.S. Census Bureau, 2015-2019 American Community Survey (civilian noninstitutionalized population)

Seniors will benefit from a continuum of housing options that accounts for mental and physical disabilities, and restricted mobility challenges that may change over time. Publicly subsidized affordable housing typically helps seniors live independently and age in place for as long as possible. The physical design incorporates ADA units and ADA adaptable features, in addition to full accessibility to units and common areas for wheelchair users. Semi-independent retirement communities and nursing facilities are other residential models that meet critical needs for seniors.

There are two low-income, publicly subsidized senior housing complexes in Willows:

- Eskaton Kennedy Manor has 54 affordable apartments. Rent is 30% of income, regardless of income. It has a HUD Section 8 contract that expires in 2031, as described under the At-Risk section of this Housing Needs Assessment chapter.
- Willows Springs Senior Apartments, built in 2015, has 49 affordable apartments, all with rents under \$600 per month.

There are seven state-licensed assisted living care facilities for the elderly in Glenn County, but there are not any in Willows. One is located 14 miles east of Willows in the town of Glenn. The others are located in Orland. (State of California Community Care Licensing Division, 2021).

Persons with a Disability

Persons with disabilities have particular housing needs depending on their situation. Public funding sources for housing typically require that 5%-10% of units are fully accessible for persons with physical disabilities per the American with Disabilities Act, and that 2% are accessible to persons with sensory disabilities. In addition, publicly assisted affordable housing often offers resident services that connect tenants with local peer support and advocacy organizations, health services, and transportation assistance. A number of federal and state sources fund Permanent Supportive Housing for persons with mental disabilities, which include individualized case management and mental health services.

There were an estimated 1,103 persons with a disability in Willows in 2019 according to the U.S. Census. This was about 19% of the total Willows population. This was higher than the proportion of persons with a disability statewide, which was about 11%. The proportion of persons 65 years and older with a disability in Willows was also significantly higher than the proportion statewide, at 46% in Willows compared to 35% in the state as a whole. **(Table 48: Persons with a Disability by Age, 2019)**

Table 49: Disability Characteristics, 2019 shows estimates for persons with a disability by type of disability, or type of “difficulty” as termed by The U.S. Census. One individual may have multiple types of disability. The types of disability are fairly evenly distributed. Ambulatory difficulty is the largest category, followed by independent living difficulty. This distribution is fairly consistent with the state as a whole.

Table 49: City of Willows, Disability Characteristics, 2019

	Persons	% of Population by Category
With a hearing difficulty	330	5.7%
With a vision difficulty	269	4.6%
With a cognitive difficulty	315	5.4%
With an ambulatory difficulty	424	7.2%
With a self-care difficulty	198	3.4%
With an independent living difficulty	393	6.7%

Source: U.S. Census Bureau, 2015-2019 American Community Survey (civilian noninstitutionalized population)

State Housing Element law also requires jurisdictions to specifically analyze needs for persons with developmental disabilities. The California State Department of Developmental Services provides data on Regional Center and Early Start consumers by zip code. As of the end of June 2021, there were 111 consumers (63 under 18 years old and 48 over 18 years old) with developmental disabilities in the 95988- zip code which encompasses the City of Willows and surrounding rural areas from Artois to Norman. In terms of type of residence of consumers in this zip code, 91 live in the home of parent, family, or guardian, and 19 have independent or supported living situations. None of the consumers were living in a community care facility, intermediate care facility, or foster care.

The City of Willows has incorporated a reasonable accommodation policy into its zoning and building codes. This means that non-discretionary variances can be made to zoning and building code requirements if the request is made on behalf of a person with disabilities. More detail is provided in the Constraints chapter.

Female-Headed Households

About one-fifth of families in Willows are female-headed households with no spouse present, which is an estimated 275 families. These families have a much lower median income than married-couple families, and families in general, as shown in **Table 50: Family Median Income, 2019**. The median income for female-headed families is just over half the median income for married-couple families. Another indicator of economic well-being is the number of families with income below the poverty level. A larger proportion of female-headed families has income below the poverty level (22.2%) than families overall (18.0%). A slightly larger proportion of female-headed families with related children has income below the poverty level (26.2%). (**Table 51: Female Householder Families Below Poverty Level, 2019**)

Table 50: City of Willows, Family Median Income, 2019

	Median Income
Families	\$59,063
Married-couple families	\$72,237
Female householder, no spouse present	\$41,051
Male householder, no spouse present	N/A

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Table 51: Female Householder Families Below Poverty Level, City of Willows, 2019

	Number of Female Householder Families, No Spouse Present	% of Female Household Families, No Spouse Present	Number of Female Householder Families, No Spouse Present, With Related Children of the Householder Under 18 Years	% of Female Householder Families, No Spouse Present, With Related Children of the Householder Under 18 Years
Below poverty level	61	22.2%	17	26.2%
At or above poverty level	214	77.8%	48	73.8%
Total	275		65	

Source: U.S. Census Bureau, 2015-2019 American Community Survey | Table: B17013

Female-headed households can benefit from a number of features offered by publicly subsidized housing. Most importantly this type of housing offers affordable restricted rent. In addition, many of these types of housing projects offer after-school programs and youth recreation programs. Many also have amenities such as computer labs, community rooms for youth activities and adult education, and playgrounds. Affordable childcare is also a critical need for these families.

Large Households

A breakdown of the number of households by household size for Willows is shown in **Table 52: Household Size, 2019**. Most households fall into the size categories of two persons per household, and four or more persons per household, each with about one-third of all households. Data for households with five or more persons was not available for Willows.

Table 52: City of Willows, Household Size, 2019

	Households	% of Total
1-person	672	29.1%
2-persons	760	32.9%
3-persons	127	5.4%
4+ persons	753	32.5%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Table 53: Median Family Income by Family Size, 2019 shows median family income by family size. While families with four persons have a higher median income than smaller families, families with seven persons or more have a significantly lower median income than families with four persons. The lower median family income for large families in Willows is not consistent with the same data set for the state as a whole, which shows the median income for families with seven or more persons at \$95,238, which is higher than all family sizes except four-person families.

Table 53: City of Willows, Median Family Income by Size, 2019

	Median Income
2-person families	\$53,542
4-persons	\$95,223
7-persons or more	\$59,303

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Large households have higher housing costs, and face challenges securing housing that is not overcrowded. The Fair Market Rent for a four-bedroom house or apartment in Willows is \$1,256, which would be affordable for a seven-person family earning the median income of \$59,303. But this rent is unaffordable for large low-income families earning less than 80% of Area Median Income at \$47,442.

People Experiencing Homelessness

The Dos Rios Continuum of Care completes a Point-in-Time Homeless Census every 1-2 years. In 2019, 9 of the 45 homeless individuals surveyed countywide were in Willows. Individuals experiencing homelessness responded to questions on a survey form; responses were not provided by the surveyor. Below is a list of findings from the 2019 Point-In-Time Homeless Census for individuals surveyed in Willows.

- Habitation: 5 in a vehicle, 2 on the street or outside, 1 in a motel, and 1 in the hospital
- 4 of the 9 individuals reported that this was the first time they had experienced homelessness.
- Age: 19-67 years old
- Gender: 6 males; 3 females
- Ethnicity: None reported Hispanic or Latino
- Race: 7 White; 2 Native American
- Veteran Status: None reported being a veteran
- Disability: 2 reported receiving disability benefits such as SSI, SSDI, or Veterans Disability

As the Point-in-Time Census is a survey on one day in late January every 1-2 years, it is a representative sample and not comprehensive, since not all individuals experiencing homelessness that are living in Glenn County are surveyed. Many individuals experiencing homelessness are not publicly visible or easy to find, and Staff and volunteers do not always have adequate time or resources to locate them.

School district data can help round out the picture of homelessness. The California Department of

Education, in coordination with school districts, collects data on housing insecurity for its students. **Chart 7: Homelessness in Public School Students by Nighttime Residence, 2018** shows how many students in Glenn County were living in various homeless situations in 2018. This data provides a broader picture than the Point-In-Time Homeless Census of the number of families that are experiencing homelessness or that are at risk of experiencing long-term homelessness. In the data collection process, a student may have been recorded as homeless in more than one school, school district, or county during a school year. As a result, this data may include duplicate counts of some students. An estimated 82% of students that were recorded as experiencing homelessness were doubled up with friends or relatives. This is consistent with accounts of rural and small city homelessness in other places as well due to the lack of temporary shelter options.

Chart 7: Homelessness in Public School Students by Nighttime Residence, 2018

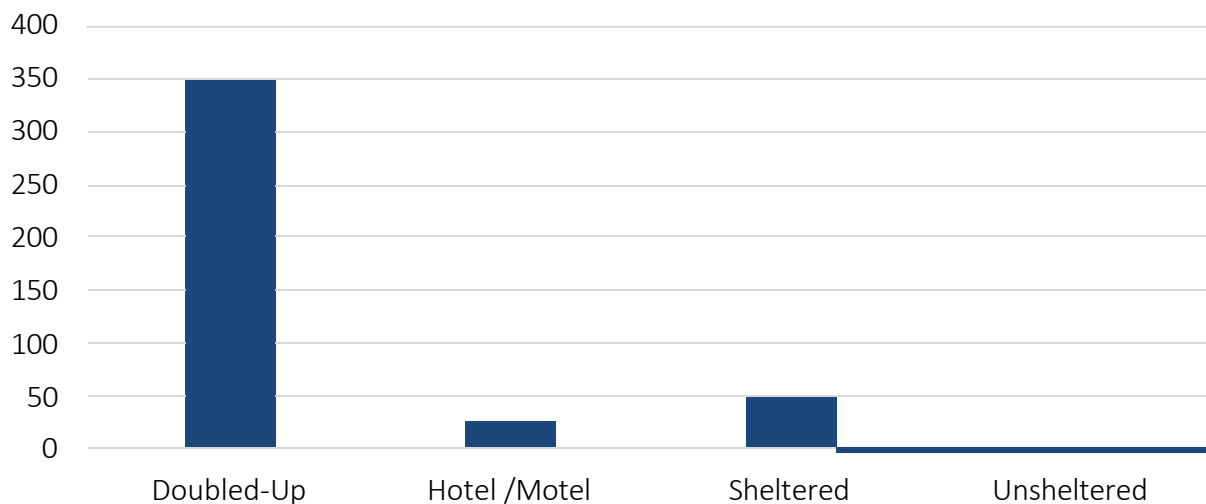


Table 54: Glenn County, Homelessness in Public School Students by Nighttime Residence, 2018

Local Educational Agency	Doubled-Up	Hotel /Motel	Sheltered	Unsheltered	Total
Glenn County Office of Education	9	1	1	2	13
Capay Joint Union Elementary	0	0	0	0	0
Lake Elementary	0	0	0	0	0
Plaza Elementary	0	0	0	0	0
Princeton Joint Unified	0	2	1	0	3
Stony Creek Joint Unified	24	0	1	0	25
Willows Unified	137	19	37	0	193
Orland Joint Unified	108	2	7	0	117
Hamilton Unified	70	0	0	1	71
Total	348	24	47	3	422

Source: California Department of Education, Coordinated School Health and Safety Office custom tabulation, 2018

Table 55 provides information on services that were provided to Willows households from 2019 through the first quarter of 2021. The number of households in Willows that received temporary housing benefits increased significantly from 2019 and 2020, jumping from 14 to 50. This trend appears to be

continuing in 2021, with 17 households receiving temporary housing benefits in the first quarter.

Table 55: Glenn County Community Action Department, City of Willows Number of Households Served by Year, 2019-2021

Number of Households Served During Time Period				
Program Assistance Type		2019	2020	1st Quarter 2021
Homeless Assistance Requests	Temporary Housing Benefits	14	50	17
	Permanent Housing Benefits	18	29	3
	Both Temporary and Permanent Housing Benefits	15	11	1
Days Authorized for Temporary Shelter		1,809	1,853	519
Housing Support Program (HSP) - # of families served		51	39	20

Source: Glenn County Community Action Department, Homeless Assistance Requests by Program and Year, 2019-2021

Another information source that helps provide a more complete picture of homelessness is Mental Health Services Act (MHSA) data, collected by the Glenn County Department of Health and Social Services. **Table 56: Mental Health Services Act Data, 2020-2021** shows that 28 children in Glenn County are being served by the Full-Service Partnership program, which provides wrap around supportive services for families. The 60 clients listed as homeless, or couch surfing is a larger number of individuals than identified in the 2018 Point-In-Time Homeless Census countywide.

Table 56: Glenn County, Mental Health Services Act Data, 2020-2021

Glenn County MHSA Program Participants	Number of participants
Children who are FSP	28
Clients listed as homeless or couch surfing	60
Dual Diagnosis clients served in MH and SUDS	15
Clients served in specialty mental health services	45

Source: Glenn County Department of Health and Social Services, MHSA custom tabulation, 01/01/2020 to 5/19/2021

The State of California has dedicated significant new funding toward addressing homelessness in recent years. These new programs are described in the Resource Inventory chapter, Financial Resources section. Federal and state policies and programs have coalesced around a “Housing First” approach that seeks to eliminate barriers to entering permanent housing. Housing First prioritizes the stability and safety of permanent housing as key to opening up avenues for people to effectively address mental illness, substance abuse, and other issues that are exacerbated by homelessness. Most federal and state programs target homeless funding for the development of Permanent Supportive Housing that has a Housing First approach, has a referral process that is coordinated among government and social service agencies, and provides individualized case management and supportive services for tenants.

In recent years, the City of Willows has revised the zoning code in order to facilitate the production of housing for people experiencing homelessness, as mandated by State law. This has included:

- Allowance of emergency shelters as a use by-right in at least one zoning district; and
- Allowance for transitional and supportive housing, and group care homes, in residential districts with no additional requirements other than what would be required of any residential use.

The city allows emergency shelters by right in the Commercial Zoning Districts (GC/CC). There are currently 87.61 acres in the city which are zoned under these designations, which would provide adequate capacity to shelter the number of individuals and households experiencing homelessness, per the most recent PIT count. Homeless services are available in Willows through the County Department of Health and Human Services and the Community Action Department. Other than the Westside Domestic Violence Shelter, there are currently no emergency shelters or emergency shelter providers in Glenn County, including in Willows. The Willows Library does serve as an emergency heating and cooling center during periods of extreme weather but does not constitute an emergency overnight shelter. In contrast to more populated areas, there are very few nonprofit agencies in the county, and therefore few resources to undertake the development of congregate shelters. Individuals experiencing homelessness who seek shelter services are currently placed in motel rooms through the County's Homeless Assistance Programs.

The focus of the County's Community Action Department is on the development of Permanent Supportive Housing for individuals and households experiencing homelessness. The County is working with a nonprofit developer on a potential project utilizing No Place Like Home (NPLH) funds, and the City of Willows intends to financially support this project through an allocation of its Permanent Local Housing Allocation (PLHA) funds. The plan is for a 32-unit project in which 15 units would be dedicated to individuals experiencing homelessness with a serious mental illness and 16 units would be affordable to other low-income residents, including those experiencing homelessness. This project would address a significant portion of the unmet need for housing for those experiencing homelessness in Willows.

Farmworkers

There are an estimated 611 Willows residents employed in the agriculture, forestry, fishing and hunting, and mining industries. This is just over one quarter of the total employed population. This is a much higher proportion than for the state as a whole, in which just 2% of all employed residents are employed in these industries (**Table 57: Agriculture and Related Occupations, 2019**).

Table 57: City of Willows, Agriculture and Related Occupations, 2019

	Number of People Employed in Agriculture, Forestry, Fishing and Hunting, and Mining Industry	% of Total Employed Population
City of Willows	611	28.6%
Glenn County	2,506	22.2%
State of California	415,545	2.2%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

The Census of Agriculture is conducted every five years by the U.S. Department of Agriculture (USDA) and is a count of U.S. farms and ranches and the people who operate them. This data is available at the county level but not on the city level. This data provides additional information about farmworkers and housing need. **Table 58: Farm and Labor Characteristics, 2017** shows that as of 2017 in Glenn County there were an estimated 3,135 workers, including 2,087 migrant workers, on farms with hired labor. Migrant workers travel from their permanent place of residence to find work at one or more agricultural employers. A portion of these workers may be in need of temporary or permanent housing.

Table 58: Glenn County, Farm and Labor Characteristics, 2017

Jurisdiction	Number of Farms	Number of Farms with Hired Labor	Number of Workers on Farms with Hired Labor	Total Migrant Workers on Farms with Hired Labor
Glenn County	1,173	534	3,135	2,087

Source: U.S. Department of Agriculture, 2017 Census of Agriculture

The federal and state governments have specialized funding programs for farmworker housing. This includes the USDA housing programs, and the Joe Serna, Jr. Farmworker Housing Grant Program administered by the State Department of Housing and Community Development. These programs support the new construction and rehabilitation of owner-occupied homes and rental units for agricultural workers, with a priority for lower income households.

The Housing Authority of the County of Butte (HACB) owns farm labor housing (also known as farmworker housing) in the City of Gridley which is located in south Butte County. The farmworker housing in Gridley is located approximately 30 miles from Chico via Highway 99. This is the only farmworker housing owned by HACB in Butte County.

HACB and property management firm AWI Management Corporation staff provided information about the Gridley farmworker housing via email correspondence on April 7 and April 19, 2022. There are 79 occupied units with an average rental contribution of \$524 per month. There are 4 one-bedroom units, 59 two-bedroom units, 12 three-bedroom units, and 4 four-bedrooms units. At the time of the correspondence, there were eight households on the waiting list for a unit. AWI Management Corporation had started marketing for units using local radio, printing leasing banners, and generating flyers for distributing to local agricultural employees.

Community Housing Improvement Program (CHIP) is a private, non-profit 501(c)(3) corporation serving Butte, Glenn, Tehama, Shasta, Sutter, Yuba, and Colusa counties. CHIP assists low-income and rural disadvantaged residents, seniors, and others who lack financial resources or knowledge to improve or provide adequately for their housing. CHIP has built more than 2,600 housing units in its seven-county service area (Community Housing Improvement Program, Website, 2022).

In an interview for the Housing Element on April 11, 2022, via Zoom and email correspondence on April 4 and 22, 2022, CHIP staff shared farmworker housing needs and resources in Butte and Glenn counties where their properties are located. CHIP has three farmworker housing projects, with the first coming online in the 1980s. La Vista Verde in Chico (Butte County) has 33 units, Las Palmas in Hamilton City (Glenn County) has 12 units, and Rancho de Soto in Orland (Glenn County) has 33 units. All three properties have U.S. Department of Agriculture (USDA) funding, and Rancho de Soto also has Joe Serna, Jr. Farmworker Housing Grant Program and Low-Income Housing Tax Credits (LIHTC) funding.

La Vista Verde in Chico has 14 two-bedroom, 14 three bedroom, and 4 four-bedroom units in addition to 1 four-bedroom manager's unit. The average tenant rental contribution per month is \$423. The waitlist is minimal with two households as of April 11, 2022. Staff commented this is due to difficulty with qualifying households and filling units, which is explained in more detail in the following paragraphs.

CHIP's farmworker housing tenants typically work locally in fields, orchards, dairies, factories, and warehouses that process agricultural products. Some of the tenants work seasonally and others work year-round. Some seasonal workers have different employment in different seasons. Workers are busiest during harvest May through June and September through October. According to property management staff, tenants' employment was not affected much by the COVID-19 pandemic.

All three farmworker housing projects in Butte and Glenn counties require eligible immigration status (e.g., permanent resident, citizen, etc.), and a low-income of 50% AMI or less. If one member of the household is working full-time at the California minimum wage of \$15 per hour, any overtime puts the household over the income requirement. Overtime is common for farmworkers at certain times of the year due to seasonal crop harvest. Thus, to meet income requirements with one person of the household working full-time with some overtime, a household would need to be at least three-persons and some households would need to be at least four-persons to qualify. Staff observed that workers with eligible immigration status tend to earn more than what the income limits allow for the housing projects. Rancho de Soto in Orland has LIHTC funding which requires between 30-50% AMI, which staff commented makes it more challenging to find qualified households. Staff shared their perspective that Area Median Income (AMI) is too low for Butte County. Farmworkers with eligible immigration status are typically paid at least minimum wage. With a two-income household, this means they are not eligible for CHIP's housing because they are over income at higher than 50% AMI.

CHIP staff shared unmet needs of farmworker housing in Butte and Glenn counties. These unmet needs include housing that does not require eligible immigration status. There is a mismatch of income and status occurring. Farmworkers with eligible status have higher incomes and do not qualify for housing, whereas farmworkers without documentation have lower incomes but do not qualify for housing due to lack of eligible status. The typical reason for denying an applicant is due to a lack of eligible immigration status. While CHIP staff has had periodic conversations with USDA about these regulations they do not know of organized statewide advocacy on this issue. Though temporary waivers for projects are possible from USDA, USDA and HCD would have to work together to address regulation issues because both funding sources are typically part of farmworker housing projects.

After the 2018 Camp Fire, USDA temporarily waived the farmworker requirement for farmworker housing. Camp Fire survivors who were not farmworkers were able to move into La Vista Verde in Chico and Las Palmas in Hamilton City. This did not happen at Rancho de Soto in Orland due to LIHTC requirements. CHIP's property management staff stated that at one point after the Camp Fire, La Vista Verde had almost one-third of units filled by fire survivors who were not farmworkers. Effects of this atypical dynamic included more pets and service animals and some tension between long-term farmworker tenants and the new Camp Fire survivor tenants, the latter of which was not strongly welcomed into the community by the former. Long-term farmworker tenants cited issues of fairness, wondering why the new tenants did not have to be farmworkers to qualify for the housing while they did.

In conclusion, there are four farmworker housing projects in Butte and Glenn counties owned by HACB and CHIP. While these counties are known as agriculturally rich areas, issues persist with matching

housing needs to available resources for farmworker households. A mismatch of need to regulated resources is occurring, causing resources to be underutilized and households not being able to be housed.

CHAPTER 5

RESOURCE INVENTORY

This chapter will describe the various resources that can be employed to produce a variety of housing types to meet the needs described in Chapter 4. The principal resources required are adequate appropriately zoned land, and financing. There are opportunities to use these resources to not only produce housing, but also further energy conservation, as residential structures are a major energy user and greenhouse gas producer. This chapter will explore available resources in the following sections:

- Adequate Sites Inventory
- Financial Resources
- Energy Conservation Opportunities

ADEQUATE SITES INVENTORY

As laid out in the Introduction Chapter, State Housing Element Law requires local governments to plan for housing needs based on future growth projections through the Regional Housing Needs Allocation (RHNA). The RHNA establishes goals to produce housing affordable to various income levels— Above Moderate, Moderate, Low, and Very Low Income. The goals are generally set every 7.5 years and correspond with Housing Element planning periods.

Government Code Section 65583.2 requires each community to ensure that there is adequate appropriately zoned land within its jurisdiction to accommodate its RHNA. This process is implemented through the Adequate Sites Inventory. The sites listed in (Table 59: Sites Inventory) are currently vacant and zoned for residential uses at densities that will allow for development that meets the RHNA for all income levels.

Table 59: City of Willows, Site Inventory Resources

Address	APN	General Plan	Zoning Designation	Minimum Density	Maximum Density	Parcel Size (Acres)	Lower Income Capacity	Moderate Income Capacity	Above Mod Capacity	Total Capacity
Howard Street and Patrick Drive	017-170-036-000	MFR	R-3/PD	16	30	8.1	130	0	0	130
Howard Street and Patrick Drive	017-170-036-000	LDR	R-1/PD	1	6	78.98	0	46	90	136

Source: City of Willows

RHNA Housing Need

The RHNA for the City of Willows is shown below (**Table 60: Regional Housing Needs Allocation, 2021-2029**). The Adequate Sites Inventory must demonstrate that there is adequate land within the city jurisdiction to accommodate the RHNA unit goals by income level. The land must be vacant or have adequate capacity for redevelopment. In addition, the land must be appropriately zoned, meaning that residential must be a permitted use on the land. (**Table 60: Regional Housing Needs Allocation, 2021-2029**)

Table 60: City of Willows, Regional Housing Needs Allocation

Affordability Tier	Number of Units Allocated	Percentage
Very Low	47	25.4%
Low	22	11.9%
Moderate	36	19.5%
Above Moderate	80	43.2%
Total	185	100%

Source: California State Department of Housing and Community Development, 2020 Final Regional Housing Need Determination

Analysis of Density to Accommodate Low Income Housing

Per State Housing Element Law, the Adequate Sites Inventory must not only identify developable land that is zoned for residential use, but it must also ensure that zoning allows densities, defined as units per acre, that will facilitate housing that is affordable for the various income levels. Housing developed at higher densities enables production of housing that is affordable to lower income groups, while lower densities tend to produce housing for higher income groups. Government Code Section 65583.2(c) (3) requires that the Housing Element establish a reasonable baseline density to feasibly develop low-income housing for the Adequate Sites Inventory. A reasonable baseline density is demonstrated by analyzing the densities of low-income affordable housing developments that have been recently produced within the jurisdiction.

Table 61: Low Income Density Analysis lists five low-income affordable housing projects that have been built within the City of Willows. The zoning, number of units, property size in acreage, and density in units per acre is provided for each housing project. All but one of the properties are zoned R-3. Willows Apartments is zoned RP. The number of units range from 31 to 60, while the property sizes range from 1.5 to 4.75 acres. The densities range from 11.4 units per acre to 20.7 units per acre, and the average density is 15.8 units per acre. From this data we can reasonably assume that low-income housing can be built at 16 units per acre. This is a conservative assumption, as only two of the projects were built at less than 16 units per acre.

Table 61: City of Willows – Low Income Density Analysis

Project	Address	Zoning	Units	Acreage	Density
Willows Apartments	175 N. Villa Ave.	RP	31	1.5	20.7
Willow Oaks	1201 W. Wood St.	R-3	60	3.64	16.5
Eskaton Kennedy Manor	714 N. Humboldt	R-3	54	4.75	11.4
Willow Springs Senior Apartments	1340 W. Sycamore	R-3	49	2.92	16.8
Sycamore West Apartments	1333 W. Sycamore	R-3	34	2.5	13.6
Sycamore Ridge Apartments	1245 W. Sycamore	RP	24	1.65	14.55
Average			45.6	3.1	15.8

Analysis of Realistic Capacity

Government Code, Section 65583.2(c)(1&2) requires that the Housing Element establish a realistic capacity for the zoning district associated with each parcel used in the Adequate Sites Inventory. **Table 61: Low Income Density Analysis** has also been used for this analysis since no market rate multifamily projects have been recently developed. The average 16 units per acre is consistent with the minimum required density for the City's R-3 and R-P districts, and therefore are the realistic capacity of the sites for the purposes of the Housing Element. Therefore, 16 units per acre is a conservative assumption of capacity for Low and Very Low Income (also defined as Lower Income) sites in the R-3 and R-P districts. For Moderate and Above Moderate-Income sites, the tentative subdivision map lots for the South Willows Residential Community subdivision were used to calculate the number of units and the density. These lots are zoned R-1.

Environmental Constraints

The sites listed in the Sites Analysis Inventory are in the South Willows Residential Community subdivision, which completed an environmental review as part of the development plan. There have been no state or federally protected species habitat identified within this subdivision, or within the Willows jurisdiction. The city completed a Mitigated Negative Declaration for the project that found there are no endangered species on the site and there is no need for any mitigation measures for endangered species or plants. The City's Land Use Element establishes the Open Space land use designation to conserve natural resources and provide for buffer areas between potentially conflicting land uses. The Willows Urban limit line also serves to limit development in areas that could be environmentally sensitive and preserve agricultural lands that are important to the City's economy and community character. Fire is not a high danger in Willows since it is not in a forested area, but the city could experience smoke from fires in other areas.

Availability of Utilities

Water service to parcels with the City of Willows is primarily provided by the California Water Service Company (Cal Water). In addition, the City has a water system that serves the property south of State Route 53. The Cal Water system's 2,250 customers are supplied by eight deep wells and no surface water is used. Daily consumption varies from one million gallons per day (mgd) in the winter months to over 3 mgd during peak summer months. According to the California Water Service Company, the system's present capacity flow of around 7 mgd is more than enough to be adequate for many years' growth within the city limits. The projected new housing in the city will not adversely affect the service capabilities for providing water to Willows residents. At present, there is an acceptable level of water

service, and this will not change with the additional new housing, given the number of new units that are projected to be constructed in the city over the current planning period. Cal Water's Water Supply and Facilities Master Plan, which is coordinated with the City's General Plan, guides the growth and development of the water delivery system to meet the City's future needs.

Sewage disposal is provided by the City of Willows. The City's wastewater treatment plant was updated in 2007 to meet current and future demands. The system has an average current demand/usage of about 0.9 mgd, with a maximum treatment flow of 2.0 mgd and a daily peak flow maximum of 4.0 mgd, sufficient capacity to meet the City's current RHNA.

Storm drainage management within the city is provided by a system of developed and undeveloped collection systems maintained by the City of Willows and Glenn County. Consistent with the City's General Plan, new development must integrate best management practices and natural features to the greatest extent possible. The General Plan Goal COS-10.6 encourages and supports multipurpose detention basins that provide water quality protection, storm water detention, and open space and recreational amenities.

The city coordinates with dry utility providers to provide service to parcel within its jurisdiction, including PG&E, Sierra Pacific, West Coast Gas, AT&T, and Comcast. These services are involved with the city in the project entitlement review and building permit process.

Adequate infrastructure is in place and planned to support the sites identified in the sites inventory below.

Identified Sites

The sites identified for inclusion in the Adequate Sites Inventory are listed in ***Table 59: City of Willows, Site Inventory Resources***. A summary description of the sites by income level follows. All of these sites are expected to be developed within the Housing Element planning period because they are closest to existing infrastructure.

Lower Income Sites: This is an 8.1-acre portion of the South Willows Residential Community subdivision with a Multi-Family Residential (MFR) land use designation and an R-3/PD zoning district. While the entire subdivision has one APN number, a tentative subdivision map has designated the location of the multi-family parcel. Per the realistic capacity assumptions described above, it is projected that this parcel will yield up to 130 Low and Very Low-Income units. This site was created in late 2020 when the property owner specifically rezoned the property to allow for an affordable rental project to be built in the South Willows Residential Community. The property owner has been in discussion with affordable housing developers and has expressed in interest in helping the project moving forward. The construction of the project could occur in phases and no other lot splits, or rezones are anticipated.

Moderate Income Sites: These are 46 lots making up a roughly 11.5 acre-acre portion of the first three phases of the South Willows Residential Community subdivision with a Low Density Residential (LDR) land use designation and an R-1. PD zoning district. While the entire subdivision has one APN number, a tentative subdivision map has designated the location of the single-family residential lots. The smaller single-family lots were placed in the Moderate-Income category, which number 46. It is projected that the Moderate-Income parcels will yield 46 Moderate Income units.

Above Moderate-Income Sites: These are 90 lots making up a roughly 22.5-acre portion of the first three phases of the South Willows Residential Community subdivision with a Low Density Residential

(LDR) land use designation and an R-1/PD zoning district. While the entire subdivision has one APN number, a tentative subdivision map has designated the location of the single-family residential lots. The larger single-family lots were placed in the Above Moderate-Income category, which number 90. It is projected that the Moderate-Income parcels will yield 90 Above Moderate-Income units.

(Table 62: RHNA and Sites Inventory) shows the RHNA targets compared to the units identified in the Adequate Sites Inventory. This demonstrates that the City of Willows has adequate site inventory to exceed each of the RHNA goals for each income level. The RHNA has established a need for a total of 185 units, while the Sites Inventory identified land that is appropriately zoned and developable to produce 266 units, resulting in a surplus of 81 units. The status of the Sites Inventory will be assessed and updated each year in compliance with State No Net Loss Law (SB 166). This will involve monitoring of rezones and development conditions of the included sites and tracking the development of residential units. During the last Housing Element planning period, there were no requests made to develop any sites at a lower density than their designated and approved density.

Table 62: RHNA and Sites Inventory

Income Level	RHNA	Sites Inventory	Surplus (Deficit)
Lower Income (Very Low and Low Income)	69	130	61
Moderate Income	36	46	10
Above Moderate Income	80	90	10
Total	185	266	81

Source: California State Department of Housing and Community Development, 2020 Final Regional Housing Need Determination

Affirmatively Furthering Fair Housing: Sites Inventory

In this section, sites included in the Site Inventory are identified, mapped, and evaluated relative to the scope of the Assessment of Fair Housing. This scope includes segregation and integration, racially and ethnically concentrated areas of poverty, access to opportunity, and disproportionate housing needs.

All of the sites listed in the Site Inventory are in the South Willows Residential Community subdivision, which is located in the south-central part of the city, in Block Group 7 of Census Tract 104 which encompasses the City of Willows. There are 130 Low and Very Low-Income units projected in the 8.1-net acre portion of the subdivision that is zoned for multi-family residential. There are 46 Moderate Income and 90 Above Moderate-Income units projected for the portion of the subdivision is zoned for single-family residential. The map “City of Willows, South Residential Community Subdivision Tentative Map, December 2020” provides a tentative map of the project site. The multi-family portion is located to the southeast **(City of Willows Planning Commission, 2020)**.

Improved Conditions

Improved conditions include racially and ethnically concentrated areas of poverty and access to opportunity.

Racially and Ethnically Concentrated Areas of Poverty

All the sites are located in an area of new growth and will receive the same amenities, whether the units are any combination of affordable, market-rate, rental, for-sale, multi-family, or single-family. Providing opportunities for all income levels to reside in an area of new growth improves fair housing

choice and equitable access to opportunity.

City of Willows, South Residential Community Subdivision Tentative Map, December 2020



The South Willows Residential Community subdivision is located in Block Group 7. As shown in the table ***“City of Willows, Census Tract 104 Block Group 7 by Race and Ethnicity, 2019”*** Block Group 7 has 239 White residents. This is less than any other block group in Census Tract 104 which encompasses the City of Willows and amounts to 41.4% of Block Group 7 identifying as White (not Hispanic or Latino). Moreover, an estimated 58.3% of residents in Block Group 7 identify as Hispanic or Latino, a larger proportion than any other block group in Census Tract 104

There are no other racial or ethnic groups represented in Block Group 7. It is a majority-minority block group, meaning the majority of residents identify as a racial or ethnic minority, also known as a person of color. Current residents of Block Group 7, the majority of whom identify as Hispanic or Latino, will likely benefit from being in an area of new growth as described in the Access to Opportunity section below.

Table 63: City of Willows, Census Tract 104 Block Group 7 by Race and Ethnicity, 2019

Race/Ethnicity	Number of Residents	Percent of Residents
White (not Hispanic or Latino)	239	41.4%
Hispanic or Latino	334	58.3%
All Other Races and Ethnicities	0	0%
Total	573	100%

Source: U.S. Census 2015-2019 American Community Survey

See **Chapter 4 Housing Needs Assessment, Assessment of Fair Housing, Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)** section for more information on this topic.

Access to Opportunity

As illustrated in the map **“City of Willows, Access to Opportunity, 2021”** in Chapter 4 Housing Needs Assessment, Assessment of Fair Housing Disparities in Access to Opportunity section, Block Group 7 is currently characterized as “low resource.” Commercial and recreational plans related to the South Willows Residential Community subdivision will likely raise this score once they are complete. These plans are detailed as follows:

- **Job proximity:** The Rumiano Cheese 47,000-square-foot packaging and research site to be completed in the Summer of 2021 just south of the South Willows Residential Community subdivision, provides the opportunity for job proximity close to the new residential development (City of Willows Planning Commission, 2020; Rumiano Cheese, 2021).
- **Environmental health:** The South Willows Residential Community subdivision will include a neighborhood park in the center of the development as well as a trail along the east, west, and south perimeters of the development. Proposed facilities for the park include turf/play areas, an amphitheater, a group picnic area, children’s play areas, tot lot, paths, natural areas, and potentially multi-use/basketball courts, skate elements, and a community garden (City of Willows Planning Commission, 2020).
- **Education:** The City of Willows is served by Glenn County Office of Education and Willows Unified School District. Glenn County Office of Education includes two charter schools with campuses in Willows: Success One! and Walden Academy. Willows Unified School District includes Murdock Elementary School, Willows Intermediate School, Willows High School, and Willows Community High School (Glenn County Office of Education, 2021). Willows Intermediate School is in close proximity to the South Willows Residential Community subdivision.
- **Transportation:** The City of Willows is served by Glenn Ride, an affordable public transportation system. Glenn Ride has seven round trips every weekday and three round trips on Saturday from Willows to Chico with enroute service to Artois, Orland, and Hamilton City. All buses are equipped with accessible lifts and bicycle racks. There are 11 bus stop locations in Willows (Glenn County, Public Transit & Transportation, 2021). Given the size of the South Willows Residential Community subdivision, it is anticipated that at least one new bus stop will be located in the subdivision.

Exacerbated Conditions

The South Willows Residential Community subdivision as it is planned will improve segregation and integration in the city, however, it will not address all segregation in the city. Thus, this section provides an analysis on further steps needed to address segregation and integration in the City of Willows.

Segregation and Integration

When an affordable multi-family project is built in the South Willows Residential Community subdivision (Block Group 7), affordable housing will be located in Block Groups 3, 4, and 7. While this improves conditions as affordable housing will now be located in three of the seven total block groups in the city, four of the seven block groups will not have affordable housing (Block Groups 1, 2, 5, and 6). In particular, Block Group 5 has the fewest number of households living below the poverty line in the city – 55 households, 7.0% of Block Group 5 – and the second largest number of White

residents in the city – 662 residents, 68.9% of Block Group 5 (U.S. Census, 2015-2019 American Community Survey). Thus, Block Group 5 may be an area for the city to concentrate its future efforts to further address segregation and integration.

The analysis of segregation and integration should also include disability and familial status (California State Department of Housing and Community Development, Affirmatively Furthering Fair Housing, 2021). Data on disability and familial status is only available for the City of Willows at the Census Tract level (*see Chapter 4 Housing Needs Assessment, Assessment of Fair Housing Segregation and Integration section*) and so the authors are unable to complete the analysis at the block group level.

Isolation of the RHNA

All of the sites in the site inventory are located in the South Willows Residential Community subdivision, so though the sites are concentrated in an area of the community, they are not further concentrated by income group. All sites will be in an area of new growth and receive the same amenities therefore improving fair housing choice and equitable access to opportunity.

Local Data and Knowledge

The South Willows Residential Community subdivision underwent a rezone in December 2020 to intentionally rezone some of the single-family designated area into multi-family for the construction of an affordable housing project. Changes in the housing market and demand for affordable housing contributed to this decision (City of Willows Planning Commission, 2020).

In addition, the city will consider applying for the California State Department of Housing and Community Development's Affordable Housing and Sustainable Communities Program (AHSC) or other available State grant funding sources to develop a pedestrian bridge from the north boundary of the planned subdivision to the existing Jensen Park. This would provide ease of access for residents to use active transportation (e.g. bicycling, walking) to the park instead of driving to the east of the subdivision to South Tehama Street to cross over the Central Canal, thus improving environmental health and access to opportunity in the neighborhood.

Other Relevant Factors

Data from the 2021 and 2014 Housing Conditions Surveys are included to address other relevant factors for disproportionate housing needs.

Disproportionate Housing Needs

The City of Willows completed its 2021 Housing Conditions Survey as an update to the 2014 Housing Conditions Survey to provide comparison data and analysis on substandard housing. The 2014 survey found that Block Groups 5, 6, and 7 had the highest density of units in need of substantial rehabilitation, with a total of 85 units. Significant investments have been made in these block groups. Compared to 2014, housing units in need of rehabilitation are not as concentrated in these neighborhoods in 2021.

Summary of Conclusions and Approach to Policies and Programs

This section on Affirmatively Furthering Fair Housing in the Site Inventory illustrates a focus on improving fair housing choice and equitable access to opportunity. Racially and ethnically concentrated areas of poverty and access to opportunity will be improved with the sites identified in the Site Inventory. Significant investments from the private sector are addressing disproportionate

housing needs in existing units in Block Group 7 as illustrated by the 2014 and 2021 Housing Conditions Surveys. The Site Inventory makes progress on segregation and integration and identifies Block Group 5 to concentrate future efforts to create more integrated living patterns. The approach of improving fair housing choice and equitable access to opportunity is reflected in the Goals, Policies, and Programs.

FINANCIAL RESOURCES

Financial resources are available for the production of affordable housing and related housing supports (emergency shelter, rental assistance, etc.) at the local, state, and federal levels. At the time of the writing of this update, the financial resources landscape is an ever-changing and somewhat unpredictable one. At both the State and Federal levels, the respective administrations propose to devote more financial resources to addressing the affordable housing shortage than perhaps at any time in history. This section describes funding sources that the City of Willows can apply for directly, those that an affordable housing developer can apply for, and those that other local housing agencies provide to support the residents of Willows. These resources are subject to change over the time period covered by the Housing Element update.

State Resources

Small Cities Community Development Block Grant (CDBG)

Government Administrator/Application Process: City of Willows/City applies to State HCD

Eligible Uses: Housing— Single-Family Housing Rehabilitation, Homebuyer Assistance, Infrastructure in Support of Housing, Multi-family Housing Rehabilitation.

Community Development— Infrastructure improvements in low-income neighborhoods.

Current Status: This is federal pass-through funding for non-entitlement jurisdictions. The Biden Administration proposes to increase the funding for this program by 8% in the 2021 budget. The State generally issues one NOFA each year. Activities to be funded by the State can vary from year to year. Jurisdictions can apply jointly if they intend to share a program (e.g. Housing Rehabilitation shared by the County and City). The applicant must have a compliant Housing Element.

State Recipient Home Investment Partnership Program (HOME)

Government Administrator/Application Process: City of Willows/City applies to State HCD alone or in partnership with developer.

Eligible Uses: New rental affordable housing; rehabilitation of existing rental affordable housing; down payment assistance programs to promote home ownership; owner-occupied housing rehabilitation; tenant-based rental assistance to prevent homelessness.

Current Status: This is federal pass-through funding for non-entitlement jurisdictions. The current administration proposes to increase the funding for this program by 8% in the 2021 budget. The State generally issues one NOFA each year. Activities to be funded by the State can vary from year to year. Jurisdictions can apply jointly if they intend to share a program (e.g., Housing Rehabilitation shared by the County and City). The applicant must have a compliant Housing Element.

Permanent Local Housing Allocation (Formula Funds)

Government Administrator/Application Process: City of Willows/City applies to State HCD

Eligible Uses: A wide range, which includes but is not limited to—affordable rental housing for households below 80% AMI; affordable rental and ownership housing, including Accessory dwelling units (ADUs), for households earning up to 120 percent of AMI; or capital costs for navigation centers and emergency shelters, as well as permanent and transitional housing for people experiencing homelessness.

Current Status: On-going funding provided through SB2 Building Homes and Jobs Act. Funding will fluctuate based on revenues taken in by the State. As allowed by PLHA guidelines, the City of Willows joined with Glenn County and the City of Orland to pool their PLHA formula funds for the first 5-year funding cycle (2020-2025). Funds can be spent on eligible projects within any of the jurisdictions, subject to agreed-upon criteria. In future funding cycles, the city can apply on their own, if they wish, or continue to pool funds with the other jurisdictions.

Permanent Local Housing Allocation (Competitive Funds)

Government Administrator/Application Process: State HCD/City applies to HCD in partnership with developer.

Eligible Uses: New multi-family housing or rehabilitation of existing multi-family housing that is affordable to households at 60% AMI or less; permanent or transitional rental housing for those at risk of or experiencing homelessness.

Current Status: On-going funding provided through SB2 Building Homes and Jobs Act. The State issues one NOFA each year.

Multifamily Housing Program (MHP)

Government Administrator/Application Process: State HCD/Developer can apply.

Eligible Uses: Deferred payment loan for housing developments with rents affordable to low-income households.

Current Status: State funding for this program is expected to be exhausted in 2021 but may be renewed in subsequent years through General Fund allocations and/or new bonds.

No Place Like Home (NPLH)

Government Administrator/Application Process: State HCD/Counties and Developers co- apply.

Eligible Uses: Deferred payment loan for housing developments that target a portion of units to homeless individuals with mental illness. An operating reserve is also provided to awardees based on the number of NPLH-assisted units. In order to be eligible, counties must prepare a plan to address homelessness and commit to provide supportive services to tenants in NPLH-assisted units.

Current Status: A 2018 housing bond and revenue generated from the Mental Health Services Act (MHSA) funded \$2 billion for this program, with funding allocated through four different NOFAs released 2018-2021. The final 2021 Round 4 NOFA is expected to be released in the fall of 2021, with applications due in early 2022. The program may be refunded through State allocations and/or a new

housing bond in future years.

Affordable Housing and Sustainable Communities Program (AHSC)

Government Administrator/Application Process: State HCD/Developer applies jointly with local transportation agency.

Eligible Uses: Grants for infill low-income affordable housing, and infrastructure that encourages reductions in vehicle trips and greenhouse gas emissions.

Current Status: State program funded by greenhouse cap-and-trade program. Recent revisions to regulations encourage greater participation from rural communities.

Infill Infrastructure Grant Program (IIG)

Government Administrator/Application Process: State HCD/City or developer applies.

Eligible Uses: Gap funding for infrastructure improvements necessary for specific residential or mixed-use infill projects.

Current Status: This is funding from Proposition 1, the Veteran's, and Affordable Housing Bond Act, therefore this funding will sunset when all bond proceeds are disbursed. The State generally issues one NOFA each year.

Low Income Housing Tax Credit Program (LIHTC)

Government Administrator/Application Process: State of California/Developer applies.

Eligible Uses: New construction or rehabilitation of affordable housing; tax credits are purchased by investors that provide equity to projects.

Current Status: Each state receives an allocation of federal tax credits for low-income housing. The California Tax Credit Allocation Committee administers allocations to affordable housing projects through a competitive application process. Most low-income affordable projects require the use of tax credits, as it typically provides the largest amount of funding.

Tax Exempt Revenue Bond Authority

Government Administrator/Application Process: State of California/Developer applies.

Eligible Uses: New construction or rehabilitation of affordable housing; banks purchase bonds and make loans with below-market terms to projects.

Current Status: Each state receives an allocation of debt from the federal government with interest earnings that are exempt from federal taxes. The California Debt Limit Allocation Committee administers allocations to affordable housing projects through a competitive application process.

Federal Resources

Housing Choice Vouchers (HCV)

Government Administrator/Application Process: Housing Authority of the County of Butte (HACB), which receives HCV allocations from HUD; HACB functions as the Housing Authority for Glenn County)/Tenants apply.

Eligible Uses: Rental assistance for low-income households

Current Status: Local housing authorities receive funding for HCV (Section 8 of the United States Housing Act of 1937) from the Federal Government. HACB currently administers 27 vouchers within the City of Willows. While funding has been cut in recent years, the Biden Administration proposes to fully fund the program so that all eligible households may receive a voucher.

Project Based Section 8 Vouchers

Government Administrator/Application Process: Housing Authority of the County of Butte (HACB), which receives HCV allocations from HUD; HACB functions as the Housing Authority for Glenn County)/Developers apply.

Eligible Uses: Rental assistance for low-income households tied to units, which can be underwritten by loans that finance housing projects.

Current Status: Housing authorities may dedicate a portion of their Housing Choice Vouchers as Project Based Vouchers. The Biden Administration is seeking to increase the number of Project Based Vouchers available to Housing Authorities.

HUD VASH Vouchers

Government Administrator/Application Process: Housing Authority of the County of Butte (HACB), which receives HCV allocations from HUD; HACB functions as the Housing Authority for Glenn County)/Tenants apply.

Eligible Uses: Rental assistance and supportive services for homeless veterans

Current Status: This federally funded program is managed through a partnership between housing authorities and the U.S. Dept. of Veterans Affairs. Homeless veterans receive a rental subsidy from the housing authority and case management from the VA. HACB currently administers one VASHvoucher in Willows. Funding for this program has been increasing in recent years with strong bipartisan support in Washington D.C.

Continuum of Care (CoC) Programs

Government Administrator/Application Process: Dos Rios Continuum of Care, administered by the Colusa-Glenn-Trinity Community Action Program

Eligible Uses: Rental subsidies, rapid re-housing, emergency shelter, homeless prevention

Current Status: The Dos Rios Continuum of Care is currently accessing State resources available to them (Emergency Solutions Grant, Homeless, Homeless Housing Assistance and Prevention, Homeless Emergency Aid Program, etc.) and the planning allocation of Federal CoC funding through HUD; they plan to begin accessing federal CoC funds from this program with increased staff capacity. Funds are passed through to service providers at the County level.

ENERGY CONSERVATION OPPORTUNITIES

As the rapid depletion of nonrenewable resources persists and energy costs continue to rise, community members have become more aware of energy conservation measures, primarily as an effort to offset these rising costs. Typically, the use of alternative energy sources is most advantageous in new housing

development. However, there are many energy-conserving measures that can be retrofitted onto older, existing housing which may conserve the ongoing use of nonrenewable fuels, which in turn, may reduce related costs.

Pacific Gas and Electric (PG&E), the utility company that serves the City of Willows, provides a plethora of energy conservation services for residents. In addition, PG&E offers energy assistance programs for lower-income households to help community members conserve energy and reduce utility costs. Programs currently administered in the City of Willows by PG&E include the California Alternate Rates for Energy Program (CARE) and the Family Electric Rates Assistance (FERA). The FERA program, also administered by PG&E, offers monthly discount of 18% on electricity to households with three or more people. Participants qualify through income guidelines. The CARE program, administered by PG&E provides a monthly discount of 20% or more on gas and electricity to households with qualified incomes, certain nonprofit organizations, homeless shelters, hospices, and other qualified group living facilities. Participants qualify through income guidelines or if enrolled in certain public assistance programs.

Other Energy Conservation programs available to residents of the City of Willows include:

- LIHEAP (Low Income Home Energy Assistance Program)
- AHSC (Affordable Housing for Sustainable Communities)
- DAC-SASH (Disadvantaged Communities and Single-Family Solar Homes Program)
- BUILD (Building Initiative for Low Emissions Development)

Glenn County Community Action Agency

One of the key providers of energy conservation services in Glenn County is the Glenn County Community Action Agency (Glenn County CAA). Glenn County CAA is dedicated to helping people help themselves and each other. The Community Action Department manages a variety of grant-funded programs including emergency services, housing services, income and employment, and community services and development for vulnerable, low-income seniors, youth, and families. The Department serves as the Lead Agency for the Colusa-Glenn-Trinity Community Action Partnership and the Dos Rios Continuum of Care, which serves Colusa, Glenn, and Trinity counties.

Glenn County CAA administers a weatherization program (WAP) for low-income homes in the City of Willows. Weatherization services offered through this program includes attic insulation and venting, door weather-stripping, glass replacement, low-flow showerheads, and gas appliance replacement. Glenn County also administers the Low-Income Home Energy Assistance Program (LIHEAP) program, described below.

Low-Income Home Energy Assistance Program (LIHEAP)

LIHEAP is a federally funded program that services the City of Willows through Glenn County Community Action Agency (Glenn County CAA). The goal of the program is to assist eligible, low-income households with managing and meeting their immediate home heating and/or cooling needs and providing home weatherization upgrades. Qualified households may receive assistance in paying their utility costs. This may include electric, natural gas, propane, heating oil, cord wood or wood pellets. There are specific emergency services for clients who have received shut-off notices from their utility provider. LIHEAP is designed assist low-income households that pay a high portion of their income to meet their energy needs.

Below is data on individuals who been serviced in the City of Willows through LIHEAP since 2014:

Homes Weatherized

2014 – 2020: 56

January - April 2021: 0

Heating, Cooling, and/or Water Heater Repairs or Replacements

2014 – 2020: 62

January – April 2021: 4

Utility Assistance for Electric Bills

2014 – 2020: 1,539

Number of payments made year-to-date as of April 2021: 64

Affordable Housing for Sustainable Communities (AHSC)

Administered by the Strategic Growth Council and implemented by the Department of Housing and Community Development (HCD), the AHSC Program funds land-use, housing, transportation, and land preservation projects to support infill and compact development that reduce greenhouse gas (“GHG”) emissions. Funding for the AHSC Program is provided from the Greenhouse Gas Reduction Fund (GGRF), an account established to receive Cap-and-Trade auction proceeds.

Disadvantaged Communities and Single-Family Solar Homes Program (DAC-SASH)

DAC-SASH is a ratepayer-funded program through the California Public Utilities Commission that provides up-front rebates to help low-income homeowners access the benefits of solar power. The DAC-SASH low-income solar program runs through 2030 in PG&E utility territory. In Willows, communities identified as “DACs” or disadvantaged communities in the state’s CES 4.0 map will be eligible for the solar program based on geography; households must still qualify based on income, owner occupancy, and be connected to PG&E’s electric grid.

Under the original SASH fund, GRID Alternatives installed systems on over 5,200 homes in California. GRID is a leading voice in low-income solar policy and one of the nation’s largest nonprofit solar installers, serving families throughout California, Colorado, the Mid-Atlantic region, and tribal communities nationwide. GRID also offers single-family, multifamily and community solar installation services, project development and technical assistance, along with multiple levels of workforce development and service-learning opportunities, from volunteerism to in-depth solar training and paid internships. GRID’s mission is to build community-powered solutions to advance economic and environmental justice through renewable energy. DAC-SASH goals include:

- Maximize financial savings for low-income households in economically and environmentally disadvantaged communities.
- Enhance long-term economic self-sufficiency in low-income communities by providing community members with access to green jobs training and solar employment opportunities.
- Provide education on energy efficiency and existing programs that can provide further benefits to families.

Building Initiative for Low Emissions Development (BUILD)

Authorized by State of California Senate Bill 1477, the Building Initiative for Low-Emissions Development (BUILD) Program will provide incentives for the deployment of near-zero emissions building technologies in low-income residential buildings emissions significantly beyond what otherwise would be expected to result from the implementation of the prescriptive standards described in Part 6 of Title 24 of the California Code of Regulations (California Energy Code). The BUILD Program is currently under development, with program goals to raise awareness of near-zero-emission building technologies and applications, test program and policy designs, and gain practical implementation experience and knowledge.

BUILD program guidelines will be finalized by the Fall 2021 and launched by the end of 2021.

The program is designed to be a market transformation program. Through outreach, technical support, and education, BUILD hopes to promote all electric building decarbonization. The first two years of the program is expected to be focused on affordable housing. In the City of Willows, there may be incentive funding for disadvantaged communities.

Assessment and Recommendations

The City of Willows has the opportunity to take advantage of County and State programs to improve energy conservation throughout its housing stock. In particular, it is recommended that the city promote the County's WAP and LIHEAP programs that make improvements to homes for low-income homeowners while improving energy efficiency. These programs are currently undersubscribed within the City of Willows. The city can also promote the DAC-SASH and BUILD programs to expand solar and zero-emission building technologies. There are also opportunities for the city to incorporate more sustainable systems and energy efficient components into housing when it accesses State CDBG or HOME funds to rehabilitate homes, as recommended in the Housing Conditions Survey summarized in the Housing Stock Characteristics section of Chapter 4.

CHAPTER 6

CONSTRAINTS ANALYSIS

GOVERNMENTAL CONSTRAINTS

Governmental policies and practices can constrain the production of housing through land use regulations, building codes, permit fees, review procedures, and funding limits. Not all of these constraints are controlled by the city. State and Federal laws sometimes create constraints that the city has to enforce. An assessment of potential governmental constraints on the production of housing is provided below.

Land Use Controls

The General Plan that is currently in effect at the time of writing this Housing Element update was adopted in 1996 and updated in 2015 with changes to the land use portion regarding residential densities). It is now in the process of being updated for adoption by end of January 2023. For the constraints analysis of this Housing Element update, the General Plan that is currently being developed was analyzed. The General Plan is the guiding land use policy document for the City of Willows. The General Plan lays out how the City plans to grow over a twenty-year period, creates an orderly process for reviewing development projects, and sets standards and rules that all projects need to address for approval.

Housing supply and cost are greatly affected by the amount of land designated for residential use and the density at which development is permitted. In Willows, approximately 42 percent of the land within the city limits is designated for residential uses. Of this percentage, the majority, approximately 39 percent, is allocated for single-family residential use, while the remaining 3 percent has been allocated for multiple-family residential purposes.

The City of Willows does not have an Inclusionary Housing Ordinance nor a Short-Term Rental Ordinance. The city conforms with the requirements of SB 330 and has no caps on the number of units developed or voter approval requirements for residential development. The city's zoning and development standards are published on the city website pursuant to Government Code 65940.1(a)(1)(B).

General Plan Designations and Zoning Districts

The General Plan sets land use standards for the following residential designations:

Estate Residential: Allows up to 1 dwelling unit per acre (1-acre minimum lot size), with an average population density of 2.8 persons per acre. Development may be serviced by community sewers and community water service.

Low-Density Residential: Provides for 2 to 6 units per acre (6,000 square foot minimum lot size). The designation is designed to provide a full range of single-family housing opportunities. In most cases, new low-density residential development is required to be serviced by community sewers and water service. For Housing Element compliance, the moderate and above moderate-income units will generally be expected to be built in Low-Density Residential areas.

Medium Density Residential (MDR): Allows 7 to 15 units per acre. The designation is intended to allow mixed uses of residential types at medium density. All medium-density residential development is required to be served by community sewer and water service. Medium Density developments would fulfill units in the moderate income RHNA requirements.

Multi-Family Residential (MFR): Allows 16 to 30 units per acre. Willows Municipal Code Section 18.25.060 defines “Family” as “all persons living in a household who are related by birth, marriage, or adoption.” This definition does not allow for unrelated persons and acts as a constraint on housing for persons with disabilities. The definition will be amended (Program RC1-4-2). The City’s municipal code generally only regulates the number of units per acre and other design standards. The designation is designed to provide the opportunity for development of apartments and condominiums. All multi-family development is required to be served by community sewer and water service. Multifamily residential will be used to meet the Very Low- and Low-income units for the Housing Element.

Agricultural/Residential: Allows a range of densities compatible with a rural character and lifestyle. This designation is suitable for agricultural use that includes residential uses. The minimum parcel size for this designation is 10 acres.

Cities are allowed under State Law to enforce codes and standards that reinforce a built character that reflects their area. The State regulates zoning broadly and allows the cities to create more specific standards for the development of vacant land. These standards are codified through the adoption of a zoning code. The City of Willows zoning standards are comparable to other jurisdictions of similar size. The densities allowed under the different zoning designations are not a detriment to the development of new housing.

For high density residential projects, the city allows up to 30 units an acre which is higher than many other rural areas. Apartment projects can be up to three stories without needing a conditional use permit but could be higher with an approved use permit. To facilitate growth in a controlled manner, the city encourages developers to use specific plans and planned unit overlays for large projects or annexations. These plans ensure that these new projects will meet the needs of the city such as design, traffic, recreation, and services.

Title 18 of the City of Willows Municipal Code sets forth the following zoning districts:

R-1: Low-Density Residential or R-1 district is intended to be applied in areas of the city that are desirable for low-density residential development. Projects in the R-1 zoning are expected to meet the following requirements as well:

- (1) Minimum lot size: 6,000 square feet for interior lots; 7,500 square feet for corner lots.
- (2) Minimum lot width: 60 feet for interior lots; 75 feet for corner lots.
- (3) Maximum lot coverage: 40 percent of the lot area.
- (4) Minimum Yard Setback.
 - (a) Front yard: 25 feet.
 - (b) Side yard: six feet except the side yard on the street side of each corner lot shall not be less than 10 feet.
 - (c) Rear yard: 15 feet.

EXCEPTION: A garage that is not attached to and made a part of the main building shall not

be closer than eight feet clear distance to the main building and shall be five feet from alley property line. A non-garage accessory building shall be a minimum of three feet from the rear property line.

(5) Maximum building height: two and one-half stories not exceeding 30 feet. Non-garage accessory buildings shall not exceed 12 feet in height without prior approval from the planning commission.

R-2: Medium Density Residential (MDR) The two-family residential use or R-2 district is intended to allow mixed uses of residential types at a medium density. Projects in the R-2 zoning are expected to meet the following requirements as well:

(1) Minimum lot size: 6,000 square feet for interior lots; 7,500 square feet for corner lots.

(2) Minimum lot width: 60 feet for interior lots; 75 feet for corner lots.

(3) Maximum lot coverage: 45 percent of the lot area.

(4) Minimum Yard Setback.

(a) Front yard: 25 feet.

(b) Side yard: six feet except the side yard on the street side of each corner lot shall not be less than 10 feet.

(c) Rear yard: 15 feet.

EXCEPTION: A garage that is not attached to and made a part of the main building shall not be closer than eight feet clear distance to the main building and shall be five feet from alley property line. A non-garage accessory building shall be a minimum of three feet from the rear property line.

(5) Maximum building height: two and one-half stories not exceeding 30 feet. Non-garage accessory buildings shall not exceed 12 feet in height without prior approval from the planning commission.

R-3: The high-density residential or R-3 district is intended to provide areas for high-density residential living in accordance with the General Plan and to minimize the impact of multiple-family projects on adjacent developments. During this Housing Element period, the city amended the Zoning Ordinance to allow this district to be developed at a density of 16 to 30 units per acre. Projects in the R-3 zoning are expected to meet the following requirements as well:

(1) Minimum lot size: 6,000 square feet for interior lots; 7,500 square feet for corner lots.

(2) Minimum lot width: 60 feet for interior lots; 75 feet for corner lots.

(3) Maximum lot coverage: 55 percent of the lot area.

(4) Minimum open space: 30 percent of the lot shall be landscaped open space except that the surface area of a pool or uncovered patio can be included as open space.

(5) Minimum Yard Setback.

(a) Front yard: 25 feet.

(b) Side yard: six feet except the side yard on the street side of each corner lot shall not be

less than 10 feet. A zero-side yard is permitted when two or more adjacent lots are developed as a unit and the opposite yard is a minimum of 10 feet. If the yard abuts an R-1 or R-2 district each story over the first requires an additional five-foot setback.

(c) Rear yard: 15 feet. If the yard abuts an R-1 or R-2 district, each story over the first requires a five-foot additional setback.

(6) Minimum distance between buildings: 10 feet.

(a) Group dwellings in a single row “side to side” series facing a side lot line: side yards to the rear of buildings, eight feet; side yards in front of buildings, 14 feet.

(b) Group dwellings in a double-row “side to side” series facing a central court: side yards to the rear of buildings, eight feet; width of central court, 24 feet; distance between buildings, 10 feet.

(c) The rear yard on a lot on which a dwelling group is constructed may be reduced to not less than 12 feet. No building in a group dwelling development shall have the rear thereof abutting upon a street.

(7) Maximum Building Height. For main buildings, 30 feet without a use permit and 50 feet with an approved use permit. Accessory buildings are 25 feet. This allows three-story buildings in the R-3 zoning district but only with a conditional use permit. To further encourage multifamily development, the city will amend zoning to permit 36 feet and three stories without a conditional use permit (Program RC1-4.3).

R-P: The multiple residence-professional office or R-P district is intended to reserve areas appropriate for mixed residential uses and promote the development of professional offices in areas located next to commercial districts. The Zoning allows for up to 30 units per acre. Projects in the R-P zoning are also expected to meet the following requirements as well:

NOTE: Lot development requirements for single-family and two-family uses shall conform with the regulations set forth in WMC [18.30.040](#) and [18.35.040](#).

(1) Minimum lot size: 6,000 square feet for interior lots; 7,500 square feet for corner lots.

(2) Minimum lot width: 60 feet for interior lots; 75 feet for corner lots.

(3) Maximum lot coverage: 55 percent of the lot area.

(4) Minimum open space: 30 percent of the lot shall be landscaped open space except that the surface area of a pool or uncovered patio can be included as open space.

(5) Minimum Yard Setback.

(a) Front yard: 25 feet.

(b) Side yard: six feet except the side yard on the street side of each corner lot shall not be less than 10 feet. A zero-side yard is permitted when two or more adjacent lots are developed as a unit and the opposite yard is a minimum of 10 feet. If the yard abuts an R-1 or R-2 district each story over the first requires an additional five-foot setback.

(c) Rear yard: 15 feet. If the yard abuts an R-1 or R-2 district, each story over the first requires a five-foot additional setback.

(6) Minimum distance between buildings: 10 feet.

(a) Group dwellings in a single row “side to side” series facing a side lot line: side yards to the rear of buildings, eight feet; side yards in front of buildings, 14 feet.

(b) Group dwellings in a double-row “side to side” series facing a central court: side yards to the rear of buildings, eight feet; width of central court, 24 feet; distance between buildings, 10 feet.

(c) The rear yard on a lot on which a dwelling group is constructed may be reduced to not less than 12 feet. No building in a group dwelling development shall have the rear thereof abutting upon a street.

(7) Maximum Building Height. For main buildings, 30 feet without a use permit and 50 feet with an approved use permit. Accessory buildings are 25 feet.

In 2020, the city adopted a zoning code change to allow for single-family uses in the Central Commercial, General Commercial and Entryway zoning districts. The change will allow for single-story, single-family homes that were converted to commercial use to revert back to residential with the approval of a use permit. This change was brought about because the city had received a number of requests from property owners to allow them to return to residential use. It is hoped that the change will bring more residential opportunities back to the City’s commercial district and to increase housing inventory.

The city has not received any requests from developers to build at densities below what are listed in the Site Inventory in Chapter 5.

Table 63: Residential Zoning Districts Use Table

Residential Use	R-1	R-2	R-3	R-P
Single-family residence	P	P	P	P
Manufactured homes	P			
Rooming and boarding of not more than two persons	P	P	P	P
Residential care facilities serving six or fewer residents	P	P	P	P
Transitional housing	P	P	P	P
Supportive housing	P	P	P	P
Accessory dwelling units	P	P	P	P
Single-room occupancy			P	P
Two-family residence (duplex)		P		
Multi-family dwellings and apartments			P	P

Source: City of Willows Municipal Code

P= permitted by right

Table 64: Commercial Zoning Districts Use Table

Residential Use	CC	CG	CH
Multi-family residences, apartments	P(1)	P(1)	P(1)
Boardinghouses	P(1)	P(1)	P(1)
Transitional housing	P	P	P
Supportive housing	P	P	P
Emergency shelters (up to 50 beds)		P	P
Emergency shelters (50 beds or more)		UP	UP

Source: City of Willows Municipal Code

P= permitted by right

UP- permitted with a conditional use permit

1= permitted only on the second story or higher of structures whose first stories contain nonresidential uses; otherwise, conditional use permit is required for residential on the first story

Density Bonus

The city has implemented a density bonus program for developments that set-aside a certain number of units for lower income households, for the purpose of complying with State Government Code 65915. To be eligible for a density bonus the project must meet one of the following requirements:

- (i) Ten percent of the total units for lower income households.
- (ii) Five percent of the total units for very low-income households.
- (iii) A senior citizen housing development or a mobile home park that limits residency based on age requirements for housing for older persons.
- (iv) Ten percent of the total dwelling units in a common interest development as defined for persons and families of moderate income; provided, that all units in the development are offered to the public for purchase.

The City's policy references Government Code 65915 for the range of density bonus and number of concessions to the zoning code allowed. Any project that receives a density bonus will need to ensure the units remain affordable. For rental projects with low and very-low-income units, the project will need to maintain affordability restrictions on the units for a period of at least 30 years. The rents will need to be available at an affordable cost as defined under the State Health and Safety code. For owner occupied units, the sales price would need to be set under State Health and Safety Code. For projects with moderate income units, sales prices of the units will need to be set according to Health and Safety Code and there needs to be an equity sharing agreement as long as it does not conflict with any requirements of public funding or law.

Parking

Section 18.120.020 of the Willows Municipal Code sets out the standards for parking in all residential zones. Parking standards are put in place to ensure that there is sufficient space for vehicles on site and that the units will cause little encroachment into the public right away to meet their parking needs. These standards are as follows:

(1) Residential Uses.

(a) One-Family and Two-Family Dwellings.

- (i) One-car garage for each dwelling unit containing one bedroom.
- (ii) Two-car garage for each dwelling unit containing more than one bedroom.

(b) Multifamily Dwellings.

- (i) One covered parking space for each unit containing one bedroom.
- (ii) Two covered parking spaces for each dwelling unit with two or more bedrooms.

The required parking shall not be sited in the front yard setback.

(c) Hotels, Motels, and Rooming Houses (Including Bed and Breakfast Operations). One parking space for each sleeping unit plus two manager parking spaces.

(d) Transitional Housing/Supportive Housing. Same parking requirements as other residential uses.

(e) Emergency Shelters. One parking space for every 10 beds, plus one additional parking space for each staff person on duty. The City has not amended its zoning code to bring it into compliance with the parking requirements delineated in AB 139 for emergency shelters, which limits parking requirements for emergency shelters to sufficient parking to accommodate staff working in the shelter. A program to address this requirement is included in Chapter 3 of this Housing Element.

The parking requirements are reasonable compared to other jurisdictions. Parking requirements do not appear to be a constraint to the construction of new housing.

PROVISION FOR A VARIETY OF HOUSING TYPES

According to Section 65583 of the Government Code, the City has a responsibility to ensure there are rules in place to allow the development of an array of housing types that are suitable for all income segments. The Housing Element needs to address how the City Municipal Code will meet this requirement through the zoning of appropriate land.

Accessory Dwelling Units (ADUs)

The City allows ADU units by right in all residential districts. On January 1, 2020, the State Legislature passed six new bills concerning ADUs. Five of the bills limit local agencies' ability to restrict the development of ADUs in a variety of ways. They also set the rules for counting ADUs in a city's site inventory for the Housing Element. The sixth law, AB 671, requires local agency housing elements to include a plan to incentivize and promote the development of ADUs at affordable rents to very low-, low-, or moderate-income households. During the next housing element period, the city will be bringing forward ordinance changes to address all of these bills and bring the City Code into compliance with State law. Programs to implement ADU measures in conformance with State ADU law are in the Chapter 3 Housing Program, Programs HD-1.3.2, RC-1.3.1 and RC-1.3.2.

Extremely Low Income (ELI) Households and SROs

ELI households earn 30 percent or less of the area median income. Many elderly, physically or mentally disabled persons, or persons experiencing homelessness or transitioning from homelessness make up this category. These households have few resources to draw from for housing costs. The City's 2021-2029 RHNA for ELI households is 24 based on the assumption that approximately half of the City's Very Low Income RHNA need is for ELI households. Under AB 2634 the city must quantify this need as well as facilitate the availability of housing appropriate for extremely low-income persons or households.

Housing need for ELI households can often be met through the development of single-room occupancies (SROs). SROs are small apartments that do not have a separate kitchen or bedroom. This unit type is generally much more affordable to build than larger apartments. SROs are allowed in the City's Zoning Ordinance and are allowed by right in the R-3 district.

Other types of low-cost housing are also permitted in the City of Willows zoning code. The City of Willows currently allows "residences, boardinghouses, transitional and supportive housing, and group dwellings" as permitted uses in its R-2, R-3, R-P, and the CC Central Commercial Districts and CG General Commercial District. The CC and CG zoning districts cover an area 2-3 blocks wide that stretches parallel to the railroad from the Central Canal on the south end of town to the north end of town at Eureka Street. Group dwellings or group homes are permitted uses in the R-2, R-3 and R-P zoning districts.

Residential Care Facilities (defined as facilities serving 6 or fewer persons that provide certain amenities, and which includes children's homes, transitional houses, orphanages, rehabilitation centers, self-help group homes) are allowed in the R-1 and R-2 zones with no conditional use permit.

Another housing type that serves ELI households are supportive housing projects. During the COVID pandemic, the State of California made funding available for the conversion of hotels and motels to transitional and permanent supportive housing for homeless individuals through Project HomeKey. The continuation of this program can offer an opportunity to create safe affordable housing for ELI households.

Manufactured Homes

Government Code Section 65852.3 requires jurisdictions to treat manufactured housing and mobile homes in the same manner as conventional or "stick-built" homes. If the manufactured home meets the same requirements in terms of setbacks and other requirements, the city treats it as it would a conventional home. In Willows, manufactured housing and mobile homes are allowed in all residential zones.

Emergency Shelters, Low Barrier Navigation Centers, Transitional and Supportive Housing

To meet the requirements of Chapter 633 of the Statutes of 2007 (SB 2) (Government Code Section 65583(a)(4)(A)), the City must allow emergency shelters by right without discretionary review in at least one zoning category that has land readily available for development of a project. SB 2 also requires that transitional and supportive housing types are specifically defined in the zoning ordinance as residential uses and that permits for these uses are not subject to any restrictions beyond what would be required of any other type of residential development. The city amended its Zoning Ordinance to ensure compliance with these facets of state law, including AB 2162, as stated in 2015. The General Commercial or GC Zoning was amended to allow transitional and supportive housing, and emergency shelters by-right. The city does not impose any additional requirements, such as spacing or setbacks, for transitional housing or emergency shelters within the GC zones. The City's zoning code and

development standards do not present constraints to the development of emergency shelters. Under state law (AB 101 and AB 139), the city needs to allow low barrier navigation centers by right and update the parking requirements for emergency shelters to limit them to parking sufficient for staff who work at the shelter. As part of the adoption of this housing element, the city will include programs to amend the Municipal Zoning Code to meet these requirements. (See Program RC-1.4.1)

The city zoning code currently allows group homes with fewer than seven persons by right in all residential zoning districts. Group homes with 7 or more persons require a conditional use permit to be sited in residential zoning districts. The Housing Element has added a program RC 1-4.2 for the city to amend the zoning code to include the conditions of approval for such a CUP, per HCD guidance.

Passed in 2017, SB-35 requires that cities streamline approvals for affordable housing projects that meet certain criteria. The City of Willows will streamline the processing of Permanent Supportive Housing Projects and navigation centers if they meet the requirements as described within SB-35. As projects are submitted, City staff will review them to see if they are eligible under SB-35. If the project is eligible, the city will process the project as described under the law.

Housing for Persons with Disabilities

To aid the development of housing for people with disabilities, the city passed a Reasonable Accommodation ordinance, found in Section 18.110.113 of the Willows Zoning Code. Reasonable Accommodation allows the city flexibility in permitting alterations to projects that conflict with building or zoning codes to help meet the needs of a disabled individual. As an example, for someone who is mobility impaired, the city could allow the individual to build a ramp within the setbacks defined by the zoning code to facilitate access to the unit. Most accommodations can be granted by the City Manager or his/her designee. If the accommodation is requested as part of a larger project, the accommodation can be granted by the governing body as part of that project approval.

Per the City of Willows Municipal Code Section 18.110.113, the City Manager or his/her designee must make the following findings for approval:

- The request must accommodate a disabled individual;
- The request is necessary to making housing available to a disabled individual;
- The request would not impose an undue financial or administrative burden on the city;
- The request would not require a fundamental alteration in the nature of a city program or law;
- The request would not pose a negative impact on surrounding uses;
- The request would not pose negative impacts on the physical attributes of the property and structures; and
- Alternative reasonable accommodations that may provide an equivalent level of benefit have been considered.

Most of these criteria are reasonable and objective provisions that do not pose significant barriers to fulfilling reasonable accommodations. However, findings related to impacts on surrounding use may act as a constraint.

Residential Care Facilities for six or fewer persons are permitted in the R-1, R-2, R-3 and R-P zoning districts. The city has not received any development requests for a residential care facility (either 6 or fewer or 7 or more persons) in many years. There is a 76-room care facility in Willows at 320 N. Crawford Street.

The city also encourages new affordable housing projects to set aside units for persons with disabilities. This includes set asides for the mobility, hearing, or sight impaired disabilities.

Farmworker Housing

The City's Zoning Code, at 18.85.020(6), allows for agricultural employee housing in the Agriculture General District (AG), per State Health and Safety Code sections 17021.5, 17021.6 and 17021.8. In addition, if a farmworker-specific project is proposed in another residential district, such as R-3, it would follow the same zoning requirements as any other similar residential project in that specific zone. Depending on the income of the households, the city has different housing options available, including an inventory of regulated affordable housing.

BUILDING CODES AND ENFORCEMENT

The City's building codes are based on the 2022 Uniform Building, Plumbing, Mechanical, and Electrical Codes and are considered to be the minimum necessary to ensure the protection of the public's health, safety, and welfare. These minimum standards cannot be revised to be less stringent without sacrificing basic public safety considerations and amenities. Local modifications to the uniform code include the following:

- For buildings constructed after January 1, 2008, address signs shall be internally or externally illuminated at night in all new buildings. No switch or other similar device shall be installed.
- In 2021, the city adopted the 2022 California Green Building Standards Code, Title 24, Part 11 of the California Code of Regulations. This code lays out the requirements for energy conservation, and water conservation and efficiency. This code does not significantly increase the cost of building new housing in the city.
- On January 1, 2020, Assembly Bill 178 took effect. This bill requires solar panels to be installed on any new single family or multifamily development of three stories or less. This bill is estimated to save property owners \$15,000 in energy costs over 30 years. The bill will also assist the state in trying to meet its clean energy goals.

No regulations within these codes would unnecessarily add to the cost for housing. The city does not perform proactive code enforcement. Instead, zoning and building codes are primarily enforced based on resident complaints. The majority of the City's Building Code are dictated by other sources, such as State legislation, so the existing building code is similar to most other jurisdictions in the State of a similar size.

PERMITTING PROCESS

The purpose of permitting is to ensure that any project adheres to the City Planning and Building Codes. Permits allow the city to verify the project is built in compliance with municipal code and for the City to routinely inspect the project to verify the project is meeting these requirements. In compliance with

AB 1483, the city posts its development standards and the various fees associated with development applications on its website at: www.cityofwillows.org/resources.

Typical Residential Permitting Process

Below is a description of the permitting process employed by the City of Willows for a typical residential project.

Step 1 – Preapplication Meeting

The applicant meets with City Planning and Building staff to discuss the project, required permits, and what is needed for submission. The city reviews zoning and the proposed project to make sure that it is compatible with the zoning code. The city also makes the potential applicant aware of specific application requirements.

Step 2 – Filing of Application

The applicant files the application with the city for review. Depending on the type of application, the applicant generally will need to submit a narrative of the project, including any square footages for new construction, a site plan showing the location of the project to parcel lines and setbacks, a site map, and building plans.

Step 3 – City Application Review

The application is routed through various City and County or State departments (depending on the project type/size) to ensure it meets the requirements under the Zoning and Building Codes. City Departments includes Planning, Building, Fire, Public Works, and Parks. Police review falls under the County Sheriff Department. The project review takes up to 30 days, and sometimes less. The individual City departments make comments on the project, and if need be, the applicant is advised that additional information needs to be submitted in order to address the comments, prior to moving forward.

Step 4 – Applicant Responds to Comments

The applicant makes changes to the project per the comments received from the city. The applicant resubmits plans and descriptions as needed. The time it takes the applicant to respond to comments is a major factor in the time it takes for the project to move forward and receive permits.

Step 5 – City Staff Approves the Project

The city reviews the changes made according to the comments. If no further changes are required, staff schedules the project for consideration by the Planning Commission. If the approval is allowed at the staff level, the project receives a permit. If approval is needed on a higher level, it moves forward to the next step. The city review generally takes two to four weeks depending on the number of comments that the applicant was asked to address.

Step 6 – Planning Commission Review

The project is brought forward to Planning Commission for approval. After approval, the City generally schedules the project for the next Planning Commission meeting. The Planning Commission meets on the third Wednesday of each month, so the applicant may have to wait between one to five weeks for their project to be heard. The Planning Commission assesses the proposed project's adherence to building and zoning codes. They also consider project impacts on traffic, utilities,

waste by-products, and emissions. The Planning Commissioners determine whether project benefits outweigh projected impacts to the community. If approved and no appeal is filed, the requested permit is issued. If appealed, the project is reviewed by the City Council. Certain projects such as zoning changes and requests for general plan amendments require approval from both Planning Commission and the City Council. Planning Commission review is fairly objective and utilizes predictable decision-making criteria (See design review discussion below).

Step 7 – City Council Appeal Hearing

If the project was denied at Planning Commission or the approval is challenged, it is heard before City Council for final approval or denial. If approved, the requested permit is issued. The City Council appeal is scheduled for the next City Council meeting after the 10-day appeal period has expired. This could take between three to four weeks.

Step 8 – Entitlement Permit is Issued and the Project Proceeds.

Once an entitlement has been approved, the Project plans are then submitted to the City for Building Department Plan Check and or Engineering Plan Check review and approval, prior to issuance of the necessary building permits for the project. In accordance with California Building Code mandated timelines for plan check and review, the City may take up to 30 days to review the plans and provide comments or request needed changes. Beyond this time frame, the developer assumes the responsibility for continuing to move the project forward to the building permit issuance. Typical time between project approval is approximately 6 months depending on the complexities and developer's readiness.

Variance Request Process

Each zoning classification within the city establishes specific development standards such as setbacks or building height. There are occasions, however, when the strict application of such standards may be inappropriate because of special property characteristics. The variance procedure is designed to permit minor adjustments to the zoning regulations when there are special or extraordinary circumstances applying to a parcel of land or a building that prevents the property from being used to the extent intended by the zoning. Under the City of Willows Municipal Code, variances can be granted only if the following findings are made:

1. That because of special circumstances applicable to the subject property, including shape, size, topography, location of surroundings, the strict application of the zoning ordinance would deprive the subject property of privileges enjoyed by other properties in the vicinity or under identical zone classification.
2. That the granting of the application is necessary for the preservation and enjoyment of substantial property rights of the applicant.
3. That the granting of the application will not, under the circumstances of the particular case, adversely affect to a material degree the health or safety of persons residing or working in the neighborhood of the subject property and will not be materially detrimental to the public welfare or materially injurious to property or improvements in the neighborhood of the subject property.
4. That the granting of the variance will not be incompatible with the City of Willows General Plan.

Is it important to stress that a variance can be granted only when a finding can be made that a hardship exists and that the strict application of zoning regulations deprives a property of privileges enjoyed by other properties in the vicinity and zone in which the property is located.

A variance cannot be granted to simply make property development less costly, to expand the use of the property, to allow greater intensification, or to result in approval of a use not otherwise allowed by the zoning or general plan.

The process for the submission of a variance is as follows:

Step 1: Pre-application discussion with Staff

It is recommended that the applicant review the request with planning staff prior to the submission of a formal application. This will allow an opportunity to discuss the feasibility of the request as well as possible alternatives that may eliminate the need for a variance or facilitate a more likely granting of a variance. In addition, the staff and applicant can review the required procedures to be followed through the process. Usually, this first step is the most important step and helps a project move more efficiently through the process.

Step 2: Filing of Application

The applicant shall submit a completed application, an accurately drawn reproducible site plan, together with a written statement of the reasons justifying the variance, along with a filing fee to the City of Willows. Planning Staff will review the material to make sure all the required information is provided. The applicant will be notified within 30 days after filing as to whether the application is complete.

Step 3: Environmental Review

Once the application is deemed accurate and complete, an Initial Study/environmental assessment will be conducted by staff, unless a Categorical Exemption is applicable. If the project requires an environmental assessment, staff will prepare a Negative Declaration or an Environmental Impact Report (EIR). Projects which are exempt from the environmental review would go directly to Step 4. However, such a project must meet the criteria set forth in State Law.

Step 4: Variance Hearing by Planning Commission

The Planning Commission must hold at least one public hearing and may hold additional hearings thereon as it may deem to be necessary. Notice of the Variance public hearing must be provided at least ten (10) calendar days prior. The notice must be published in the newspaper and must be sent to property owners within 300 feet of the subject property. The Variance may be approved subject to certain conditions or denied with findings to substantiate the denial. Any action of the Planning Commission may be appealed to the City Council. Without appeal, a Variance is effective in ten days from the approval date. Any Variance permit granted in accordance with the City's Code shall automatically be revoked if not used within one year from the date of approval unless an extension is requested and granted per the Municipal Code.

Environmental Review

According to State law, all projects must receive some form of environmental review prior to moving forward. The scope of project's environmental impacts determines the appropriate level of review. The first determination is whether or not the project is exempt from California Environmental Quality Act (CEQA) review. A new building on an appropriately zoned parcel could potentially be found to be exempt from CEQA review. If the project does trigger a CEQA review, the next step is to prepare an Initial Study. If the initial study finds the project does not need an Environmental Impact Report (EIR), the project receives a Negative Declaration or Mitigated Negative Declaration. If the Initial Study determines an EIR is needed, the project is placed on hold until one can be prepared, reviewed, and approved. The EIR process alone could add 6-12 months to the project approval timeline.

Design Review

The City's Planning Commission also serves as the Architectural Design Review Board.

The purpose of Design Review is to ensure that structures and uses are properly related to proposed sites and surrounding sites. Design Review may include the determination of appropriate structural height, building locations and orientations, yard dimensions, landscaping, lighting, pedestrian walks, fencing and location of parking and traffic circulation when control of these site elements is considered necessary to protect the health, safety and peace, comfort, convenience, and general welfare of nearby property owners or residents. Design review also involves recommendations that to implement the General Plan, help to assure quality development. Design Review applies in all zoning districts which are commercial, industrial, or medium or high density residential. It is also required for new single-family residential subdivisions. Exempt from design review are single-family dwellings or duplexes that are sited on individual lots with frontage on a public street and ordinary maintenance.

Design review is generally related to site planning and fairly objectives and predictable in nature, and generally considers the following:

- Site planning including spacing between building and surrounding properties and generally employing standards such as setbacks
- Materials and Colors
- Screening
- Circulation.
- Exterior Lighting.
- Landscaping
- Consistency with Design Guidelines.

To facilitate the construction of housing and further promote certainty for meeting design review requirements, the city created design guidelines for single-family and multifamily projects. These guidelines provide applicants with a clear picture of the design considerations that should be incorporated for approval. These guidelines make the processing of project approvals more predictable, transparent, and efficient as it sets clear rules for the Planning Commission to follow. As long as the applicant meets the requirements of the guidelines, the project can be processed expeditiously. The city is in the process of amending the code to formally adopt reference to these

guidelines.

All new buildings, structures, and other physical improvements and any relocation or exterior addition, extension, or change of or to existing buildings, structures, and other physical improvements are subject to design review, whether or not a building permit is required, unless exempted in Willows Municipal Code Section 18.141.040.

Physical improvements regarding residential may include, but are not limited to, the following:

- The siting and style of single-family residences and duplexes when consisting of a subdivision of five or more contiguous lots therein which are proposed to be built by one builder.
- Condominiums, townhouses, apartments, and any other multi-family residences.

SUBDIVISION/PARCEL MAPS AND LOT LINE ADJUSTMENTS

Subdivision/Parcel Map Review Process

Section 17 of the Willows Municipal Code describes the process for review and approval of a subdivision or parcel map.

1. **Preliminary Map:** applicant submits a preliminary map for processing and approval for any development that will be developed into two or more units.
2. **Tentative Map:** after receiving comments on the preliminary map, the applicant submits a tentative map for review by City departments and other external agencies. The tentative map is reviewed for setbacks, utilities, open space, and other items dictated under the zoning and building codes.
3. **Final Map:** A final map will be prepared and submitted for processing, approval, and filing for all subdivisions creating five or more parcels and/or condominiums. The planning commission and city council shall not deny approval of a final map pursuant to Willows Municipal Code 17.15.070 if they have previously approved a tentative map for the proposed subdivision and find that the final map is in substantial compliance with the previously approved tentative map.

If a project meets one or more of the following requirements, it is exempt from filing a final map:

1. The land before divisions contains less than five acres and each parcel created by the division abuts upon a maintained public street or highway and no dedications or improvements are required by the City.
2. Each parcel created by the division has a gross area of 20 acres or more and has an approved access to a maintained public street or highway, and no dedications or improvements are required.
3. The land consists of a parcel or parcels of land having approved access to a public street or highway, comprises part of a tract of land zoned for industrial or commercial development, has the approval of the city council as to the street alignments and widths, and no dedications or improvements are required.
4. Each parcel created by the division has a gross area of 60 acres or more.

No tentative map, final map or parcel map shall be approved unless the Planning Commission and

the City Council find that the proposed subdivision, together with the provisions for its design and improvements, is consistent with the General Plan or any specific plan adopted pursuant to the City of Willows Municipal Code.

Approval of a tentative or final map shall be denied if any of the following findings are made:

1. That the proposed map or the design or improvement of the proposed subdivision is not consistent with applicable General and Specific Plans.
2. That the site is not physically suitable for the type of development or for the density of development proposed.
3. That the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat or that they do not provide reasonable public access to public resources per Article 3.5 of the Subdivision Map Act.
4. That the design of the subdivision or the type of improvements is likely to cause serious public health problems.
5. That the design of the subdivision or the type of improvements will conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision. The City Council may approve a map if it finds that alternate easements, for access or for use, will be provided and that these will be substantially equivalent to ones previously acquired by the public. This subsection shall apply only to easements of record or to acquired easements for access through or use of property within a proposed subdivision.
6. That the discharge of waste from the proposed subdivision into the city sewer system would result in violation or add to a violation of existing requirements prescribed by a California Regional Water Quality Control Board.

Lot Line Adjustment Process

Upon filing of an application, an accurately drawn lot-line adjustment map, and any other required supplemental information to the City Planning Department, initial review takes place. If the application is accurate and complete, the documents are forwarded to the City Engineer for review. Conditions are not imposed on the approval of a lot-line adjustment except to ensure that the parcels conform to the local general plan, any applicable specific plan, any applicable coastal plan, and zoning and building ordinances.

Following city engineer approval, the lot line adjustment is scheduled before the Planning Commission. The lot-line adjustment and transfer of title is accomplished by recording grant deeds in the County Recorder Office with or without a map prepared by a registered civil engineer or licensed land surveyor in the State of California. The City Engineering Department will coordinate the recording of all applicant documents when the following criteria have been met:

1. The City Manager or his/her designee has certified in writing that any conditions placed on the approved lot-line adjustment have been satisfied.
2. The applicant, or the applicant's title company or agent, has submitted copies of the Grant Deed(s) for the land proposed to be conveyed for the lot-line adjustment and the City Engineer has determined that the Grant Deed(s) are in substantial compliance with the

approved lot-line adjustment map.

The applicant has submitted written verification to the City that property taxes are paid to the County of Glenn Treasurer-Tax Collector on all parcels affected by the adjustment.

SB-35 and AB 2162, Permanent Supportive Housing, and Navigation Centers

The city does not have a specific procedure for SB-35 applications, or reviewing Permanent Supportive Housing planning permit applications, but will comply with SB-35 and AB 2162 as applicable. Navigation Centers are not currently defined or addressed in the City's Municipal Code but will be added in order to comply with AB 101 as described in Program RC-1.4.1 in the Chapter 3 Goals, Policies, & Programs.

ON-SITE AND OFF-SITE IMPROVEMENT STANDARDS

On-Site Improvements

As part of the project review, the city ensures that there is adequate infrastructure capacity to serve the project. Typically, the developer makes any necessary basic infrastructure improvements to accommodate the proposed development such as land grading, street, alley, walkway, and off-street parking, grading, and paving, curbs, gutters, sidewalks, sanitary sewers, storm drains, appurtenances, street lighting, fire hydrants, electric, gas and water systems, street signs, and warning and safety devices. The amount of infrastructure needed will be dictated by the location of the project and its proximity to existing infrastructure.

Off-Site Improvements

The City of Willows Public Works department is responsible for ensuring that all new streets meet the requirements set forth in the City's standards. For arterial streets, the curb-to-curb width is expected to be between 64 and 70 feet with a right of way width of 86 to 100 feet. For collector streets, the curb-to-curb width is 40 feet with a right-of-way width of 60 feet. For the streets in industrial and commercial areas, curb-to-curb is 44 feet and right-of-way width is 64 feet. For residential and minor streets, curb-to-curb width is 36 feet and right-of-way width is 56 feet.

According to the City's Circulation Element, traffic flows mainly along the old Highway 99, now known as Tehama Street for north-south traffic and along Biggs Willows Road/Wood Street and Sycamore Street for east-west traffic.

Any person who constructs or causes to be constructed any building or dwelling in the City of Willows shall construct curbs, gutters, and sidewalks in accordance with the City of Willows standards. Any person who causes improvements to be made to an existing building, dwelling, or lot which exceed 50 percent of the value of such building, dwelling, or lot over a 12-month period shall construct curbs, gutters, and sidewalks in accordance with city standards.

All curbs and gutters constructed in the city shall conform to the following standards:

- (1) Curb. Five inches wide at top with two-inch radius on front, six and one-fourth inches wide at gutter line, six inches in height above gutter; and
- (2) Gutter. Sixteen inches wide and six inches thick, with one-and-one-half-inch slope to curb. Rolled-type gutters may be constructed at a variance only upon written consent of the city council.

All sidewalks shall be not less than four inches in thickness with floated and brushed surface, and shall be four feet wide, except when otherwise permitted by written consent of the city council. All sidewalks shall be constructed one foot from the private property line, except when otherwise permitted by written consent of the city council.

Any person dissatisfied with any decision of the public works department made in connection with the Municipal Code may appeal to the City Council. Such appeal shall be in writing and shall state the specific relief desired. The decision of the City Council is final, and no appeal shall be made after a building permit has been issued.

All new projects are expected to connect to the City’s public sewer system. All costs associated with the connection are expected to be paid by the developer and the work performed must be done in accordance with the specifications of the City’s building code. The connection to the sewer will be inspected by a city approved inspector and must be done to their specifications.

The city may require payment for other off-site improvements or for mitigation measures created by the project. In some cases, the developer can build these improvements in lieu of paying a fee. All of these improvements need to be developed to City standards and will require an inspection prior to acceptance by the city.

The City’s on-site and off-site improvements standards are fairly standard and are not seen as a significant constraint to the development of housing in Willows.

INFRASTRUCTURE

Public Utilities

Residential development requires a variety of services from local government agencies and private utility companies. In the Willows area, these services are provided by the City, Glenn County, private companies, and individual residents and property owners as follows:

Domestic Water:	California Water Service Company; individual wells
Sewage Disposal:	City of Willows; individual systems
Streets and Drainage:	City of Willows; Glenn County
Electricity and Gas:	Pacific Gas and Electric Company, Sierra Pacific, West Coast Gas
Telephone:	AT&T
Cable Television:	Comcast
Refuse:	Waste Management

In compliance with Senate Bill (SB) 1087, the city will forward the adopted Housing Element to its water provider so they can grant priority for service allocations to proposed developments that include units affordable to lower income households. The city supplies sewage services to the residents, so they are already aware of the Housing Element update.

Water Service

Cal Water has provided high-quality water utility services in Willows since 1927. To meet the needs of Willows residents, they utilize seven wells, two storage tanks, and 35.7 miles of pipeline to pump and

deliver two million gallons of local groundwater per day. In September of 2020, Cal Water installed 1,650 feet of 8-inch PVC water main and 27 individual customer service connections. Crews also installed four new fire hydrants as part of the project. Construction took place on Green Street, from Crestwood Way to North Lassen Street, and on North Lassen Street, from Green Street to Glenwood Lane.

According to Cal Water's 2015 Urban Water Management Plan, Willows had 2,371 municipal connections with an estimated population of 7,118. Cal Water estimates that the population will increase by 1.14% a year and that the estimated service population will be 8,535 by 2025. However, the estimated capacity in 2025 would serve a population of 9,200 people. Water service capacity is not expected to be a constraint to the development of housing during the Housing Element period.

Wastewater Collection and Treatment

The City of Willows' sewer system collects and treats all sewage from sources inside the city limits. The city processes an influent flow of approximately 650,000 gallons per day average for dry weather flow. There is a peak day wet weather flow of 1.3 million gallons. The plant generates approximately 100 tons of dried biosolids per year. These biosolids are hauled off to a landfill once a year.

Police and Fire Protection

Currently, the City contracts out police services with the Glenn County Sheriff Department. Fire Protection is provided by the City of Willows Fire Department. When a project comes forward, the plans are forwarded to both departments for review. The departments assess the projects for what impacts they will have on Police and Fire services. In addition, for most major residential projects, such as annexations, the city encourages a specific plan. Draft specific plans are sent to these departments so they can determine if there is capacity to serve the project at full build-out. If there is insufficient capacity, the project can be scaled back, or a new plan can be developed, to ensure that there will be sufficient capacity when the additional resources are needed. The ability to provide Police and Fire protection is not a constraint to meeting the current Housing Element's planning period.

School Facilities

The Willows Unified School District provides school services to the City of Willows. To pay for the construction of new facilities, developers are required to participate in the fee program that collects funds based on the square footage for a project, at a rate of \$3.36 per square foot.

Other Infrastructure

The city has determined new major growth will happen in a controlled way in the south area in the South Willows Residential Community. This is a specific planned area that is scheduled to add over 400 new single-family residences and approximately nine acres of multifamily housing. This area is adjacent to existing curb, gutter, sidewalk, streets, water, and sewer infrastructure. The internal infrastructure will be expected to be provided by the developers as they build out the project. Any needed new external infrastructure will be financed through the impact fees paid on the new construction. The provision of infrastructure is not anticipated to be a constraint on the construction of new housing during the planning period.

State and Federal Assistance Programs

The availability of state and federal assistance programs to fund infrastructure is unknown during the planning period. The city is not an entitlement jurisdiction under HUD's CDBG or HOME Programs. To access these funds, the city will need to apply through the State Department of Housing and Community

Development. During the current planning period, the city did receive two HOME grants for the construction of two new affordable rental projects. The city also received an Economic Development Administration grant to help fund the infrastructure for the commercial/industrial component of the new development in the south area. The city will continue to assess new funding programs as they become available to determine if they would be a benefit to the residents of the city. As potential projects come forward, the city will work with the developers to secure funding on a case-by-case basis.

Historic Overlay Districts

The Downtown District (Central Commercial Zoning) is a historic district. However, design restrictions in this district are limited to commercial signage and are not applicable to residential development.

CITY FEES

Building Permit Fees

Building Permit fees are charged to pay for the staff time and resources that are required for the review of projects. These fees are charged based on metrics such as the value of the project, square footage, and the number of water, gas, and electrical hookups. The project value is determined by using the International Code Council Building Valuation Table. This table assigns a value based on the use and type of construction being used to construct the project. The city then has a formula based on the valuation to determine what the final permit fee will be. The city also adds a plan check fee calculated at 65% of the final building permit fee. The fees are necessary to ensure that housing projects comply with applicable city standards. **Table 65 City of Willows Building Permit Fees Schedule** provides a list of applications for development permits and the required permit processing fee associated with each type of project.

The City Impact Fees are charged on a per unit basis, except for the school fees, which are charged per square foot as described earlier. Planning Fees are charged based on the Permit Fee Schedule Table on the next page. Building Fees are based on a valuation determined from the International Code Council Building Valuation Table.

The City's permit fees are similar to those of other communities of similar size and suggest that processing fees are not a major constraint to the development of housing in Willows.

They do not represent a constraint on the production of a range of housing types. On the contrary, the fees that are charged by the city represent only partial reimbursement for the effort that must be expended by City staff in order to properly review development plans. The city will continue to conduct periodic surveys (both formal and informal) of other communities in the Willows area to ensure that local processing fees do not inhibit housing construction.

Table 65: City of Willows Permit Fees Schedule

APPLICATION FEES	
Certificate of Compliance	\$228
Design Review	\$283+\$128 per PC mtg + PTA Deposit.
Encroachment Permit	\$78+\$58 per inspection & 2% of Public Improvement cost
ENVIRONMENTAL ASSESSMENT	
Categorical Exemption	\$64
Notice of Determination (NOD)	\$32 + County Posting Fee
Initial Study w/minor Neg. Dec	Consultant Fee + 5%
Initial Study w/MND	Consultant Fee + 5%
Environmental Report (EIR)	Consultant Fee + 5%
Tentative Parcel Maps (4 or fewer lots)	\$285 + \$32/lot + PTA
Tentative Parcel Maps (r or more lots)	\$565 + \$32/lot + PTA
Vesting Tentative Map	\$680 + \$32/lot + PTA
Extensions and Revisions to Approved Plan	\$191
Final Maps	\$562 + \$32/lot + PTA
General Plan Amendment	\$1146 + PTA
Home Occupation	\$86
Lot Line Adjustment	\$350
Lot Merger	\$228
Rezone or Prezone	Minimum \$1,000 deposit + consultant cost + 5%
Sign Permit	\$64
Temporary Use Permit	\$228
USE PERMIT	
Minor	\$114 + PTA Deposit
Major	\$570 + PTA Deposit
VARIANCE	
Minor	\$114 + PTA Deposit
Major	\$570 + PTA Deposit
Zoning Clearance Letter	\$128
Appeal to PC or CC	\$222
PASS THROUGH AGREEMENT (PTA)	
Projects deemed Categorically Exempt	\$500 min. deposit
Projects requiring Environmental Review minimum	\$1,000 minimum (Deposits are applied to fully allocated costs associated with the project. Additional deposits may be required).
In addition to the fees shown above, your project may require an Environmental Impact Report. These reports are funded by the applicant, managed by City Staff and completed by a private consultant. The developer may also be financially responsible for ant mitigation measures identified by the Environmental Impact Report.	

Source: City of Willows

Table 66: City of Willows Building Permit Fee Schedule

Schedule of Permit Fees	1997 Uniform Administration Code table 3A-3H
Plan Review Fees	65% of the building permit fee
Plan Review Fees for electrical, mechanical and plumbing	25% of the total permit fee
Total Valuation	Fee
\$1.00 to \$500.00	\$23.50
\$5.01 to \$2,000.00	\$23.50 for the first \$500 plus \$3.05 for each additional \$100.00 or fraction thereof , to and including \$2,000.00
\$2,001.00 to \$25,000.00	\$69.25 for the first \$2,000.00 plus \$14.00 for each \$1,000.00, or fraction thereof, to and including \$25,000.00
\$25,001.00 to \$50,000.00	\$391.75 for the first \$25,000.00 plus \$10.10 for each additional \$1,000.00, or fraction thereof, to and including \$50,000.00
\$50,001.00 to \$100,000.00	\$643.75 for the first \$50,000.00 plus \$7.00 for each additional \$1,000.00, or fraction thereof, to and including \$100,000.00
\$100,001.00 to \$500,000.00	\$993.75 for the first \$100,000.00 plus \$5.60 for each additional \$1,000.00, or fraction thereof, to and including \$500,000.00
\$500,001.00 to \$1,000,000.00	\$3,233.75 for the first \$500,000.00 plus \$4.75 for each additional \$1,000.00, or fraction thereof, to and including \$1,000,000.00
\$1,000,001.00 and up	\$5,608.75 for the first \$1,000,000 plus \$3.65 for each additional \$1,000.00 or fraction thereof.

Source: City of Willows

Development Impact Fees

Development Impact Fees can pose a financial constraint on the production of housing units. Development Impact Fees are charged on new construction projects to fund public improvements that will be required to serve project residents. Impact fees often pay for streets, parks, police, and fire services. The fees are calculated through application of a fee nexus study that projects the need for public services based on various types of residential development. A fee nexus study calculates a fee for each development category. In most cases, a single-family home has a greater impact on services compared to one multifamily rental unit, so multifamily fees tend to be less than single family fees. In Willows, multifamily impact fees are less than single-family impact fees. **Table 67: City of Willows Development Impact Fees Schedule** lists the City's single-and multi-family impact fees.

Table 67: City of Willows, Development Impact Fee Schedule

DEVELOPMENT IMPACT FEE SUMMARY (revised July 2015)								
Fee Category	2014 Housing Element		Difference		% Increase		Single Family Residential	Multi-Family Residential
	Single Family Residential	Multi-Family Residential	Single Family Residential	Multi-Family Residential	Single Family Residential	Multi-Family Residential		
Library	\$1,645	\$1,577	\$1,495	\$1,434	\$150	\$143	10.03%	9.97%
Parks and Recreation	\$2,353	\$2,257	\$2,139	\$2,052	\$214	\$205	10.00%	9.99%
Freeway Interchange	\$453	\$319	\$412	\$290	\$41	\$29	9.95%	10.00%
Streets and Traffic	\$845	\$593	\$768	\$539	\$77	\$54	10.03%	10.02%
Police	\$869	\$834	\$ 790	\$758	\$79	\$76	10.00%	10.03%
Fire	\$1,785	\$1,712	\$1,623	\$1,556	\$162	\$156	9.98%	10.03%
Sanitary Sewer Wastewater	\$1,387	\$1,330	\$1,261	\$1,209	\$126	\$121	9.99%	10.01%
Storm Drain	\$2,239	\$1,343	\$2,035	\$1,221	\$204	\$122	10.02%	9.99%
Administration (3% of Subtotal)	\$348	\$299	\$316	\$272	\$32	\$27	10.13%	9.93%
Total Per Unit	\$11,924	\$10,264	\$10,839	\$9,331	\$1,085	\$933	10.01%	10.00%
School Fees (Sq. Ft.)	\$3.36	\$3.36	\$0.81	\$0.81	\$2.55	\$2.55	314.81%	314.81%

Source: City of Willows

In Willows, the anticipated city charged development impact fees for a typical 1,500-square-foot single-family unit are approximately \$11,924. A breakdown of this calculation is shown in **Table 68: Single Family Fees**.

Table 68: City of Willows, Single Family Example

Single Family Home Example		
# of Sq. Ft.	1500	Cost per Sq Ft
Construction Price Sq. Ft	\$ 177.00	
Lot Cost	\$ 44,610.30	\$ 29.74
Construction Cost	\$ 265,500.00	\$ 177.00
Contingency and Overhead (10%)	\$ 26,550.00	\$ 17.70
Permit Fees	\$ 3,012.93	\$ 2.01
Impact Fees	\$ 11,924.00	\$ 7.95
School Fees	\$ 5,040.00	\$ 3.36
Total	\$ 356,637.23	\$ 237.76
<i>Note: This model does not include A&E, Developer Profit and other assorted soft costs.</i>		

The approximate per-unit fee total for a multi-family project, assuming 900-square-foot units of “good” quality construction, is \$10,264. A breakdown of this calculation is shown in **Table 69: Multi-family Fees**. A review on these fees compared to the impact fees in the previous Housing Element shows that most fees have only increased in the 10% range, which is very reasonable considering inflation.

Table 69: City of Willows, Multi-Family Example

Multifamily Example			
# of Sq. Ft.	900	Cost Per Sq Ft	Cost Per Unit
# of Units	40		
Construction Price Sq. Ft	\$ 177.00		
Lot Cost	\$ 348,723.14	\$ 9.69	\$ 8,718.08
Construction Cost	\$ 6,372,000.00	\$ 177.00	\$ 159,300.00
Contingency and Overhead (10%)	\$ 637,200.00	\$ 17.70	\$ 15,930.00
Permit Fees	\$ 41,903.86	\$ 1.16	\$ 1,047.60
Impact Fees	\$ 410,560.00	\$ 11.40	\$ 10,264.00
School Fees	\$ 120,960.00	\$ 3.36	\$ 3,024.00
Total	\$ 7,931,347.00	\$ 220.32	\$ 198,283.67
<i>Note: This model does not include A&E, Developer Profit and other assorted soft costs.</i>			

As a means of assessing the cost that fees contribute to development in Willows, the city has calculated the total fees associated with development of a single-family and multi-family development. The City’s current fee schedule was updated on July 1, 2015. Development Impact fees represent approximately 3.3% of the total cost of construction per single-family home and 5.2% for a multi-family unit. Based on the proportion of fee cost to the overall development cost, impact fees are not a significant constraint to the development to single-family or multi-family housing.

The impact fee that is outside of the city's control are the fees for schools. These fees are charged on a per square foot basis. In the previous housing element, these fees were \$0.81 per square foot for single family and multifamily projects. These fees are now charged at \$3.36 per square foot. Since the last Housing Element, these fees have increased by nearly 315%, compared to the average increase of 10% for City impact fees. As an example, for a 1,500 square foot single-family home, the school fees are \$5,040, which is 42% of all City Impact fees for this type of unit. For a 900 square foot apartment, the school fees are \$3,024, which is 29% of all City Impact fees for this type of unit.

An additional incentive the city has created to help with development of housing is a deferral on impact fees on all residential development. The payment of impact fees is not due until issuance of the Certificate of Occupancy by way of a City Policy. This deferral is an incentive as developers would not have to carry interest on the amount of impact fees during the construction of their project. The program is structured so that the city is ensured that their impact fees will be received, as the project cannot be occupied until after the fees have been paid.

The city has created an impact fee exemption program for a large portion of the city. This program exempts the older sections of town. The exemption zone is bounded by Villa and Pacific Avenue on the west, Green Street on the north, Tehama Street on the east and the Central Canal on the South. The zone is about one square mile in area. All new construction on parcels inside this area is exempt from impact fees. This is a significant advantage to encourage infill development in the central city area. The city does not have a formal process for a fee waiver, but they have granted them in the past. Any request for a fee waiver would need to be reviewed by city staff and then brought to City Council for their consideration and final approval or rejection.

Fees Evaluation

Program RC-1.1.1 in the Chapter 3 Housing Program requires the city to survey other cities in the Glenn County area to ensure that City fees do not become a constraint on housing production. If fees are found to be a constraint on housing development, they will be revised.

NON-GOVERNMENTAL CONSTRAINTS

Non-governmental constraints include market trends, financing availability, and environmental conditions. These factors affect the cost and availability of land, building materials, labor, and funding. In addition, conditions created by the Camp Fire and COVID-19 are unique to the current planning period. While these constraints are largely outside the control of government, the city should be aware of how they influence the local housing market in order to proactively establish policies and goals that mitigate negative impacts.

Land Cost and Availability

Multi-family Zoned Land

For multi-family zoned properties, only one lot sold in 2019 and 2020. This lot was 71,874 square feet and sold for \$240,000. This equates to a price of \$3.34 per square foot. When compared to single-family zoned vacant lots, this per square foot value is 14% less. The property is being developed as a 24-unit apartment building with an estimated cost of \$9.9 million dollars. The land cost only accounts for 2.4% of the total project. With such a low percentage of the total project cost, it appears the cost of multi-family land is not an undue burden to the development of housing.

Single-family Zoned Land

An analysis of vacant single family lots sold between 2019 and 2020 shows that the average cost in the City of Willows was \$42,100 or \$4 per square foot with an average lot size of 11,145. With a median sales price of \$244,150, the lot cost accounts for 17% of the property value. For illustration purposes, the City of Chico, which is approximately 32 miles away from Willows, is the largest city in the region. For the same time period, the average lot cost was \$10.45 a square foot with an average lot cost of \$97,958. This does not appear to be an undue burden for the construction of housing. However, similar to the limited availability of single-family homes for sale, there is a very limited supply of vacant lots for sale.

Construction Costs

Construction costs have increased significantly during the current housing element cycle. These increases have been the result of labor and materials costs. The Turner Center for Housing Innovation at UC Berkeley did an analysis of hard construction costs for apartments. In their report, they pointed out that hard costs statewide increased 24% between 2009 and 2018. When looking at the costs between 2014 and 2018 the increase is even more significant with an increase of 45%. To put this in perspective, the average square foot hard cost was \$177 in 2009, and in 2018 it cost \$222 a square foot.

According to the Turner Center report, wages for the Construction and Extraction Occupations category saw an increase of 28.7% between 2006 and 2018. Cement Masons and Concrete Finishers saw the most significant increase in wages at 32.5%. Some of these wage increases were attributed to higher levels of overhead, profit and contingency by contractors to mitigate the risk and costs associated with a restricted workforce, and to keep workers on their jobs instead of jumping to other projects that were paying better wages.

Adding to the increase in wages were also large increases in the cost of materials. Between 2010 and 2018, the cost of concrete increased by 28%, finishes and gypsum saw an increase of 65%, and lumber saw an increase of 110% during that period. Only metals saw a decrease of 39% over that time period. The COVID-19 pandemic has contributed to materials cost increases. In some areas the cost of lumber tripled as supplies became constrained due to shutdowns in sawmills.

The increase in construction costs can be attributed to many factors but appears to be mainly due to large increases in materials and a restricted workforce. It is not clear if these factors will continue during the next housing element period, but if they do, it could significantly impact the overall supply and affordability of units.

Even though the city does not have control over factors such as construction or land costs, the city has implemented programs to help offset some of the development costs. This includes streamlining permits for projects as they are submitted, creating an area in the central city area that is exempt from development impact fees, and offering a deferral on development impact fees until the project is ready to receive a Certificate of Occupancy.

Financing Availability

Private Multifamily Financing

Securing financing for acquisition of multi-family properties can be difficult in rural areas. Many private lenders will only offer debt financing in larger metropolitan areas. Also, many private lenders will only loan up to 80% of the value of the project. Purchase of larger multi-family projects would require a large down payment. Loans available in rural areas may be limited to shorter amortization terms. Even when

there are governmental guarantees available such as from Fannie Mae or Freddie Mac, loans often still have a maximum loan to value of 80%.

With the lack of resources available, for rural multi-family housing, borrowers will sometimes turn to “hard money” loans. Hard money loans are secured with real estate and the lenders tend to be private investors or companies instead of banks or other financial institutions. These loans tend to be for short terms and at higher interest rates compared to a standard loan. These loans are considered to be loans of last resort.

Publicly Subsidized Multifamily Rental Financing

There are many State and Federal programs available for the acquisition, rehabilitation, or construction of affordable housing. Many of these programs have set asides specifically aimed at funding housing in rural areas. These programs include loan guarantees through Fannie Mae, Freddie Mac, or the U.S. Department of Agriculture (USDA). There are also direct loans available for these projects that have higher loan to value ratios compared to market rate loans.

Affordable housing projects are also eligible for Federal and State Tax Credits. Tax Credits generate private investor equity that helps to lower the amount of loan funding needed for the project. Tax credit projects are also eligible for tax exempt bond financing. Bonds are issued that help to lower the interest rate the developer pays for financing. Other public programs provide low interest loans for longer terms than private financing. These programs aid with gap financing and take lower positions from the main mortgage. Many of these gap loans are paid back through the payment of residual receipts and have no set required annual payment. The most significant constraint on publicly subsidized financing is competition with other projects for funding allocations. However, with the variety and size of these programs available throughout the State, there are fewer constraints to this type of financing than at any time in the last 20 years.

Private Homeownership Financing

Since the year 2000, the Federal Reserve has consistently lowered the bank lending rate which caused the interest rate on a 30-year fixed rate mortgage to decrease significantly. In 2000, the national average annual interest rate was 8.05%. In 2020, the average annual interest rate was 3.11%. As an illustration, in 2000, the monthly principal and interest payment on a \$200,000 mortgage was \$1,474.50. In 2020, the monthly payment was \$855.12 for the same mortgage, representing a savings of \$619.38 a month. To further illustrate the difference, if a household could afford to spend 30% of their gross monthly income on a principal and interest payment, in 2000, a family would need an annual income of \$58,980 to afford a \$200,000 mortgage. In 2020, the same mortgage would require an annual income of only \$34,205. Unfortunately, because of the consistent and rapid rise in property values in California, home purchases require much larger mortgages in 2020 than the mortgage amounts required in 2000, and it is currently difficult to find houses in Willows for \$200,000 or less.

Publicly Subsidized Homeownership Financing

The City of Willows currently does not have any homebuyer assistance programs. The city could look at opportunities in the future as they become available. Some programs are available to city residents, including USDA homebuyer loans and loan guarantees, CalHFA lending programs and direct loans, and other governmental programs aimed at low- and moderate-income households. Glenn County also offers a housing rehabilitation program that is eligible for all residents of the County, including residents of

Willows. Even without direct funding from the city, there are still plenty of opportunities for publicly subsidized home ownership financing available to Willows residents.

Environmental Constraints

Active earthquake faults can be found throughout California. However, Willows is located in an area that is considered to be relatively free of seismic hazards. The most significant seismic activity that can be anticipated in the Willows area is ground shaking generated by seismic events on distant faults.

Willows has an elevation of over 130 feet above seas level. A review of the FEMA Flood maps shows that the majority of the city is in Zone X or AE and AH. According to these designations, there is not a requirement in Zone X, zones AE and AH, to require flood insurance.

Noise exposure at the available housing sites in the city is considered to be minimal. A small active airport is located near Willows, which is responsible for an increase in periodic noise when the airport is in use, but there are no large airports in the vicinity of the city. The most prominent source of noise in Willows is Interstate 5. The city is located adjacent to the interstate and the majority of ambient noise around Willows can be attributed to traffic on this roadway.

Interstate 5 also acts as the western boundary of the city. The proposed new growth area is to the south of the central city area. As part of a rezone to add multifamily to the project in December of 2020, an Initial Study/Subsequent Mitigated Negative Declaration was prepared for the project, and it was determined that the new development will have less than significant impacts due to mitigation measures that were incorporated in the plan.

COVID-19

On March 13, 2020, President Trump declared the ongoing Coronavirus Disease 2019 (COVID-19) pandemic of sufficient severity and magnitude to warrant an emergency declaration for all states, tribes, territories, and the District of Columbia pursuant to section 501 (b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207 (the “Stafford Act”). This declaration shut down “non-essential” businesses such as bars, restaurants, and most retail stores. Essential businesses included hardware stores, supermarkets, and other retailers that sold food or medical supplies. Housing construction was considered an essential business, however, COVID still had a severe impact in that sector. Construction sites had to deal with shutdowns due to COVID outbreaks. Also, many factories that created the needed building materials saw shutdowns or reduced staffing. With these staffing reductions, supply inventories became severely constrained. Construction projects had to wait extended periods for supplies like wood and concrete. These demands created delays that would reduce activities for days and weeks. These delays resulted in fewer units being built to meet the high demand for housing in the State. This resulted in higher housing sales prices and rents. Additionally, due to workers contracting COVID and fears of contracting the disease, there was a reduction in the construction workforce as well.

Camp Fire

On November 18, 2018, a faulty electrical line sparked the deadliest and most destructive wildfire in the history of the State of California in the foothills of Butte County. When the fire was finally fully contained on November 25th, 2018, it had killed 85 people, burned almost 240 square miles, and destroyed 18,000 structures, most of which were dwelling units. The towns of Paradise and Concow were almost completely destroyed, and 56,000 people were evacuated with 20,000 of them relocating permanently. Prior to the Camp Fire there was already a limited supply of rental and for-sale housing in Butte and the

surrounding counties. Adding 20,000 more people looking for housing caused these housing markets to be even more constricted. Over two years later, there are still victims of the Camp Fire looking for a new place to live.

City Actions that Address Non-Governmental Constraints

Land Prices

Program HD-1.4.1 addresses limited land and high land prices by identifying available sites, including publicly owned sites for affordable housing developers.

Construction Costs

Program HD-1.4.6 encourages the development of smaller, more affordable units that have lower construction costs, such as SROs.

Program MI-1.1.1 explores implementation of a housing rehabilitation program. This preserves existing housing stock, which is more cost efficient than building new units.

Financing Availability

Program HD-1.4.1 assists affordable housing developers in applying to applicable State funding programs to support housing development.

Program HD-1.4.3 expands homeownership opportunities for very-low- and low-income first-time homebuyers with CDBG and HOME funds.

Program FH-1.2.1 directs the City to coordinate with the Housing Authority of the County of Butte to provide Section 8 vouchers for City of Willows residents and housing projects.

Program FH-1.2.2 directs the City to collaborate with Glenn County to access Permanent Local Housing Allocation (PLHA) funds.

Affirmatively Furthering Fair Housing: Identification of Contributing Factors

This section identifies, evaluates, and prioritizes contributing factors for six fair housing issues as recommended by the California State Department of Housing and Community Development. It prioritizes factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliances.

Table 70: City of Willows, Identification of Contributing Factors, 2021

Priority (high, medium, low)	Fair Housing Issue	Contributing Factors	Meaningful City Action
High	Concentrations of affordable housing, low-income households, and people of color in Block Groups 1, 3, and 4.	Location of affordable housing, naturally occurring affordable housing, and services and amenities. Lack of private investments in specific neighborhoods.	<p>1. When developers contact the city regarding building affordable housing in Block Groups 1, 3, and 4 – suggest other sites in the City for developers to consider instead, especially sites in Block Group 5 due its lack of income diversity.</p> <p>2. Use map of multi-family units in the city to identify neighborhoods with concentrations of single-family or multi-family housing. Use this data to suggest potential sites to developers to help create more integrated living patterns.</p> <p>3. Recruit residents from areas of concentrated poverty, especially people of color, to serve on boards, committees, tasks forces, and other local government decision-making bodies.</p>
High	Lack of Housing Choice Vouchers and affordable housing units for the number of households living below the poverty level.	Lack of regional collaboration for affordable housing and availability of Housing Choice Vouchers. Limited capacity at the City to engage. The City has a contract planner for only eight hours per week.	<p>1. Meet with Housing Authority of the County of Butte (HACB) staff at least twice per year to discuss Housing Choice Voucher and Project-Based Voucher needs, affirmative marketing and outreach, and methods of increasing the number of vouchers in the City.</p> <p>2. In collaboration with Glenn County, assist with publishing an annual Request for Proposals for Permanent Local Housing Allocation (PLHA) funds to attract affordable housing developers to the area.</p> <p>3. Meet with Community Housing Improvement Program (CHIP) and Yuba-Sutter Habitat for Humanity (Habitat) at least twice per year to discuss potential development opportunities in the city and methods of collaboration. Assist with producing one project each in Willows during the Housing Element cycle.</p>

Medium	People of color are disproportionately represented in rental housing, and renters are much more likely than owners to experience a Housing Problem	Lack of resources for local public fair housing enforcement and outreach, and access to and likelihood of discrimination in employment, financial, and lending services.	<p>1. Meet with CHIP and Habitat at least twice per year to develop sweat equity housing that includes low-interest loan and down payment assistance. Assist developers with affirmative outreach to people of color.</p> <p>2. Apply for HOME and CDBG funds and develop a housing rehabilitation program in collaboration with an experienced entity within the Housing Element cycle. Program to focus on areas of concentrated rehabilitation (Block Groups 1 and 2), resulting in repairs, and mitigating potential cost, displacement, and relocation impact on residents.</p>
Medium	A lack of full-time year-round positions with good wages is increasing cost burden for residents.	A shift over time throughout the city from year-round to seasonal positions, and a lack of housing units needed to bring employers and employees to the City.	1. Meet with Glenn County and the City of Orland at least twice per year to assess feasibility of a potential economic development program, with an intentional focus on agricultural occupations due to the region's economic activities.
Medium	According to TCAC/HCD's 2021 Opportunity Area Maps, most of the City of Willows is identified as having "less positive economic outcome," "less positive education outcome," and "less positive environmental outcome."	Lack of private and public investments, including amenities, employers, housing, and services	1. Conduct an Affordable Housing and Sustainable Communities (AHSC) feasibility analysis by the end of the first year of the Housing Element cycle. If deemed feasible, apply for AHSC funds by February 2023.

Low	Lack of language access for residents who are not fluent in English.	Increased diversity in the city in recent years has resulted in a higher percentage of residents who speak a language other than English at home. Most of these residents speak Spanish.	<p>1. Affirmative recruiting in hiring practices and intentional outreach to Hispanic/Latino and Hmong/Laotian residents for City employment opportunities to increase availability of bicultural and bilingual staff.</p> <p>2. Expand access to community meetings by providing live interpretation in Spanish. Bilingual English/Spanish City staff members to interpret.</p> <p>3. Expand access to planning materials created for the public by providing materials in English and Spanish. Bilingual English/Spanish City staff members to translate materials.</p>
Low	Lack of fair housing enforcement and outreach	Limited City capacity for fair housing enforcement and outreach activities	<p>1. Apply for, or work with a consultant to apply for, CDBG funds through the California Department of Housing and Community Development to support fair housing enforcement and activities.</p> <p>2. Meet with North Valley Property Owners Association and Legal Services of Northern California at least twice per year to coordinate information, referrals, and outreach to residents. This may include posting links on the City's website and Facebook page, posting physical flyers at City Hall and sending an "email blast" to the City's stakeholder contact list.</p> <p>3. Conduct special outreach activities during the month of April for National Fair Housing Month, which celebrates the passage of the Fair Housing Act in 1968. This may include posting digital fair housing materials on the City's website and Facebook page, posting physical flyers at City Hall, and sending an "email blast" to the City's stakeholder contact list.</p>

Appendix A: Review of Previous Housing Element Programs 2014-2021

Review of Previous Housing Element Programs 2014-2021		
Goal: HD-1: Provide a variety of housing unit types and sizes to meet the RHNA for the City of Willows		
Policy: HD-1.1: Continue to maintain a sufficient supply of land designated for residential development to meet the RHNA for the planning period		
Program	Accomplishments	Delete/Continue/Modify?
HD-1.1.1: Continue to monitor the available residential land in the city to ensure adequate sites are available for the developing of housing	The city engages in discussions with developers as they approach the City with development proposals	Modify: incorporate the new requirements of SB 166, "No Net Loss" to provide a structured, pro-active monitoring program.
HD-1.1.2: Work in close cooperation with Glenn County to ensure the orderly development of unincorporated lands adjacent to the City and consistency of land use policies and development standards	The City comments on developments proposed adjacent to the city (for example, tying into a City utility or infrastructure). No annexations are proposed at this time.	Delete: this process happens as a normal course of action, with the city commenting on any projects that would involve City infrastructure.
HD-1.1.3: Revise Zoning Ordinance to provide consistency with GP residential densities by removing the 14-dwelling unit per acre max in the density in the R-3 and R-P zoning districts	Completed in 2015	Delete
Policy HD-1.2: Recognize Willows' housing needs when considering nonresidential development proposals		
Program	Status	Delete/Continue/Modify?
HD-1.2.1: Work in close cooperation with Glenn County to ensure the orderly development of unincorporated lands adjacent to the city and consistency of land use policies and development standards	The City and County are both working on updates to their General Plans to be adopted in 2021. The City and County attend monthly meetings and review zoning and land use maps as needed	Delete: this process happens as a normal course of action, with the city commenting on any projects that would involve city infrastructure.
Policy HD-1.3: Use the design review process to ensure that housing subdivisions are sensitive to the character and appearance of their surroundings		
Program	Status	Delete/Continue/Modify?
HD-1.3.1: The city will continue to offer pre-application consultations for interested developers and make available public information handouts	Public information handouts for design review have been made available	Continue

Policy HD-1.4: Make maximum use of public and private resources to help meet identified housing needs

Program	Status	Delete/Continue/Modify?
HD-1.4.1: Assist in the development of affordable housing	The city applied for HOME grant with a developer in 2018, construction completed in 2021	Modify: provide greater details on assistance types
HD-1.4.2: Continue to support the emergency housing program operated by Glenn County which provides emergency shelter and transitional housing	Not implemented	Modify: collaborate with Continuum of Care on housing programs by attending the meetings, supporting funding applications and placing brochures in city offices, etc.
HD-1.4.3: Expand homeownership opportunities for very low and low income and first-time homebuyers through the use of CDBG	Not implemented	Modify: describe actions to partner with self-help single family affordable developers
HD-1.4.4: The city will consider providing incentives to builders to provide housing and care choices for seniors of all income levels and levels of independence.	The city provided parking incentives for a 49-unit senior project completed in 2015	Modify: combine with HD-1.4.5
HD-1.4.5: Work with housing providers to ensure that special housing needs are addressed through a combination of regulatory incentives, zoning standards, new housing construction programs and supportive services	Brochure not yet completed; in 2015 the City applied for HOME funds for a senior project	Continue
HD-1.4.6: Encourage the development of housing affordable to extremely low-income households. The city will monitor the need for such housing and evaluate opportunities for funding annually.	City has modified code to allow SF and MF use of structures built as houses which lost their allowable use to re-establish a residential use with an approved use permit.	Modify: delineate SROs, one-bedroom units and supportive housing

Goal EC-1: Ensure increased energy self-sufficiency through use of energy conservation measures in all homes, including extremely low, very low-, low- and moderate-income housing		
Policy EC-1.1: Promote the use of energy conservation measures through PG&E in the development of all housing, but especially low- and moderate-income housing		
Program	Status	Delete/Continue/Modify?
EC-1.1.1: Promote and encourage the weatherization program administered by Glenn County and funded by PG&E	Ongoing	Continue
EC-1.1.2: Continue to support the energy audits free to homes located within the city limits	Ongoing	Modify: update to reflect current PG&E and other assistance programs
Policy EC-1.2: Promote opportunities for use of solar energy and encouraging solar access on all properties developed in the future		
Program	Status	Delete/Continue/Modify?
EC-1.2.1: Encourage use of solar energy considerations in new residential construction	Ongoing, city has issued numerous solar energy permits for new construction and rehabilitation	Modify: all new construction is now required to include solar. Include promotion of solar for housing rehabilitation projects
Goal MI-1: Ensure that the quality, safety, affordability, and livability of the housing stock in Willows is continually maintained or upgraded and that dilapidated housing which cannot be improved is replaced		
Policy MI-1.1: Continue to annually apply for state and federal funding to maintain and rehabilitate homes and apartments until local needs are met		
Program	Status	Delete/Continue/Modify?
MI-1.1.1: Apply for rehabilitation funding as it becomes available through CDBG and HOME	Not implemented	Modify: include resources to assist the city with program administration, since limited resources have been a constraint
MI-1.2: Continue to enforce the Housing, Fire Prevention and Electrical Codes and Health/Safety Regs		
Program	Status	Delete/Continue/Modify?
MI-1.2.1: Continue enforcement by appropriate City Departments	Ongoing	Delete: these are State requirements that are regularly updated and enforced through the regular course of business

Goal RC-1: Remove or eliminate governmental constraints on the maintenance, improvement, and development of housing, where appropriate and legally possible		
Policy RC-1.1: Periodically examine local building and zoning codes to reduce housing construction costs without sacrificing basic health and safety considerations		
Program	Status	Delete/Continue/Modify?
RC-1.1.1: Periodically reexamine the Zoning Ordinance for possible amendments	Ongoing compliance with California Building Codes is maintained by city staff	Delete: compliance with California Building Codes are not subject to flexibility
RC-1.2: Continue to charge development fees that do not unreasonably contribute to the cost of housing		
Program	Status	Delete/Continue/Modify?
RC-1.2.1: Survey other cities in the Glenn County area to ensure that local development fees do not become a constraint on housing production	Survey is completed every two to three years	Continue
RC-1.3: Encourage the removal of government constraints on the maintenance, improvement and development of affordable housing to assist citizens with special needs		
Program	Status	Delete/Continue/Modify?
RC-1.3.1: Amend Zoning Ordinance re: transitional and supportive housing in all zones allowing residential units	Complete in 2015	Delete
RC-1.3.2: Amend Zoning Ordinance to remove any references limiting family household sizes for definition of "Family"	Complete in 2015	Delete
Goal EO-1: Ensure that housing programs maximize choice, avoid economic segregation and avoid discrimination		
Policy EO-1.1: Promote equal opportunity in housing, assessing non-discrimination in all City housing programs		
Program	Status	Delete/Continue/Modify?
EO-1.1.1: In coordination with Glenn County, establish an Equal Housing Opportunity Program (brochure and tenant advocacy program)	The informational brochure and tenant advocacy program were not developed	Modify: the new requirements imposed by AB 686 will result in a thorough analysis of fair housing issues in the City and appropriate programs will be recommended based on this analysis

Appendix B: Community Meeting #1: Housing Needs and Issues Poll Report



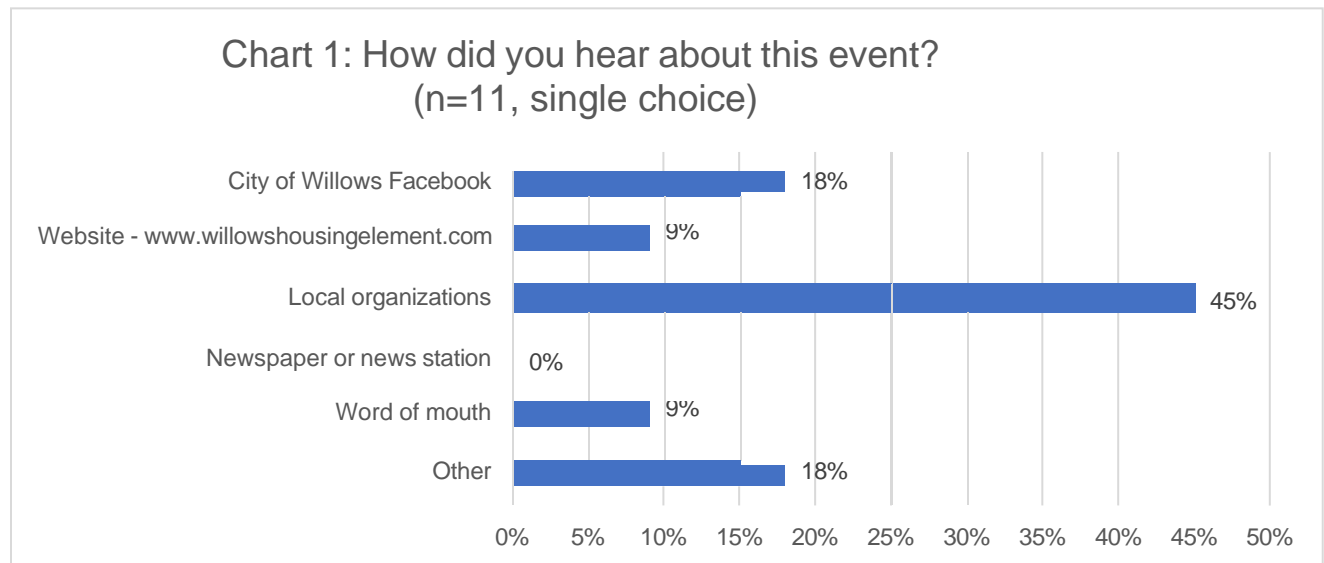
Poll Report
2021 Willows Housing Element
Community Meeting #1: Housing Needs & Issues
Wednesday, March 10, 2021
6:00-8:30 pm

Community members responded to bilingual polls in English and Spanish that were launched live during the webinar portion of the event. Both the polls and community members' aggregated responses are provided below.

Poll 1

How did you hear about this event? / ¿Cómo se enteró de este evento?

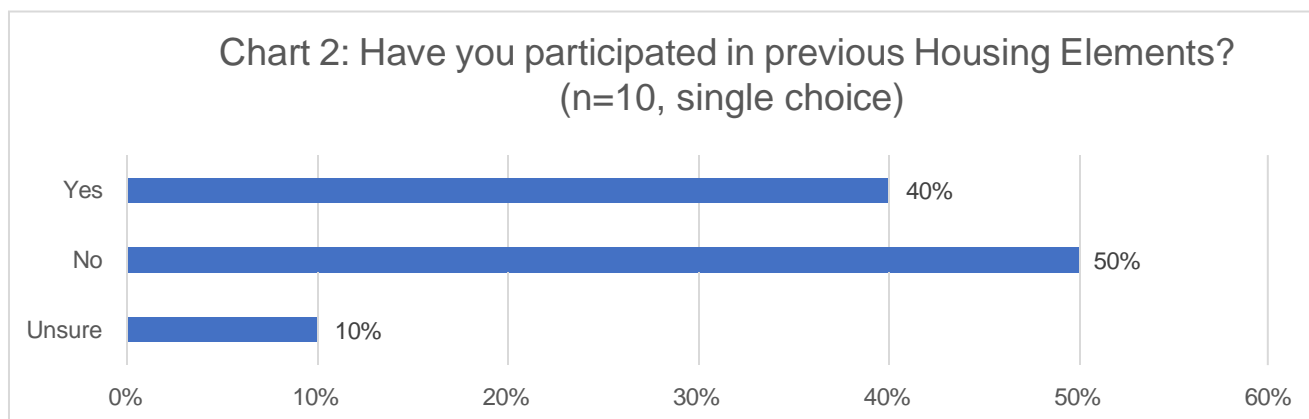
- a. City of Willows Facebook / Página de Facebook de la Ciudad de Willows
- b. Website – www.willowshousingelement.com / Sitio de Web – www.willowshousingelement.com
- c. Local organization(s) / Organización(es) Local(es)
- d. Newspaper or news station / Periódico o estación de noticias
- e. Word of mouth / Me pasaron la voz
- f. Other / Otro



Poll 2

Have you participated in previous Housing Elements? / ¿Ha participado en Elementos de Vivienda anteriores?

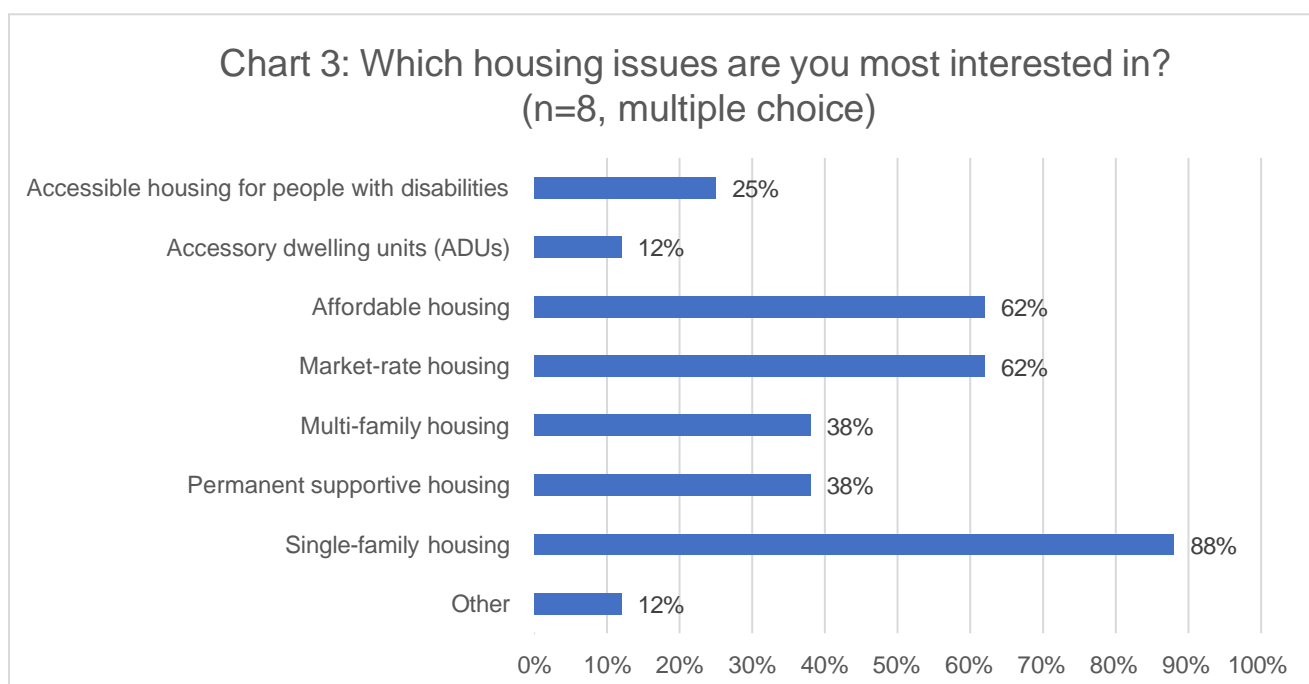
- a. Yes / Sí
- b. No / No
- c. Unsure / No estoy seguro



Poll 3

Which housing issues are you most interested in? Please select all that apply. / ¿En que problemas de Vivienda está usted más interesado? Por favor seleccione todos las respuestas que correspondan.

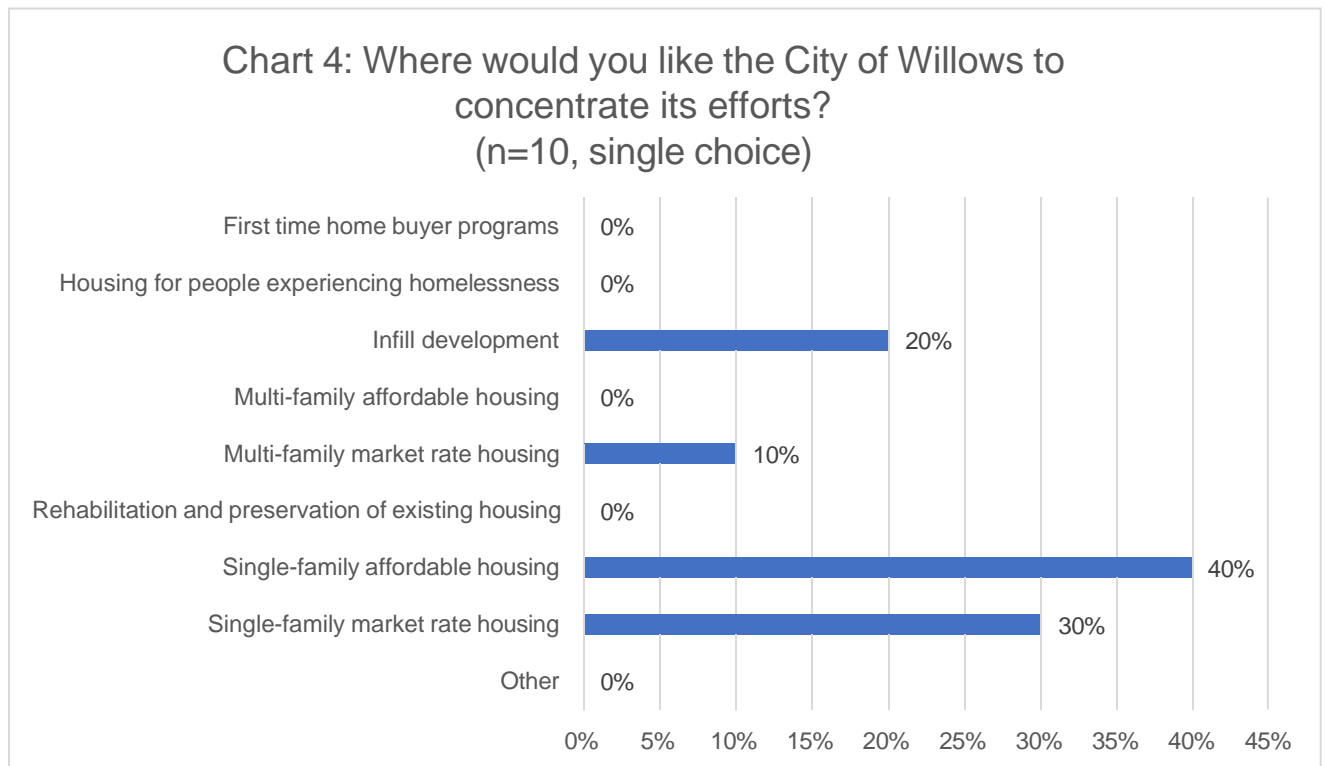
- a. Accessible housing for people with disabilities / Vivienda accesible para personas con discapacidades
- b. Accessory dwelling units (ADUs) / Unidades de Vivienda Accesorias (ADUs, siglas en Inglés)
- c. Affordable housing / Viviendas asequibles
- d. Market-rate housing / Viviendas a precio de mercado
- e. Multi-family housing / Viviendas multifamiliares
- f. Permanent supportive housing / Viviendas de apoyo permanente
- g. Single-family housing / Viviendas unifamiliares
- h. Other / Otro



Poll 4

Where would you like the City of Willows to concentrate its efforts? / ¿Dónde le gustaría que la Ciudad de Willows concentre sus esfuerzos?

- a. First time home buyer programs / Programas para compradores de Vivienda por primera vez
- b. Housing for people experiencing homelessness / Viviendas para personas que no tienen hogar
- c. Infill development / Desarrollo de rellenos
- d. Multi-family affordable housing / Vivienda multifamiliar asequible
- e. Multi-family market rate housing / Vivienda multifamiliar a precio de mercado
- f. Rehabilitation and preservation of existing housing / Rehabilitación y preservación de viviendas existentes
- g. Single-family affordable housing / Viviendas unifamiliares asequibles
- h. Single-family market rate housing / Viviendas unifamiliares a precio de mercado
- i. Other / Otro



Appendix C: Community Meeting #2: Housing Goals and Programs Poll Report



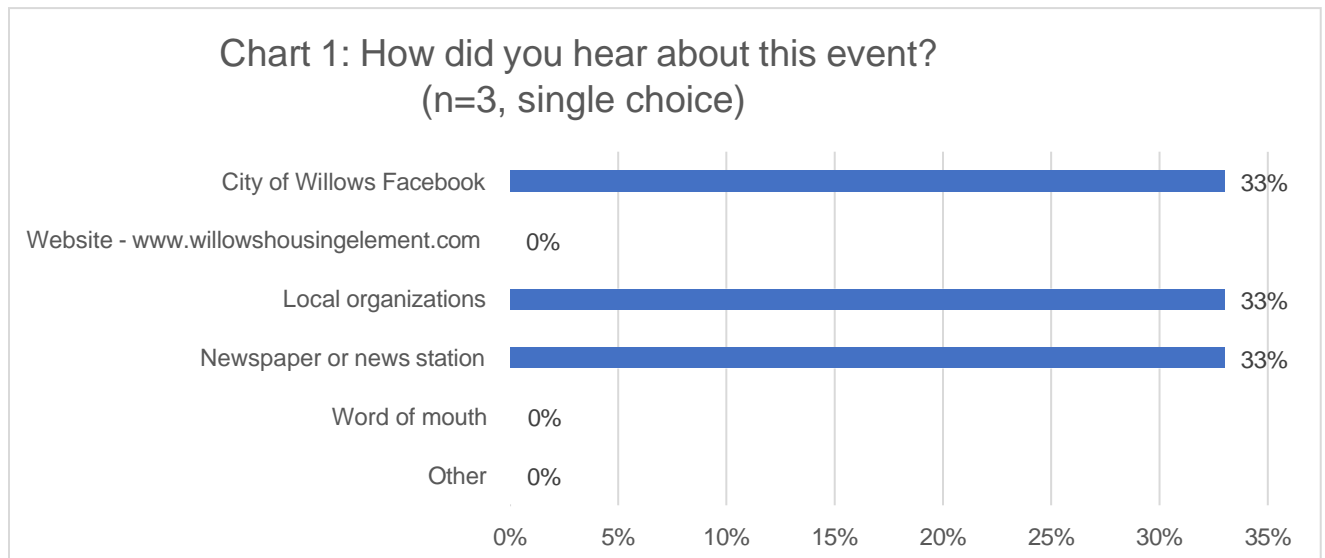
**Poll Report, 2021 Willows Housing Element
Community Meeting #2:
Housing Goals & Programs
Wednesday, April 7, 2021
6:00-7:30 pm**

Community members responded to bilingual polls in English and Spanish that were launched live during the meeting. Both the polls and community members' aggregated responses are provided below.

Poll 1

How did you hear about this event? / ¿Cómo se enteró de este evento?

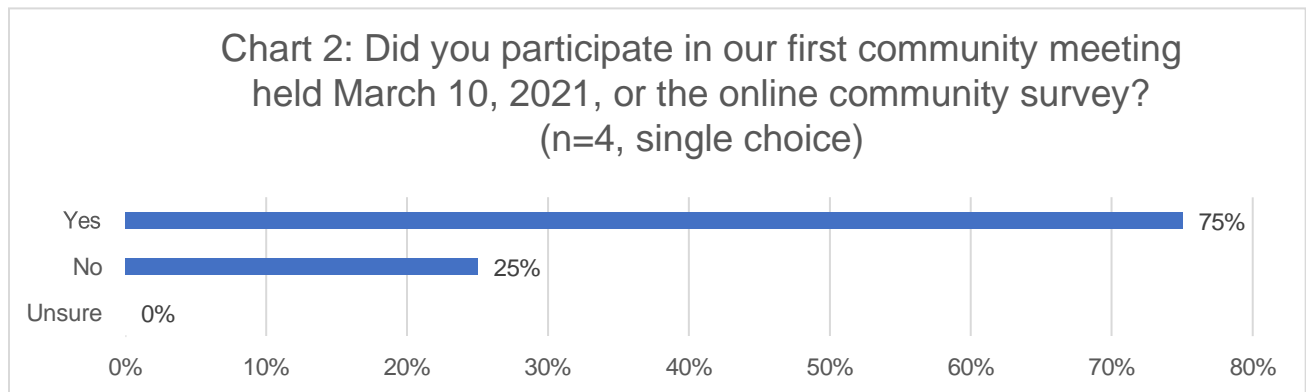
- a. City of Willows Facebook / Página de Facebook de la Ciudad de Willows
- b. Website – www.willowshousingelement.com / Sitio de Web – www.willowshousingelement.com
- c. Local organization(s) / Organización(es) Local(es)
- d. Newspaper or news station / Periódico o estación de noticias
- e. Word of mouth / Me pasaron la voz
- f. Other / Otro



Poll 2

Did you participate in our first community meeting held March 10, 2021, or the online community survey? / ¿Participó en la primera reunión comunitaria el 10 de marzo de 2021, o en la encuesta comunitaria en línea?

- a. Yes / Sí
- b. No / No
- c. Unsure / No estoy seguro



Poll 3

How interested would you be in participating in a housing rehabilitation program? / ¿Qué tan interesado estaría en participar en un programa de rehabilitación de viviendas?

- a. Very interested / Muy interesado
- b. Somewhat interested / Algo interesado
- c. Neutral / Neutral
- d. Not very interested / No muy interesado
- e. Not at all interested / Nada interesado

