City of Willows
HOUSING ELEMENT

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HousingTools

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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 update 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 comment 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.

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 home-buyers 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.

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 agendized 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

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.

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 using the self-help model by the end of the Housing Element cycle (2029)

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 2022. 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 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

POLICY: MI-1.2: Preserve the affordability of units that are at-risk of converting from affordable rent-restrictetd 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.

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 Low Barrier Navigation Center development as a use by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements, as defined and delineated in AB 101. 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.

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 add residential care facilities serving seven or more persons as defined in Health and Safety Code Sections 1267.8, 1566.3, and 1568.08 as an allowable use with a conditional use permit in all residential and commercial zoning districts. The code amendment will include the City's objective findings of approval for the issuance of a CUP.

Responsible Party: 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 home-buyers 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

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***

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.

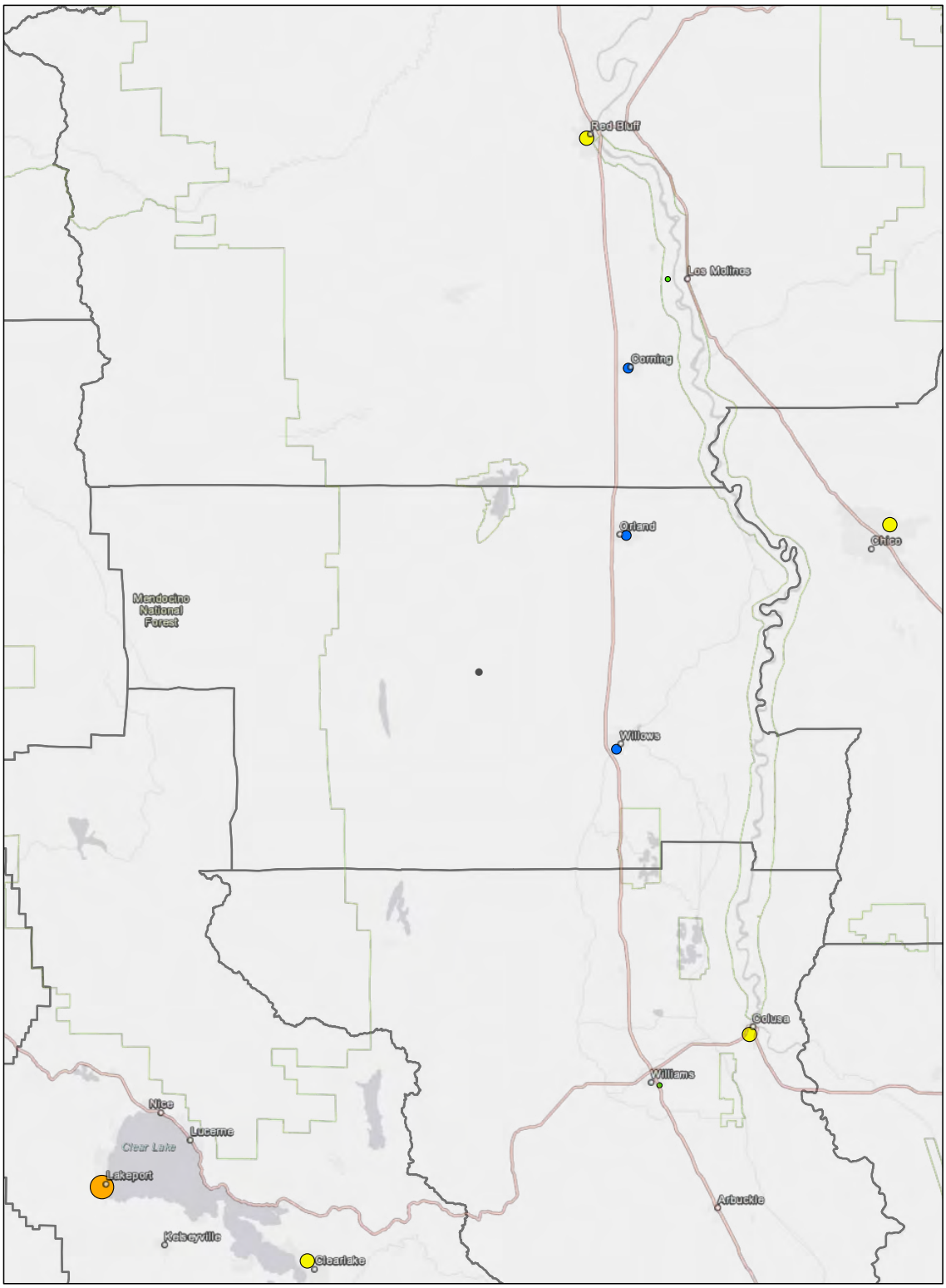
City of Willows: Less than 0.5 fair housing inquiries per one-thousand people.

"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



4/19/2022, 10:06:24 AM

County Boundaries

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

< .25 Inquiries

< .5 Inquiries

< 1 Inquiry

Greater than 1 Inquiry

1:577,791

0 5 10 20 mi

0 5 10 20 km

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

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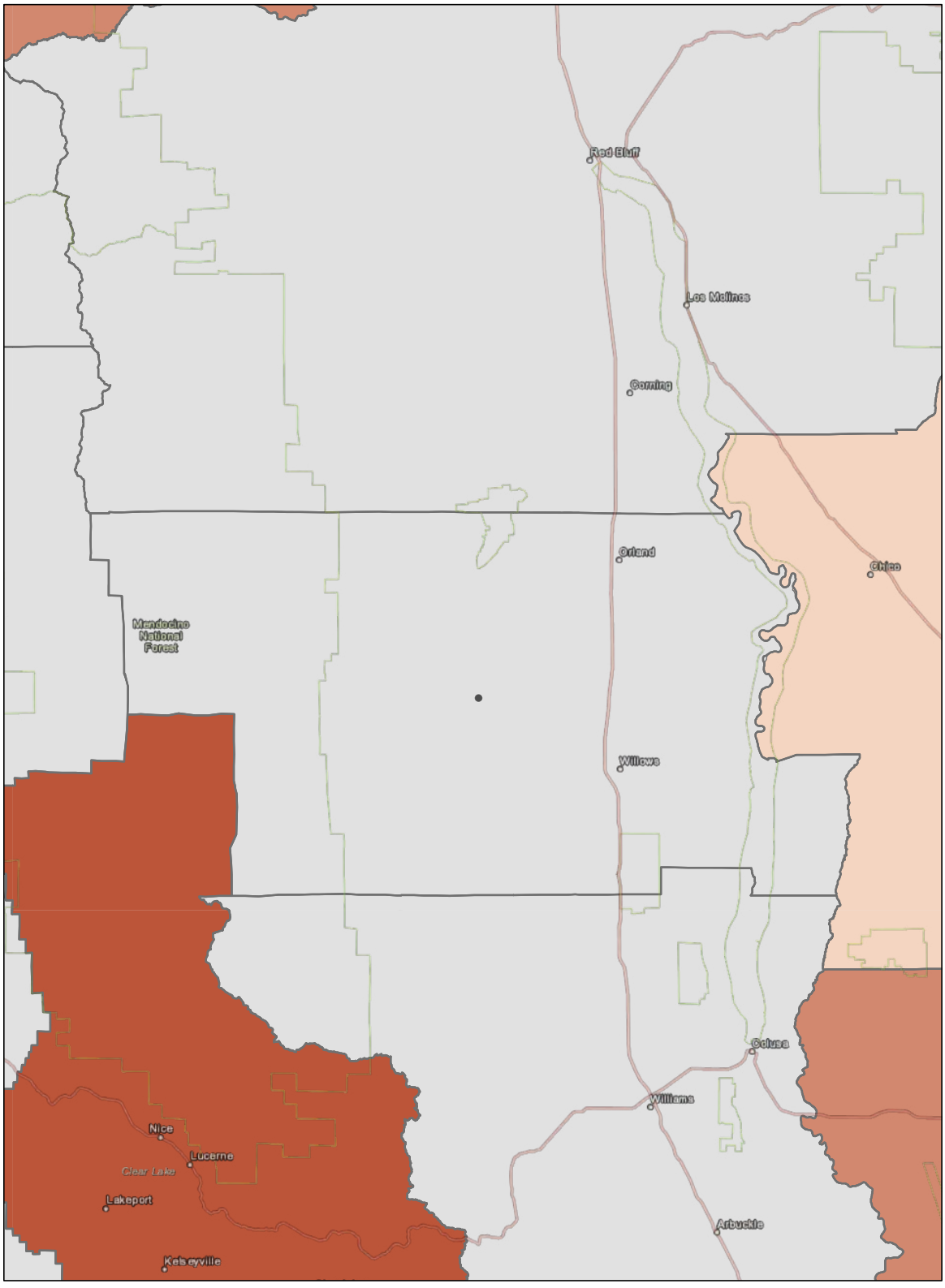
Glenn County, FHEO Cases - Total Map, 2020



4/19/2022, 10:09:26 AM

County Boundaries

(A) FHEO Cases - Total (2020) - County

0 Cases

< .01 Cases

.01 - .025 Cases

.025 - .05 Cases

1:577,791

0 5 10 20 mi

0 5 10 20 km

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

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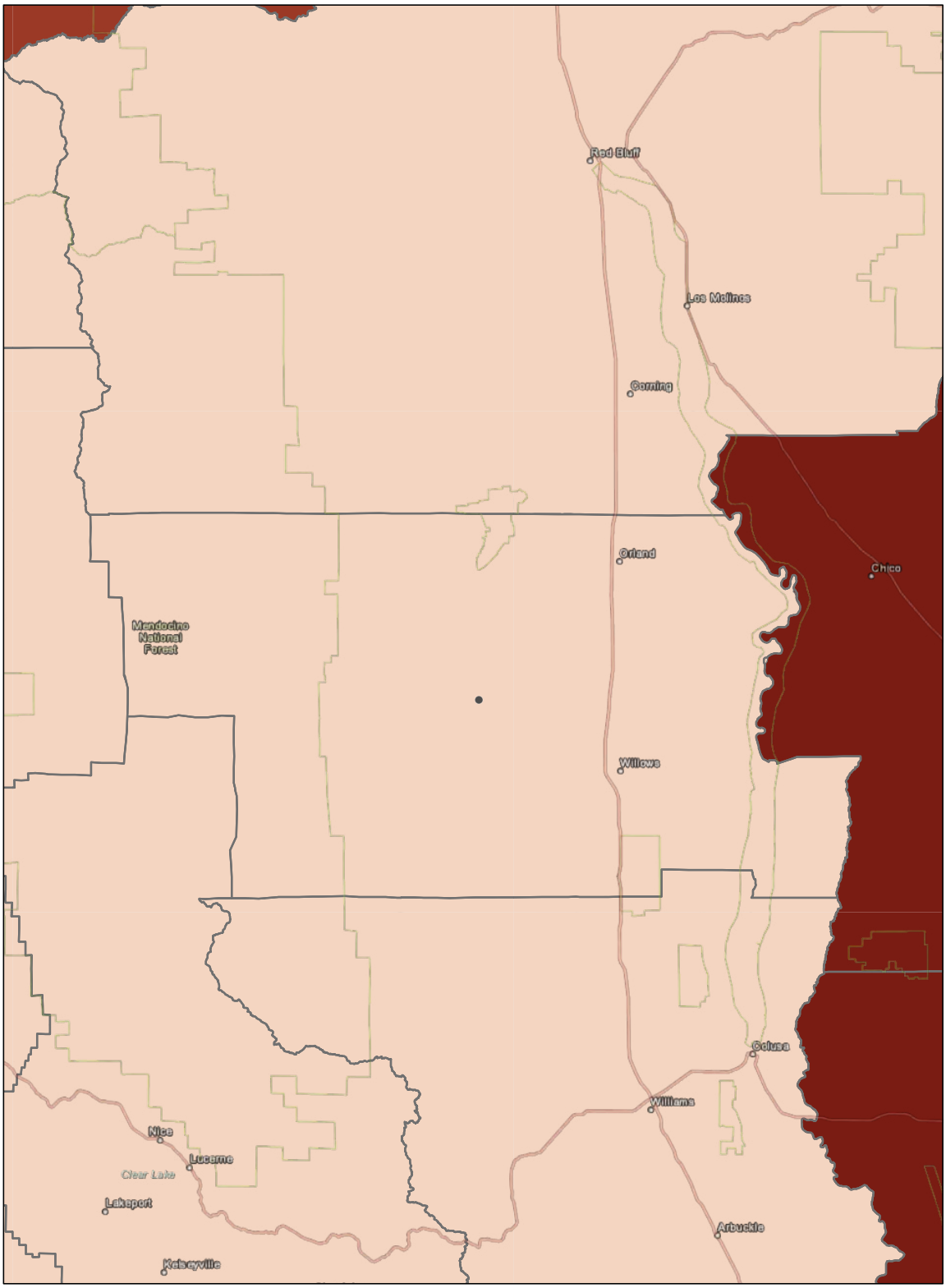
Glenn County, FHEO Cases – Disability Bias Map, 2020



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County Boundaries

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

0%

65.01% - 85%

> 85%

1:577,791

0 5 10 20 mi

0 5 10 20 km

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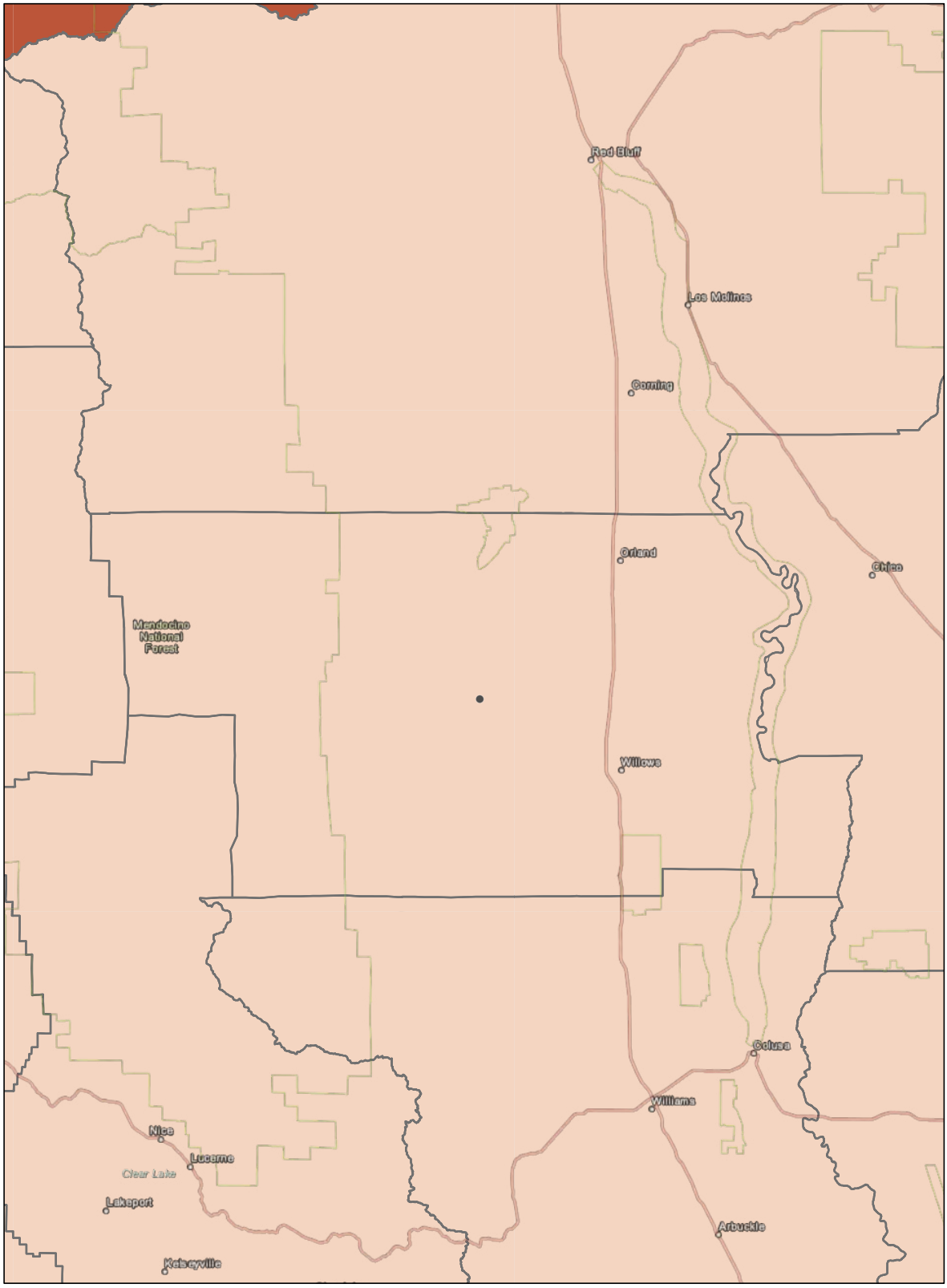
Glenn County, FHEO Cases – Race Bias Map, 2020



4/19/2022, 10:09:45 AM

County Boundaries

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

0%

20.01% - 35%

1:577,791

0 5 10 20 mi

0 5 10 20 km

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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 eight 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 Popula-tion	Number of Persons	Percent of Total Popula-tion	Change	Number of Persons	Percent of Total Popula-tion	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.

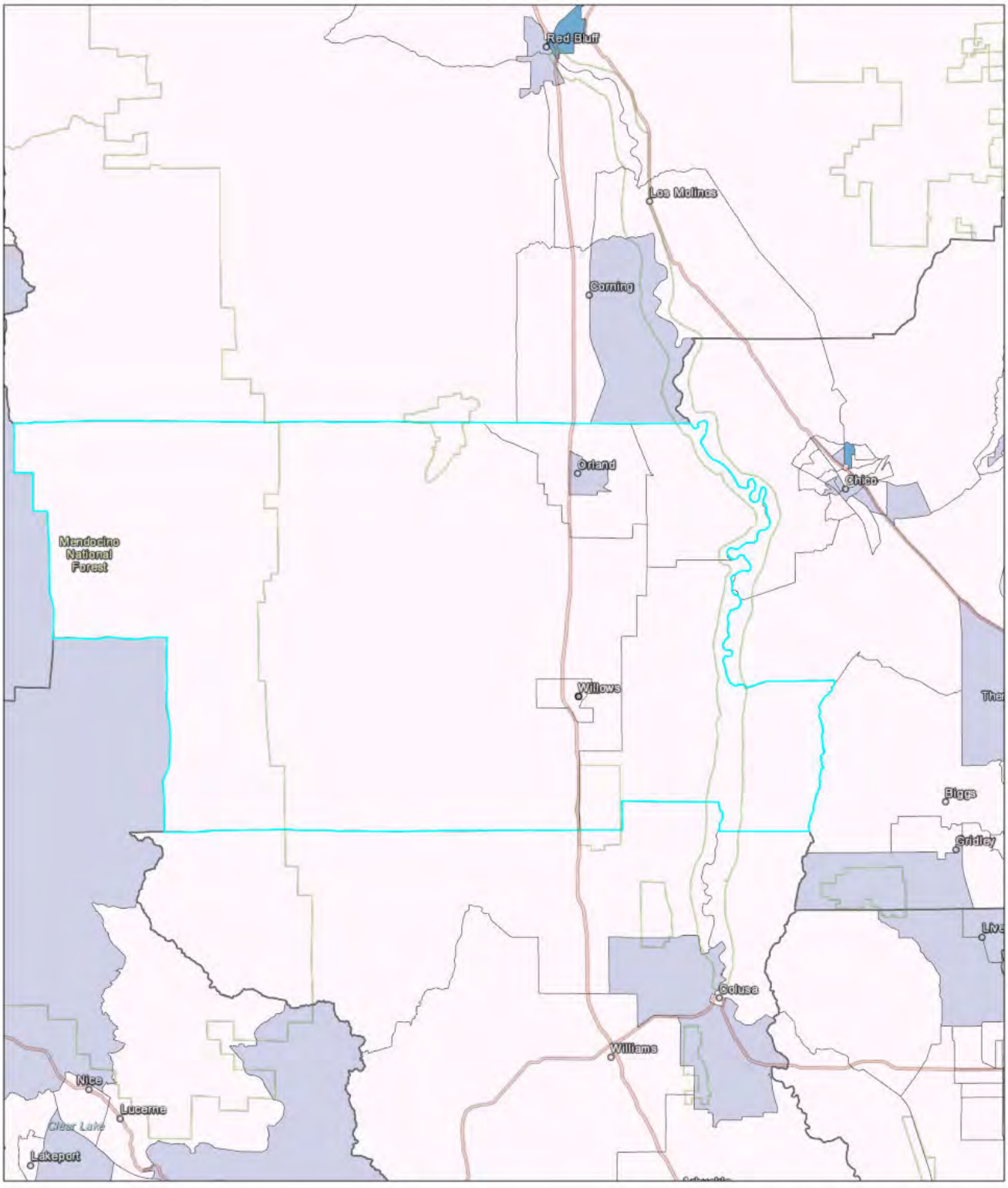
The maps "***City of Willows, Percent of Children in Single Parent, Female Households, 2019"*** and "***Glenn County, Percent of Children in Single Parent, Female Households, 2019***" below indicate the percent of children residing in female householder, no spouse/partner present households in the City 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

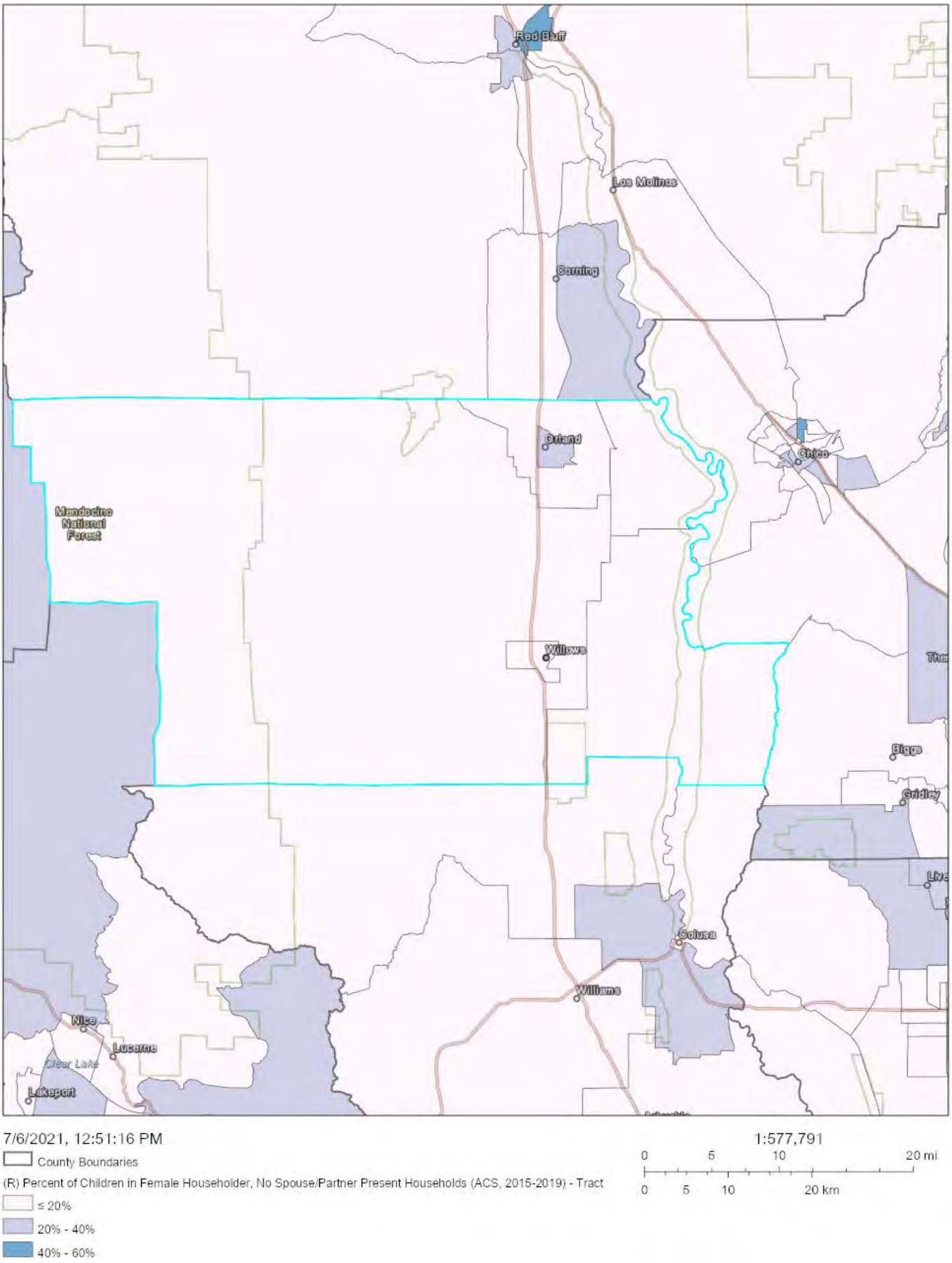
Language & Fluency	City of Willows					Glenn County				
	2010		2019		2010-2019	2010		2019		2010-2019
	Number of Persons	Percent of Population	Number of Persons	Percent of Population	Change	Number of Persons	Percent of Population	Number of Persons	Percent of Population	Change
Persons 5 years and over 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



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



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

6/30/2021, 1:58:12 PM

City/Town Boundaries

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

60% - 80%

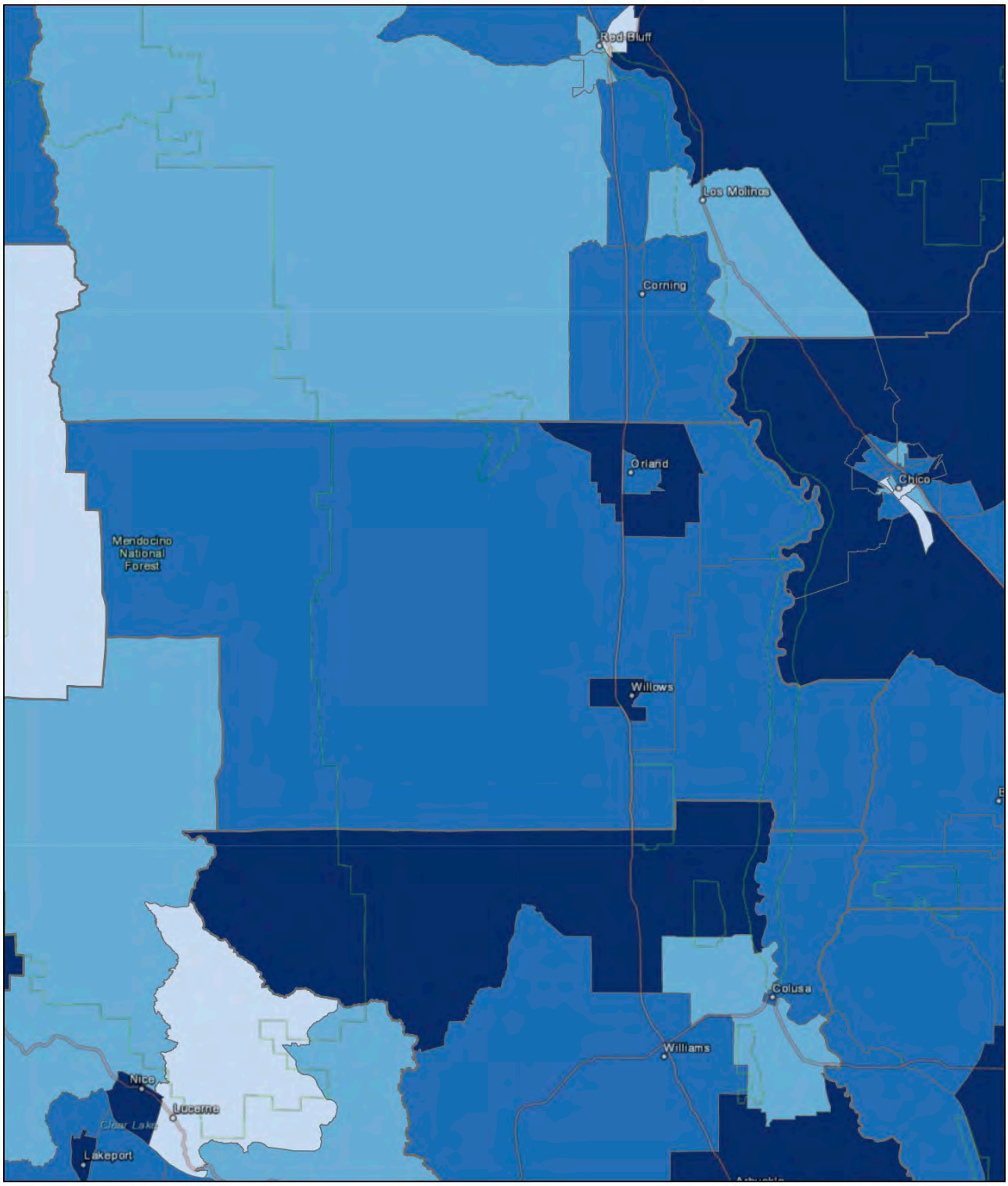
> 80%

1:36,112

0 0.3 0.6 1.2 mi

0 0.5 1 2 km

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



6/30/2021, 2:37:38 PM

1:577,791

0 5 10 20 mi

0 5 10 20 km

County Boundaries

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

20% - 40%

40% - 60%

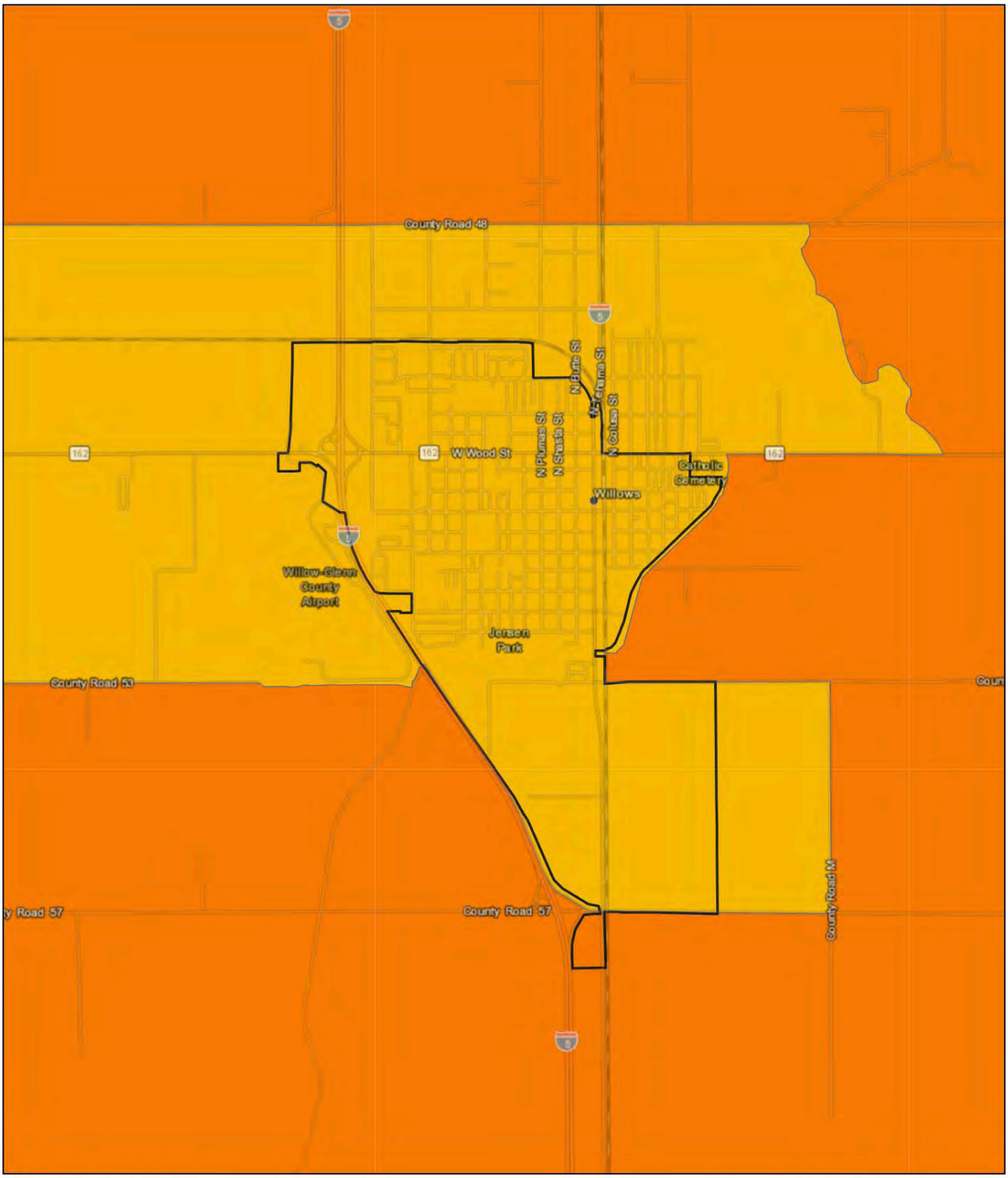
60% - 80%

> 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



6/30/2021, 12:29:20 PM

City/Town Boundaries

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

10% - 20%

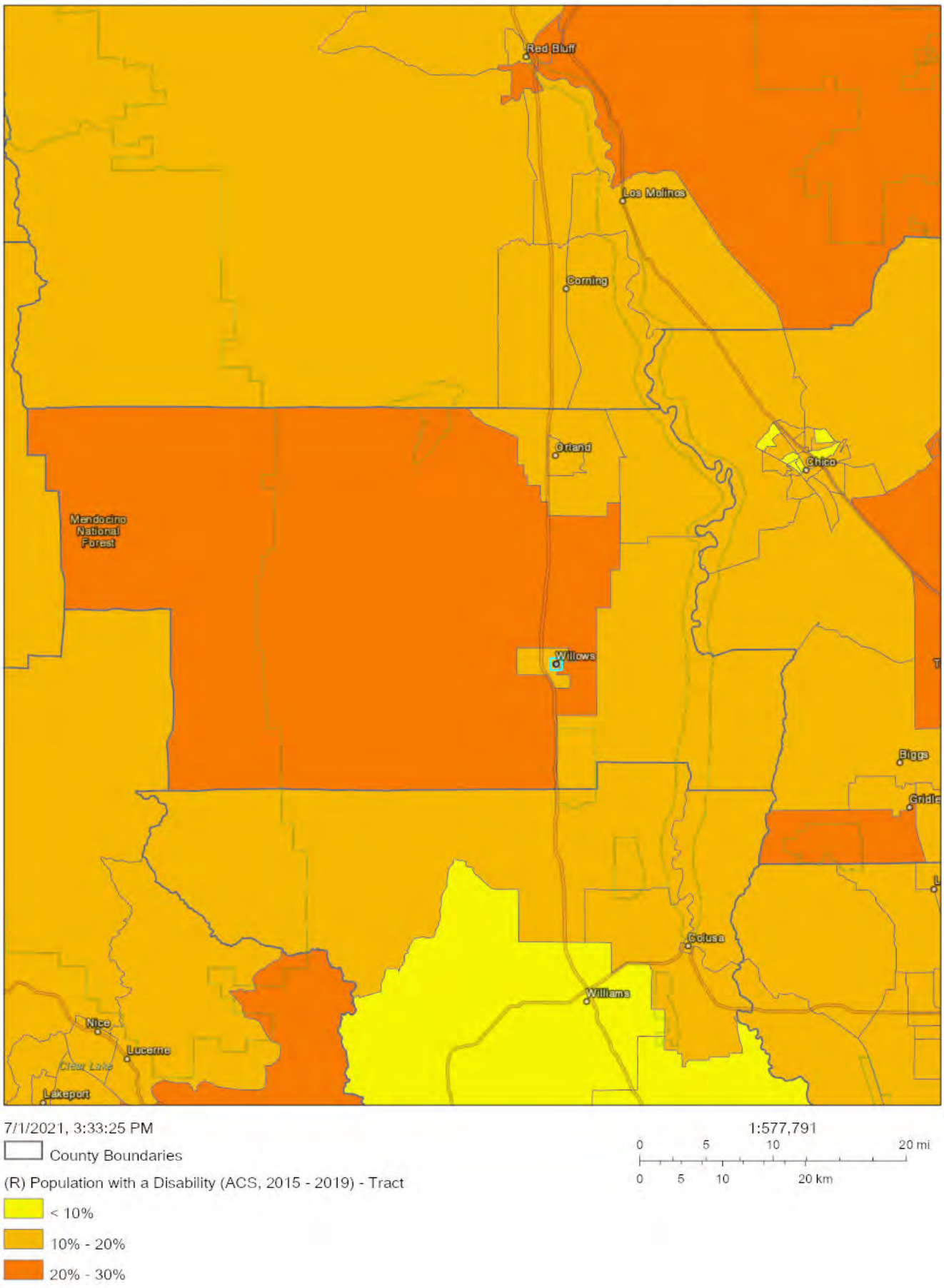
20% - 30%

1:36,112

0 0.3 0.6 1.2 mi

0 0.5 1 2 km

Glenn County, Percent of Population with a Disability, 2019



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 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.

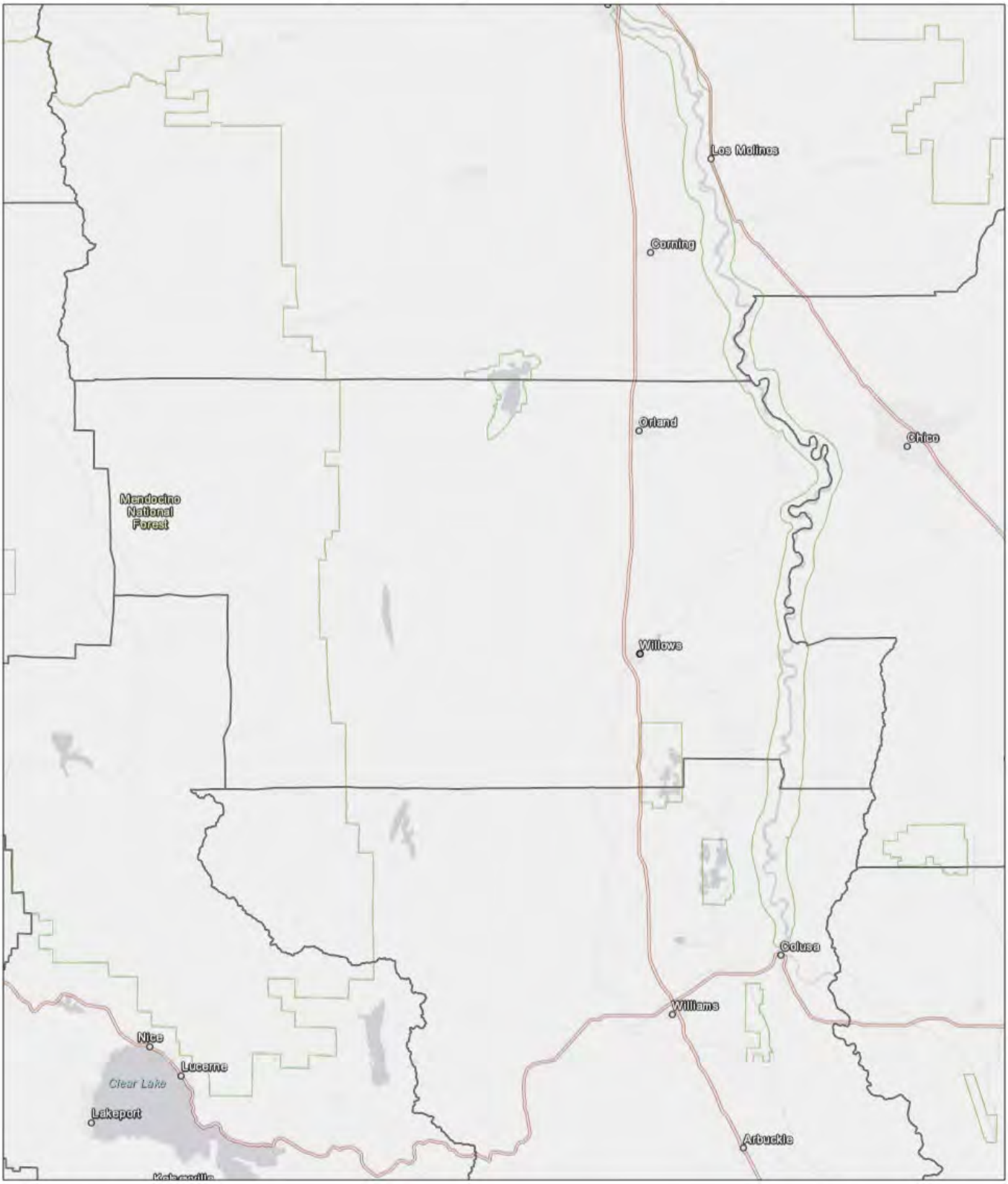
Table 7: Glenn County, Annual Income Needed to Afford Rental Housing, 2020

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



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).

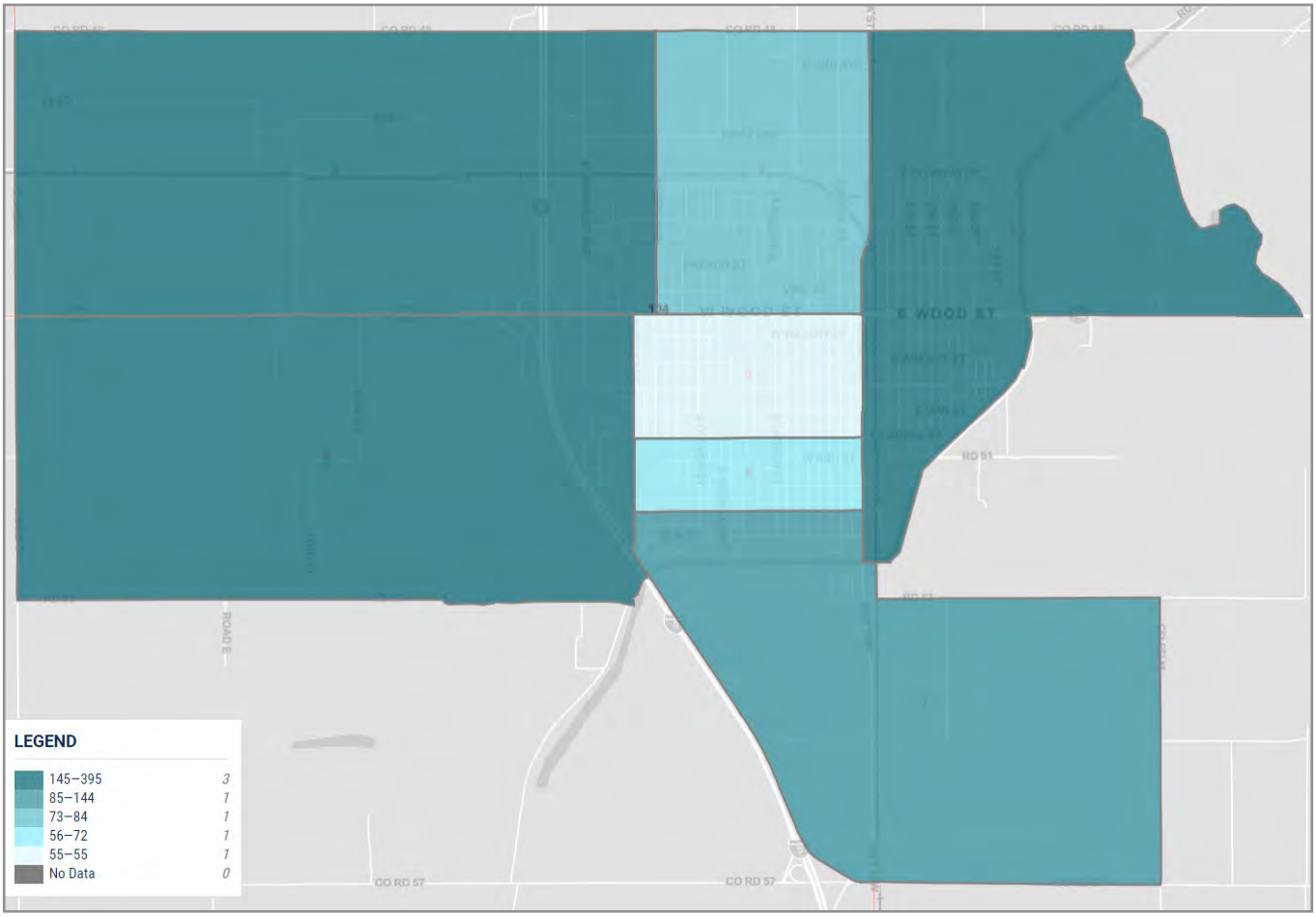
- Block Group 3 is on the west side of the City, bordered by Highway 162 to the south, County Road 48 to the north, and Pacific Avenue to the east. An estimated 204 households live below the poverty level (U.S. Census 2015-2019 American Community Survey).

- 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:

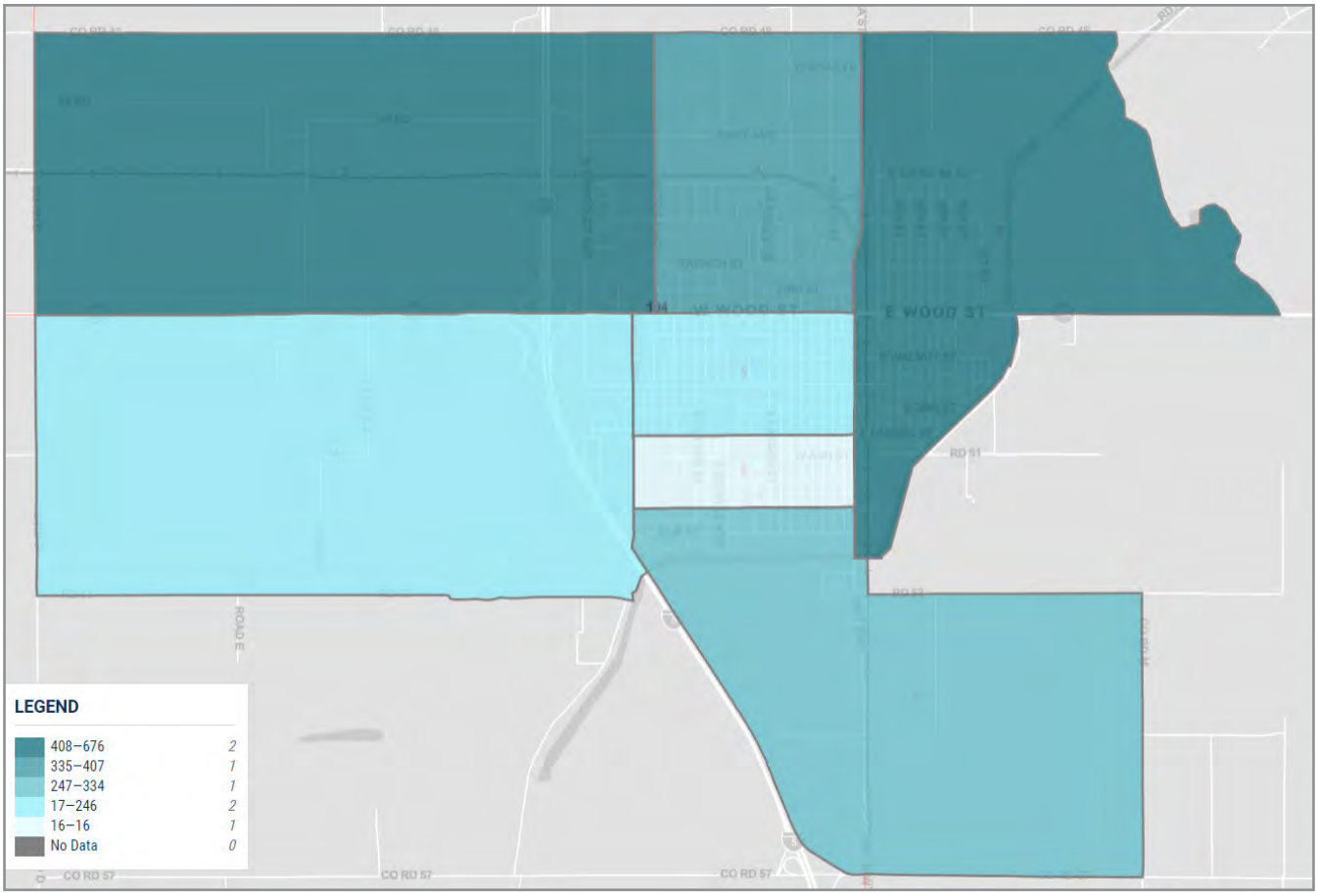
- Block Group 1 is on the northeast side of the City, bordered by County Road 53 to the south, County Road 48 to the north, and Tehama Street to the west. An estimated 676 residents are

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:

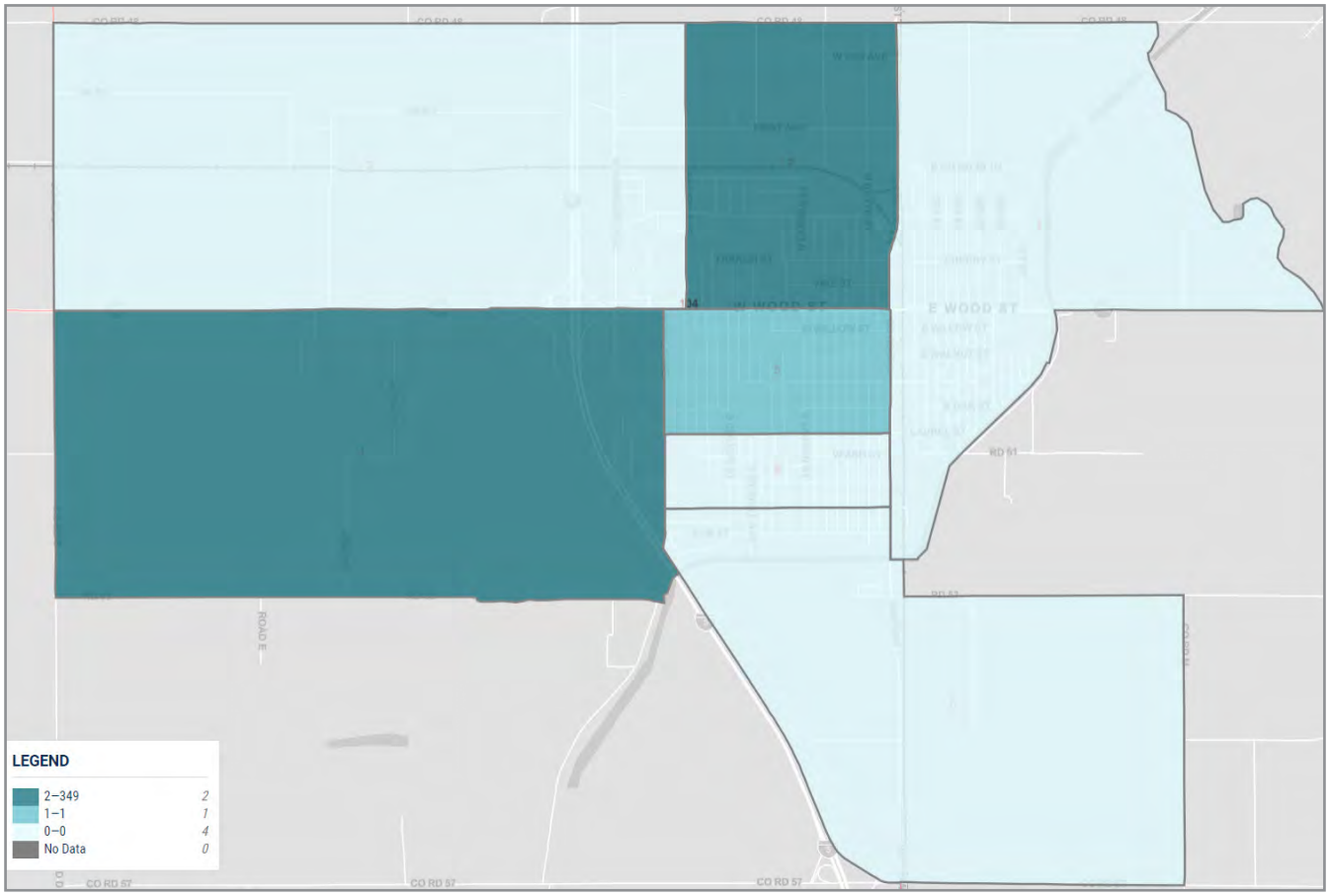
- Block Group 2 is the northcentral part of the City bordered by Wood Street to the south, County Road 48 to the north, Pacific Avenue to the west, and North Tehama Street to the east. An estimated 349 residents are Asian (U.S. Census 2015-2019 American Community Survey).

- 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



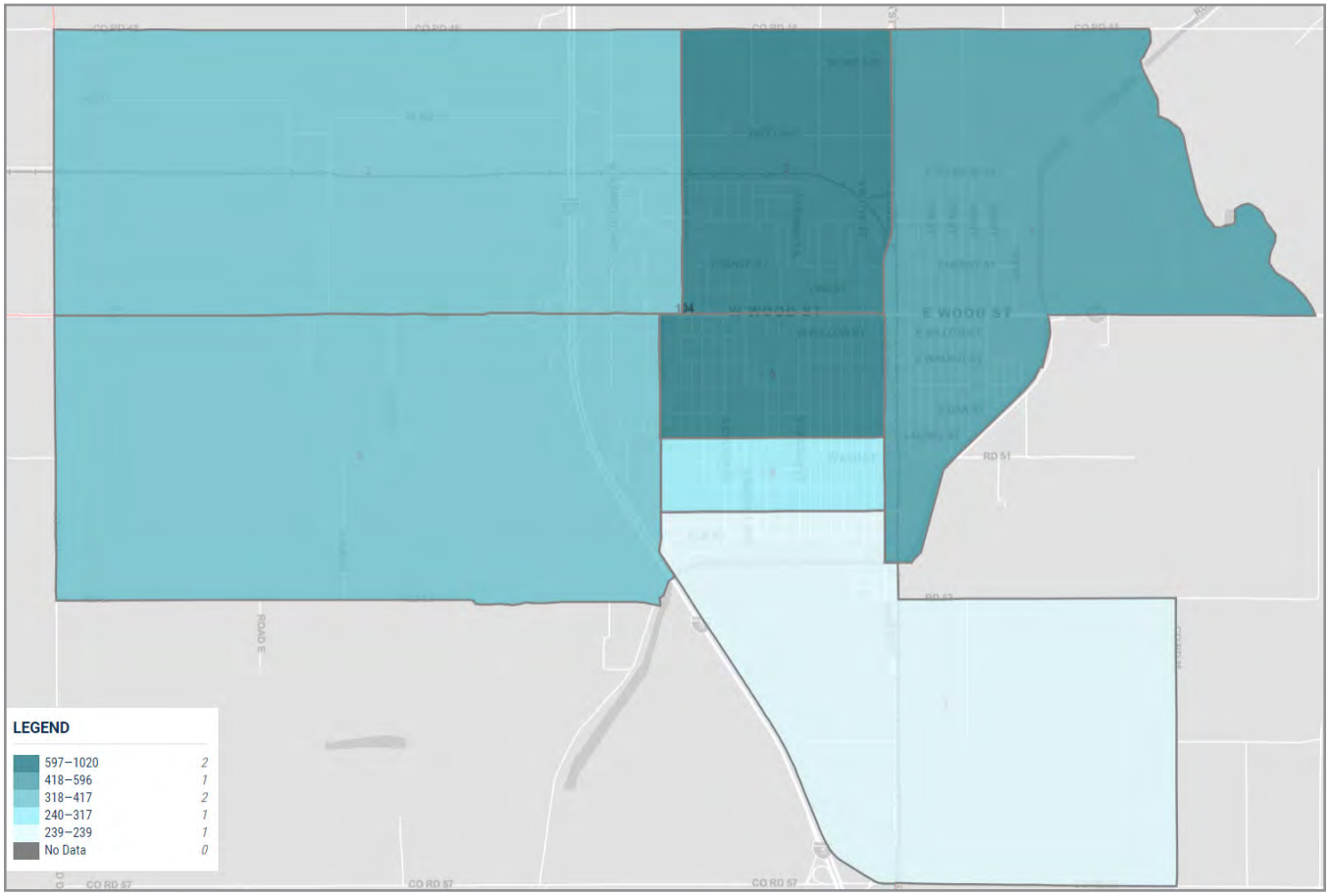
For context, this report also includes information about the number of White residents in Census Tract 104. The map, "***Census Tract 104 by Block Group, Number of White Residents (not Hispanic nor Latino), 2019***" depicts the number of White residents who do not identify as Hispanic or Latino in Census 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

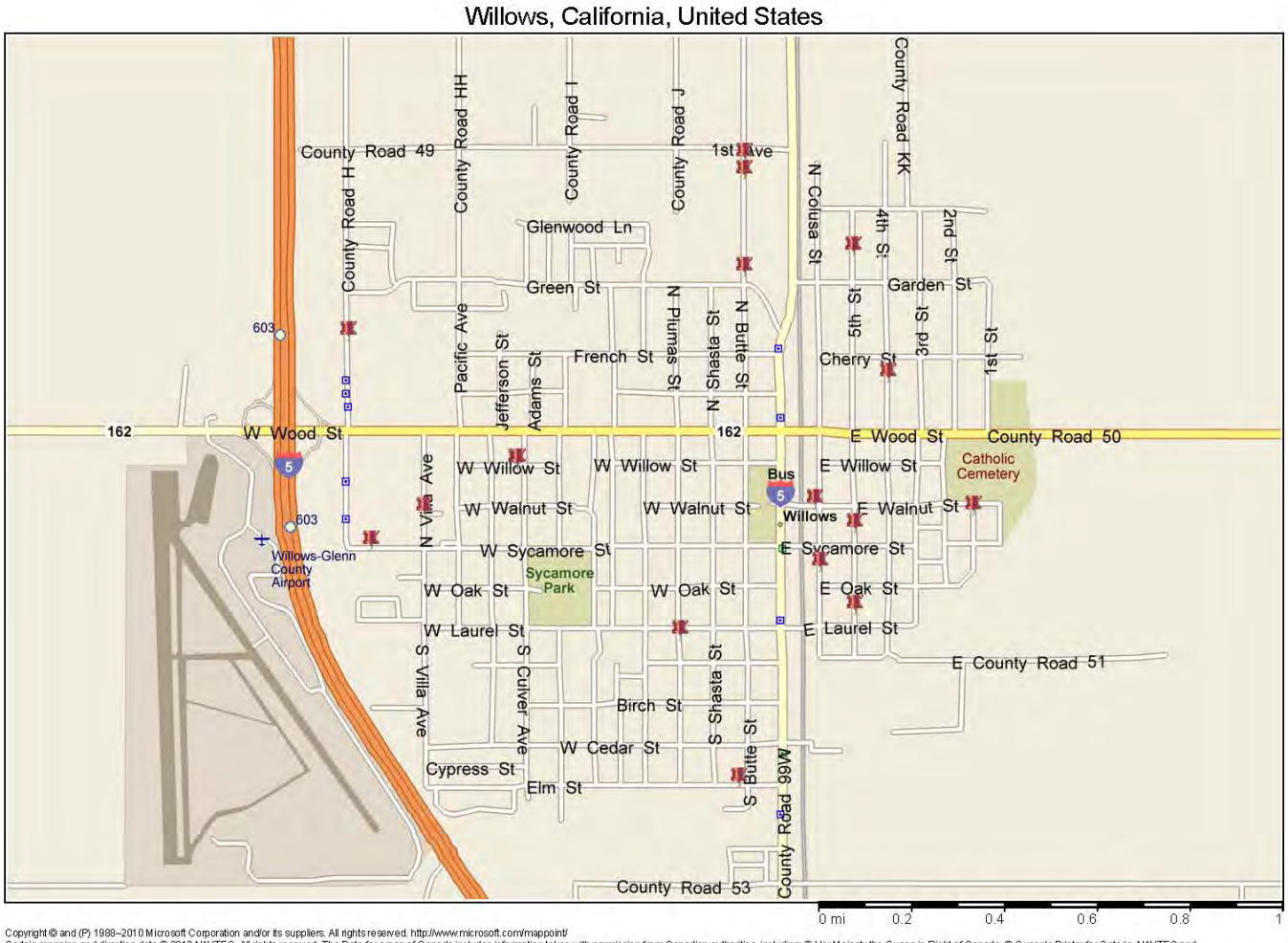
This section provides analysis on affordable housing using local data and knowledge.

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



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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.

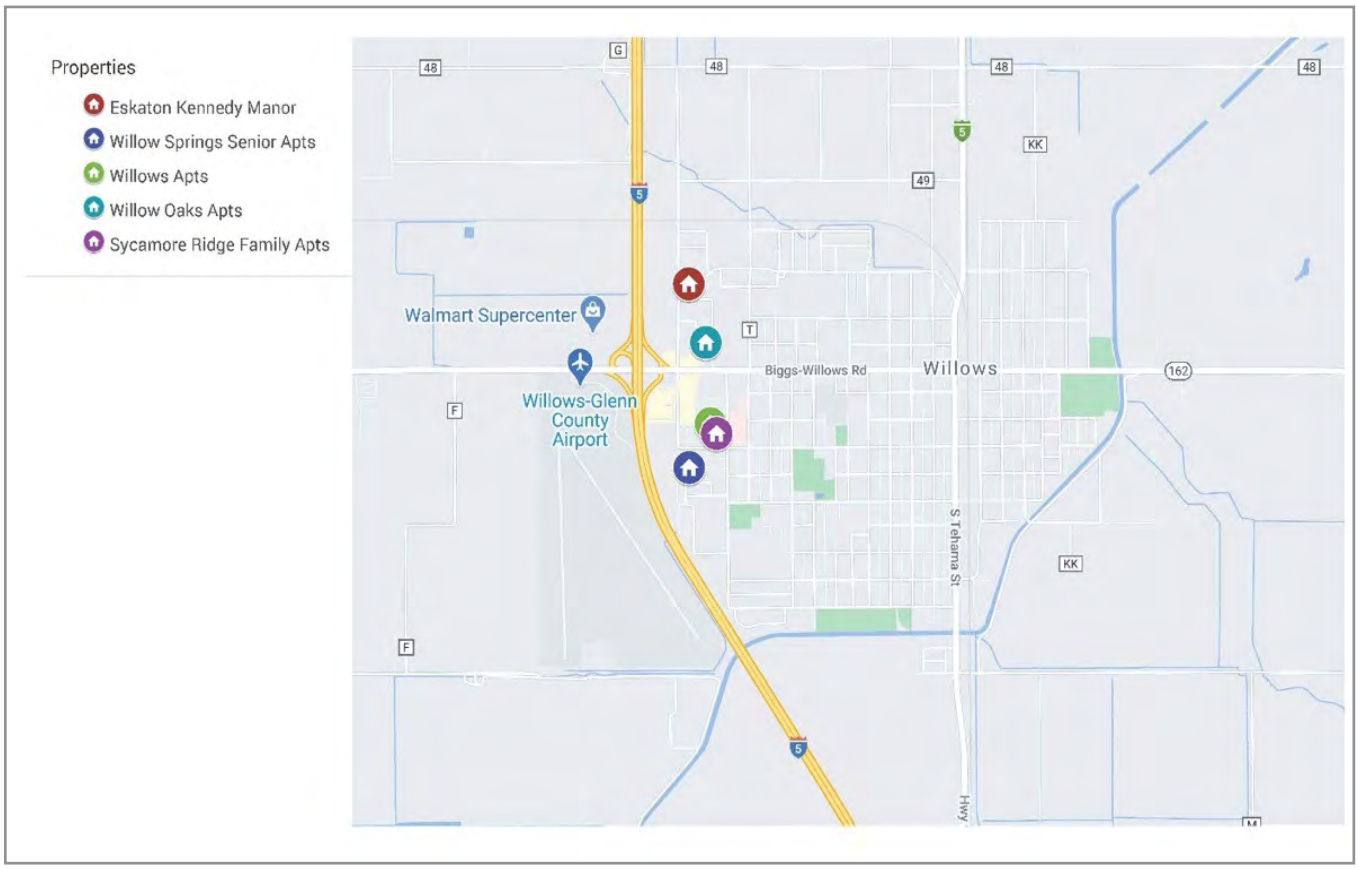
Table 8: City of Willows, Affordable Housing Properties by Funding Source and Year, 2021

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 (PolicyMap 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.

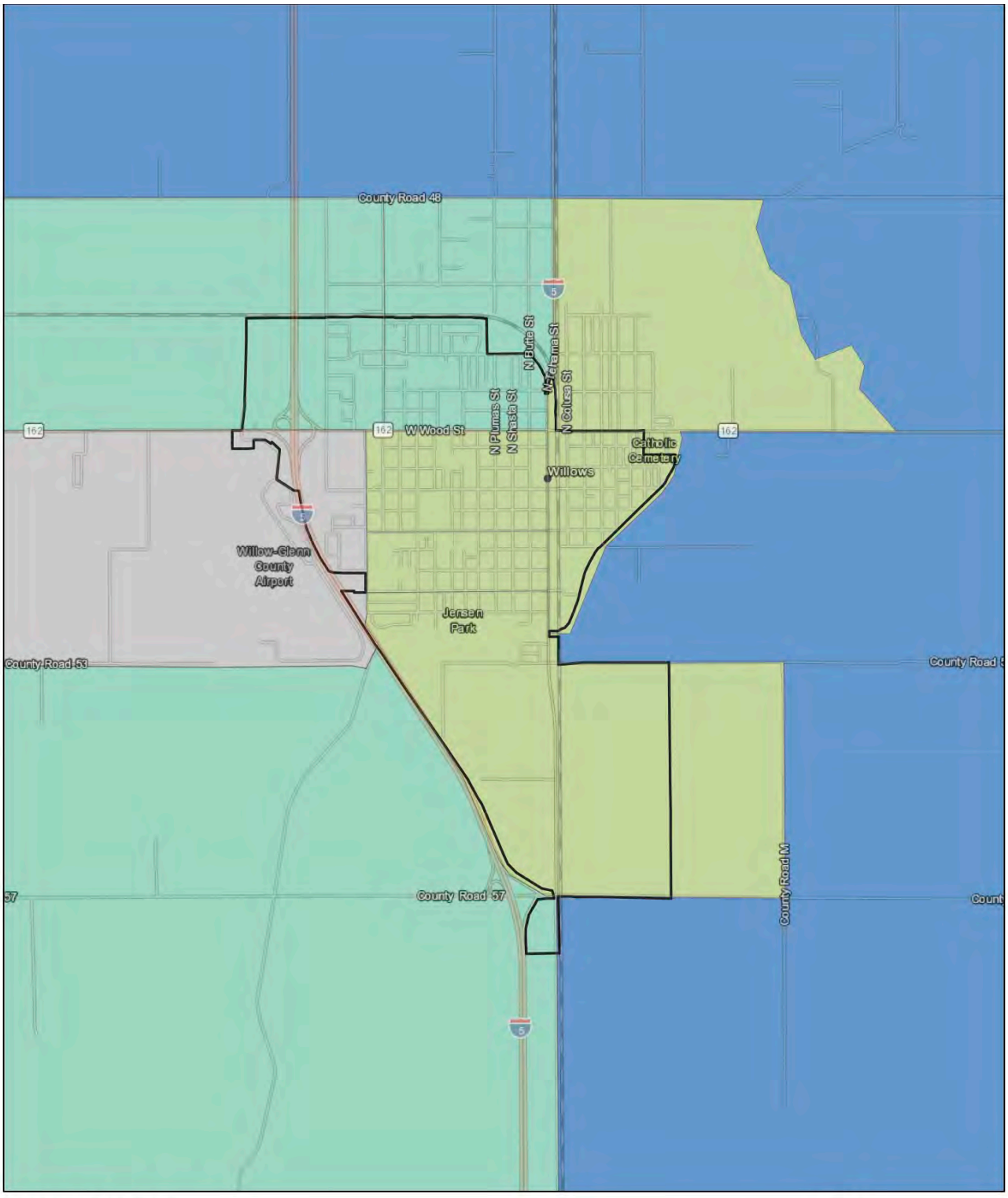
Disparities in Access to Opportunity

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).

City of Willows, Access to Opportunity, 2021