



City of Cotati **Housing Element Update** **2023-2031**

Final Technical Background Report
HCD Certified – June 2, 2023

TABLE OF CONTENTS

4.1 INTRODUCTION	1
4.2 HOUSING NEEDS DATA	1
4.2.1 Pre-Certified Housing Needs Dataset	1
4.2.2 Housing Needs Analysis	2
Housing Costs and Affordability.....	2
Housing Affordability	2
Senior Households	6
Persons with Disabilities, including Developmental Disabilities	8
Large Households	11
Farmworker Housing	12
Female-Headed Households.....	13
Homelessness	15
4.2.3 Zoning for a Variety of Housing Types.....	17
4.3 LOCAL HOUSING PROGRAMS & RESOURCES	25
4.3.1 Resources: Housing Assistance Programs	25
Federal Assistance Programs	25
State Assistance Programs	28
Local Assistance Programs	30
4.3.2 Resources: Shelters, Transitional and Supportive Housing	31
4.3.3 At-Risk Assisted Housing Developments	32
4.3.4 Planning and Zoning Incentives	32
Density Bonuses	33
Affordable Housing	33
Local Processing and Permit Fees	33
4.4 HOUSING CONSTRAINTS ANALYSIS	37
4.4.1 Non-Governmental Constraints	37
Vacant Land	37
Land Costs	37
Construction Costs	37
Financing	38
Development Trends	39
Community Opposition	39
4.4.2 Potential Governmental Constraints	40
General Plan and Zoning Code	40
Density	43
Development Standards.....	44
Parking Requirements.....	49
Growth Controls	50
Specific Plans	52
Streamlined & By-Right Development Applications.....	53

Housing for People with Disabilities	54
Building Codes and Enforcement	54
Reasonable Accommodation	55
Development and Permitting Fees	56
Local Processing and Permit Procedures	58
Design Review	59
Historic Preservation	59
4.4.3 Environmental and Infrastructure Constraints	60
Environmental Constraints	60
Infrastructure Constraints	68
4.5 Assessment of Fair Housing.....	69
4.5.1 Background and Summary of Fair Housing Issues.....	69
Housing Element Requirements.....	70
4.5.2 Fair Housing Enforcement and Outreach Capacity.....	71
Compliance with Existing Fair Housing Laws & Regulations.....	71
Fair Housing Services, Outreach, and Enforcement at a Local Level..	74
Housing Enforcement and Outreach Capacity: Fair Housing Issues and Contributing Factors	76
4.5.3 Segregation and Integration Patterns and Trends	77
Race and Ethnicity	78
Persons with Disabilities.....	86
Familial Status.....	88
Income.....	89
Poverty	95
Racially & Ethnically Concentrated Areas of Poverty (R/ECAP) and Affluence (RCAA)	97
Integration and Segregation: Fair Housing Issues and Contributing Factors	98
4.5.4 Disparities in Access to Opportunities	98
Resource Areas.....	99
Education	100
Access to Healthy Environment	103
Transportation.....	105
Economic Development and Job Access	110
Disparities in Access to Opportunity: Fair Housing Issues and Contributing Factors	114
4.5.5 Disproportionate Housing Needs, Including Displacement	114
Cost Burden and Severe Cost Burden.....	114
Overcrowding	118
Substandard Housing	120
Homelessness	121
Displacement	121
Disproportionate Housing Needs and Displacement: Fair Housing Issues and Contributing Factors.....	124

4.5.6 Summary of Fair Housing Goals and Priorities Based on Identified Contributing Factors	125
4.5.7 Housing Sites and AFFH Considerations.....	126
Segregation and Integration	127
Racially and Ethnically Concentrated Areas of Poverty	128
Disparities in Access to Opportunity.....	128
Disproportionate Housing Needs Including Displacement	128

TABLES

Table 1: Housing Cost Limits by Area Median Income Level	3
Table 2: HCD Income Limits Sonoma County, 2022	3
Table 3: Sonoma County Median Hourly Wage by Occupation, 2020.....	4
Table 4: Cotati Household Income Level by Tenure.....	4
Table 5: Cotati Cost Burden and Housing Problems by Tenure.....	5
Table 6: Senior Population by Age Group in Cotati.....	7
Table 7: Senior Households by Age and Tenure in Cotati	7
Table 8: Senior Household Income Groups by Cost-Burden Levels in Cotati.....	8
Table 9: Disability Type per Age Group in Cotati.....	9
Table 10: Household Size by Tenure.....	11
Table 11: Large Households by Income Group	12
Table 12: Household Size versus Bedroom Size by Tenure in Cotati	12
Table 13: Single Parent and Female-Headed (FH) Households in Cotati	14
Table 14: Total Number of Homeless Persons in Cotati, by Shelter Status	15
Table 15: Residential Uses Allowed by Zoning District in Cotati.....	18
Table 16: Sites with Capacity for Emergency Shelter	20
Table 17: Average Mortgage Interest Rates 2000 – 2022	38
Table 18: Allowable Land Uses for Low Density and Neighborhood District Zones .	40
Table 19: Permit Requirements for Mixed Use Corridors, Downtown Specific Plan Districts, and Other Districts	42
Table 20: City of Cotati Development Standards	45
Table 21: Development Standards in Downtown Cotati Specific Plan Area	47
Table 22: Development Standards for Santero Way Specific Plan.....	47
Table 23: City of Cotati Parking Requirements	49
Table 24: City of Cotati Permitting Fees	56
Table 25: Permitting Fees in Cotati and Comparable Local Jurisdictions	57
Table 26: Timelines for Permit Procedures and Decision-Making Authority.....	58
Table 27: Housing Resources for Cotati.....	74
Table 28: Racial Isolation Index Values for Segregation within Cotati	83
Table 29: Racial Dissimilarity Index Values for Segregation within Cotati	83
Table 30: Theil’s H Index Values for Racial Segregation within Cotati	84
Table 31: Disability by Type, 2019	86
Table 32: Disability Status by Race and Ethnicity, City of Cotati, 2015-2019	87

Table 33: Population by Income Group in Cotati and the Region	91
Table 34: Income Group Isolation Index Values in Cotati (2010, 2015) and Average Bay Area Jurisdiction	93
Table 35: Income Group Dissimilarity Index Values for Segregation in Cotati	93
Table 36: Poverty Status by Race in Cotati	95
Table 37: Percent of Population Below Poverty Level for Whom Poverty Status is Determined in California, Sonoma County, and Cotati (2019).....	97
Table 38: Cotati-Rohnert Park Unified District Student Demographics.....	102
Table 39: FDIC-Regulated Bank Branches by Sonoma County Municipality	112
Table 40: Projected Change in Jobs and Employed Residents in Cotati between 2010 and 2040.....	112
Table 41: Current Market Rate Rental Costs	115
Table 42: Cost Burden Severity in Cotati, County, State	117
Table 43: Substandard Housing Issues	121
Table 44: Homeless Persons in Cotati by Shelter Status	121
Table 45: Prioritization of Contributing Factors.....	125
Table 46: Housing Sites and Segregation Indicators	127
Table 47: Housing Sites and Access to Opportunity.....	128
Table 48: Housing Sites and Housing Needs Indicators.....	129

FIGURES

Figure 1: Earthquake Zones of Required Investigation	62
Figure 2: Deep-Seated Landslide Susceptibility	63
Figure 3: Earthquake Shaking Potential for California.....	64
Figure 4: Flood Hazard Zones.....	65
Figure 5: Fire Hazard Severity Zones.....	66
Figure 6: California Tiger Salamander Range	67
Figure 7: Zoning Map of the City of Cotati	78
Figure 8: Population by Race in Cotati, 2000-2019	79
Figure 9: Population by Race in Cotati, Sonoma County, and the Bay Area.....	80
Figure 10: Racial Dot Map of Cotati	81
Figure 11: Racial Dot Map of Cotati and Surrounding Areas, 2020.....	82
Figure 12: Levels of Segregation in Census Tracts within Sonoma County, 2018 ..	85
Figure 13: Population with a Disability, Cotati	87
Figure 14: Household Type in Cotati	88
Figure 15: Percent of Children in Female-Headed Households.....	89
Figure 16: Percent of Children in Married-Couple Households	89
Figure 17: Households by Household Income Level.....	90
Figure 18: Income Dot Map of Cotati, 2015	92
Figure 19: Map of Existing Affordable Rental Housing Projects in Cotati and Surrounding Area	94
Figure 20: Population by Poverty Status, 2019.....	96

Figure 21: Population by Poverty Status, 2014.....	96
Figure 22: Population Living in Resource Areas by Race in Cotati.....	98
Figure 23: TCAC Opportunity Maps (2022) – Composite Score	99
Figure 24: Population Living in Resource Areas by Race	100
Figure 25: TCAC Opportunity Areas (2022) Education Score by Tract	101
Figure 26: English Language Arts/Literacy Distribution – All Grades, 2018-2019	102
Figure 27: Mathematics Achievement Distribution – All Grades, 2018-2019.....	103
Figure 28: CalEnviroScreen 4.0 Percentiles by Census Tracts in Cotati.....	103
Figure 29: CalEnviroScreen 4.0 Percentiles by Census Tracts in the Region.....	104
Figure 30: Clean Environment Conditions in Cotati Compared to Other California Cities/Towns	105
Figure 31: Sonoma-Marin Area Rail Transit (SMART) Service Corridor Map.....	106
Figure 32: Sonoma County Transit System Map	108
Figure 33: California Healthy Places Index: Transportation in Cotati.....	109
Figure 34: Sonoma County Equity Priority Communities	110
Figure 35: TCAC Opportunity Areas (2021) Economic Scores in Cotati	111
Figure 36: Inflow and Outflow of Workers in Cotati.....	113
Figure 37: Ratio of All Jobs to Homes in Sonoma County Jurisdictions	114
Figure 38: Cost Burden by Tenure in Cotati, 2019	116
Figure 39: Cost Burden by Income Level in Cotati	117
Figure 40: Occupants Per Room for Households by Race and Ethnicity.....	119
Figure 41: Overcrowding Severity in Cotati, Sonoma County and the Bay Area..	120
Figure 42: Urban Displacement Project Bay Area Model 2020 - Cotati.....	122
Figure 43: Urban Displacement Project Bay Area Model 2020 – North Bay Region	123
Figure 44: Special Flood Hazard Areas (FEMA, 2020) in Cotati.....	124
Figure 45: Housing Sites and Resource Areas	127

Section IV: Technical Background Report

4.1 INTRODUCTION

This section of the Technical Background Report includes the required quantification and analysis of needs, identification, and analysis of the housing needs for special needs populations, and analysis of zoning for a variety of housing types. The Technical Background Report supplements the Housing Needs Data Report described below. Through the Housing Element, the City is planning to accommodate future population growth and address local housing needs.

Key information from this analysis is summarized in Section 1 of the Housing Element.

4.2 HOUSING NEEDS DATA

To meet all statutory requirements in Government Code § 65583(a) (1 and 2) related to quantification and analysis of existing housing needs, this Technical Background Report includes locally acquired information and data including areas of economic and ethnic segregation, special needs, local knowledge of the housing stock, local housing resources, and an analysis of housing constraints.

4.2.1 Pre-Certified Housing Needs Dataset

The Housing Needs Data Report provided by the Association of Bay Area Governments (ABAG) is included in Appendix A. This appendix contains a list of housing terms, regional housing needs allocation (RHNA) methodology, household characteristics, demographics of housing stock, and data on special needs populations. The data in this report was reviewed and pre-certified by the California Department of Housing and Community Development (HCD) in March 2021 and meets most of the requirements for quantification of existing and projected, including the following:

- Population, employment trends, and existing and projected housing needs for all income levels;
- Household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding (e.g., existing households, existing extremely low-income households, total, lower and extremely low-income households overpaying, overcrowded households); and;
- Special housing needs (e.g., number of persons with disabilities, number of persons with developmental disabilities, elderly households by tenure, large households by tenure, farmworkers, and female-headed households).

The remaining housing needs data requirements, including quantification of persons experiencing homelessness, estimation of the number of units in need of

rehabilitation and replacement, and projects at risk of converting to market-rate uses, are addressed within this Technical Background Report (Section 4). The section also contains other data related to local housing programs and resources, an analysis of housing constraints, and the assessment of fair housing.

4.2.2 Housing Needs Analysis

To meet all requirements of Government Code § 65583(a)(1)(2), this section includes data and analysis of the jurisdiction's projected housing needs for special needs housing populations including the elderly, persons with disabilities (including developmental disabilities), large households, female-headed households, persons experiencing homeless and persons in need of emergency shelter, and agricultural workers. After identifying and analyzing these special housing needs, the City can provide resources and actions to accommodate and address diverse housing needs.

Housing Costs and Affordability

Housing affordability is a major consideration in providing suitable housing. The cost of housing itself is not a problem unless households in the area cannot find adequately sized units at an affordable price. Affordability is defined as paying 30% or less of gross monthly household income on housing costs, based on both State and Federal standards for households of lower income. The following section discusses current income levels and ability to pay for housing compared with housing costs. Since above moderate-income households do not generally have problems locating affordable units, affordable units are frequently defined as those reasonably priced for households that are very low- to moderate-income.

Housing cost is generally the single, greatest expense item for households. For owner-occupied households housing expenses consist of mortgage and interest payments, insurance, maintenance, and property taxes. For renter-occupied households housing expenses consist of rent and utilities. Higher-income households may choose to spend greater portions of their income on housing expenses and still have sufficient money left over for other expenses. However, many lower-income households must involuntarily spend a large share of their income on housing leaving them with less money for other expenses.

Housing Affordability

Table 1 shows the affordable housing cost guidelines established in Section 50052.5 and 50053 of the California Health and Safety Code. The guidelines are based on the median income calculated by the HCD income limits. As previously described, the generally accepted definition of housing affordability is for a household to pay no more than 30% of its gross annual income on housing. It should be noted that moderate-income households and above typically spend greater than 30% on household expenses; therefore, the threshold for overpayment is higher at approximately 35% of their income.

Table 1: Housing Cost Limits by Area Median Income Level

Income Level	Income Limit	For Sale	Rental
Extremely Low	0-30% AMI	30% of 30% of AMI	30% of 30% of AMI
Very Low	31%-50% AMI	30% of 50% of AMI	30% of 50% of AMI
Low	51%-80% AMI	30% of 70% of AMI	30% of 60% of AMI
Moderate	81%-120% AMI	35% of 110% of AMI	35% of 110% of AMI

Source: HCD Income Limits, 2022.

HCD establishes household income limits to define households as extremely low-, very low-, low-, or moderate-income level. These income levels vary throughout the state and are based on the area median income of the region and adjusted based on the number of persons per household. The income limits for Sonoma County are shown on Table 2. A family of three with an annual income of \$85,550 or less would be considered a low-income household:

Table 2: HCD Income Limits Sonoma County, 2022

Income Level	Persons Per Household					
	1	2	3	4	5	6
Extremely Low (ELI)	\$25,000	\$28,550	\$32,100	\$35,650	\$38,550	\$41,400
Very Low Income (VLI)	\$41,600	\$47,550	\$53,500	\$59,400	\$64,200	\$68,950
Low Income (LI)	\$66,550	\$76,050	\$85,550	\$95,050	\$102,700	\$110,300
Median Income	\$78,950	\$490,250	\$101,500	\$112,800	\$121,800	\$130,850
Moderate Income	\$94,750	\$108,300	\$121,800	\$135,350	\$146,200	\$157,000

Table 2 summarizes 2022 HCD-defined household income limits for extremely low-, very low-, low-, and moderate-income households in Sonoma County (including Cotati) by the number of persons in the household and shows maximum affordable monthly rents and maximum affordable purchase prices for homes. Households earning the 2020 median income for a family of four in Cotati (\$112,800) could afford to spend up to \$33,840 a year, or \$2,840 per month, on housing without being considered cost burdened.

Extremely low-income households have incomes at or below 30% of the area median income (AMI), adjusted for household size. In Sonoma County, the 2022 AMI for a four-person household is \$112,800. A household of the same size with an annual income at or below \$35,650 is considered extremely low-income (ELI). This income is equivalent to an hourly wage of \$17.14, which may include farmworkers, cooks, and cashiers (Table 3). Additionally, many extremely low-income households are on fixed incomes with sources including disability benefits and social security.

Table 3: Sonoma County Median Hourly Wage by Occupation, 2020

Occupation	Median Hourly Wage
Waiters and Waitresses	\$13.49
Cashiers	\$14.38
Retail Salesperson	\$16.07
Farmworkers and Laborers	\$15.94
Cooks, Restaurant	\$16.64

Sources: U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages (QCEW), 2020 first quarter industry employment

There are an estimated 285 ELI households in Cotati, 10.1% of the City’s total households. This is a lower proportion than the larger Sonoma County, where 19.9% of households are extremely low-income. In Cotati, 12.3% of ELI households are homeowners, and 87.7% rent. In comparison, 56.3% of the City’s total households are homeowners and 43.7% rent.

Table 4: Cotati Household Income Level by Tenure

Income Level	Owner-Occupied	Renter-Occupied	Total
0%-30% of AMI Extremely Low-Income (ELI)	35	250	285
31%-50% of AMI Very Low-Income (VLI)	159	180	339
51%-80% of AMI Low-Income (LI)	145	273	418
81%-100% of AMI	44	165	209
Greater than 100% of AMI	1,214	370	1,584
Total	1,597	1,238	2,835

Source: HUD, CHAS ACS Tabulation, 2013-2017 release

Extremely low-income households may be more likely to face housing problems and cost burden. Housing problems include a lack of complete kitchen facilities, lack of complete plumbing facilities, or overcrowding. Cost burden is the ratio of housing costs (rent or mortgage, utilities, taxes) to household income. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income.

In Cotati, about 76% of extremely low-income renters experience housing problems, 78% are cost-burdened, and 58% are extremely cost-burdened, as shown in Table 5

below. ELI renters face greater housing problems and cost burden than ELI homeowners in Cotati.

Table 5: Cotati Cost Burden and Housing Problems by Tenure

	Total owners	Total renters	Total households
ELI Households	35	250	285
Any housing problem	25	190	215
Cost burden >30 %	19	195	214
Cost burden >50 %	15	145	160
VLI Households	159	180	339
Any housing problem	125	170	295
Cost burden > 30 %	125	165	290
Cost burden >50 %	45	100	145
LI Households	145	273	418
Any housing problems	30	265	295
Cost burden > 30 %	30	240	270
Cost burden >50 %	20	45	65
<i>Source: HUD Consolidated Housing Affordability Strategy (CHAS), 2013-2017 ACS</i>			

Many extremely low-income households seek rental housing and are likely to experience housing problems including cost burden, overcrowding, or substandard housing conditions. This can be exacerbated by stagnant wages and increasing cost of living that may result in the lack of adequate resources to meet basic daily needs. ELI households may include multiple wage earners and typically include food service workers, full-time students, teachers, farmworkers, healthcare professionals, seniors, or adults with disabilities and special needs.

Housing types that can accommodate special needs populations include mobile homes, studios or one-bedroom units such as single-room occupancy units, and shared multi-bedroom homes.

Programs and Resources for Very and Extremely Low-Income Households

Several existing and planned affordable housing complexes in Cotati include units that serve very low and extremely-low income households including:

- Charles Street Village, 47 affordable homes, Seniors, 2001
- Marvin Gardens, 37 affordable homes, Family, 1983
- Wilford Lane Apartments, 35 affordable homes, Special Needs, 2003
- Windwood Apartments, 28 affordable homes, Family, 1981

- Cotati Station, 8 very low-income rental units, approved in 2022
- Kessing Ranch, 2 very low-income, for sale units
- Three proposed projects will include very low-income units:
 - Redwood Row, 9 very low-income units (170 total units)
 - Cotati Village, 18 very low-income units (177 total units)
 - Red's Residential, 14 very low-income units (126 total units)

Rooming houses, (Single Room Occupancies or SROs), are allowed under a use permit in the NU zone.

Within the 5th Housing Element planning cycle, 7 VLI units were permitted.

To address the remaining needs of extremely low-income households, the City is implementing the following policies and programs:

- Program 1-5: Preservation of Affordable Housing
- Program 2-6: Emergency Shelters, Transitional Housing, and Supportive Housing
- Program 3-2: Funding for Affordable and Special Needs Housing
- Program 4-1: Anti-Displacement Actions

Senior Households

Households with individuals 65 years and older are considered senior households. Seniors may experience challenges accessing or securing affordable housing while living on a fixed income. Increasing costs of living and healthcare can exacerbate existing issues related to disabilities, chronic health conditions, or reduced mobility. Seniors who rent may be at greater risk of housing insecurity than homeowners and are more likely to be cost burdened.

Existing and Projected Needs of Senior Households

In 2019, 977 persons (13.1% of the City's population) aged 65 years and older were recorded. The senior population increased by approximately 36.3% since 2013 whereas the City's total population increased at a lesser rate of 2.1%. Table 6 identifies the senior population by age group and the associated percent change. From 2013 to 2019, the 85 years and older age group significantly increased by 193%, and the 65 to 74 age group increased by 56.9%, and the 75 to 84 age group decreased by 16.8%.

Table 6: Senior Population by Age Group in Cotati

Age Group	2013		2019		Percent Change, 2013-2019*
	Number	Percent	Number	Percent	
Age 65-74	394	55.0%	618	63.3%	+56.9%
Age 75-84	280	39.1%	233	23.8%	-16.8%
Age 85+	43	6.0%	126	12.9%	+193%

*Source: City of Cotati 5th cycle Housing Element; US Census Bureau, 2019*Note: (+) represents increases and (-) represents decreases in population size*

Senior households make up 22.3% of the total households in Cotati. Of the total senior households, 79.1% own their unit and 20.9% rent. Seniors who are 65-74 years make up about 70% of owner-occupied senior householders, as shown in Table 7 below. Since 2013, the number of owner-occupied senior householders has increased by 45.8% whereas renter-occupied senior householders have decreased by 16.2%. The increase in owner-occupied senior households is likely due to the aging in place of Cotati's population.

Table 7: Senior Households by Age and Tenure in Cotati

	Owner		Renter	
	Number	Percent	Number	Percent
Age 65-74	339	69.6	50	38.8
Age 75-84	86	17.7	64	49.6
Age 85+	62	12.7	15	11.6
Total	487	100	129	100

Source: US Census ACS: 2019 5-Year estimates, Table B25007

In Cotati, 25.6% of seniors experience ambulatory difficulties followed by those with independent living difficulties (15.6%) and hearing difficulties (11.6%).

Half of the owner-occupied senior households earn above-moderate incomes and are less likely to experience cost burdens. Households that are not cost burdened pay 30% or less of their income on housing needs such as mortgage/rent, taxes, and utilities.

Low-income senior households who rent are most likely to experience severe cost burdens, paying more than half of their income towards housing expenses. Of total senior households who reported any cost burdens, 15% are severely cost burdened and may require assistance in rehabilitating their homes to suit their changing needs such as handrails, ramps, flooring, etc. Rental subsidies also continue to be viable options for seniors to reduce housing costs and address their unique needs.

Table 8: Senior Household Income Groups by Cost-Burden Levels in Cotati

Income group	0%-30% of Income Used for Housing	30%-50% of Income Used for Housing	50%+ of Income Used for Housing	Total	Percent
0%-30% of AMI	25	34	30	89	12.4
31%-50% of AMI	50	69	59	178	24.7
51%-80% of AMI	90	25	20	135	18.8
81%-100% of AMI	24	14	0	38	5.3
Greater than 100% of AMI	210	70	0	280	38.9
Total	399	212	109	720	100

Source: US HUD CHAS ACS Tabulation, 2013-2017 release

Programs and Resources for Senior Households

There are 47 units of senior housing and 15 beds of residential care and assisted living in Cotati:

- Charles Street Village (770 E. Cotati Avenue) – 47 units of lower-income senior housing
- Oaks of Hebron Sierra (405 W. Sierra Avenue) – 6 bed elderly residential care facility
- Sunset House (9408 Willow Ave) – 9 bed elderly assisted living facility

To address the remaining needs of senior households, the City is implementing the following policies and programs:

- Program 2-4: Accessory Dwelling Units (ADUs)
- Program 3-2: Funding for Affordable and Special Needs Housing

Persons with Disabilities, including Developmental Disabilities

State law defines disability as a “physical or mental impairment that makes performance of a major life activity difficult” (CA Dept of Fair Employment and Housing, 2022). Physical and mental impairments can include chronic or episodic conditions such as HIV/AIDS, hepatitis, epilepsy, seizure disorder, multiple sclerosis, heart disease, and other similar conditions. Individuals with these conditions are protected under various State laws, such as the Prudence K. Poppink Act and Fair Employment and Housing Act. Individuals with mental, physical, or developmental disabilities need accessible, safe, and affordable housing close to medical care or supportive services. Individuals with disabilities typically live on fixed incomes, limiting their ability to pay for housing.

Housing Element law, as amended by SB 812 (2021) requires jurisdictions to evaluate special housing needs for individuals experiencing developmental disabilities. A

developmental disability is defined in the Lanterman Act as an impairment that “originates before an individual attains 18 years of age, continues or may continue indefinitely, and constitutes a substantial disability for that individual” and includes mental retardation, cerebral palsy, epilepsy, and autism.

Existing and Projected Needs of Persons with Disabilities

In Cotati, 10% of the population (1,581 individuals) reported having a disability, including developmental disabilities. The proportion of disabled residents is lower than Sonoma County overall, and individuals with disabilities have decreased from 17% in 2013 (Source: 5th Cycle Housing Element). Among disability types, 5.6% experience cognitive difficulties, 5% experience ambulatory difficulties, and 4% experience independent living difficulties. Most youth with disabilities live at home with a parent or guardian.

Disabled renter households reported a higher incidence of housing problems, such as overcrowding, overpayment, or lacking full kitchen or plumbing facilities than non-disabled owner households.

Table 9: Disability Type per Age Group in Cotati

Disability Type	Under 5* years	5-17* years	18-34 years	35-64 years	65-74 years	75+ years	Total
Hearing difficulty	0	0	0	91	45	68	204
Vision difficulty	0	0	0	42	23	28	93
Cognitive difficulty	8		168	149	46	47	417
Ambulatory difficulty	0		17	104	141	109	371
Self-care difficulty	0		28	52	12	48	140
Independent living difficulty	-	-	69	79	60	92	300
Developmental Disability	22		34				56

Source: US Census Bureau, S1810 Disability Characteristics, 2019: ACS 5-Year Estimates; California Department of Developmental Services, 2020

** The number of individuals experiencing cognitive, ambulatory, and self-care difficulties represent age groups 17 and younger.*

Programs and Resources for Persons with Disabilities

In Cotati, there are 83 units of affordable housing that support disabled households:

- Charles Street Village (770 E. Cotati Avenue) – 47 units of lower income senior housing, including units accessible to senior disabled households.
- Wilford Lane Village (160 Wilford Lane) – a 36-unit family apartment community, includes several units that were designed to accommodate disabled persons with special needs.

Based on 2019 ACS data, 10% of households in Cotati had a disabled member. Applying this figure to the 6th Cycle RHNA, approximately 23.4 new households will have one or more disabled members through 2033, including at least. Based on 2019 ACS data, 4.0% of persons in Cotati have an independent living or self-care disability. Applying this figure to the RHNA, approximately one with special housing needs that require a supported living environment.

Households with a disabled member will require a mixture of housing units with accessibility features, in-home care, or group care housing facilities. Some of these households will have a member with developmental disability who may also have special housing needs. The North Bay Regional Center (NBRC) indicated that developmentally disabled persons may live with a family in a typical single family or multifamily home, but some developmentally disabled persons with more severe disabilities may have special housing needs that may include extended family homes, group homes, small and large residential care facilities, intermediate care, or skilled nursing facilities. Most of these persons will be low income and will need affordable housing such as extremely low/very low/low-income housing (both rental and ownership), Section 8/Housing Choice Vouchers, and single room occupancy units.

Regionally, the NBRC provides services and housing opportunities for individuals with disabilities in Sonoma County and provides in-home family support services for adults with disabilities to assist with daily needs and activities. Other local and regional resources and programs for individuals with disabilities include:

- North Bay Industries – located in Rohnert Park, provides supportive employment programs and affordable housing for adults with disabilities.
- United Cerebral Palsy (UCP) of the North Bay – children and young adult education, integrated employment, and recreational activities.
- First 5 Sonoma County – programs and resources for parents and children from prenatal stage to five years.
- Allied Integration Services – adult day programs including vocational training, skill-building, and behavioral management.

To address the remaining needs of households with disabilities, the City is implementing the following policies and programs:

- Program 3-2: Funding for Affordable and Special Needs Housing
- Program 4-4: Reasonable Accommodation
- Policy H-3.6: Continue to facilitate accessible universal design in new housing development and eliminate further barriers to safe and accessible housing for people with disabilities

Large Households

Large households typically comprise of five or more persons residing together. This may include multiple generations and/or extensions of a family, multiple families, students, or other non-related household members. Large households serve a unique need in that householders may want to save money due to the high cost of living, share responsibilities for religious or cultural reasons, serve a member with disabilities, among other living arrangements including co-housing communities, intentional communities, group homes, employee housing, fraternities, sororities, and communes. While all housing units with three or more bedrooms can serve large households, some larger and multi-generational households may require more bedrooms to avoid overcrowding.

Existing and Projected Needs of Large Households

In Cotati, large families make up 12.2% of total households and have more than doubled in the 5th Housing Element Cycle. Tenure among large households is 48.5% owner-occupied and 51.5% renter-occupied units. More than half of larger families are at above-moderate income levels and roughly one third of larger families are at low to extremely low-income levels. Lower- and moderate-income large households may have difficulty accessing affordable rental housing.

Large families can have a difficult time finding housing units large enough to meet their needs. In Cotati, there appears to be an adequate amount of housing units available to provide units with enough bedrooms both for larger households that own their home and that rent. Table 10 identifies the number of large households by household size. While there appear to be adequate units in Cotati to accommodate all large owner and renter households, it does not mean that there is a match between housing units and large families. Consequently, a lack of units available to large households is cited as a contributing factor to fair housing issues.

Table 10: Household Size by Tenure

Household Size	Owner-occupied households	Renter-occupied households	All households
1-person	449	308	757
2-person	448	312	760
3-person	292	237	529
4-person	211	165	376
5 or more-person	163	173	336
Total	1,563	1,195	2,758

Source: U.S. Census Bureau, ACS 5-Year estimates, Table B25009, 2019

Table 11: Large Households by Income Group

Income Group	All other household types	Larger families of 5+ people	Total
0%-30% AMI	264	10	274
31%-50% AMI	343	10	353
51%-80% AMI	379	45	424
81%-100% AMI	177	34	211
Greater than 100% AMI	1,450	139	1,589

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

Table 12: Household Size versus Bedroom Size by Tenure in Cotati

Tenure	5 Person Households			6 Person or Larger Households		
	3 BDR units	Households	Shortfall/ Excess	4+ BDR units	Households	Shortfall/ Excess
Owner	649	138	511	415	25	390
Renter	438	102	336	129	71	58
Total	1,087	240	175	544	96	448

Source: U.S. Census Bureau, 2019 ACS 5-Year estimates, Tables B25009, S2504, DP04

Programs and Resources for Large Households

To address the remaining needs of large households, the City is implementing the following policies and programs:

- Program 2-4: Accessory Dwelling Units (ADUs)
- Program 3-2: Funding for Affordable and Special Needs Housing
- Program 4-6: Culturally Appropriate Facilitation and Involvement

Farmworker Housing

Statewide, farmworker housing is of unique concern and importance. Farmworkers are essential to the region's economy and its food supply. According to the United States Department of Agriculture (USDA) 2017 Census of Agriculture, only 18% of Sonoma County's farmworkers are migrant workers, with 82% of farmworkers considered settled and working farm(s) within 75 miles of their residences. Of the County's 3,594 farms counted in 2017, 48% hired farm labor, 93% were considered family farms, and 44% of farms were smaller than 10 acres.

Existing and Projected Needs of Farmworkers

The 2019 ACS 5-Year Estimate identified approximately 153 Cotati residents employed in farming, fishing, and forestry occupations, representing 3.8% of the City workforce and 2.08% of Sonoma County farmworkers.

Per the Sonoma County Farmworker Health Survey 2013-2014, the “majority of farmworkers (88%) reported that Sonoma County was their permanent residence, and most (71%) farmworkers were living in the US with their families.” Farmworker families were estimated to spend between 30% and 54% of their annual income on housing. Two-thirds of farmworkers lived in overcrowded dwellings in Sonoma County, and farmworkers who lived with their families were the most likely to live in overcrowded conditions.

In 2021, the local newspaper printed a special report about low-wage earners living in Sonoma County, saying, “many are farmworkers... who live in cramped apartments with too many people, or sheds with only a chemical toilet, or tiny mobile homes with leaking roofs or backed-up sewage pipes...”¹ Although the data does not indicate a specific need for farmworker housing among Cotati residents, this is a significant regional need.

Programs and Resources for Farmworkers

Various programs are available in the region to meet the needs of farmworkers. These include:

- California Rural Legal Assistance, provides legal aid with civil cases for low-income people, farmworkers, and migrant communities
- La Luz Center, provides rental assistance, tenant support, and access to food, counseling, education, and health resources to eligible residents

To address the remaining needs of farmworkers, Cotati is implementing the following program(s):

- Program 3-1: Zoning for a Variety of Housing Types
- Program 3-2: Funding for Affordable and Special Needs Housing

Female-Headed Households

Single parent households are households with children under the age of 18 at home and include both male- and female-headed households. These households generally have a higher ratio between their income and their living expenses (that is, living expenses take up a larger share of income than is generally the case in two-parent households). Finding affordable, decent, and safe housing is often more difficult for single parent and female-headed households. Additionally, single parent and female-headed households have special needs involving access to daycare or childcare, health care and other supportive services.

Existing and Projected Needs of Female-Headed Households

Forty-five percent of Cotati households are headed by a single people. There are 438 single-male heads of household (15.9%) and 811 single-female heads of household (29.4%). Table 13 identifies single-parent households by gender of the householder

¹ [Many live in squalid conditions to work in Sonoma County](#), Press Democrat, November 18, 2021

and presence of children. In Cotati, while 4.4% of families overall are under the poverty level, 57.5% of female-headed households are under the poverty level. Area Median Income (AMI) of 18% or less is considered poverty, as defined by the California Poverty Measure. As Cotati’s population and households grow, there will be a continued need for supportive services for single-parent households with children present.

Table 13: Single Parent and Female-Headed (FH) Households in Cotati

Household type	Number	Percent of Total Households
Total households	2,758	
Total FH households	811	29.4
FH householder w. children under 18, no spouse	113	4.1
Male householder w. children under 18, no spouse	16	0.6
FH households living alone	455	16.5
Total families under the poverty level	120	4.4
FH households under the poverty level, no spouse	69	2.5
No child	29	
1 or 2 children	24	
3 or 4 children	16	

Source: US Census Tables B17012 & DP02 2019: ACS 5-Year estimates – acc. 6/1/22

Programs and Resources for Female-Headed Households

Female-headed households under the poverty level may need additional resources related to job training, childcare, and health care coverage. State and County programs are available to assist low-income families and single-parent families, including the following:

- SonomaWORKS provides temporary help for families with children who have little or no money. This may include housing, food, utilities payments, childcare or medical care, job training, legal services, and mental health services.
- Medi-Cal and the County Medical Services Program provide health care coverage for eligible residents.
- CalFresh and WIC help eligible residents afford food and access information about nutrition and health.

For families at risk of homelessness, available resources include the following:

- 2-1-1 is a local hotline that provides information about a variety of services in Sonoma County, including housing, shelter, and food.

- SHARE Sonoma County is a local service provider that matches home-seekers who are either homeless or at-risk of homelessness with home-providers that have an extra room in their house.

To address the remaining needs of female-headed households, the City is implementing the following program:

- Program 4-3: Nondiscrimination & Fair Housing Information

Homelessness

Homeless individuals and families have perhaps the most immediate housing need of any group. They also have one of the most difficult sets of housing needs and support services to meet, due to both the diversity and the complexity of factors that lead to homelessness. The Department of Housing and Urban Development defines homelessness as any “individual or family who lacks a fixed, regular, and adequate nighttime residence.” This also includes those at risk of being homeless, those fleeing domestic violence, those who have no other residence, and those who lack the resources to obtain permanent housing. In California, those who have reported experiencing chronic homelessness have increased by 20% between 2020 and 2021.²

Existing and Projected Needs of Persons Experiencing Homelessness

According to the 2020 Point-in-Time Census, there was an estimated total of 37 homeless persons in Cotati, all of which were unsheltered. In Sonoma County, there are a total of 2,745 reported individuals experiencing homelessness, which represents a 7% decrease in homeless persons since 2019. The causes of homelessness are complex and often based on inter-related factors. In Sonoma County, the primary causes of homelessness, as reported by the 2020 Sonoma County Homeless Census Comprehensive Report, were lost job (22%), alcohol or drug use (16%), argument with family or friend (15%), and fire (10%). Obstacles to obtaining permanent housing, from highest reported to lowest reported, include unable to afford rent (70%), no job or not enough income (50%), no money for moving costs (31%), no housing availability (20%), and no transportation (17%).

Of those experiencing homelessness in the County, the majority (63%) are men and white. The number of homeless individuals who are sheltered in Sonoma County increased by 5% between 2019 to 2020. The amount of homeless youth (18-24) and seniors (61+) has increased since 2016.

According to the 2020 Sonoma County Homeless Census Comprehensive Report, the number of those who are homeless and unsheltered in Cotati increased dramatically between 2018 to 2019 (Table 14) but decreased since then.

Table 14: Total Number of Homeless Persons in Cotati, by Shelter Status

	2018	2019	2020

² 2021 Annual Homeless Assessment Report (AHAR) to Congress

Unsheltered	1	44	37
Sheltered	0	0	0
Total	1	44	37
<i>Source: 2020 Sonoma County Homeless Census Comprehensive Report</i>			

Programs and Resources for Persons Experiencing Homelessness

Emergency shelters are allowed by-right in the General Commercial District and the Public Facilities District of Cotati. Emergency shelters are allowed within the Downtown Specific Plan area, subject to the permit requirements and standards of the Downtown Specific Plan. North House on Old Redwood Highway in Cotati is a 8-unit transitional housing facility serving homeless and mentally disabled adults. “A Step Up – Cotati” is a 11-bed transitional home serving adults with addiction and behavioral health issues.

Cotati has two housing facilities operated by Community Support Network that serve populations that are homeless or at-risk of homelessness.

- North House – 8050 Old Redwood Highway: Eight-bed residential Transitional Training Program for mentally ill, homeless adults. There is minimal supervision and services focus on helping clients assess their own skills and abilities relating to independent living stabilization. Clients can stay up to eight months.
- A Step Up – 420 East Cotati Avenue: Eleven-bed facility providing dual diagnosed adults (mental illness with alcohol and/or other drug issues) the opportunity to improve physical and emotional health and develop positive habits that can speed up their path to recovery and self-sufficiency. Clients can stay up to twelve months.

Cotati partners with the Committee on the Shelterless (COTS) shelter and housing programs, which provide emergency and transitional shelter and permanent housing for the homeless. Some of the programs include Integrity Housing, Permanent Supportive Housing (PSH), and the Rapid Rehousing (RRH) program.

A list of regional housing resources is provided for those experiencing homelessness at the Homeless Shelter Directory, including:

- Sonoma County Behavioral Health
- Community Support Network
- The SAY Dream Center For Youths
- The Living Room Day Shelter For Women
- The Rose - Women with Children Emergency Shelter
- Redwood Gospel Mission

- Catholic Charities Homeless Services Center
- Family Support Center
- Sloan House Women's Emergency Shelter
- Community Support Network Opportunity House
- InterFaith Shelter Network

To address the remaining needs of homeless individuals, the City is implementing the following policies and programs:

- Program 2-5: Continuum of Care and Crisis Response - Seek funding to support transitional and supportive housing.
- The City of Cotati has greatly expanded its relationship with local non-profit organizations and service providers, through participation with the CDC and separately to meet the various needs of the un-housed population. This has resulted in three units of transitional housing being purchased within the City, with management of these services being led by CDC staff.
- Program 3-2: Planning for Affordable and Special Needs Housing – Develop a housing stakeholders group that includes affordable housing developers and special needs group stakeholders to discuss needs and priorities.
- The City's Land Use Code requires 10% of all units in new subdivisions to be single story and universally accessible to allow for full conversions in the future if needed/wanted. The City's objective design guidelines also require multifamily housing projects to incorporate 10% of the units as accessible.
- Program 3-3: Funding for Affordable and Special Needs Housing – Seek available funding for lower income and special needs housing.
- Program 1-1: Housing Rehabilitation and Home Ownership
- Over the 5th Cycle, the CDC applications for these funding sources has primarily focused on addressing homelessness and infrastructure deficiencies.
- Policy H-3-9: Coordinate with regional and local service groups to facilitate linkages between at-risk individuals and families, and organizations that provide support services.

4.2.3 Zoning for a Variety of Housing Types

This section provides an analysis of zoning and availability of sites for a variety of housing types pursuant to Government Code § 65583(a)(4), 65583(c)(1), and 65583.2(c). The City provides for a range of housing types within its Zoning Code, as demonstrated in Table 15 below, including single-family, multi-family, accessory dwelling units, mobile and manufactured homes, residential care facilities, emergency shelters, supportive housing, transitional housing, single-room occupancy living units, boarding/rooming houses and family daycare homes.

Additional information related to the permitting requirements, allowed densities, and development standards for each type of housing and zoning designation can be found in Section 4.4.2, Potential Governmental Constraints. Because Cotati is small town of mature neighborhoods it has limited availability of sites across all zoning districts discussed. State laws such as SB 478 (2021) promote the creation of “missing middle” housing such as live/work units, multiplexes, townhomes, bungalow courts, and other housing types by allowing more flexibility in size and shape of new, small-scale development (Turner Center, 2019).

This Housing Element includes a program for the City to allow an increased variety of housing types such as live-work studios. The City is actively processing and permitting projects that address the community’s housing needs, including many of the housing types analyzed here. Additionally, during 2022 the City is updating the Downtown and Transit Oriented Zoning to allow better allow for infill residential development.

Table 15: Residential Uses Allowed by Zoning District in Cotati

Zoning Map Symbol	Name of Zoning District	General Plan Designation Implemented by Zoning District	Maximum density/dwelling units to accommodate
RR	Rural Residential	Rural	One unit per 1 or 1.5 acre
RVL	Residential Very Low Density	Low-Density Residential	One unit per 0.5 to 0.66 acre
NL	Neighborhood, Low Density	Low-Medium Density Residential	6 units per acre
NM	Neighborhood, Medium Density	Medium Density Residential	10 units per acre
NU	Neighborhood, Urban	High-Density Residential	15 units per acre
Mixed Use Corridor and Downtown Zones			
CE	Commercial, East Cotati Ave. Corridor	Office, General Commercial	15 units per acre
CD	Downtown Commercial	General Commercial, La Plaza Specific Plan	15 units per acre
CA	Commerce Avenue	Downtown Specific Plan ³	61 dwellings
NG	Northern Gateway	Downtown Specific Plan	229 dwellings
HC	Historic Core	Downtown Specific Plan	71 dwellings
LP	La Plaza	Downtown Specific Plan	89 dwellings
Special Purpose and Overlay Zones			

³ Downtown Specific Plan area has no density limits. The plan establishes a maximum number of residential units that can be developed within the zones of the Specific Plan area.

Zoning Map Symbol	Name of Zoning District	General Plan Designation Implemented by Zoning District	Maximum density/dwelling units to accommodate
CP	Coordinated Planning Overlay	All	
MHP	Mobile Home Park Overlay	All Residential	determined by the primary zone of the affected site
PF	Public Facility	Public Facilities	
SPSW	Specific Plan, Santero Way	All	No maximum
SPD	Specific Plan, Downtown	General Commercial, Residential, Parks	No maximum

Source: <https://www.codepublishing.com/CA/Cotati/html/Cotati17/Cotati1720.html>

Single- and Multifamily Rental Housing

Single- and multifamily housing types include detached and attached single-family homes, duplexes, triplexes, townhomes, condominiums, and rental apartments. Single-family dwellings are permitted in the RR, RVL, and NL zones, and in the NM and NU zones with a use permit. Multifamily housing of 5-9 units is allowed with a use permit in the NM and NU zones. Multifamily housing with 10 or more units is permitted in SPSW zone and is permitted with a use permit in the NU zone. Residential components of mixed-use projects are a permitted use in the CE, CG, CD, HC, LP, NG, CA, and SPSW zones. Zones allowing multifamily housing are generally adjacent to medium and low density residential areas, with many areas near major thoroughfares or the train station.

According to the 2020 ACS 5-year estimates, there are 2917 housing units in Cotati. Single-family detached and attached account for most Cotati housing stock, consisting of 55.3% (1613 units) and 13.1% (382 units) respectively. Duplexes, triplexes, and fourplexes comprise 5.7% (166 units) and multi-family complexes with five or more units comprise 19.9% (580 units) of the housing stock.

Housing for Agricultural Employees

According to the 2020 ACS 5-year estimate, 3% of Cotati’s residents (124 people) were employed in the agriculture, forestry, fishing/hunting, and mining industries. There is no farmworker data specific to the City, but there are agricultural lands that would require farmworker employment within the City limits. While there is a significant amount of agricultural production in Sonoma County and demand for farmworker housing in the unincorporated areas of the county as well as communities with agricultural land, there are no parcels in Cotati currently designated for agricultural use. Agricultural uses, such as crop production, horticulture, vineyard, and orchard use may be allowed in the Rural Residential zone subject to the issuance of a use permit.

Cotati’s Zoning Code allows employee housing that accommodates up to six employees, considered as a single-family use and subject to the same standards and permit requirements as a single-family residence in all zones that allow single-family uses, and is compliant with CA Health and Safety Code Section 17021.5. Under Program 3-1 (Zoning for a Variety of Housing Types), the City will amend its Code to allow housing consisting of no more than 36 beds in group quarters (or 12 units or less) designed for use by a single family or household to be treated as an agricultural use, as required by CA Health and Safety Code Sections 17021.6.

Emergency Shelters and Low Barrier Navigation Centers

According to the Health and Safety Code, emergency shelters are housing with minimal supportive services for homeless persons that are limited to occupancy of six months or less by a homeless person. Local agencies are required to identify a zone where emergency shelters are allowed as permitted use without a conditional use or another discretionary permit. Emergency shelters are allowed in the Downtown Commercial (CD) District and the Public Facilities (PF) District of Cotati. The City also allows establishment of emergency shelters in the Downtown Specific Plan area, subject to the permit requirements and standards of the Downtown Specific Plan. Sites zoned PF are scattered throughout the City, with CD and Downtown Specific Plan areas located near the center of the City, with better access to transit and amenities. These sites have sufficient capacity to meet the need for emergency shelter, as shown in Table 16. In addition to these vacant sites, there is potential for reuse and redevelopment of existing buildings as emergency shelters.

Table 16: Sites with Capacity for Emergency Shelter

APN	Zoning District	Acres	Current Use
144-261-003	CD	0.15	Vacant
144-274-007	CD	0.17	Vacant
Total		0.32	
<i>Calculated using the standards of AB 2339 (2022): 37 people in need of emergency shelter x 200 sq.ft per person = minimum of 0.17 acres needed</i>			

Under State law, the City may apply certain written objective development and management standards for homeless shelters. Cotati’s Zoning Code includes the following standards for homeless shelters:

- **Occupancy.** The maximum number of beds or persons permitted to be served nightly by an emergency shelter, or any combination of emergency shelters in the city, shall not exceed twenty persons.
- **Length of Stay.** Occupancy for an individual in an emergency shelter is limited to no more than six months. The operator of the emergency shelter shall maintain adequate documentation to demonstrate compliance with this provision.
- **Location.** No emergency shelter shall be located within three hundred feet of another emergency or homeless shelter.

- Management Plan. Prior to the director's decision, the operator of the emergency shelter must submit to the community development department a written management plan. As a minimum, the management plan shall include and address the following:
 - Procedures for staff training to meet the needs of the shelter residents, and have processes to address the following topics: client intake, confidentiality, health and safety training, mental health, and substance abuse treatment and referrals;
 - Operational rules and standards of conduct for residents, including policies prohibiting the use or possession of controlled substances by residents, rules concerning the use or possession of alcohol, curfew, prohibition of loitering, and any other provisions necessary to ensure compatibility with surrounding uses;
 - Policies and procedures for eviction from the facility for violation of rules and standards of conduct;
 - A detailed safety and security plan to protect shelter residents and surrounding uses;
 - A process for resident screening and identification;
 - Provisions for on-site or partnerships with off-site organizations to provide job training, counseling, and treatment programs for the residents;
 - Services to assist residents with obtaining permanent shelter and income;
 - If applicable, timing and placement of outdoor activities;
 - Location within the facility for temporary storage of residents' personal belongings;
 - Provisions for continuous on-site supervision during hours of operation. Specifically, there shall be a minimum of one staff person per eight clients during daytime hours, seven a.m. to nine p.m., and a minimum of two staff people at the facility during nighttime hours, nine p.m. to seven a.m.;
 - If applicable, procedures for ensuring safety and security of women and children within the facility;
 - The exterior of the building must be kept in a good state of repair and the exterior finish and landscaping must be kept clean and well maintained. Each site shall be kept in a neat and orderly manner, free of weeds, loose trash, debris and other litter, including but not limited to shopping carts;
 - Organized outdoor activities on the site may only be conducted between the hours of eight a.m. and nine p.m.;
 - Employees, partners, directors, officers, managers and similar persons shall be screened prior to occupancy to confirm that they

have no history of a previously failed emergency shelter (or similar facility) due to the fault of the operator, and have not been convicted of any of the following offenses within the prior five years:

- A crime requiring registration under Penal Code Section 290;
 - A violation of Penal Code Sections 311.2 or 311.4 through 311.7;
 - A violation of Penal Code Sections 313.1 through 313.5;
 - A violation of Penal Code Section 647(a), (b), or (d);
 - A violation of Penal Code Section 315, 316, or 318;
 - A felony crime involving the use of force or violence on another; or
 - The maintenance of a nuisance in connection with the same or similar business operation.
- The management of the emergency shelter shall effectuate a background investigation on all employees to the satisfaction of the chief of police.
- Common Facilities and Services. An emergency shelter may include the following facilities and services as ancillary to the emergency shelter use:
 - Commercial kitchen facilities;
 - Dining area;
 - Laundry room;
 - Recreation or meeting room;
 - Outdoor recreational spaces; provided, that the space is located within a building interior courtyard or is enclosed by a building, solid fence, or wall or some combination thereof to secure the space and ensure that it is not accessible to the general public;
 - Animal boarding for current residents of the facility only; and
 - Child care facilities for current residents of the facility only.
- Client Intake Areas. An enclosed intake area shall be provided within the emergency shelter building. The intake area shall be a minimum of one hundred square feet in size, located entirely within the building. The intake hours shall be posted clearly on the doors to the emergency shelter. Clients shall be allowed to wait in an interior or exterior waiting area that shall not exceed one hundred fifty square feet. Clients shall not loiter nor form a queue outside of the exterior waiting area.
- Parking. Each emergency shelter shall have a minimum of two off-street parking spaces plus the greater of either: (a) one additional off-street parking space for each ten beds, or fraction thereof, or (b) one additional parking space per employee.

- Lighting. Exterior lighting shall be located along all pedestrian pathways, parking lots, entrances and exits, common outdoor areas, and at the front of the building. All lighting shall be maintained in good operating condition and shall be fully shielded.
- On-Site Security. Security measures shall be reviewed and approved by the chief of police prior to commencement of operations on the site and shall be sufficient to protect clients and neighbors. On-site security shall be provided during the hours when the emergency shelter is in operation and at all times when clients are present on site. In the event that five or more calls for police services have been received over a thirty-day period by the police department, the facility shall be required to provide additional on-site security staff to the satisfaction of the chief of police and the community development director.
- City, County and State Requirements. An emergency shelter shall obtain and maintain in good standing all required licenses, permits, and approvals from the city, county, and state agencies or departments and demonstrate compliance with applicable building and fire codes. An emergency shelter shall comply with all county and state health and safety requirements for food, medical, and other supportive services provided on site.

These development standards are consistent with State requirements set by SB 2 and encourage and facilitate the development of emergency shelters. The management standards for emergency shelters may be in excess of those allowed by State law, parking standards for emergency shelters have not been updated for compliance with AB 139, and Cotati's Zoning Code does not currently provide allowances for low barrier navigation centers. Under Program 3-1 (Zoning for a Variety of Housing Types), the City will allow Low Barrier Navigation Centers to be a by-right use in zones where multifamily and mixed-uses are permitted, including the nonresidential zones where multifamily is permitted, and amend parking requirements and management standards for emergency shelters pursuant to State law, including AB 139. Additionally, Program 2-5 (Continuum of Care and Crisis Response) is included in Section 2 to address and expand resources available in Cotati.

Transitional and Supportive Housing

Transitional and supportive housing projects are allowed in all districts where residential uses are allowed. Transitional and supportive housing are considered residential uses and are only subject to standards that apply to other residential dwellings of the same type in the same zone, in compliance with state law.

Program 3-1 (Zoning for a Variety of Housing Types) will ensure that the City is in compliance with state laws to allow permanent supportive housing by right in all zones where multifamily and mixed-uses are permitted.

Single Room Occupancy (SRO) Housing

Single Room Occupancy facilities (SROs) is a type of housing that can serve extremely low-income households. It includes housing with shared facilities, such as living or dining areas, with private sleeping areas. Rent is much lower than those associated with typical apartment complexes. The City's NU zone allows for rooming houses with a Use Permit. While SRO facilities are not specified in the zoning code, the City has allowed the by-right conversion of an existing motor lodge to long-term occupancy. Program 3-1 (Zoning for a Variety of Housing Types) will ensure that the City is in compliance with the most recent state laws for allowable residential land uses.

Manufactured Homes

Manufactured homes on permanent foundations are allowed on lots zoned for single-family dwellings, except for those abutting a designated historical landmark site (CMC Chapter 15.24). Manufactured homes are allowed in RR, R1, and R2 zones in the same manner as a stick-built single-family home and must be certified under the National Mobile Home Construction and Safety Standards Act of 1974. Program 3-1 (Zoning for a Variety of Housing Types) will bring the City into compliance with the requirements of Government Code § 65852.3 to permit manufactured homes in the same manner, in the same zones, and only subject to the same requirements as other single-family residential uses.

Mobile Home Parks

Mobile home parks (MHP) are described as "any area or tract of land where one or more spaces are rented or leased or held out for rent or lease to accommodate mobile homes, manufactured homes or travel trailers used for human habitation for 30 days or longer." Mobile homes account for 4.1% (119 units) of the City's housing stock. The Mobile Home Park (MHP) zoning district is a type of Special Purpose and Overlay Zones district in which mobile homes are the only allowable land use type.

Accessory Dwelling Units (ADUs)

An ADU is a self-contained home that is smaller than the main house and legally part of the same property. Residential properties are eligible to construct an Accessory Dwelling Unit (ADU) which can be an interior or garage conversion, detached stand-alone ADUs, ADUs attached to the primary residence, and ADUs constructed above garages type. Additionally, every single-family residential property is also eligible to construct a Junior ADU (JADU), with the exception of NM and NU zones; Program 3-1 is included to amend the Zoning Code to allow JADUs in these zones. The maximum size of JADUs is 500 square feet.

To support the development of ADUs, the City has formed partnerships with the following community-based non-profit organizations:

- **Napa Sonoma ADU Center** provides resources to homeowners considering construction of an ADU or JADU.

- **Homes for Sonoma**, a nonprofit developer, was founded to create affordable housing options in a safe environment and support a sustainable community. The organization aims to address the housing crisis in Sonoma County and across the state with scalable solutions, especially by promoting ADUs.

The City issued an average of 3 annual permits for ADUs between 2018 and 2021.

4.3 LOCAL HOUSING PROGRAMS & RESOURCES

4.3.1 Resources: Housing Assistance Programs

The following programs include Federal-, State-, and locally run programs providing funding for construction, rehabilitation, or rental assistance for very low-, low-, and moderate-income households. This section describes programs utilized by the City and those that may be locally available and potentially applicable within the jurisdiction.

Federal Assistance Programs

The **Community Development Block Grant (CDBG)** Program funds a wide variety of local housing and community development projects that improve the quality of living for lower-income residents whose incomes are less than 80% of the Area Median Incomes as established by the U.S. Department of Housing and Urban Development (HUD).

Sonoma County receives approximately \$1.8 million annually in CDBG funds. The program is administered by the Community Development Commission, and the Sonoma County Board of Supervisors makes the final decision regarding how the funds are distributed locally. The City of Cotati is a part of the urban county group of non-entitlement jurisdictions with funds administered by the Sonoma County Community Development Commission. The Cities & Towns Advisory Committee administers CDBG funding to participating cities. The City can apply directly to the Sonoma County Community Development Commission to obtain CDBG funds for designated projects; however, the City is not guaranteed any minimum allocation.

CDBG funds can be used for activities that meet one of the following National Objectives:

- Benefits low- and moderate- income persons;
- Aids in the prevention or elimination of blight; and
- Meets a need from having a particular urgency (e.g. disasters)

Examples of such activities include the following:

- Housing rehabilitation
- Community and Senior Centers
- Acquisition of real property for affordable housing

- Infrastructure improvements
- Public services
- Accessibility modifications
- Permanent supportive housing for people experiencing homelessness
- Homeless Shelters

Home Investment Partnerships (HOME) grants are provided by HUD to fund a wide variety of projects that implement local housing strategies and create affordable housing for low-income households including building, buying, rehabilitating affordable housing, or providing direct rental assistance (*Source: HUD*). The County receives approximately \$650,000 in HOME funds annually. The City or nonprofit developers can apply to Sonoma CDC to obtain HOME funds, which are used on a competitive basis. The City can work with affordable housing developers to support applications for these funds that can be used for all aspects of affordable housing development (*Source: SCHA*).

Housing Choice Voucher Section 8 (HCV Program) is a major federal program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market.

To become a participant of the HCV Program, individuals and families must sign up on the Waiting List with the Sonoma County Housing Authority. This is a list of people who are waiting to receive rental assistance. Names can only be added to the Waiting List when the list is open, which is approximately every three to five years. While the list is open, 750 applications are randomly selected and assigned a place in line. Once a name reaches the top of the Waiting List, the applicant is interviewed to determine whether they are eligible for the program. Most recently, the Sonoma County HCV Program Waiting List was opened to receive applications from October 1, 2021 – November 1, 2021.

If selected, participants may choose any housing that meets the Housing Quality Standards of the program. The Sonoma County Housing Authority (SCHA) pays a housing subsidy directly to the landlord, and the participant pays the difference between the actual rent charged and the amount subsidized by the program. The tenant's share of rent and utilities is generally between 30 to 40% of their monthly income (*Source: SCHA*).

Project-Based Voucher Program is administered by the Sonoma County Housing Authority (SCHA) and is administered like the HCV program, except the voucher is tied to an individual unit, rather than “owned” by the person. Project-based vouchers are an important tool to ensure long-term financial stability of projects serving lower-income persons, especially extremely low-income households. In recent years, SCHA has awarded new project-based vouchers, with priority given to projects with set-aside units for people experiencing homelessness.

The Emergency Shelter Grant (ESG) Program administered by Sonoma County CDC which provides HUD funds to rehabilitate and operate emergency shelters and transitional shelters, provide essential social services, provide permanent housing solutions, and prevent homelessness (*Source: SCHA*).

The **Federal Home Loan Bank System** facilitates Affordable Housing Programs (AHP) which subsidize the interest rates for affordable housing. The San Francisco Home Loan Bank District provides local services within California. AHP grants are awarded annually through a competitive application process to Bank members working in partnership with housing developers and community organizations.

Basic eligibility requirements include having at least 20% of units in rental housing reserved for very low-income households and any owner-occupied housing must serve lower income households (*Source: Federal Home Loan Bank of San Francisco*).

HUD Section 811/202 Programs provide critical affordable housing to elderly and persons who experience disabilities. The Section 202 program funds development and operation of affordable housing for very low-income elderly households. The Section 811 program provides non-profits with funding to develop and operate supportive housing for disabled very- and extremely-low-income persons (*Source: HUD*).

Low-Income Housing Preservation and Residential Home Ownership Act (LIHPRHA) requires that all eligible HUD Section 236 and Section 211(d) projects which are “at-risk” of conversion to market-rate rental housing through the mortgage prepayment option be subject to LIHPRHA incentives. The incentives include HUD subsidies which guarantee owners an eight percent annual return on equity. Owners must file a Plan of Action to obtain incentives or offer the project for sale to a) non-profit organizations, b) tenants, or c) public bodies.

Low Income Housing Tax Credits (LIHTC) provide State and Local LIHTC-allocating agencies the equivalent of approximately \$8 billion in annual budget authority to issue tax credits based on population for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households.

National Housing Trust Fund (NHTF) is a federal program administered in California by HCD whereby funds can be used to increase and preserve the supply of affordable housing, with an emphasis on permanent housing for extremely low-income households. Previously, NHTF funding was allocated through the Housing for a Healthy California Program. Beginning in Fiscal Year 2022, the NHTF will be aligned with federal regulations. HCD is currently in the process of developing guidelines for the 2022 allocation of NHTF funds.

Off-Farm Labor Housing Direct Loans & Grants is a federal program administered by the US Department of Agriculture Rural Development. This program provides affordable financing to develop housing for year-round and migrant or seasonal domestic farm laborers. Housing construction may be in urban or rural areas, if there is a demonstrated need for farmworkers nearby. The rental housing is

for very low- to moderate-income (\$5,500 above low-income limit) farmworkers and their families (*Source: USDA RD*).

State Assistance Programs

Affordable Housing and Sustainable Communities Program (AHSC) is administered by the Strategic Growth Council and implemented by the Department of Housing and Community Development (HCD). The AHSC Program funds land-use, housing, transportation, and land preservation projects to support infill and compact development that reduce greenhouse gas emissions. The AHSC provides grants and/or loans that benefit disadvantaged communities through increasing accessibility of affordable housing, employment centers, and key destinations via low-carbon transportation. Eligible applicants for the AHSC program include localities, public housing authorities, and redevelopment successor agencies among others.

CalHome Program is administered by HCD and provides grants to local public agencies and nonprofit developers to assist individual first-time homebuyers through deferred-payment loans for down payment assistance and home rehabilitation, including manufactured homes not on permanent foundations, acquisition and rehabilitation, homebuyer counseling, self-help mortgage assistance, or technical assistance for self-help homeownership. The CalHome Program also provides financial assistance for development of multiple-unit ownership projects (*Source: HCD*).

California Emergency Solutions and Housing (CESH) Program is administered by HCD and provides grants to fund a variety of activities to assist persons experiencing or at risk of homelessness. Local governments, non-profit organizations, or designated unified funding agencies can apply for funding to use for housing relocation and stabilization services, operating subsidies for permanent housing, flexible housing subsidy funds, operating support for emergency housing interventions, and systems support for homelessness services and housing delivery systems.

California Housing Accelerator Program is a new HCD program and intends to reduce the backlog of shovel-ready housing projects that have been stuck in financial limbo. Projects which have been funded under other HCD programs and have not been able to access low-income housing tax credits are eligible for the program. Applications for funding assistance must go through a selective process, giving priority to Tier I "Multifamily Project Tracker" projects, and once selected is provided a forgivable loan. The program is funded by the Coronavirus State Fiscal Recovery Fund established by the federal American Rescue Plan of 2021.

California Housing Finance Agency (CalHFA) operates several programs to help reduce the cost of housing. These programs, funded through the sale of taxable and tax-exempt bonds, provide permanent financing of affordable housing developments, financing for homebuyers, hardship assistance, resources to increase homeownership for Black residents, and grants for the pre-development costs associated with the construction of Accessory Dwelling Units.

Community Placement Plan (CPP) and Community Resource Development Plan (CRDP) Funds. In collaboration with the regional center, the California Department of Developmental Services uses CPP and CRDP funds to develop safe, affordable, and sustainable homes as a residential option for individuals with intellectual and developmental disabilities.

Golden State Acquisition Fund (GSAF) provides funding seeded by HCD's Affordable Housing Innovation Fund to preserve and expand quality affordable and senior housing. Combined with matching funds, GSAF makes up to five-year loans to developers for the acquisition or preservation of affordable housing. Terms for funding include development parameters that require projects to designate units to lower income households. Nonprofit and for-profit developers, cities, counties, and other public agencies within California are all eligible for GSAF financing.

Homekey is administered by HCD and provides grants to local entities to acquire and rehabilitate a variety of housing types to sustain and expand housing for people experiencing homelessness or are at risk of experiencing homelessness and provides additional funding for wrap-around supportive services.

Infill Infrastructure Grant Program (IIG) promotes infill development by providing financial assistance for infrastructure improvements necessary for specific residential or mixed-use infill development projects or areas. Criteria for funding include affordability, density, and access to transit. Eligible applicants for the IGG Program include nonprofit and for-profit developers of qualifying infill projects and localities with jurisdiction over qualifying infill areas among others.

Joe Serna, Jr. Farmworker Housing Grant (FWHG) Program is administered by HCD and finances the new construction, rehabilitation, and acquisition of owner-occupied and rental units for agricultural workers, with a priority for lower income households. Eligible applicants include local government agencies, nonprofit corporations, and cooperative housing corporations among others.

Local Early Action Planning (LEAP) Grants is administered by HCD and provides over-the-counter grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that accelerate housing production and facilitate compliance to implement the sixth-cycle Regional Housing Needs Assessment.

Local Housing Trust Fund (LHTF) Program is funded through HCD and provides matching funds to local and regional housing trust funds dedicated to the creation, rehabilitation, or preservation of affordable housing, transitional housing, and emergency shelters. Funds are also used to provide down payment assistance for first-time homebuyers and is restricted for units with at least 55 years of affordability for households earning less than sixty percent AMI.

Mobile Home Park Rehabilitation and Resident Ownership Program (MPRRP) is administered by HCD and is used to finance the preservation of affordable mobile home parks by conversion to ownership or control by resident

organizations, nonprofit housing sponsors, or local public entities. Eligible applicants include mobile home park resident organizations, nonprofit entities, and local public agencies. Low-income residents of converted parks can apply for individual loans to the entity that has purchased the park.

Multifamily Housing Program (MHP) is administered by HCD and assists the new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower income households. Eligible applicants must have successfully developed at least one affordable housing project.

Predevelopment Loan Program (PDLP) provides predevelopment capital to finance the predevelopment costs of projects to construct, rehabilitate, convert, or preserve assisted housing projects with priority given to developments which are rural, located in the public transit corridors, or which preserve and acquire existing government-assisted rental housing as risk of conversion to market rates. Eligible applicants include local government agencies among others.

Section 811 Project Rental Assistance offers long-term project-based rental assistance funding from the U.S. Department of Housing and Urban Development (HUD) through a collaborative partnership among the California Housing Finance Agency (CalHFA), Department of Health Care Services (DHCS), Department of Housing and Community Development (HCD), Department of Developmental Services (DDS) and California Tax Credit Allocation Committee (TCAC).

Supportive Housing Multifamily Housing Program (SHMHP) provides low-interest loans to developers of permanent affordable rental housing that contain supportive housing units. SHMHP funds may be used for new construction or rehabilitation of a multifamily rental housing development, or conversion of a nonresidential structure to a multifamily rental housing development.

Veterans Housing and Homelessness Prevention (VHHP) Program is implemented by HCD and funds the acquisition, construction, rehabilitation, and preservation of affordable multifamily housing for veterans and their families to allow veterans to access and maintain housing stability. Eligible applicants include affordable housing developers who are partnered with appropriate service providers.

Local Assistance Programs

Housing Land Trust of Sonoma County (HLT) is a private, non-profit corporation founded in February 2002, with a goal of making housing affordable and to provide home ownership and opportunities to low- and moderate-income families in Sonoma County. HLT uses the Community Land Trust model (CLT), a model in which the organization owns real estate in certain areas within the City and provides access to land and housing for the local community who have been forced out of the housing market. Through this model, low and moderate-income families can purchase homes on affordable terms and lease the land beneath the home for 99 years. Homeowners can sell their homes if they decide to move and get a fair return for their investment and at the same time benefit potential homebuyers by keeping the price affordable.

The City of Cotati in partnership with Housing Land Trust of Sonoma County and Renew Now Homes have currently listed the Jamie Lane and Kessing Ranch available for purchase by qualifying applicants.

Fair Housing of Sonoma County (FHOSC) is a non-profit agency that is a designated provider of fair housing and supplies land-tenant information and referral service to all residents of Sonoma County.

Legal Aid of Sonoma County's Homeless Advocacy Project (HOME) is a program that assists low-income tenants of Sonoma County with eviction defense, Section 8 issues, mobile home park issues, and habitability problems.

The County Fund for Housing (CFH) provides financial assistance to develop, preserve and accelerate the development pace of affordable housing in Sonoma County. The CFH resources are used to provide loans and grants to qualified developers, public entities, groups, and individuals to undertake activities which create, maintain, or expand the County's affordable housing stock. CFH receives funds from multiple local sources, including, but not limited to County of Sonoma General Fund; County of Sonoma Reinvestment and Revitalization Funds; Developer In-Lieu Fees; Transient Occupancy Tax; and CFH loan processing fees, interest, and loan repayments.

4.3.2 Resources: Shelters, Transitional and Supportive Housing

The City will continue to seek sources of funding, including Emergency Housing Assistance Program through the County, to support transitional housing, and supportive housing by interested developers/operators to provide housing for homeless persons and households at-risk of homelessness.

The Sonoma County Community Development Commission (CDC) receives and administers federal block grant funds through the Consolidated Plan process that are used in the unincorporated County and participating cities to address the needs of lower income households, including the special needs and homeless populations. Cotati is a participant in the Urban County Consolidated Plan process and block grant programs. The CDC funds a variety of programs and shelters County-wide to address homelessness that provide short-term emergency housing assistance as well as long-term programs to transition from homelessness. These programs include Shelter Plus Care, Committee on the Shelterless, Community Support Network, and the Catholic Charities Homeless Services Center.

There are emergency shelters serving as general homeless shelters or transitional housing opportunities that are available to Cotati's homeless population. There are no homeless listings within the City limits but there are homeless shelters in Santa Rosa and Petaluma that provide help to Cotati's homeless population.

In 2015, the City partnered with Catholic Charities to provide space and facilities for a pilot Safe Parking program. Additionally, the City operates a mental health crisis

responses team Specialized Assistance for Everyone (SAFE) in conjunction with the City of Rohnert Park.

The City continues to investigate other possible opportunities to partner and expand services. There are several state licensed neighborhood facilities in the City.

In 2019, the County CDC purchased a three-unit property within Cotati (8190, 8192, and 8194 Arthur Street) to provide supported transitional housing to residents.

A Step Up – Cotati is a live-in program providing an 11-bed home where residents can live for up to 3-12 months in a safe and supportive environment. The place allows them to improve their emotional and physical health, while learning positive coping skills on the path to recovery and independence.

4.3.3 At-Risk Assisted Housing Developments

Pursuant to Government Code § 65583, at-risk assisted housing developments refer to any existing multi-family, rental housing complexes which receive funding under public programs and are at risk of being converted from low-income housing to market rate housing within ten (10) years of the housing element planning period. The conversions can occur due to termination and opting out of programs such as rental subsidies, mortgage repayment, expiration of restricted uses or direct loans.

The City of Cotati contains a total of 147 low-income units, none of which are at risk of being converted to market rate units within the planning cycle (ABAG, 2021). Affordability restricts were renewed in December 2022. Affordability restrictions were renewed in December 2022 for 28 units of affordable housing that were recently at-risk.

4.3.4 Planning and Zoning Incentives

AB 2345 provides developers with density bonuses or other incentives in exchange for the provision of affordable housing units included within the development which meets certain requirements. As of January 2021, up to a 50% density bonus can be approved for housing projects consisting of a combination of affordable and Above-moderate homes. The legislation also reduces specific thresholds for obtaining approvals and allowances from local jurisdictions, requires density bonus reporting, and reduces parking obligations for many projects qualifying for a density bonus. To qualify for the density bonus developments must include (a) at least eleven percent (15%) of the total units are for very low-income households, (b) at least twenty percent (24%) of the total units are for low-income households, or (c) at least forty percent (44%) of the total for-sale units are for moderate-income households. The density bonus applies to housing development of five or more dwelling units.

The City of Cotati requires developers to construct housing in which at least 15% of the total number of proposed units are for lower income households. The affordable units must be built on-site in developments with 10 or more units; smaller

developments can meet the affordable housing obligation by paying an in-lieu fee. The density bonus is available to help to offset these costs when the units are provided on-site.

Density Bonuses

The City's current density bonus provisions are as follows:

- General Density Bonus: The City grants at least a 20% increase in the number of dwelling units, up to a maximum of 35%.
- Bonus for Condominium or Planned Development Project: The City grants at least a 5% increase in the number of dwelling units, up to a maximum of 35%.
- Density Bonus for Land Donation: An applicant is granted at least a 15% density bonus for the entire development when donating land to the City, up to a maximum of 35%.
- Senior Housing Density Bonus: The City shall grant a density bonus that is 20% of the number of senior housing units.

Program 3-1 (Zoning for A Variety of Housing Types) will bring the City into compliance with changes to the State's Density Bonus Law.

Affordable Housing

The City of Cotati prioritizes access to healthy, safe, and affordable housing for all its residents. As part of this effort, the City formed a strategic partnership with several experienced housing service providers including the Housing Land Trust of Sonoma County (HLT) and the Sonoma County Community Development Commission (CDC) to develop and administer a variety of affordable housing programs.

The City's Inclusionary Housing Policy requires all residential projects of 10 units or more to allocate 15% of the homes to families and individuals that are under either "Very-Low," "Low" or "Moderate" Income level.

Local Processing and Permit Fees

Applicants need to obtain the building permit form either online or in physical form and fill it out. Completed permit form is sent to the Community Development Department office by email or mail and then after the permit is received, it will be evaluated by the department and an applicant is provided the permit number and the amount due. After paying the due amount, the applicant will receive the approved permit and scheduled inspections will be conducted.

Like all other California jurisdictions, Cotati collects permit and processing fees to cover the costs of the services it provides (i.e. building permits, planning entitlements) as well as collecting development impact fees to cover the costs of capital improvements necessary to accommodate and provide services to new homes (i.e. impact fees for traffic and parks), as reflected in the Tables below.

In general, fees to construct a large single-family home are about \$10,000 higher than the fees to construct a multi-family home. As a percentage of development costs, fees constitute about 14% of the development costs for a single-family home in Cotati, and about 12% of the development costs for a multi-family home. These fees were not determined to pose a constraint to development. However, the City's current practice of charging some impact fees on a per-unit cost (traffic, parks) may not adequately reflect the expected lower impacts from smaller residential units as required under AB 602. Program 5-4 will ensure that the City bases its impact fees on units site, which will lower overall development costs for multi-family units.

	SFD on existing lot	SFD w/subdivision		Multifamily
Entitlements	Administrative Design Review Building permit	Subdivision map Final map CEQA (assumes IS/MND) Design review Building permit		Design review, CEQA (assumes IS/MND) Building permit
Typical processing time	30-days	8-12 months		3-8 months
Est. Fees per project	\$1,993	\$8,767		\$7,333
Entitlements		\$16,070		6000
		\$7,333		\$2,184
		6000		
		\$2,184		
Subtotal per unit	\$1,993	\$2,018		\$310

\$600k SFRs
Subdivision 20 units
MF 50 units \$350k valuation

Impact Fees	\$59,599	\$59,599		\$50,552
Building Permit	1%-2% of construction valuation	1%-2% of construction valuation		1%-2% of construction valuation
Total	\$61,592	\$61,616		\$50,863

DEVELOPMENT IMPACT	
Application Type	Fee/Deposit Amount
AFFORDABLE HOUSING IN-LIEU	Based on sales price of unit, calculated as follows: \$2,400 first \$125,000 of sales price +\$200 for each \$5,000 increment thereafter
BED TAX (all new residential construction)	
a. 2 bedrooms	\$350
b. 3 bedrooms	\$400
c. 4 or more bedrooms	\$450
LINKAGE*	
a. Commercial	\$2.19/sf
b. Industrial	\$2.26/sf
c. Retail	\$3.77/sf
	Please note that new construction less than 2,000 sf, and the first 2,000 sf of any commercial project is exempt. There are additional exemptions, please check with the Community Development Department.
PARK IN-LIEU	Calculated according to the following formula: $DUs \times Population/DU \times 5 \text{ acres}/1000 \text{ population} \times \text{Fair Market Value}/\text{Total Acres of Project Site} = \text{Subtotal} \times 6/5 = \text{In Lieu Fee}$
TRAFFIC*	
a. Residential	\$6,726.01/ unit
b. Commercial	\$7,099.33/ 1000 sf
c. Restaurant	\$10,795.48/ 1000 sf
d. Industrial	\$3,904.52/ 1000 sf
e. Office	\$4,788.95/ 1000 sf
f. Hotel	\$,5182.87 /room
SEWER CONNECTIONS (based on meter size)	
a. ¾-inch	\$16,638
b. 1-inch	\$27,787
c. 1.5-inch	\$55,407
d. 2-inch	\$88,685
e. 3-inch	\$148,103
f. 4-inch	\$282,858
	Applicable to all customer classes. Fees for multi-family projects will be charged on the size of the water meter.
WATER CONNECTIONS* (based on meter size)	
a. ¾-inch	\$8,920.96
b. 1-inch	\$14,897.10
c. 1.5-inch	\$29,706.32
d. 2-inch	\$47,548.23
e. 3-inch	\$89,206.43
f. 4-inch	\$151,652.08
g. 6-inch	\$294,383.21
	All customer classes based on meter size.
WATER CONSERVATION	
a. New Residential	\$1,750/unit
b. Industrial/Commercial/Mixed Use	\$1,500/acre
FIRE SYSTEM CONNECTION	Per resolution 2016-68, this fee is included in the water connection fee.

Source: Master Fee Schedule 2021, City of Cotati

4.4 HOUSING CONSTRAINTS ANALYSIS

This section of the Housing Element examines the constraints that could hinder the City's achievement of its housing objectives and the resources that are available to assist in the production, maintenance, and improvement of the City's housing stock.

4.4.1 Non-Governmental Constraints

In compliance with Government Code § 65583(a)(6), the following section analyzes potential non-governmental constraints:

Vacant Land

There is remaining vacant land within available the City, including land in areas zoned for lower densities, higher densities, and mixed-use development, and a range of lot sizes. The availability of vacant land allows for the development of additional housing in the City without the need for redevelopment and does not pose a constraint.

Land Costs

The financial infeasibility, economic fluctuations, succession of post-2017 emergency situations, and lack of appropriately zoned land have contributed to the slow pace of house production in Sonoma County over the past few years. In addition, the COVID-19 pandemic has put additional pressure on the local market and worsened the housing shortage. The market is still impacted by the 2017 Tubbs Fire and subsequent wildfires including the 2019 Kincaid Fire. The number of lots for sale has increased from 5088 in 2018 to 6563 in 2021. The land cost as a share of the property value at 35% in Sonoma County is lower relative to other California counties.

Land recently listed for sale in Cotati consists of lots smaller than an acre with access to utilities. The average price of vacant land in Cotati was \$976,318 per acre as of August 2022, according to LoopNet. The lot with the highest cost per acre is located near the SMART station and has existing approved plans for multifamily development and the lot with the lowest cost per acre is located on the outskirts of town, primarily near other vacant lots and commercial uses. While land costs are high, they do not pose a significant constraint to the development of housing in Cotati.

Construction Costs

According to local stakeholders in the development community, hard costs for residential construction typically start around \$400 per square foot. Construction costs vary based on the type of development. Construction costs for stacked flats start as low as \$250 per square foot. Disruptions in supply chains have exacerbated construction costs and further constrained housing development. Stakeholders also expressed that the unpredictability of construction costs was a constraint to the development of housing, especially for projects relying on tax credits or similar affordable housing funding sources. The cost of construction affects the affordability of new housing and is a significant nongovernmental constraint to housing in Cotati.

Financing

Financing is one of the most crucial factors considered in the provision of adequate housing for all sectors of the population. The availability of finance is influenced by factors beyond the local government's control, such as bank and investor capital levels, borrowers' creditworthiness, and investors' willingness to provide capital for real estate.

Lenders typically prefer a 20-percent down payment on a mortgage loan. Prospective buyers, who might be able to support an 80-percent loan, often do not have the financial resources to make the required down payment. Lenders will sometimes loan up to 90 percent of the asking price, but an applicant's credit is much more closely scrutinized, and monthly payments and monthly income requirements are significantly higher. Consequently, financing can pose a major obstacle for first-time or moderate-income homebuyers, even for those who might otherwise qualify for a standard loan.

There are three government-insured types of home loans. They are USDA loans, VA loans, and FHA loans. USDA loans are provided based on the rural Development rural area requirements. USDA loans have nine different multifamily housing programs that provide rental assistance for lower-income tenants and are geared toward financing projects related to the development, rehabilitation, and preservation of affordable homes for low-income, elderly, disabled people, and domestic farm laborers. FHA loans are provided by the Federal Housing Administration. This program is managed by the federal government's Department of Housing and Urban Development (HUD). For Californians, there is the CalHFA and CalPlus under the FHA loan program.

Mortgage interest rate has fluctuated below 5% since 2010. The highest average rate recorded was 4.69% in 2010 and the lowest rate was 2.96 in 2021. The data shows a trend in average mortgage interest rates, in which every two years it adjusts to either surpass or fall below 4%, as shown in Table 17.

Table 17: Average Mortgage Interest Rates 2000 – 2022



Source: Freddie Mac, 30-year fixed mortgage rates and points. Retrieved from <https://www.freddiemac.com/pmms/pmms30>

Development Trends

The La Plaza View Mixed-Use development is an entitled mixed-use project in downtown Cotati. It is located on the vacant parcels along East Cotati Avenue between Charles Street and La Plaza. The proposed project has two three-story buildings and includes 27-29 residential units. A separate density bonus project under ministerial consideration utilizing Senate Bill 35 (SB 35) streamlining provisions, has also been proposed on this site.

Cotati Village is part of the larger Cotati commons project, previously known as South Sonoma Business Park. This proposed project was originally envisioned in 2002 to develop 35-acres of land with 15-acres allotted to retail, offices, and corporate facilities. After conducting an environmental impact study, the City proposed an alternative project and adopted “The Orchard Plan Alternative” in May 2001, which includes 13.36-acres of mixed and retail use, and 50 residential units. Subsequently, in 2021, a horizontal mixed-use project proposing 7,000 square feet of commercial space and approximately 170 multi-family apartment projects was submitted and is under review by City staff.

The Kessing Ranch Subdivision is a new single-family development located at the corner of Old Redwood Highway and Valparaiso Avenue. The project has 7 units for sale affordable homes out of the 42 units available. Construction was completed in 2022 with all units being occupied.

Cotati Station is a 98-unit multifamily apartment project in the Santero Way Specific Plan area, adjacent to the SMART rail station in Cotati. This project benefited from a 100% density bonus granted by the Cotati City Council and is anticipated to break ground in late 2022.

While multifamily housing units comprised only 31% of Cotati’s housing units at the end of 2017, recently approved and constructed projects will increase this proportion significantly.

State law allows single-family homes to build at least one accessory dwelling unit (ADU) and one junior accessory dwelling unit. In compliance with the state law, Cotati Municipal code Chapter 17.42.170 articulate ADU and JADU procedures and development standards. Additionally, the City’s Cottage Housing Ordinance allows missing middle housing types on most residential lots in the City, and grants increased density for qualifying projects. These ordinances play a significant role in addressing the growing housing shortage and promotes individual homeowners to contribute to increasing the housing supply in the City over the coming years.

Community Opposition

Residents of Cotati have at times expressed concern about housing developments that would change the “community character” or appearance of their neighborhoods, especially in single-family areas. However, when these concerns have been addressed, they have generally resulted in a better project and have not stopped the

development of housing projects in Cotati. Community members appear to be generally supportive of affordable housing, mixed-use development, senior housing, and transit-oriented development. Although this has not happened in recent memory, community opposition within the California Environmental Quality Act (CEQA) review process can pose a constraint to development. The CEQA process does add time, uncertainty and cost to the approval and construction of housing development. Programs will remove discretionary review procedures where appropriate, reducing the opportunities for community opposition to serve as a constraint to housing development while affirmatively further fair housing choice.

4.4.2 Potential Governmental Constraints

Governmental constraints are policies, standards, requirements, or actions imposed by the various levels of government upon land and housing ownership and development. Although federal and state agencies play a role in the imposition of governmental constraints, these agencies are beyond the influence of local government and are therefore not addressed in this document.

General Plan and Zoning Code

Each jurisdiction in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of the General Plan establishes the basic land uses and density of development within each jurisdiction. Under state law, the General Plan elements must be internally consistent, and each jurisdiction’s zoning must be consistent with its General Plan. Thus, the Land Use Element must provide suitable locations and densities to implement the policies of the Housing Element.

The City of Cotati’s General Plan was updated in 2015 to guide development for the next 20 years. The City’s land use regulations are codified in Chapter 17.22 of the Cotati Municipal Code and include allowable land uses and planning permit requirements for residential, commercial, mixed use, specific plan, and other district areas. The various district zones allow for a variety of housing including multi-family housing up to 100 units, residential care facilities, mobile/ manufactured homes, live/work units, emergency shelters, and ADUs, as shown in Table 18 and Table 19 below. Minimum and maximum densities are described within each zoning district.

Table 18: Allowable Land Uses for Low Density and Neighborhood District Zones

Housing Type	RR	RVL	NL	NM	NU	OSC
Minimum Density Permitted (units per acre)	N.A.	N.A.	4*	8*	12*	Max. 1 caretaker unit
Maximum Density Permitted (units per acre)	1	2	6	10	15	Max. 1 caretaker unit
Single-Family Dwelling	P	P	P	UP**	UP**	-

Accessory Dwelling Units	P	P	P	P	P	-
Junior Accessory Dwelling Units	P	P	P	-	-	-
Multifamily housing, 2 units	-	-	UP	P	P	-
Multifamily housing, 3 or 4 units	-	-	-	UP	P	-
Multifamily housing, 5 to 9 units	-	-	-	UP	UP	-
Multifamily housing, 10 or more units	-	-	-	-	UP	-
Multifamily housing, up to 100 units with 25%	-	-	-	-	P	-
Residential care facility for the elderly (RCFE)	UP	UP	UP	UP	UP	-
Residential care, 11 or more clients	UP	UP	UP	UP	UP	-
Residential care, 6 or fewer clients, in a single-family dwelling	P	P	P	P	P	-
Residential care, 7 to 10 clients	UP	UP	UP	UP	UP	-
Residential component of a mixed-use project	-	-	UP	UP	UP	-
Residential accessory use or structure	P	P	P	P	P	-
Caretaker quarters	-	-	-	-	-	UP
Cottage housing	-	-	S	S	S	-
Mobile Home Park	UP	UP	UP	UP	UP	-
Mobile/Manufactured Home	P	P	P	P	P	-
Rooming or boarding house	-	-	-	-	UP	-
Organizational house ¹	-	-	-	-	UP	-

Source: City of Cotati Municipal Code Chapter 17.22, 2022

RR = Rural Residential

RVL = Residential, Very Low Density

NL = Neighborhood - Low Density

NM = Neighborhood - Medium Density

NU = Neighborhood - Urban

OSC = Open Space, Conservation

OSR = Open Space, Recreation

P = Permitted Use, Zoning Clearance required

UP = Use Permit required

S = Permit requirement set by Specific Use Regulations

- = Use not allowed

** = No residential subdivision, or residential development project with multiple units on a single parcel (including the residential component of a mixed use project) will be approved at less than the minimum density; except that in the CE, CG, and CD zoning districts, the review authority may reduce the minimum density for a mixed use project where it determines that the minimum density is not feasible due to constraints on the parcel, including topography, easements, and access.*

*** = Use permit approval shall require that the review authority first find that the location of a proposed single-family dwelling on a parcel that may be further subdivided will not preclude future subdivision and development in compliance with the General Plan.*

¹ "Organizational house" means a residential lodging facility operated by a membership organization for its members and not open to the general public. Includes fraternity and sorority houses, student dormitories, convents, monasteries, and religious residential retreats.

Table 19: Permit Requirements for Mixed Use Corridors, Downtown Specific Plan Districts, and Other Districts

Housing Type	CE	CG	CD	CI	IG	PF	HC	LP	NG	CA
Minimum Density Permitted (units per acre)	12*	12*	12*	N.A.	N.A.	N.A.	Subject to Downtown Specific Plan – See Table 21			
Maximum Density Permitted (units per acre)	15	15	15	15	N.A.	N.A.				
Accessory Dwelling Unit	P	P	P	-	-	-	P	P	P	P
Residential care facility for the elderly (RCFE)	UP	MUP	-	-	-	UP	-	UP	UP	UP
Residential care, 7 or more clients	UP	-	-	-	-	UP	-	UP	-	-
Residential component of a mixed-use project	P	P	P	-	-	-	P	P	P	P
Emergency/transitional shelter**	-	-	S	-	-	S	S	S	S	S
Live/work unit	UP	UP	-	UP	UP	-	P	P	P	P
Home occupation	P	P	P	-	-	-	P	P	P	P

CE = East Cotati Avenue Corridor
CG = Gravenstein Highway Corridor
CD = Downtown Commercial
CI = Commercial/Industrial District
IG = General Industrial District
PF = Public Facility District

Downtown Specific Plan
HC = Historic Core
LP = La Plaza

NG = Northern Gateway
CA = Commerce Avenue
SUR = Specific Use Regulations P = Permitted Use, Zoning Clearance required
MUP = Minor Use Permit required
UP = Use Permit required
S = Permit requirement set by Specific Use Regulations
- = Use not allowed

* = No residential subdivision, or residential development project with multiple units on a single parcel (including the residential component of a mixed use project) will be approved at less than the minimum density; except that in the CE, CG, and CD zoning districts, the review authority may reduce the minimum density for a mixed use project where it determines that the minimum density is not feasible due to constraints on the parcel, including topography, easements, and access.
** = Emergency shelters are allowed by right; Specific Use Regulations relate to management standards and other use standards discussed in Section 4.2.3.

Density

According to the City’s General Plan, higher density is intended to concentrate in central locations and decreases as one goes further from the City core towards the urban growth boundary (UGB) and sphere of influence (SOI). This is reflected in Chapter 17.22 of the City’s Municipal Code as density limits typically range from four (4) units per acre in NL (Neighborhood – Low Density) zones to fifteen (15) units per acre in NU (Neighborhood Urban), CE (East Cotati Avenue Corridor), CG (Gravenstein Highway Corridor), CD (Downtown Commercial), and CI (Commercial/Industrial District) zones. There are no acreage-based residential density limits for certain mixed-use corridors, including the Downtown Specific Plan and other overlay districts, as shown above. Density limits for these zones are subject to the provisions of their respective plans and supporting CEQA analysis.

The Downtown Cotati Specific Plan describes five main district zones, four of which allow residential and mixed uses. The Specific Plan encourages high density residential development based on development standards such as maximum allowable dwelling units, maximum building height, and FARs. For example, HC (Historical Core) district allows a maximum of 71 dwellings, 35-ft. maximum height, and FAR of 2.15.

Cotati’s live/work unit provisions allow for the re-use of existing structures subsequent to an environmental assessment (CMC 17.42.090), essentially allowing adaptive reuse for workforce housing. Live/work units are allowed a maximum density of 15 units per acre and are not applicable to affordable housing requirements

and incentives. This provision limits allowable units based on acreage rather than maximizing units based on the building envelope.

Development Standards

Zoning regulations establish certain development standards that implement the goals, policies and programs of the land use element as described in the City's General Plan. Specific development standards include allowable lot coverage, minimum lot area, setback requirements, building height, and street-side building distances. Table 20 below illustrates development standards for residential and commercial zoning districts.

Table 20: City of Cotati Development Standards

	Zoning District	Minimum Lot Size (Sq. Ft.)	Minimum Lot Width (Feet)	Maximum Building Height (Feet)		Minimum Front Yard Setback (Feet)	Minimum Side Yard Setback (Feet)		Minimum Rear Yard Setback (Feet)	Maximum Lot Coverage (Percent)
				Primary	Accessory		Interior	Street Side		
RESIDENTIAL	RR	65,340 for RR-1.5 zone 43,560 for RR-1.0 zone	100 100	28	12 ¹	25	10	20	20	30% on a 0.5-acre parcel; reduced by 10% for each additional 0.5 acre to a minimum of 10%
	RVL	28,750 for RVL-0.66 zone 21,780 for RVL-0.5 zone	100 100	28	12	25	10	20	20	Same as RR
	NL	6000	60	28	12	20	7 ft. (one side) 5 ft. (the other side)	10	20	40%
	NM	5000	50	28	12	20	5 ft.; 10 ft. for multifamily structures; none required for rowhouse units	10	20	50%
	NU	3500	45	28 ft.; 35 ft. with use permit	12	15	10 ft. for 1-story building walls; 15 ft. for 2-story building walls; none required for rowhouse units	15	15	60%
	OSC	Determined via subdivision review	N.A	35	25 for parcels ≤1 acre 28 for parcels >1 acre	30	20	30	30	5%
COMM	CE	6000	60	35 ft.; 45 ft. with use permit; or 45 ft. in compliance with Section 17.30.040(D) ²		10 ft. for street side ³	10 ft. abutting a residential zone, none required otherwise	Varies ⁴	20 ft. abutting a residential zone, 10 ft. required otherwise	80%

M E R C I A L	CG	10,000	100	35 ft.; 50 ft. with use permit; or 45 ft. in compliance with Section 17.30.040(D)	0 ft.; except that the build-to-line along the Gravenstein frontage shall be 30 ft. from the highway right-of-way	10 ft. abutting a residential zone, none required otherwise	Varies ⁴	20 ft. abutting a residential zone; 10 ft. required otherwise	80%
	CD	2000	20	35 ft.; 50 ft. with use permit; or 45 ft. in compliance with Section 17.30.040(D)	0 ft.; 15 ft. on Arthur, Charles, Henry, and William Streets, and East Cotati Avenue, in compliance with the La Plaza Specific Plan	10 ft. abutting a residential zone, none required otherwise	Varies ⁴	10 ft.	100%
	CI	10000	100	40 ft.	20	20 ft. abutting a residential zone, none required otherwise	20	30	80%
	IG	10000	100	20 ft. if located within 50 ft. of a residential zone, 40 ft. elsewhere	20	0	20	30	80%

Source: City of Cotati Municipal Code Title 17, 2022

¹ Greater height allowed for accessory structures where authorized by minor use permit (17.42.160).

² Mixed Use structures in CE, CG, and CD zones may exceed maximum height limit to three (3) and forty-five (45) feet if the upper stories are residentially exclusive with a minimum 50% reserved as affordable to lower and moderate-income households.

³ Build-to-Lines require that buildings have at least 80% of the street-facing façade abutting the build-to-line (required location of new structures). The Build-to-Line may be waived for projects with more than one building where the frontage is occupied with more than one building (17.30.020).

⁴ Street side of a corner parcel is measured from whichever of the following points results in the greatest setback from an existing or future roadway: 1) The nearest point on the side property line bounding the street; 2) edge of an easement for a private road; 3) inside edge of the sidewalk; or 4) boundary of a planned future right-of-way (17.30.020).

Residential development standards for the City’s Specific Plan areas are shown in Table 21 and Table 22. These areas are regulated by Form Based Codes, with no density limits. Realistic densities for these zones are based on land use controls and are listed in the following tables.

Table 21: Development Standards in Downtown Cotati Specific Plan Area

Zone	Setbacks	Parking	Height	Realistic Density
HC	Front: 0’-5’ Side Street: 0’-5’ Sideyard: 0’ or 5’ Rear: 20’ Alley: 2’	1.5 spaces/unit	35’	25-30 units/acre*
LP	Front: 0’-8’ Side Street: 0’-12’ Sideyard: 0’ or 10’ Rear: 20’ Alley: 2’	2 spaces/ unit	35’	20-30 units/acre*
NG	Front: 0’-10’ Side Street: 0’-12’ Sideyard: 0’ or 10’ Rear: 10’ Alley: 2’	2 spaces/ unit	50’	25-35 units/acre*
CA	Front: 0’ Side Street: 0’ Sideyard: 0’ Rear: 15’ Alley: 2’	2 spaces/ unit	35’	25-30 units/acre*

*Based on La Plaza View; See Table 11 of Housing Element Section 3.

Table 22: Development Standards for Santero Way Specific Plan

Use Type	Setbacks	Height	Max Lot Coverage	Realistic Density
Single-Family	Front: 8’-12’ Rear: 4’ Side: 9’-14’ from street ROW 5’ from lot line 10’ from Specific Plan property line for the first floor and increased by 5’ for each additional story	35’ 2.5 stories	50%	6-12 units/acre
Duplex	Front: 8’-12’ Rear: 4’ Side: 9’-14’ from street ROW 5’ from adjacent lot line	35’ 2.5 stories	60%	12-15 units/acre

	0 built-to line at continuous unit lot line 10' from Specific Plan property line for the first floor and increased by 5' for each additional story			
Townhome	Front: 8'-12' Rear: 4' Side: 9'-14' from street ROW 5' from adjacent lot line 0 built-to line at continuous unit lot line 10' from Specific Plan property line for the first floor and increased by 5' for each additional story	35' 2.5 stories	70%	18-20 units/acre*
Live/Work	Front: '-12' Rear: 4' Side: 9'-14' from street ROW 5' from adjacent lot line 0 built-to line at continuous unit lot line 10' from Specific Plan property line for the first floor and increased by 5' for each additional story	35' 2.5 stories	70%	20-25 units/acre*

* Based on existing projects

The City's development standards are generally conducive to increased building density for residential development. Mixed use structures in commercial areas are allowed height increases if affordable units are provided and are allowed to build to the front and side yard setbacks to maximize buildable parcel space.

The Downtown Specific Plan contains urban development standards that are unique to the four districts including building placement, height, types and façades. Development standards are similar to the City's standards for CE, CG, and CD zones. For example, 0' front setbacks and 35 feet in height (50 feet for the NG district) are allowed.

While the City's standards allow for increased building density for residential development, the City's code includes design standards for streetscapes (trees, façade, setbacks) to allow for sunshine, airflow, and space that promotes public health and safety (Chap. 17.26). The City established unique and place-based setback standards such as the build-to-line requirements to maintain a cohesive streetscape. The setbacks for proposed buildings in the Specific Plan will effectively shape the public space of streets, enhancing the comfort and convenience of residents and pedestrians. The City's development standards promote building mass

that accommodates residential units and do not serve as a constraint to housing development.

Parking Requirements

Sufficient parking for vehicles is a necessity for most Sonoma County residents. However, if parking requirements are excessive, they can reduce the feasibility of developing new housing at the densities necessary to provide affordable housing. The City’s Municipal Code establishes off-street residential parking standards, as summarized in Table 23.

Sites with multiple tenants have aggregated parking standards for each separate use. Multi-tenant centers can share parking requirements with adjacent non-residential use centers. More residential parking can be provided, but projects are encouraged to not “overpark” by supplying more parking than is necessary.

Parking reductions of up to 15% are available provided that the applicant/ property owner provides sufficient evidence that justifies the request (17.36.080). Other allowable reductions include a waiver of covered parking for affordable units. Additionally, residential portions of horizontal mixed-use development may provide parking equivalent to multifamily dwellings with no guest spaces. The same applies to vertical mixed use, but a 30% reduction in spaces is allowed in these cases.

The parking requirements are consistent with those of other suburban communities in the North Bay. The City’s parking reductions and shared parking allocations allow flexibility in modifying parking requirements, especially in mixed-use areas with high density. Overall, the City’s parking requirements do not pose a significant or unique constraint to housing production. A revision to the Municipal Code is included in Program 3-1 (Zoning for A Variety of Housing Types) to implement the Government Code §65915 required parking maximums for all multifamily projects without need for a special request. This will further reduce the potential for parking requirements to pose a constraint on new housing development.

Table 23: City of Cotati Parking Requirements

Type of Residential Use	Required Parking	Additional Comments
Accessory Dwelling Unit (ADU)/ Junior ADU	1 space per unit	On-site parking not required per Section 17.42.170.
Condominium dwelling units	2 covered spaces within a garage or carport for each unit	
Guest parking	1 space per four (4) units	
Live/work units	2 spaces per unit	
Individual mobilehomes	2 spaces for each unit	at least 1 within a garage or carport

Mobilehome parks	2 spaces for each mobilehome	plus 1 additional space for each 4 mobilehomes shall be provided for guest parking throughout the park
Multifamily Residential (MFR): Studio units and one-bedroom units	2 spaces per unit	at least 1 within a garage or carport
MFR: Two- and three-bedroom units	2 spaces per unit	at least 1 within a garage or carport
MFR: Four-bedroom units and above	2 spaces per unit	or less as required by the review authority. At least 1 space shall be within a garage or carport
MFR: Guest parking	1 space for each four (4) units	
Organizational house	1 space for each bedroom	
Residential Care Home (RCH): Six or fewer clients	2 covered spaces within a garage or carport.	
RCH: Seven or more clients	1 space for each 2 beds	1 space for each 4 beds for guests and employees
Residential development with density bonus	1 space per studio to 1-bedroom 2 spaces per 2-3 bedrooms 2.5 spaces per 4+ bedrooms	
Rooming or boarding houses	1 covered or uncovered space for each bedroom	
Senior housing projects	1 space for each two (2) units, with half the spaces covered	1 guest parking space for each 10 units. Reduced parking may be provided
Single-family dwellings	2 covered spaces within a garage or carport	
<i>Source: City of Cotati Municipal Code Ch. 17.36, 2022</i>		

Growth Controls

Growth controls are typically established through urban growth boundaries (UGBs) which allow local governments to manage the urbanization of undeveloped land, and growth management ordinances (GMOs) which set a cap on the annual number of units produced. A phased approach to growth controls can effectively conserve open space while balancing housing needs. However, low allocations and excessive limitations can constrain development that prevents jurisdictions from producing their fair share of housing. Every incorporated jurisdiction in Sonoma County has

enacted UGBs that are accompanied by countywide community separators for open space, but many GMOs have been invalidated by recent legislation.

Urban Growth Boundary (UGB)

The City adopted a UGB on November 1998 by a voter-approved measure further described in Policy LU 1.8 of the General Plan. A supermajority (69.5%) of residents voted in favor of Measure Q (2016) to extend the UGB for another 20 years.

The City's General Plan established criteria to allow amendment of the UGB under a majority vote, as described below:

- No more than 10 acres of land shall be incorporated into the UGB to accommodate residential uses;
- Does not result in unconstitutional taking of private property;
- Development of a public park, public school, public facility, public open space or other projects are necessary to promote public health, safety, and welfare;
- Exempt projects with vested rights.

The City Council must make supportive findings that demonstrate the need for expanding the existing UGB.

Growth Management Ordinance (GMO)

Growth management provisions are codified in Chapter 17.52 of the City's Municipal Code and describe allocation measures, procedures, and monitoring of unit allocations.

Under Cotati's existing growth management program, a maximum of one hundred (100) units are allocated annually, at least twenty-five (25) of which must be exclusively available for low and very low-income households and ten (10) of which are reserved for detached single-family dwellings on individual parcels. Units which were not allocated may be carried into the subsequent years where adequate water and sewer infrastructure capacities are available. The 100-unit annual allocation limit has never been reached in Cotati.

A growth management allocation is required for all non-exempt residential development prior to building permit issuance. Remodels, additions to existing residences, and ADUs/JADUs are exempt from allocation requirements. Additionally, any dwelling units provided in compliance with a Specific Plan may be exempted at the discretion of the City Council (CMC 17.52.020).

Unused allocations may be rolled over for up to three years, for a total of 300 units. With a maximum of 1110 allowable units in the 6th Cycle, the growth management controls do not appear to pose a constraint and prevent the City from fulfilling its RHNA of 234 units. However, the provisions of SB 330 (2019) likely restrict use of the City's existing growth management program because it was not voter-approved prior to 2005. Program 2-2 (Streamlining Housing Development) is included in this

Housing Element to bring the City into compliance with current statute. The City does not actively administer or monitor its growth management program; as such, it does not serve as a constraint to development.

Specific Plans

Specific Plans contain place-based development standards and a policy framework that implements the goals and policies of the City's General Plan per Gov. Code § 65450-65457. Specific plans allow for expedited review of development projects that are consistent with adopted Specific Plans. However, Specific Plans could also pose a constraint to housing production if the standards are too strict or require additional reviews that lengthen the permit approval process.

The City's Specific Plan provisions are codified in Chapter 17.28 of the Cotati Municipal Code. Special plans in Cotati are listed below:

- **Downtown Cotati Specific Plan:** A 59.5-acre planned development with 450 maximum residential units, 418,000 sq. ft. of non-residential space, and designated open space at La Plaza Park. The plan contains five distinct districts: historic core (HC), La Plaza (LP), Northern Gateway (NG), Commerce Avenue (CA), and Parks (P). A variety of housing is encouraged including...courtyard housing (retail/commercial first floor and residential flats or townhouses above), duplex/ triplex/ quadplex, and rowhouses. The plan utilizes use standards (setbacks, parking requirements, maximum dwellings, max. non-residential sq. ft., max. bldg. height, FAR) that are unique to each district to regulate development intensity and spatial form of the urban fabric. Maximum height limits average 35 feet, parking requirements range from 1.5-2 spaces per residential unit, and lots require a 10-20-foot rear yard setback to an alleyway with 0-foot front yard setback to enhance pedestrian-scale environments. The NG District allows a maximum height of 50 feet with step back features on upper floors to minimize massing while emphasizing mixed core development. This includes first floor commercial and primary residential uses above. The plan was adopted on August 26, 2009.
- **Santero Way Specific Plan:** A 22.45-acre area proposing 198 residential units, 230,000 sq. ft. of commercial space, and 9,000-20,000 sq. ft. of retail space. There are nine (9) property owners for the varying land use districts: retail mixed-use, office mixed-use, public park and plaza, residential, and self-storage overlay. The Specific Plan encourages a variety of housing types and describes each housing type's development standards per land use district. For example, SFRs, duplexes, townhomes and live/work units are allowed a 0-foot contiguous lot-line side yard setback while meeting building codes to allow for increased density. The plan encourages courtyards that cluster residences among a shared open space concept that also allows for increased density. Co-housing is allowed under a conditional use permit. Additionally, 15% of units within each district must remain affordable per the City's inclusionary housing ordinance. The plan was adopted and amended in August 2001.

Cotati's Specific Plans aim to provide a variety of housing types in mixed use districts while maintaining a pedestrian-scale environment. The plans encourage walkability while planning for automobile-oriented development such as the CA district in the Downtown Specific Plan. While the Specific Plan development standards allow for increased density, parking requirements have the potential to reduce achievable densities. Program 2-2 (Streamlining Housing Development) is proposed to address this potential constraint.

Streamlined & By-Right Development Applications

Pursuant to Government Code § 65913.4, the City of Cotati processes affordable housing projects through the Affordable Housing SB 35 Project Supplemental Application, which is submitted concurrently with the Master Plan Project Application. This application process allows any proposed housing projects that provide on-site affordable units for households making less than 80% AMI to be eligible for permit streamlining, given that the project meets certain criteria. The streamline approval process allows ministerial review and omits CEQA analysis requirement along with CUPs or other discretionary entitlements. The criteria include:

- Consultation with Native American tribes by submitting a notice of intent;
- Stated number and type of units of at least two residential units or more and minimum and maximum density ranges, including any applicable density bonus;
- Affordability of units to be incorporated utilizing City's Municipal Code provision of a) at least 10% total units for households making less than 80% AMI if more than 10 units proposed, or b) at least 20% total units for households making less than 120% AMI, and should be deed restricted to maintain affordability period;
- Conforms with General Plan and zoning districts as an allowable use;
- Perimeter of the site is surrounded by at least 75% urban development including, but not limited to, residential, commercial, public institutional, transit corridor or transportation passenger facility, or retail use;
- Not located on farmland, wetlands, fire severity areas, hazard waste sites, delineated earthquake fault zones, FEMA-designated floodway or flood hazard area, conservation lands, protected species habitat areas, and demolition of historic structures or existing residential uses;
- Not involving subdivisions unless under provisions of the Subdivision Map Act.

If the project complies with existing zoning and objective design standards, the property owner may volunteer to streamline their project through the SB 35 permit approval process upon provision of 50% affordable units. Program 2-2 (Streamlining Housing Development) establishes a clear process for developers wishing to utilize streamlining provisions in accordance with the City's zoning.

Housing for People with Disabilities

Persons with special needs, such as the elderly and those with disabilities, must have access to housing. Community care facilities provide a supportive housing environment to persons with special needs in a group environment. The City allows these facilities in the following zones:

- **Residential Care Home:** Residence for up to six persons allowed within existing structures in all residential zones with no administrative review. New construction requires the same administrative permit as a single-family residence.
- **Residential Care:** Residential facility for elderly/disabled persons with meals, housekeeping and activities for seven or more clients allowed in RR, RVL, NL, NM, NU, CE and PF with a CUP. Areas with appropriate access to amenities and services are the most suitable for residential community care facilities. Most of these areas are located within allowed zones. These facilities require a CUP as allowed by law to ensure land use compatibility and protect public health and safety. Residential care facilities are only subject to development standards for other residential developments of the same type in the same zone.

Under Program 3-1, the City will allow Residential Care Facilities for 7 or more clients with disabilities as a permitted use in residential zones, subject only to clear, transparent, objective standards. This program will facilitate approval certainty of this housing type.

- **Residential Care Facility for the Elderly:** Convalescent homes for elderly, disabled, and ailing persons allowed in CG with an MUP; in CE, PF, RR, RVL, NL, NM and NU with a CUP.

In the Cotati Zoning Code, "Family" is defined as an individual, or two or more persons related by blood, marriage, or adoption, or a group of unrelated persons who live together in a dwelling unit as an independent housekeeping unit, which may include use of common cooking facilities or shared household responsibilities. This definition is broad and inclusive and does not pose any constraints to housing for people with disabilities.

Building Codes and Enforcement

Americans with Disabilities Act (ADA) provisions include requirements for a minimum percentage of units in new multi-family developments to be fully accessible to the physically disabled and another percentage to be "adaptable" to being accessible to the physically disabled. Development of fully accessible and/or adaptable units may also increase the overall project costs. Enforcement of ADA requirements is not at the discretion of the City but is mandated under federal law. The provisions of the ADA applicable to residential uses would apply only to multi-family developments and any residential components of a live-work project in a Commercial Zone.

Compliance with building codes and the ADA may increase the cost of housing production. However, these regulations provide minimum standards that must be followed to ensure the development of safe and accessible housing. Therefore, the

local enforcement of these codes does not significantly constrain the development of housing.

Cotati enforces the 2023 California Building Code, and CalGreen Tier 1 is the most applicable local amendment. The enforcement of the 2023 Building Code and CalGreen Tier 1 amendment have not been identified as having any impact on housing supply and affordability in Cotati. These standards are consistent across most North Bay communities and allow the future cost of home ownership/occupancy to be reduced through lower utility bills (electricity, gas and water), and resulting in a reduced long-term cost of living.

Reasonable Accommodation

Under the ADA, cities must reasonably modify policies when necessary to avoid discrimination because of disability, unless they can show that the modifications “would fundamentally alter the nature of the service, program or activity.” (28 Code of Federal Regulations 35.130(b)(7).) In general, the law states that local agencies retain their ability to regulate land uses and to apply neutral, non-discriminatory regulations, but are required to make accommodations to allow persons with disabilities an equal opportunity to use and enjoy housing in the community.

The City of Cotati adopted its reasonable accommodation ordinance in Section 17.68, *Reasonable Accommodations for Persons with Disabilities*, of the City of Cotati Municipal Code. The Federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act implement part of the City’s General Plan Housing Element and provides a procedure for individuals with disabilities to request reasonable accommodation. The Reasonable Accommodation Ordinance states that that an individual(s) with disabilities have an equal opportunity to use and enjoy housing by allowing accommodation(s) with respect to certain City regulations, policies, procedures, and standards. The ordinance is enforced, if said accommodation(s) are both reasonable and necessary to provide such equal opportunity without compromising the City commitment to protecting community character and environmental quality. The City does provide reasonable accommodation for various scenarios, including but not limited to allowances for a wheelchair ramp in a required setback; an increase in building height to permit an elevator installation; or providing an applicant with additional time to submit material, if deemed reasonable under the Acts.

Requests for reasonable accommodation are subject to an administrative permit and are approved within 30 days. There is no fee to request reasonable accommodation. Upon review of an application, the Director of Community Development will grant the request based on the following findings:

- That the requested accommodation is intended to be used by an individual with a disability who resides or will reside on the property;
- That the requested accommodation is necessary to afford an individual with a disability equal opportunity to use and enjoy a residential use;

- The requested accommodation will not impose an undue financial or administrative burden on the City; and
- That the requested accommodation will not require a fundamental alteration in the nature of the land use and zoning.

The reasonable accommodations process is free, ministerial, and fast. It does not pose a constraint.

Development and Permitting Fees

Various permitting fees for housing development, as shown in Table 24, are charged by the agencies within the City of Cotati to cover the cost of processing, evaluating, and ensuring compliance. Per Government Code § 66020, the City is legally required to set permit and development fees in amounts that do not exceed and are equal to the cost of providing services associated with these fees. These fees are established at the time of imposition or project approval. The City’s fee schedule notes that some permit application fees are charged on a fixed fee basis, and some charged as a deposit based on the over-all costs incurred during the permit process, which is further discussed in the Local Processing and Permit Procedures section below.

Permit fees will vary based on the project’s scope of work, location, and discretionary fees required to entitle the project. Planning and engineering fees may vary significantly per project and thus are charged on a full-cost recovery basis after an initial deposit while most building permit fees will remain relatively similar. Other discretionary fees such as in-lieu costs for affordable housing or parking, affordable rental housing linkage, traffic impact, and development impact. After-the-fact permitting fees are two times the building permit fee. Permit types that are not listed usually incur an hourly cost of staff time.

Table 25 compares selected permitting fees from Cotati with jurisdictions of similar populations within Sonoma County. While there is significant variation between different types of permits in different jurisdictions, the fees required by the City of Cotati are generally within the range of fees required by comparable jurisdictions and therefore are not likely to pose a unique or significant constraint to housing development. Fees increase annually based on the San Francisco Bay Area Construction Cost Index, or similar consumer price index to account for inflation and are typical across other jurisdictions.

Table 24: City of Cotati Permitting Fees

Item/Permit Type	Fee
Administrative Permit	\$ 183 hourly
Annexation	\$ 7,684 initial deposit
Appeals	\$ 500
Conditional Use Permit	
Design Review Administrative Preliminary	\$ 1,993 \$ 6,000 initial deposit

Final	\$ 2,184 initial deposit
Development Agreement	
Environmental Review CEQA exemption Initial Study/ Mitigated Negative Declaration / Negative Declaration Initial Study/ Environmental Impact Report	\$ 183 hourly \$ 7,333 initial deposit to City staff + actual consultant costs and fees \$ 7,333 initial deposit to City staff + actual consultant costs and fees
General Plan Amendment	\$ 16,070 initial deposit
Hillside Development Permits	\$ 2,184 initial deposit
Limited Term Permits	\$ 1,000 initial deposit
Pre-Application Reviews Single-family homes (owner occupied) Formal conceptual plan review or preliminary (with written comments)	Determined by staff – actual cost \$ 2,406
Subdivisions Parcel Map Tentative Subdivision Map	\$ 8,737 initial deposit \$ 16,070 initial deposit
Time Extension	\$ 4,583 initial deposit
Tree Removal Initial five (5) trees ≥ 6 trees City Staff Review	\$ 50 each \$ 92 each \$ 733
Use Permit Minor Use Modification to previously approved Use Permit Major Use Permit	\$ 1,818 \$ 3,284 \$ 4,396
Variance Minor Major	\$ 1,467 \$ 3,667 initial deposit
Zoning Code/ Zoning Map/ PUD Amendment	\$ 11,000 initial deposit
Plan Check of Building Plans/ Permits	\$ 183 hourly
<i>Source: City of Cotati Master Fee Schedule, September 2022</i>	

Table 25: Permitting Fees in Cotati and Comparable Local Jurisdictions

City	Administrative Permit	Conditional Use Permit	Residential Design Review	Development Agreement
Cotati	\$350 (inspection of modification of service)	\$1,818-\$4,369	\$183-\$6,000	Actual Cost
Sebastopol	\$454	\$1,500 – \$3,000	\$347 – \$4,000	\$15,000
Cloverdale	\$630	\$3,070	\$4,430	\$5,910

Rohnert Park	\$803	\$ 2,731	\$1,638 residential remodel \$2,731 new residence	Actual cost of time & materials charged against an Initial Deposit as determined by staff
<i>Source(s): Cotati Master Fee Schedule, 2022; City of Rohnert Park Development Services – Planning Schedule of Fees and Charges, 2022; Cloverdale Master Fee Schedule, 2022; Sebastopol Master Fee Schedule, 2020.</i>				

Local Processing and Permit Procedures

Clear regulatory frameworks and straight-forward procedures for obtaining planning and building permits provide developers with consistency and realistic expectations that can significantly decrease expenses incurred during development that may otherwise delay project construction. Projects that must go through unclear and multi-layered permitting authorities can incur increasing project development costs, which ultimately is reflected in the amount of viably affordable units. Administrative processing of planning and building permits allows jurisdictions to apply the local municipal code and zoning ordinances that organize varying land uses within City boundaries.

Table 26: Timelines for Permit Procedures and Decision-Making Authority

Type of Approval or Permit	Typical Processing Time	Approval Authority	Appeal Authority
Conditional Use Permit	3-6 months	Planning Commission	City Council
Development Agreement	4-6 months	City Council	-
Design Review	3-8 months	Planning Commission	City Council
Variance	3-8 months	Planning Commission	City Council
Zoning Clearance	10 days	CD Director	Planning Commission
Major Subdivision	8-12 months	City Council	-
<i>Source: Cotati Community Development Department Staff September, 2022</i>			

Residential development requires zoning clearance, design review, and issuance of building permits. Depending on the type and location of development, other permits and approvals may be required, such as a conditional use permit. Conditional use permits are not required for multifamily development in any zoning district except Low Density Residential.

The City has not received any requests for lesser densities in recent history, and would not approve such requests due to minimum densities in a variety of zones.

Design Review

All projects must obtain design review approval for approval of a planning permit or building permit for new construction. Single-family dwellings can receive design review approval from the Community Development Director, with all other residential projects requiring design review from the design review administration and the Planning Commission. An application for design review is submitted along with the application for a planning permit. Each project must demonstrate that it does the following:

1. Complies with this section;
2. Provides architectural design, building massing and scale appropriate to and compatible with the site surroundings and the community;
3. Provides attractive and desirable site layout and design, including building arrangement, exterior appearance and setbacks, drainage, fences and walls, grading, landscaping, lighting, signs, etc.;
4. Provides efficient, safe, and visually attractive public access, circulation and parking;
5. Provides appropriate open space and landscaping, including the use of water-efficient landscaping, and native plants where appropriate;
6. Addresses site planning design considerations related to city services, traffic flows and patterns, and environmental conditions in a manner that ensures maximum aesthetic cohesiveness;
7. Is consistent with the general plan and applicable specific plans; and
8. Complies with any applicable city design guidelines, design standards, and/or design review policies.

There are existing objectives design standards in place for projects eligible for SB 35 streamlined ministerial approval. Under Program 2-2, the City will expand existing objective design and development standards for SB 35 projects to apply to multi-family, single-family, and mixed-use projects.

Historic Preservation

The State of California recognizes the historical significance or potential significance of two resources in Cotati: the Cotati Downtown Plaza and the Cotati Women's Improvement Club, both of which are located within the DSP area. There has been no systematic historic architectural survey of Cotati; however, 24 parcels, most situated on the Plaza, were listed in the 1991 La Plaza Specific Plan and Environmental Impact Report as containing possible historic buildings. Separate from CEQA, the City does not have a historic review process, or any designated historic districts.

4.4.3 Environmental and Infrastructure Constraints

Environmental Constraints

Housing development and sites considerations necessitate an evaluation of environmental constraints, and an understanding of the cost and feasibility of potential mitigations. Early identification and assessment of potential environmental impacts, usually conducted during the land acquisition and site design stage, limit the waste of time and financial resources for development projects. Multiple Federal and state laws, including the California Environmental Protection Act, the Federal Clean Water Act, the Federal Endangered Species Act, and the California Endangered Species Act, require developers and local governments to identify and address impacts on special-status species and protected habitats.

Government Code § 65302.1 requires local governments to adopt policies and programs for protecting the community from wildfire, flooding, seismic, geologic, and human-caused hazards in the Safety Element of the General Plan. Some of the policies addressed in Cotati's General Plan in relevance to mitigating hazard risks applicable to future development include, but are not limited to:

- **Policy SA 2.1:** Require new land development proposals to avoid unreasonable exposure to geologic hazards, including Earthquake damage, subsidence, liquefaction, and expansive soils.
- **Policy SA 2.2:** Ensure that all development and construction proposals are reviewed by the City to ensure conformance with applicable building standards.
- **Policy SA 2.4:** Development in areas subject to liquefaction, such as along East and West Cotati Avenues and Gravenstein Highway shall be reviewed by qualified soils engineers and geologists prior to development in order to ensure the safety and stability of all construction.
- **Policy SA 2.5:** Ensure that development on slopes over 10% grade complies with special building and grading restrictions
- **Policy SA 2.6:** Development and grading on slopes greater than 15% shall be prohibited
- **Policy SA 2.11:** Prior to the development of any new structures and any addition greater than 500 square feet in areas of moderate to high potential for expansive soils, a site-specific soil study shall be prepared.

Flooding, earthquakes, wildfire, and landslides are primary hazards that have the potential to affect future development in Cotati. The Downtown Specific Plan (DSP) Area, and the Santero Way Specific Plan Area, designated by the Association of Bay Area Governments (ABAG) as Priority Development Areas or Production Areas, are targeted for major redevelopments in the next five years. The DSP area is the only area that experienced localized flood hazards in the past. Between 2015 to 2019,

permits for new construction have been issued to 59 single-family and 18 mixed-use, commercial development projects.

Flood

According to flood factor data records, Cotati has a moderate risk of flooding over the next 30 years. About 387 homes out of 2341 homes are identified to have a greater than a 26% probability of being severely affected by flooding. Under the Sonoma County Flood Control and Water Conservation District Act, Flood Protection Advisory Committee was formed in three flood protection zones to address flood protection measures and provide recommendations on annual budgets involving expenditures related to flood protection, stream maintenance, and stormwater management within the zone area. The Sonoma County Water Agency (SCWA) categorizes the City of Cotati within Zone 1A- Laguna/Mark West Creek in the Stormwater Management Plan. The SCWA developed the Flood Management Design Manual to guide public agencies and private entities in the planning, design review process, and permitting procedures of individual project proposals relative to flood management. The City of Cotati in partnership with Sonoma Water applies the criteria in this manual when reviewing drainage design and plans for development projects.

State law accords local government the ability to put regulations in place that promote public health, safety, and welfare of its communities. Pursuant to state law, the City of Cotati has adopted floodplain management regulations. Municipal Code Title 15, Article V: Provisions for flood hazard reductions articulate the standard of construction including anchoring, construction methods and materials, and elevations and floodproofing for new construction in special flood hazard areas.

The following standards apply to all new constructions and existing residential structures in need of improvement:

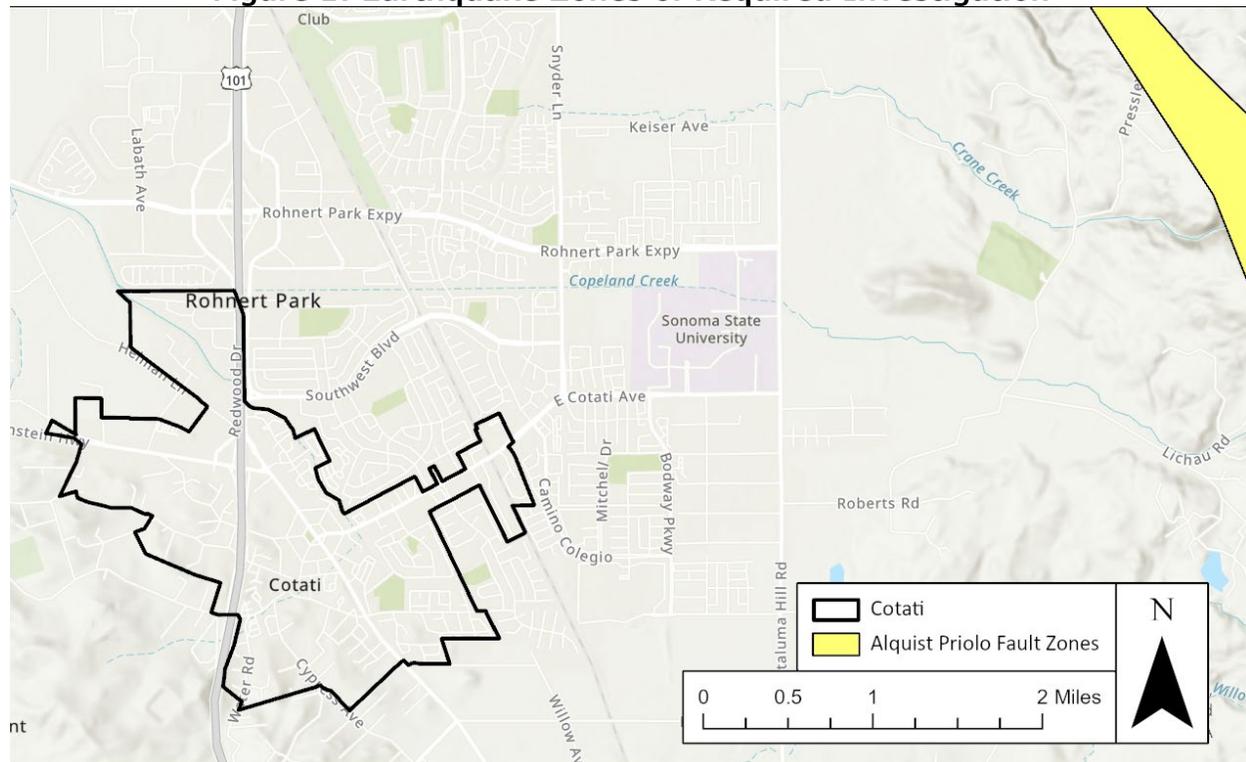
- Adequately anchored to prevent flotation, collapse, or lateral movement of the structure and be constructed with flood-resistant materials.
- Structures on slopes must have adequate drainage paths and areas below the base flood elevations areas must install flood-resistant utility equipment.
- The lowest floor (including basement) must be elevated to or above the base flood elevation (BFE).
- All enclosed areas below the lowest floor (excluding basement) must be designed to have openings on exterior walls that allow floodwater to exit and enter directly

Seismic & Geologic Hazards

Cotati is situated in a seismically active region and therefore has a very high earthquake risk. About 2,470 earthquakes have occurred since 1931, with the 1906 San Francisco earthquake (a 7.9 magnitude) being the most significant to adversely impact residents and property. The largest earthquake recorded within 30 miles of

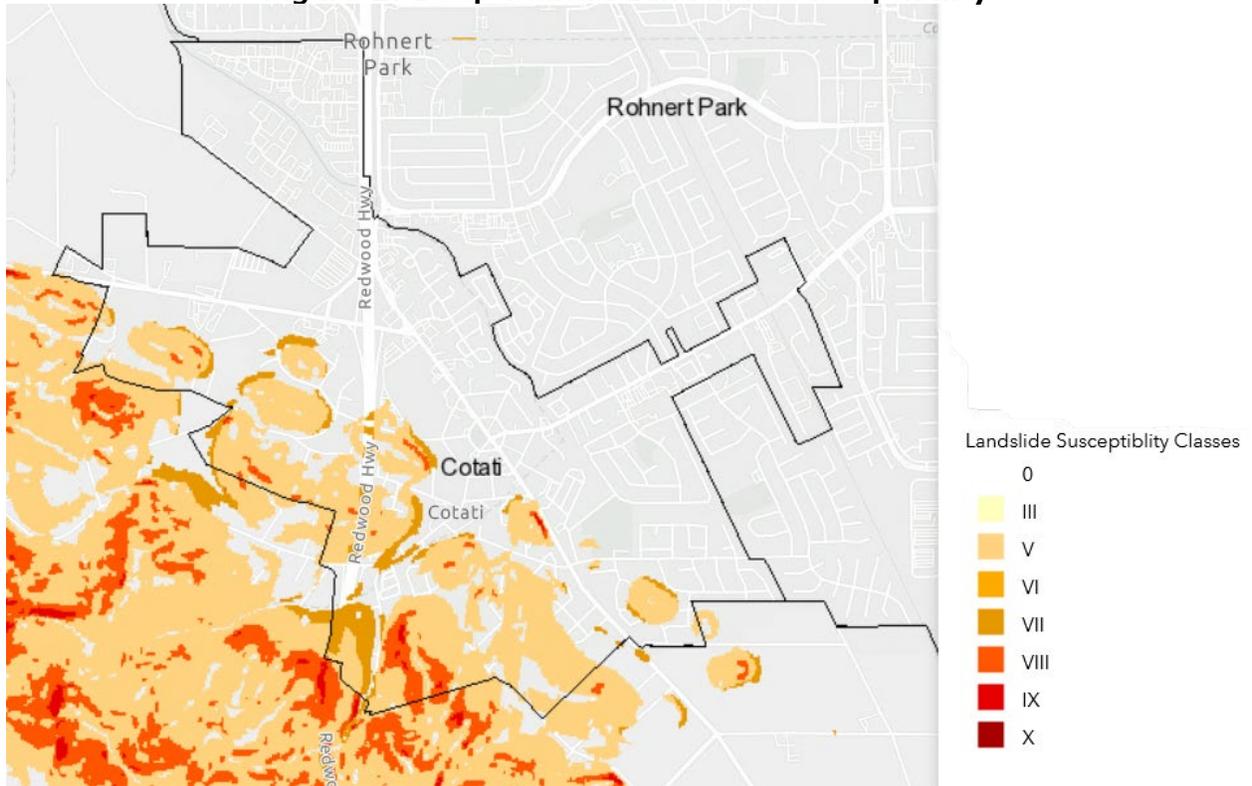
Cotati was a 6.0 magnitude in 2014. The USGS database indicates a 95.28% probability of a major earthquake within 30 miles of Cotati happening in the next 50 years. Earthquakes are also conducive to liquefaction, a state in which surface soil loses cohesion and converts to a fluid. The soil type determines the liquefaction potential in areas. Soils in Cotati are susceptible to liquefaction. Areas along East and West Cotati Avenues, Wilford Lane, and Redwood Drive have moderate liquefaction risk. These areas are also associated with shrink-swell, with the potential of high shrink/ swell in the eastern area and moderate shrink/swell in the western area of the City. Seismic events, soil saturation, and development-related construction can trigger landslides, in addition, the area's slope angle, vegetation cover, and the physical nature of the ground play a role in landslide occurrences. According to Cotati's hazard risk assessment, the likelihood of landslide occurrence and its potential impact on people and property is medium risk. Landslides are not a significant constraint in future development projects because the City's topography is relatively flat.

Figure 1: Earthquake Zones of Required Investigation



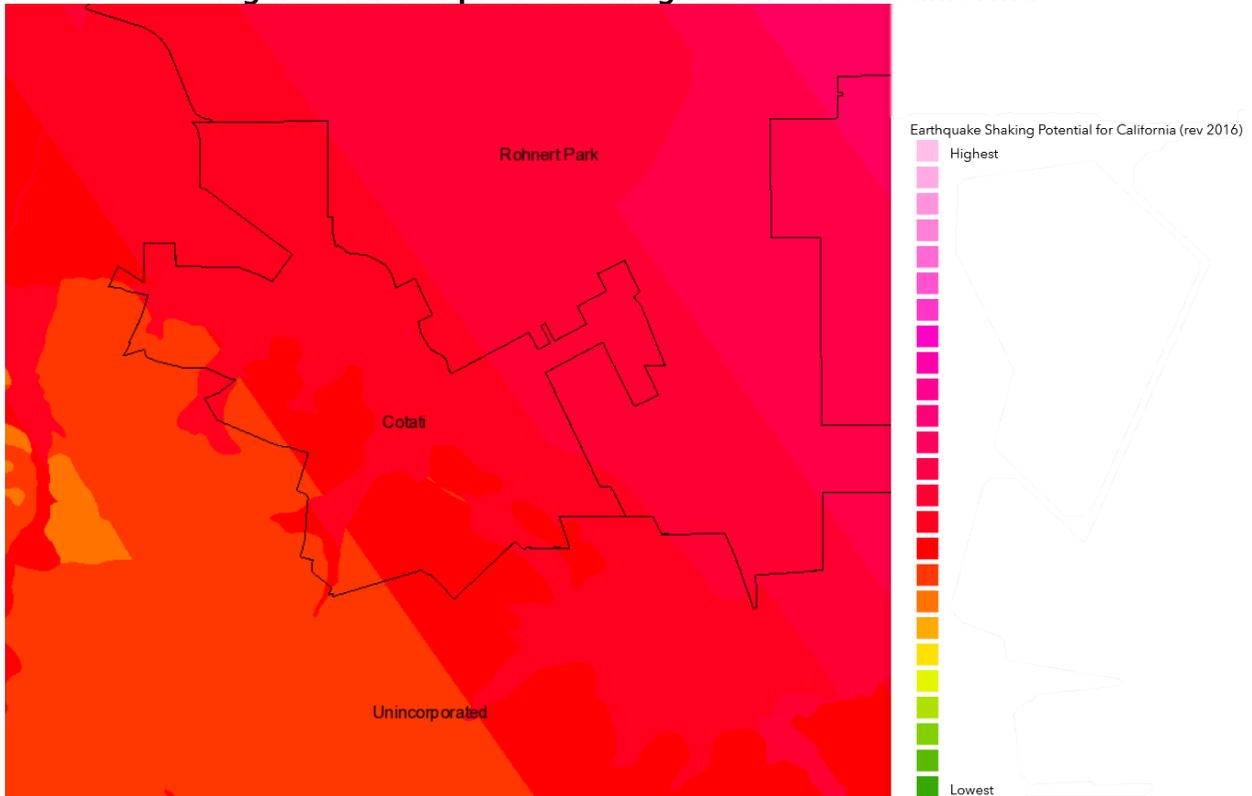
Source: California Geological Survey, Earthquake Zones of Required Investigation

Figure 2: Deep-Seated Landslide Susceptibility



Source: California Geologic Survey Data Viewer, CGS Map Sheet 58

Figure 3: Earthquake Shaking Potential for California



Source: California Geologic Survey, MS48: Earthquake Shaking Potential for California (revised 2016)

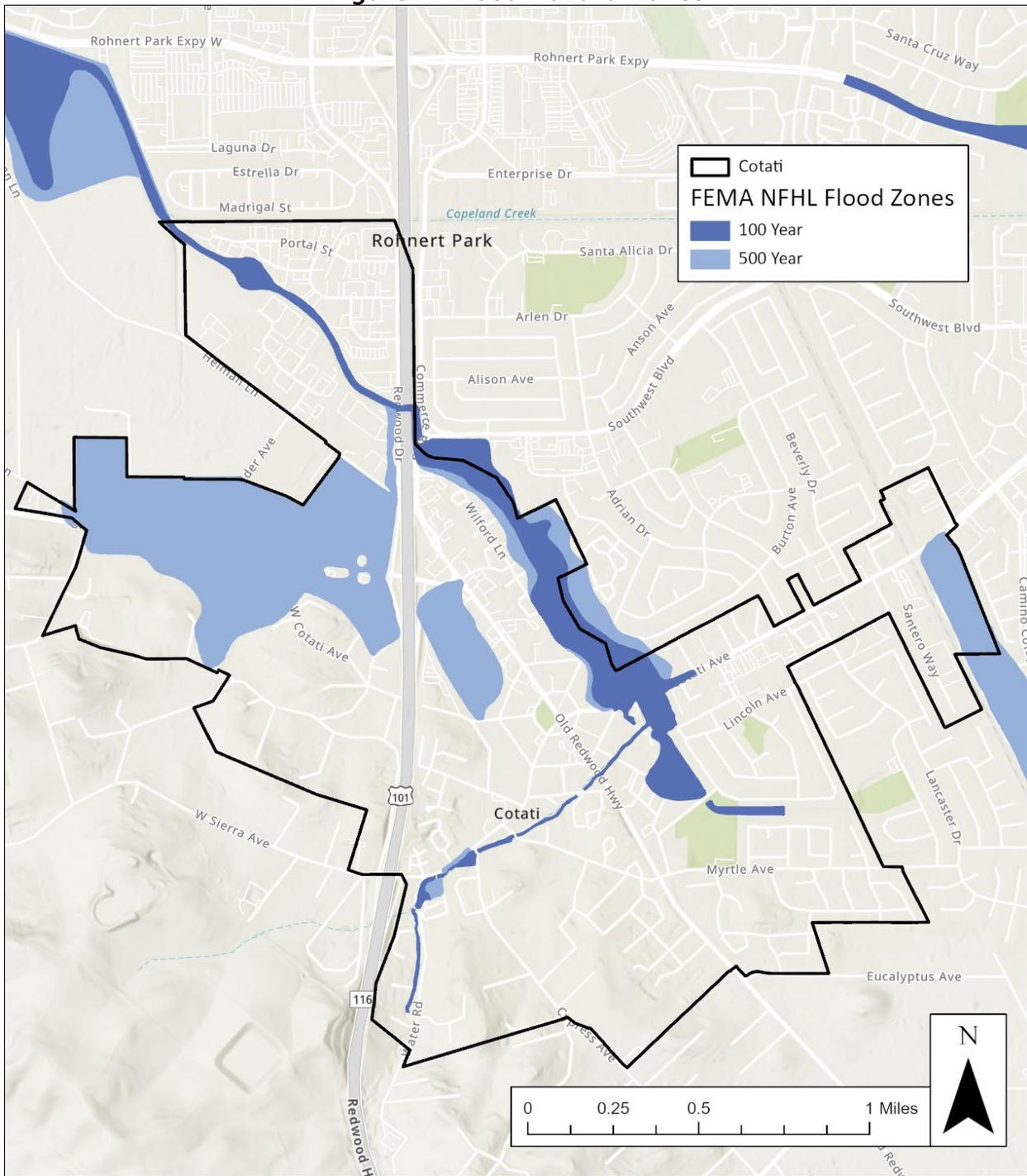
Flood

The northeastern portion of Cotati is subject to flooding from the Laguna de Santa Rosa and Cotati Creek. Approximately 4.8 percent of the land within the city limits located within is subject to one percent of flooding in any given year and about 7.7 percent within the Urban Growth boundary are considered high flood hazards with the FEMA flood zone AE (a 100-year flooding scenario with base flood elevation determined).

The Downtown Specific Plan area is the only priority development area that has experienced localized flooding in the past, and no other areas are known to be susceptible to hazard risks. Based on the 100-year scenario of flood risk assessment, 200 residential buildings may be exposed to flooding.

Among critical facilities, the City of Santa Rosa's wastewater treatment plant where Cotati wastewater is sent, has experienced significant flooding on several occasions and is likely to be exposed to flooding in the future.

Figure 4: Flood Hazard Zones

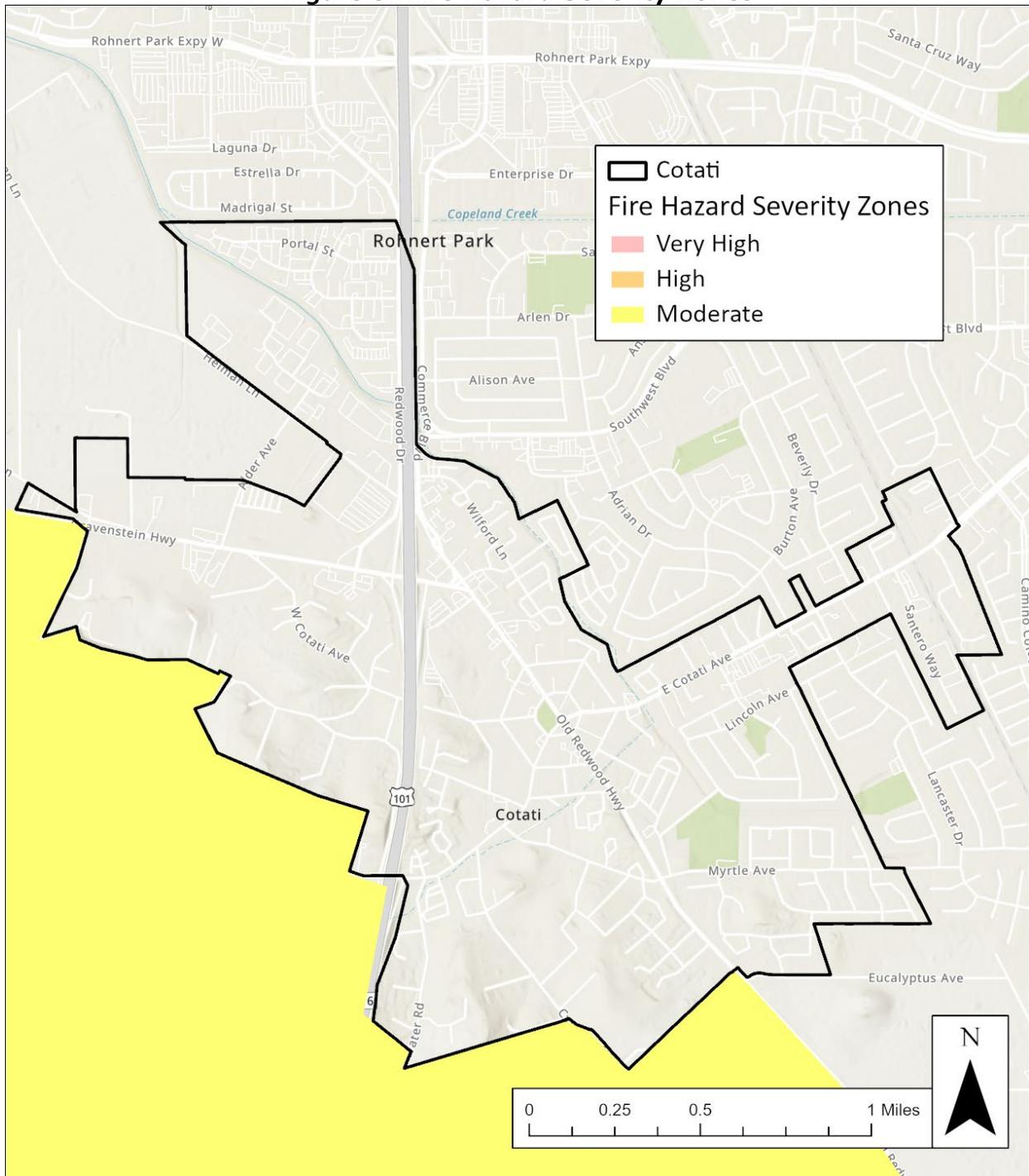


Source: FEMA, National Flood Hazard Layer, 2008

Fire

There are 7 residential structures found in high relative hazard and 341 residential structures found in moderate relative hazard for wildfire. Wildland urban interface fires are prevalent in Sonoma County.

Figure 5: Fire Hazard Severity Zones



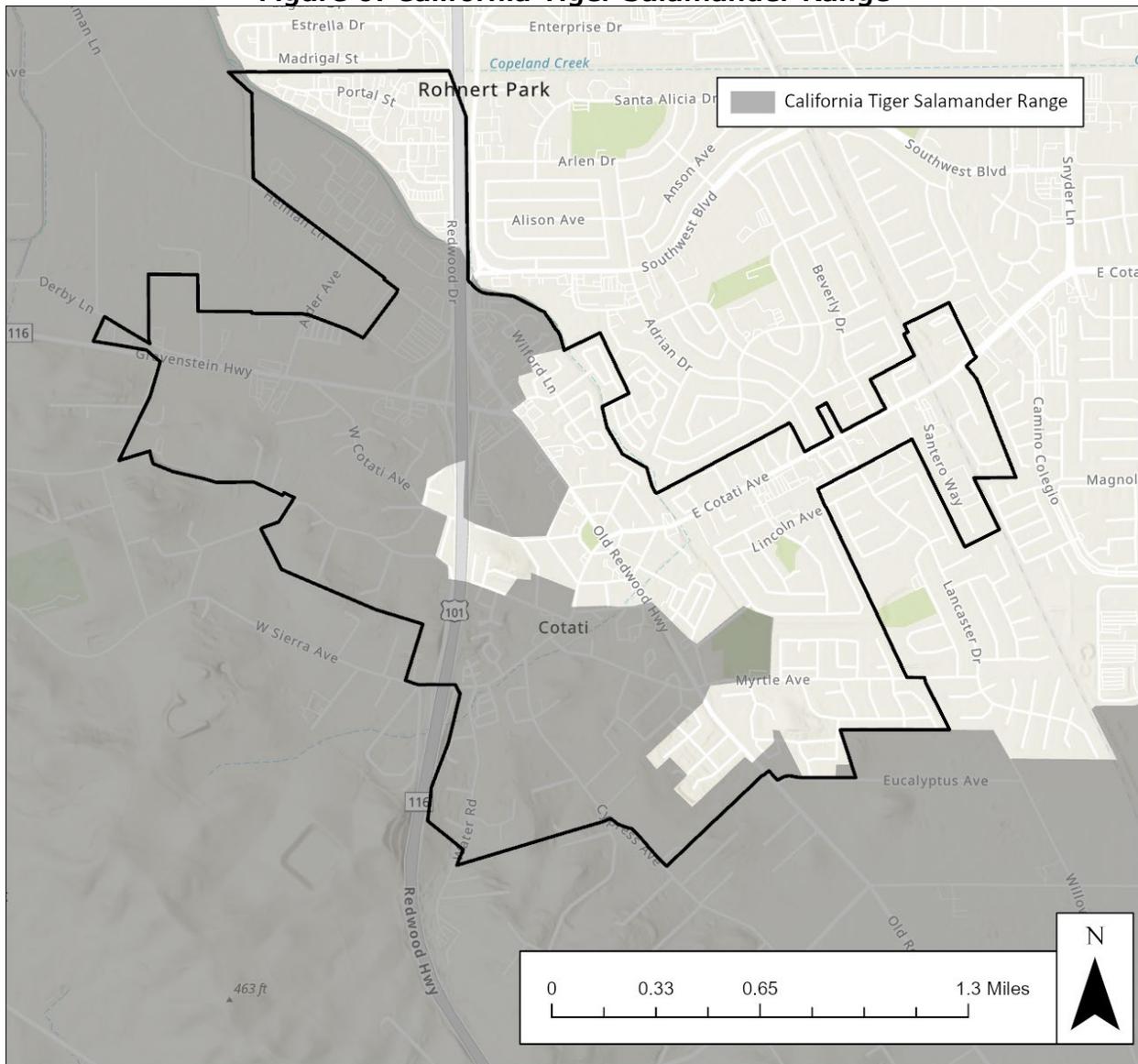
Source: California Department of Forestry and Fire Protection, California Fire Hazard Severity Zones (FHSZ), June 2, 2022

Special Status Species

State law requires cities to adopt policies and actions that address the protection of natural resources and habitats for sensitive plant and wildlife species. The

conservation element of Cotati’s General Plan consists of twenty policies and twelve actions that address the preservation, rehabilitation, protection, and enhancement of biodiversity communities and sensitive habitat areas. It prohibits new developments on the City’s hills where slopes are greater than 15% and requires the identification of appropriate mitigation measures for proposed development projects. Wetlands, riparian, lowland areas, and other environmentally sensitive areas providing habitat for a variety of plant and wildlife species are observed within and vicinity of Cotati. Some of the special-status wildlife species spotted in Cotati include California tiger salamander, California red-legged frog, Foothill yellow-legged frog, Western Pond turtle, California yellow-billed cuckoo, Tricolored blackbird, Pallid bat, and American badger.

Figure 6: California Tiger Salamander Range



Source: California Department of Fish and Wildlife, California Tiger Salamander Range, 2020

Infrastructure Constraints

The City of Cotati shares the same National Pollutant Discharge Elimination System (NPDES) stormwater permit with Sonoma Water, the County of Sonoma, and several Sonoma County cities. These agencies use similar programs, policies, and procedures to implement their respective stormwater programs. The Low Impact Development Technical Design Manual is a guiding document that these agencies use in compliance with the NPDES water permit.⁴ Development projects are required to follow the manual and refer to design guidelines to reduce stormwater runoff, protect water quality, and promote groundwater recharge. New development and redevelopment projects are also required to implement stormwater quality source and treatment controls and trash removal.

Multi-family residential projects and sites allocated for subdivisions are required to make on-site and off-site improvements needed for efficient service delivery. These requirements include constructing connections to existing water and sewer lines, electrical and gas lines, constructing streets with curbs, gutters, and sidewalks, and providing fire hydrants, streetlights, and drainage structures. Single-family residential development on existing lots requires connection to an existing road, water service, sanitary sewer service, and gas and electric utilities. Subdivisions must provide adequate access and streets to all parcels, including paved access roads. Neighborhood roadways must have a total right of way of 56 feet, which comprises 30 feet of pavement (two 8-foot vehicle traffic lanes with seven feet of curbside parking on each side) and a planting strip on either side of the pavement. Mixed-use projects that include residential units are required to provide streets in compliance with commercial street design standards. Commercial streets must have a total right-of-way of 68 to 80 feet, including 48 feet of pavement (two or four 11-foot vehicle traffic lanes with a 4 to the 6-foot bike lane and 7 feet of on-street parking on each side of the street) and a planting strip on either side of the pavement.

The building permit valuation process and infrastructure connectivity fees of multi-family residential projects are lower compared to single-family developments. Overall, on-site and off-site infrastructural improvements required by the City do not pose constraints or limit the provision of any type of housing development.

Energy

As of 2019, Cotati uses 100% renewable electricity (Evergreen) provided by Sonoma Clean Power.

Water and Wastewater

Cotati's main water supply comes from the Russian River surface water, and three groundwater wells located in Santa Rosa Plain Subbasin which are provided by Sonoma County Water Agency (SCWA) through two transmission pipelines. The City is entitled to receive up to 1,520 acre-feet per year under the water supply

⁴ [Low Impact Development Technical Design Manual](#)

agreement with the SCWA. Cotati obtains about 1/3 of its water supply from three municipal groundwater wells. While the City has historically used groundwater to supply more than half of its demands, its current water management strategy is to draw its primary water supply from the Agency and utilize groundwater to supplement its needs during peak demand periods or periods of drought. The City is part of the Santa Rosa Subregional Water Reuse System (Subregional System), which provides wastewater treatment, disposal, and water recycling services to Cotati.

The City of Cotati owns and operates the wastewater collection system and provides sanitary sewer service to approximately 1200 acres in and around City limits. Sewage and wastewater generated is transported to the Santa Rosa Subregional Wastewater Reclamation System for treatment at Laguna Treatment Plant. According to the City's 2010 Urban Water Management Plan, the City plans to implement a system that would deliver recycled wastewater treated at the Santa Rosa Subregional System. There is only one sewer project identified in the Capital Improvement Program from Fiscal Year 2020/21 through FY 2024/25. The City's water and sewer systems do not pose a constraint to housing development.

4.5 ASSESSMENT OF FAIR HOUSING

4.5.1 Background and Summary of Fair Housing Issues

Extremely low-income households, senior households, persons experiencing disabilities, farmworkers, female-headed households, and homeless individuals are special needs groups with the greatest need for affordable housing, resources, and services. The special needs groups are more likely than others to experience housing problems and severe cost burdens, paying more than half of their income towards housing expenses. Chronic or acute illnesses, domestic abuse, developmental disabilities, and other factors may exacerbate housing issues for special needs groups. Rising housing costs, inflation, and stagnant wages and housing growth may also exacerbate housing issues that can lead to severe cost burden and/or homelessness.

The requirement to affirmatively further fair housing (AFFH) is derived from the Fair Housing Act of 1968, which prohibited discrimination concerning the sale, rental, and financing of housing based on race, color, religion, national origin, or sex, and later amended to include familial status and disability. The 2015 U.S. Department of Housing and Urban Development (HUD) Rule to Affirmatively Further Fair Housing and California Assembly Bill 686 (2018) mandates that each jurisdiction takes meaningful actions to address significant disparities in housing needs and access to opportunity. These measures are intended to address disproportionate housing needs of the City's most vulnerable residents, including renters and cost burdened households.

Housing Element Requirements

Under State law, affirmatively furthering fair housing (AFFH) means “taking meaningful actions, in addition to combatting discrimination, which overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” Housing Element law as amended by AB 686 (2018) requires that jurisdictions incorporate AFFH into their Housing Element updates, including community engagement and outreach, an assessment of fair housing, identification of housing sites, and goals, policies, and programs that meaningfully address local fair housing issues. The City of Cotati is addressing these requirements through the following means:

- **Meaningful Engagement:** Meaningful engagement and outreach efforts were conducted throughout the Housing Element process. These efforts and the incorporation of feedback received is detailed in Appendix A.
- **Assessment of Fair Housing:** This section contains the assessment including the analysis and comparison of local data and regional data, trends, and patterns. This data is supplemented by local knowledge wherever available. The AFH identifies fair housing issues and contributing factors based on the analysis in the five different subsections:
 - Enforcement and Outreach Capacity
 - Segregation and Integration Patterns and Trends
 - Disparities in Access to Opportunity
 - Disproportionate Housing Needs, including Displacement
 - Areas of Concentrated Poverty and Affluence Across Racial and Ethnic Groups
- **Identification of Contributing Factors:** Factors that contribute to fair housing issues have been identified for each area of the AFH and prioritizes these factors within Table 45.
- **Summary of Fair Housing Issues:** Fair housing issues are summarized in Section 4.5.6 of the AFH, along with the description of goals and actions in Table 45.
- **Sites Inventory:** Housing sites identified to meet regional housing needs have been evaluated relative to the components of the AFH. Section 11-3 contains the housing sites information, maps, and the sites analysis. Section 4.5.7 of the AFH contains additional analysis of the housing sites relative to the fair housing topics.

The City of Cotati has made efforts to affirmatively further fair housing through the adoption of the Housing Element, increasing funding for affordable housing, preserving existing and naturally occurring affordable housing, and enhancing local

fair housing protections. This Assessment of Fair Housing (AFH) details the efforts and progress that the City has made to promote a fair and equitable housing market and highlights remaining fair housing issues that should be addressed during the implementation of the 6th Cycle Housing Element. These fair housing issues, contributing factors, level of priority, and the City programs and actions intended to address each issue are compiled at the end of this AFH.

4.5.2 Fair Housing Enforcement and Outreach Capacity

Fair housing enforcement and outreach capacity relate to the ability of the City and local fair housing entities to disseminate information related to fair housing and provide outreach and education to ensure community members are aware of fair housing laws and rights. In addition, enforcement and outreach capacity include the ability to address compliance with fair housing laws, such as investigating complaints and obtaining remedies. While the City does not directly enforce fair housing laws, it does partner with and refer residents to local fair housing and housing legal support organizations.

Compliance with Existing Fair Housing Laws & Regulations

Federal and State laws prohibit intentional housing discrimination and prohibit any actions or policies which may have a discriminatory effect on a protected group of people make it illegal to discriminate based on a person's protected class, including race, color, religion, sex, national origin, familial status, and disability. In California, the Fair Employment and Housing Act (FEHA) and the Unruh Civil Rights Act also make it illegal to discriminate based on marital status, ancestry, sexual orientation, source of income, or any other arbitrary forms of discrimination. Examples of policies or practices with discriminatory effects include exclusionary zoning and land use policies, predatory mortgage lending and insurance practices, and residential rules that may indirectly inhibit religious or cultural expression.

Both the Federal and State governments have structures in place to process and investigate fair housing complaints. In California, the Department of Fair Employment and Housing (DFEH) maintains the authority to investigate complaints of discrimination related to employment, housing, public accommodations and hate violence. The agency processes complaints online, over the phone and by mail and provides protection and monetary relief to victims of unlawful housing practices. At a federal level, HUD also processes, investigates, and enforces any complaints in violation of the Federal Fair Housing Act.

Additional fair housing protections in the State of California include:

- **The Ralph Civil Rights Act** (California Civil Code § 51.7) forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute.

- **The Bane Civil Rights Act** (California Civil Code § 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual’s constitutional or statutory rights, including a right to equal access to housing.
- **California Civil Code § 1940** prohibits landlords from questioning potential residents about their immigration or citizenship status. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person’s citizenship or immigration status.
- **The California Tenant Protection Act** (AB 1482 of 2019; California Civil Code 1946.2, 1947.12 and 1946.13) prohibits tenants from being evicted without “just cause,” which means that tenants who have lived in a unit for at least a year may only be evicted for enumerated reasons, such as failure to pay rent, criminal activity, or breach of a material term of the lease. The law also caps rent increases at 5% for a period of 10 years.
- **California Government Code** § 11135, 65008, and 65580-65589.8 prohibit discrimination in programs funded by the State and in land use decisions. Specifically, changes to § 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including:
 - Housing for persons with disabilities (SB 520)
 - Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2)
 - Housing for extremely low-income households, including single-room occupancy units (AB 2634)
 - Housing for persons with developmental disabilities (SB 812)

The City of Cotati maintains compliance with all federal and state fair housing laws and is committed to ensuring access to fair housing services. Two locally implemented fair housing laws protect Cotati residents against discrimination based on the protected characteristic of sexual orientation and familial status.^{5,6} In addition to protection for these specific classes, the City promotes fair housing through the preservation and production of affordable housing for at-risk residents. The following affordable housing requirements can be found in City of Cotati Municipal Code:

- **Inclusionary Housing Ordinance:** The City requires that new housing projects with ten or more units reserve at least 15% of units as deed-restricted affordable housing. There are some exceptions for housing that is

⁵ Cotati Municipal Code, Chapter 9.32: *Discrimination Based on Sexual Orientation* <https://www.codepublishing.com/CA/Cotati/html/Cotati09/Cotati0932.html>
⁶ *Cotati Municipal Code, Discrimination Against Families with Children in Property Rentals*, <https://www.codepublishing.com/CA/Cotati/#!/html/Cotati19/Cotati1908.html>

developed offsite, and the units are deed-restricted for a minimum of 30 years.⁷

- **In-Lieu Fees:** The City offers the payment of in-lieu fee for developers who construct nine or fewer units. The fees paid by developers then go into the City's affordable housing fund to be used to support the construction of affordable housing.⁸
- **Linkage Requirements:** The City requires non-residential developers to contribute to affordable housing by paying a housing linkage fee or construct affordable housing on-site. The fees paid by developers go into the City's affordable housing fund to be used for the construction of affordable housing.⁹
- **Mobile home Park Space Rent Stabilization:** The City has made efforts to preserve its share of mobile home parks by implementing local review procedure for mobile home conversion projects and by imposing rent stabilization on these units.¹⁰ Developers intending to convert existing mobile home parks must provide adequate notice to existing park residents, offer residents the right of first refusal to purchase the park, conduct a review of impacts on existing residents, and secure the approval of the City Council before conversion may occur.¹¹

Aside from these city-level actions, the County of Sonoma promotes the preservation and creation of affordable housing and works to affirmatively further fair housing through their own policies, programs, projects, and practices. The Sonoma County Community Development Commission (CDC) was established in 1970 and is "dedicated to creating homes for all in thriving and inclusive neighborhoods." They strive to do so by offering three core services: rental assistance, homeless services, and investment in community and affordable housing projects. The goal is to create housing that is "affordable, available, and accessible to the County's low-income and workforce residents." The Sonoma County Board of Supervisors provides oversight to the CDC.¹²

Every three years, the CDC produces a Three-Year Strategic Plan to identify its role within the County of Sonoma and to guide its work efforts over the next several years. The most recent plan, released in August 2019, discusses recent evidence that "housing instability as measured by rent burdens, over-crowding, and concentrations of poor households in high poverty neighborhoods remains a pressing issue impeding

⁷ Cotati Municipal Code. Chapter 17.31: Affordable Housing Requirements, <https://www.codepublishing.com/CA/Cotati/html/Cotati17/Cotati1731.html>

⁸ City of Cotati, Fee Schedule, October, 2021, http://p1cdn4static.civiclive.com/UserFiles/Servers/Server_9669113/Image/City%20Hall/Master%20Fee%20Schedule%20-%20Published%2010222021_Revised%203_21_22.pdf

⁹ Cotati Municipal Code. Chapter 17.31

¹⁰ Cotati Municipal Code, Chapter 19.14: Mobile Home Park Space Rent Stabilization, <https://www.codepublishing.com/CA/Cotati/html/Cotati19/Cotati1914.html>

¹¹ Cotati Municipal Code. Chapter 17.46: Conversion of Mobile Home Park to Other Uses <https://www.codepublishing.com/CA/Cotati/html/Cotati17/Cotati1746.html>

¹² Sonoma County website "Community Development Commission" web page

the full recovery of the county and disproportionately impacting communities of color.”¹³ To address these issues, the CDC has created a strategic plan aimed at fostering a strong team, building trust through proactive engagement, and creating pathways to housing and community resources.

In addition to ongoing promotion of increased supply of affordable housing, Sonoma County also funds non-profit organizations to provide fair housing services such as fair housing advocacy, public education on renter and property owner rights, and assistance in attaining and retaining housing for those who live with a disability, some of which are featured in the next section.

Fair Housing Services, Outreach, and Enforcement at a Local Level

The City of Cotati provides the following fair housing and affordable housing resources on the “Housing” page of their website:

Table 27: Housing Resources for Cotati

Service/Need	Provider	Website
Affordable Home Ownership	Housing Land Trust of Sonoma County	http://www.housinglandtrust.org/
Fair Housing Services	Fair Housing Advocates of Sonoma County	http://www.fairhousingnorcal.org/
Food Distribution	Redwood Empire Food Bank	https://refb.org/
	Neighbors Organized Against Hunger (NOAH)	https://www.noahfoodpantry.org/
Home Sharing	Petaluma People Services Center	https://petalumapeople.org/housing/
Housing Rehabilitation	Sonoma County Community Development Commission (CDC)	http://sonomacounty.ca.gov/Community-Development-Commission/
Housing Rehabilitation Loan Program	Sonoma County Community Development Commission	https://sonomacounty.ca.gov/CDC/Housing-and-Neighborhood-Investment/Housing-Rehabilitation-Loan-Program/
Legal Assistance	California Rural Legal Assistance	http://www.crla.org/
Rent Assistance	Reach for Home (Formerly NSCS)	http://www.reachforhome.org/

¹³ SCCDC Three-Year Strategic Plan, August 2019
https://sonomacounty.ca.gov/Main%20County%20Site/General/Sonoma/Sample%20Dept/Department%20Information/Plans%2C%20Policies%20and%20Reports/_Documents/2019_08_20_3YearStratPlan_att1.pdf

Sonoma County Homeless Resource Guide	Sonoma County	http://www.sonomacountyhomeless.org/
Transitional Housing	Reach For Home (Formerly NSCS)	http://www.reachforhome.org/
State Affordable Housing Income Limits	State of California	https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2021.pdf
Grants and Funding	California Department of Housing and Community Development (HCD)	https://www.hcd.ca.gov/grants-funding/index.shtml

Cotati residents also benefits from regional and state organizations that provide fair housing information, outreach, and enforcement, including their capacity and resources available to them. These organizations include:

Department of Fair Employment and Housing (DFEH)

The California DFEH is a state agency dedicated to enforcing California’s civil rights laws. Its mission targets unlawful discrimination in employment, housing, and public accommodations, hate violence, and human trafficking. Victims of discrimination can submit complaints directly to the department. DFEH is also a HUD Fair Housing Assistance Program (FHAP) agency and receives funding from HUD to enforce fair housing laws.

Fair Housing Advocates of Northern California (FHANC)

Fair Housing Advocates of Northern California is a private 501(c)(3) nonprofit organization with a stated mission of ensuring equal housing opportunity and educating communities on the value of diversity in their neighborhoods. FHANC is also a grantee under HUD’s Fair Housing Initiatives Program (FHIP), which means that it receives funding from HUD to assist victims of housing discrimination. FHANC provides fair housing counseling services, fair housing complaint investigation, and assistance in filing fair housing administrative complaints to residents of Sonoma, Solano, and Marin counties. FHANC also offers counseling and education programs on foreclosure prevention and pre-purchase homebuying.

Legal Aid of Sonoma County

Legal Aid of Sonoma County represents low and very low-income residents within County. Legal Aid Sonoma County is also a grantee under HUD’s Fair Housing Initiatives Program (FHIP), as it receives funding from HUD to assist victims of housing discrimination. Their housing practice provides legal assistance regarding public, subsidized (including Section 8 and other HUD subsidized projects) and private housing, fair housing and housing discrimination, housing conditions, rent control,

eviction defense, lockouts and utility shut-offs, residential hotels, and training advocates and community organizations. Legal Aid is restricted from representing undocumented clients.

Sonoma County Community Development Commission (CDC)

The County of Sonoma Community Development Commission (CDC) supports countywide development of affordable housing to help mitigate the effects of housing segregation by financing new affordable housing and/or rehab projects with federal, state, and local funds. The County also funds non-profit organizations to provide fair housing services such as fair housing advocacy, public education on renter and property owner rights, and assistance in attaining and retaining housing for those who live with a disability. More specifically, the Sonoma County Code of Ordinances (Sonoma County Mun. Code § 23-90-010, *et seq.*) provides for specific procedures for requesting reasonable accommodations under the FHA and FEHA.

To address discrimination within operations and decision-making processes, the County joined the Government Alliance on Race and Equity and participants from 12 county departments created Sonoma County Racial Equity Alliance and Leadership. Subsequently, county employees formed the County Latinx Employee Resource Network. The Board of Supervisors also created the Office of Equity in the Summer of 2020. In January of 2021, the Board of Supervisors approved a five-year strategic plan supporting racial equity and promoting social justice. The goals contained in the strategic plan are to foster a county organizational culture that supports the commitment to achieving racial equity; implement strategies to make the County workforce reflect County demographic across all levels; ensure racial equity throughout all County policy decisions and service delivery; and engage community members and stakeholder groups to develop priorities and to advance racial equity.

Federally, Title VIII fair housing case may be filed based on race, color, national origin, religion, sex, disability, familial status, and retaliation for filing a Fair Housing and Equal Opportunity (FHEO) complaint. Between January 1, 2013, and March 19, 2021, there were three FHEO Inquiries in the City of Cotati, which is fewer than .5 per inquiries per one-thousand people. Of these inquiries, one was on account of Disability and two were on an undefined count. All three cases resulted in counts of “No Valid Issue.”¹⁴

Housing Enforcement and Outreach Capacity: Fair Housing Issues and Contributing Factors

The City of Cotati is in full compliance with all applicable fair housing regulations at the State and Federal levels. As discussed above, the City does not directly enforce fair housing laws, but does disseminate information about and refer residents to local fair housing and housing legal support organizations. Challenges related to fair housing enforcement are primarily due to a lack of funding and staff capacity –

¹⁴ AFH Data Viewer: FHEO Inquiries by City (HUD, 2013-2021)

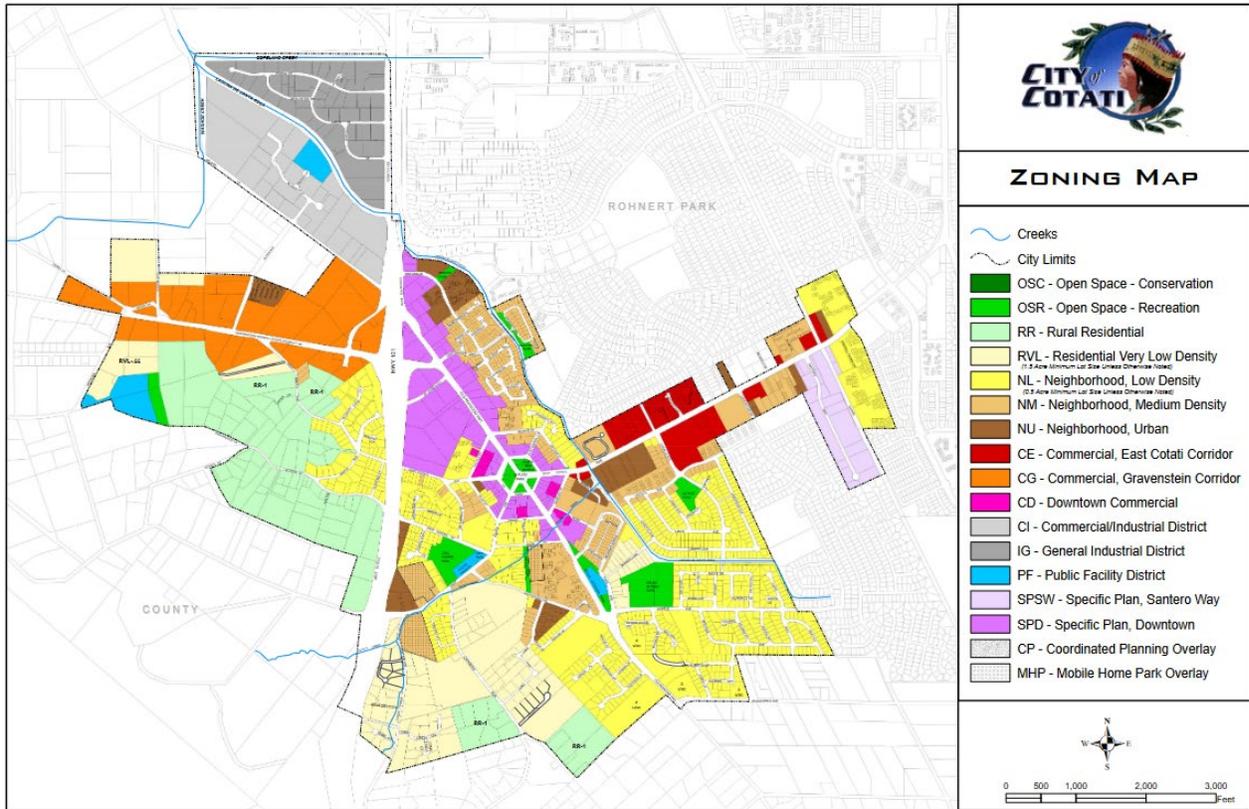
including bilingual capacity – to ensure that residents, tenants, and property owners are aware of their rights and obligations related to tenancy and rental protections. Program 4-3 (Nondiscrimination and Fair Housing Information) will help to ensure that this factor is mitigated and that outreach is more effective.

4.5.3 Segregation and Integration Patterns and Trends

Segregation is the separation of different demographic groups into different geographic locations or communities, meaning that groups are unevenly distributed across geographic space. Integration is the equal distribution of demographic groups within a geographic location or community. This section of the Assessment of Fair Housing will assess the extent of racial and income segregation and integration both on the neighborhood level and between the City and neighboring jurisdictions.

Segregation is partly a result of historical exclusionary zoning practices, which is a practice that either intentionally or unintentionally excludes certain types of land uses and/or races and ethnicities from a given community. Exclusionary zoning was introduced in the early 1900s, often to prevent racial and ethnic minorities from moving into middle- and upper-class neighborhoods. Zoning codes that discriminate based on race and ethnicity are now illegal, however, nearly all communities in the United States have land use patterns that reflect past practices. This can limit the supply of available housing units. In many cities, the implementation of these zoning practices, along with a host of other factors including historical disinvestment in low-income neighborhoods, has resulted in segregation. The 2022 State of Housing in Sonoma County report commissioned by Generation Housing indicated that Cotati had the lowest amount of share of single-family zoning among jurisdictions in Sonoma County. Cotati has taken steps to address past exclusionary zoning practices with each update of the Housing Element. The City is currently zoned according to the map in Figure 7 below. Most land in southern and western portions of the City is zoned for Rural Residential (RR), Residential Very Low Density (RVL) or Neighborhood, Low Density (NL.) The former type of zoning district is applied to areas deemed appropriate for low density areas of detached single-family homes and allows for densities ranging from one dwelling unit per 0.66 acres to one unit per one-half acre. The latter type of zoning is applied to areas developed with and deemed appropriate for neighborhoods of detached single-family homes and duplexes with a maximum allowable density of six dwelling units per acre.

Figure 7: Zoning Map of the City of Cotati

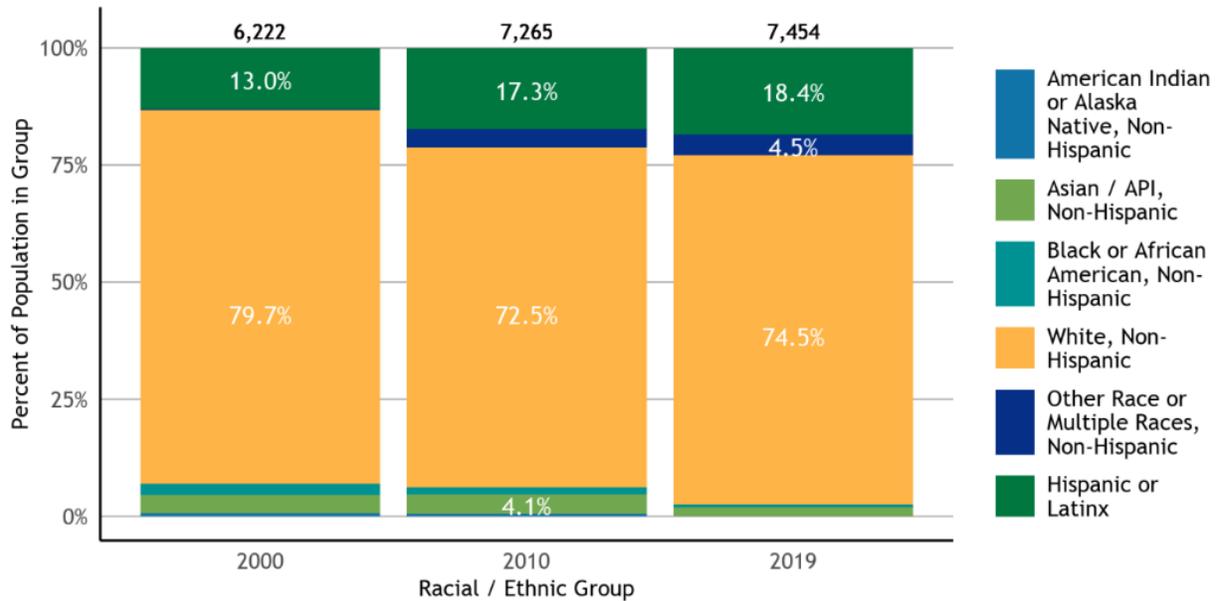


Source: City of Cotati Municipal Code, Chapter 17.2

Race and Ethnicity

The City of Cotati’s population is predominantly white by more than 50%, though the percentage has decreased since 2000. The percentage of the nonwhite population in Cotati has increased by 5.2 percentage points between 2000 and 2019 (Figure 8). The White, Non-Hispanic population increased the most while the Black and African American, Non-Hispanic population decreased the most during this period.

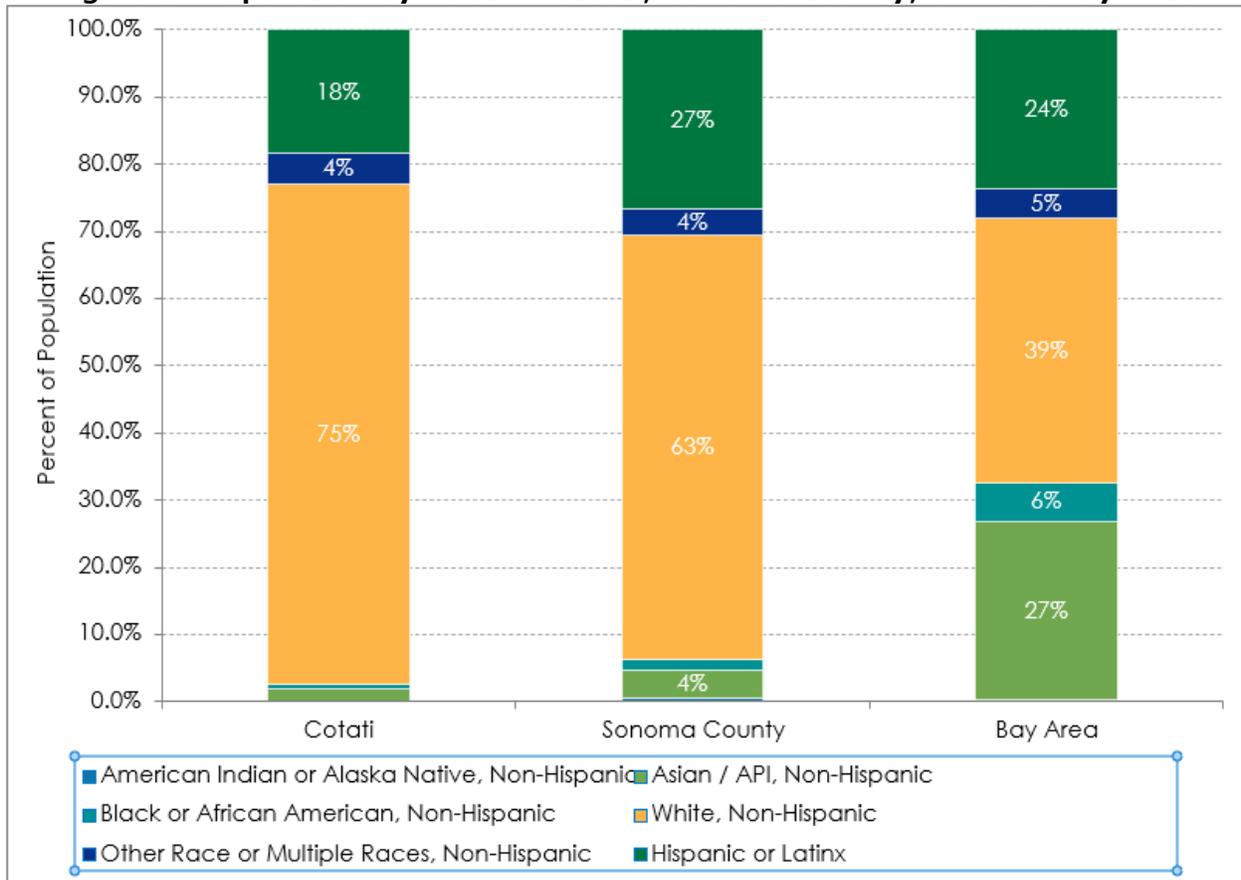
Figure 8: Population by Race in Cotati, 2000-2019



Source: U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002

There is a significantly greater share of white residents in Cotati (75%) than in Sonoma County (63%) and the San Francisco Bay Area (39%). Cotati also has a significantly smaller share of Asians/API individuals (<4%) compared to the Bay Area (27%) and only slightly fewer compared to Sonoma County (4%). Another notable difference between local and regional racial compositions is the percentage of Black or African Americans who make up six percent of the Bay Area population but less than one percent of Cotati’s population (Figure 9).

Figure 9: Population by Race in Cotati, Sonoma County, and the Bay Area

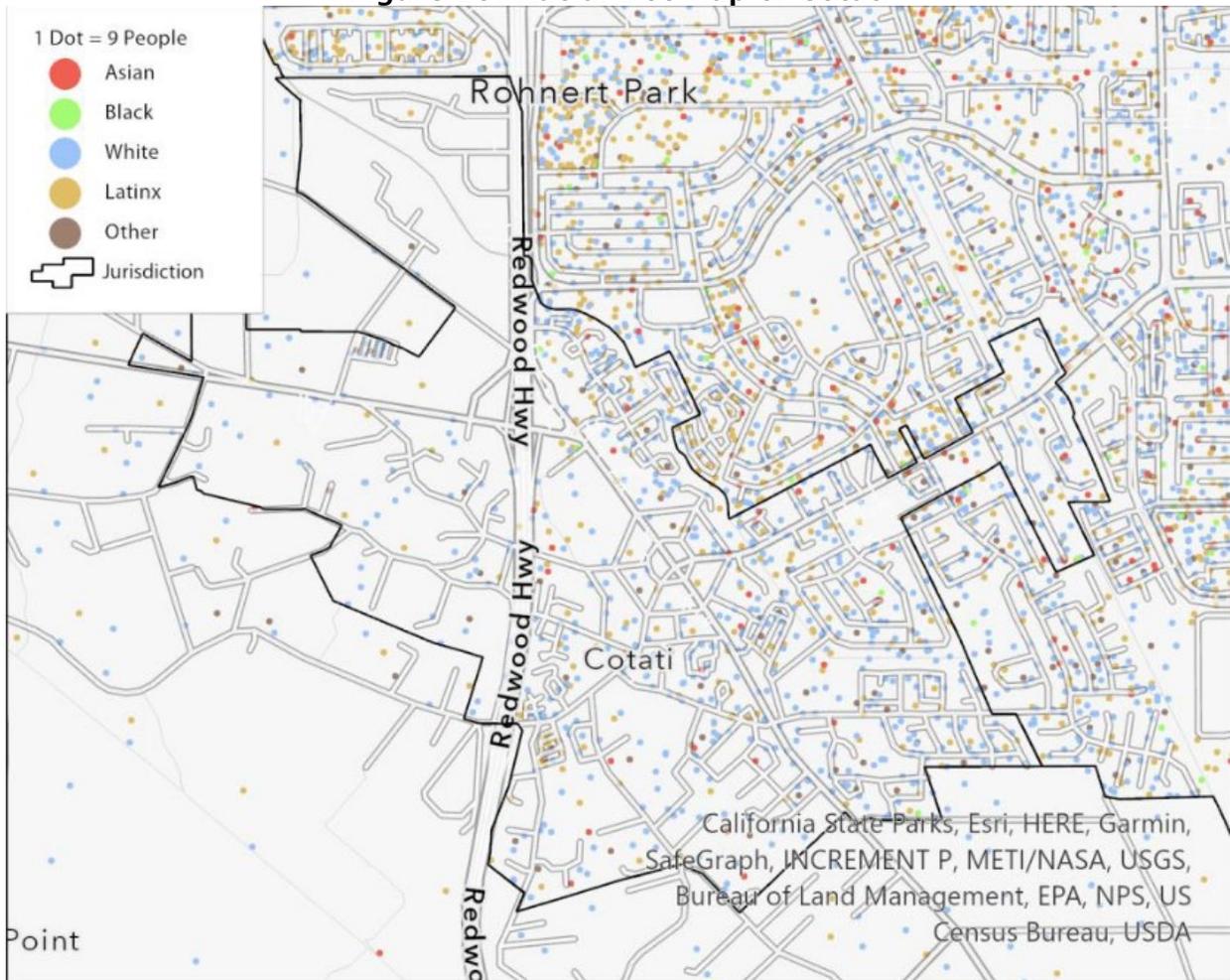


Source: U.S. Census Bureau, American Community Survey 2019 5-Year Estimates

The racial dot map of Cotati in Figure 10 offers a visual representation of the spatial distribution of racial groups within the jurisdiction. When the distribution of dots does not suggest patterns of clustering, segregation measures tend to be lower. Conversely, when clusters of certain groups are apparent on a racial dot map, segregation measures may be higher. There are no identifiable clusters of racial groups in Cotati.¹⁵

¹⁵ "AFFH Segregation Report: Cotati, produced by UC Merced Urban Policy Lab and ABAG/MTC Staff, March 6, 2022

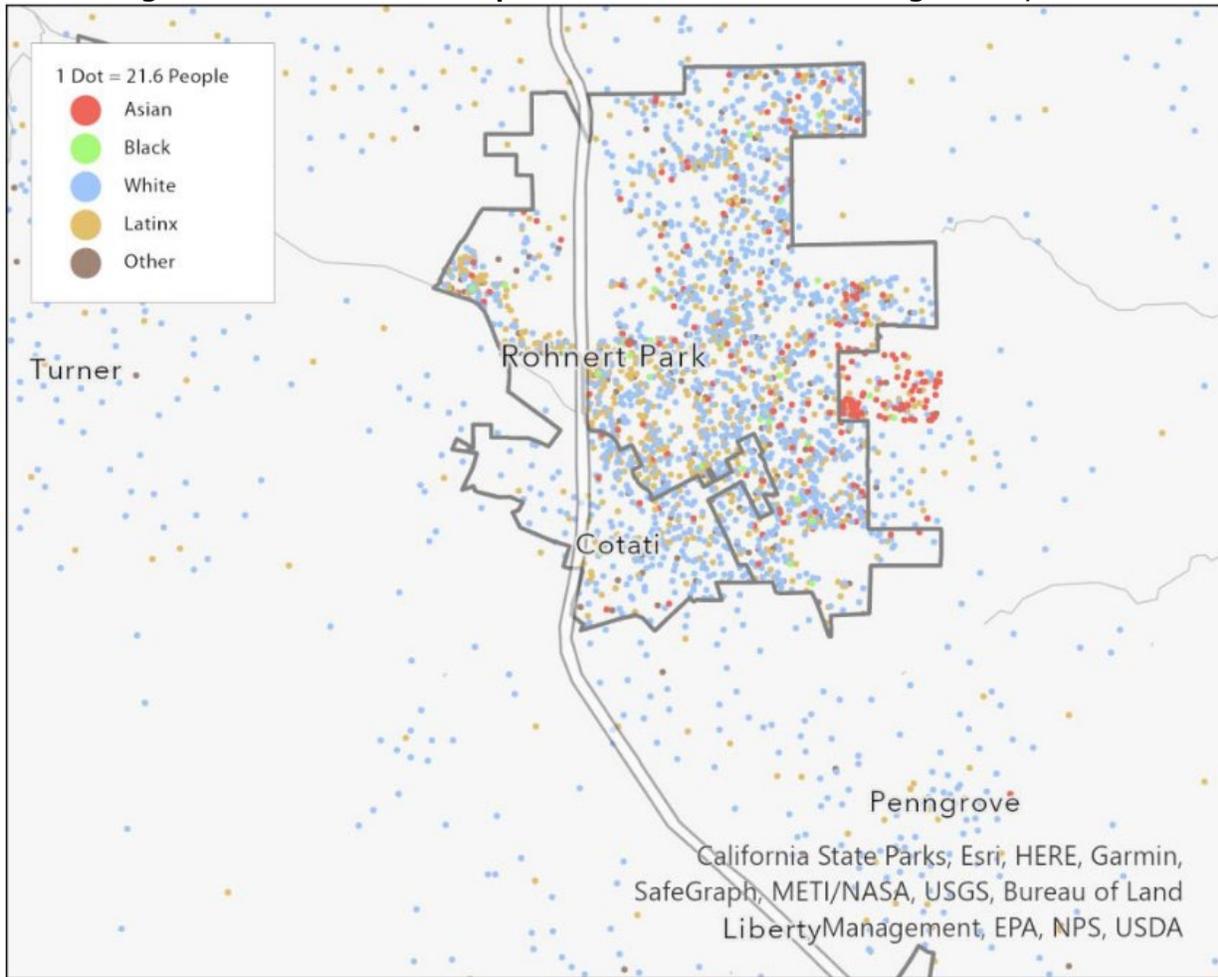
Figure 10: Racial Dot Map of Cotati



Source: U.S. Census Bureau, 2020 Census State Redistricting Data Summary File, 2020 Census of Population and Housing

At the regional level, segregation is measured between cities instead of between neighborhoods. Racial dot maps can also be useful for examining racial segregation between different jurisdictions in the region. Figure 11 below presents a racial dot map showing the spatial distribution of racial groups in Cotati as well as in nearby Bay Area cities. While there is a notable concentration of Hispanic/Latino populations on the southern side of the City of Rohnert Park bordering Cotati, there are no notable clusters within the City itself.

Figure 11: Racial Dot Map of Cotati and Surrounding Areas, 2020



Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing

The racial isolation index compares each neighborhood's composition to the jurisdiction's demographics. This index ranges from zero to one. Higher values indicate that a particular group is more isolated from other groups. The index value indicates the experience of the average member of that group.

Cotati's isolation index of 0.644 for white residents means that the average white resident lives in a neighborhood that is 64.4% white. Non-white racial groups are less isolated and more likely to encounter other racial groups in their neighborhoods. The isolation index values for all racial groups in Cotati for the years 2000, 2010, and 2020 are in Table 28 below. Among all racial groups in the jurisdiction, the white population's isolation index has changed the most over time, becoming less segregation from other racial groups.

The Bay Area Average column provides the average isolation index value across Bay Area jurisdictions for different racial groups in 2020. The data in this column provides context for the levels of segregation experienced by racial groups in Cotati. For

example, Table 28 indicates the average isolation index value for white residents across all Bay Area jurisdictions is 0.491 meaning that a white resident lives in a neighborhood that is 49.1% white in the average Bay Area jurisdiction, which is significantly lower than that of Cotati.

Table 28: Racial Isolation Index Values for Segregation within Cotati

Race	Cotati			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander	0.041	0.042	0.044	0.245
Black/African American	0.020	0.015	0.019	0.053
Hispanic/Latino	0.127	0.189	0.234	0.251
White	0.722	0.714	0.644	0.491

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

While the racial isolation index measures the segregation of a particular group, the dissimilarity index measures segregation between two distinct groups. Table 29 provides the dissimilarity index values indicating the level of segregation in Cotati between white residents and residents who are Black, Hispanic/Latino, or Asian/Pacific Islander. It also provides the dissimilarity index between white residents and all residents of color in the jurisdiction across three time periods. In Cotati, the highest segregation is between Black/African American and white residents. The dissimilarity index of 0.119 means that 11.9% of Black/African American (or white) residents would need to move to a different neighborhood to create perfect integration between these two racial groups.

Table 29: Racial Dissimilarity Index Values for Segregation within Cotati

Race	Cotati			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander vs. White	0.071*	0.079*	0.085*	0.185
Black/African American vs. White	0.111*	0.066*	0.119*	0.244
Hispanic/Latino vs. White	0.050	0.018	0.101	0.207
People of Color vs. White	0.024	0.026	0.074	0.168

Note: If a number is marked with an asterisk (*), it indicates that the index is based on a racial group making up less than 5 percent of the jurisdiction population, leading to unreliable numbers.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Finally, the Theil’s H Index measures how diverse each neighborhood is compared to the diversity of the whole city. Neighborhoods are weighted by their size, so that larger neighborhoods play a more significant role in determining the total measure of segregation. The index ranges from zero to one. A value of zero would mean all neighborhoods within a city have the same demographics as the entire city. A value of 1 would mean each group lives exclusively in their own, separate neighborhood.

The “Bay Area Average” column in the table below provides the average Theil’s H Index across Bay Area jurisdictions in 2020. Between 2010 and 2020, the Theil’s H Index for racial segregation in Cotati increased, suggesting that there may now be more neighborhood level racial segregation within the jurisdiction. However, in 2020, the Theil’s H Index for racial segregation in Cotati was lower than the average value for Bay Area jurisdictions, indicating that neighborhood level racial segregation in Cotati is less than in the average Bay Area city.

Table 30: Theil’s H Index Values for Racial Segregation within Cotati

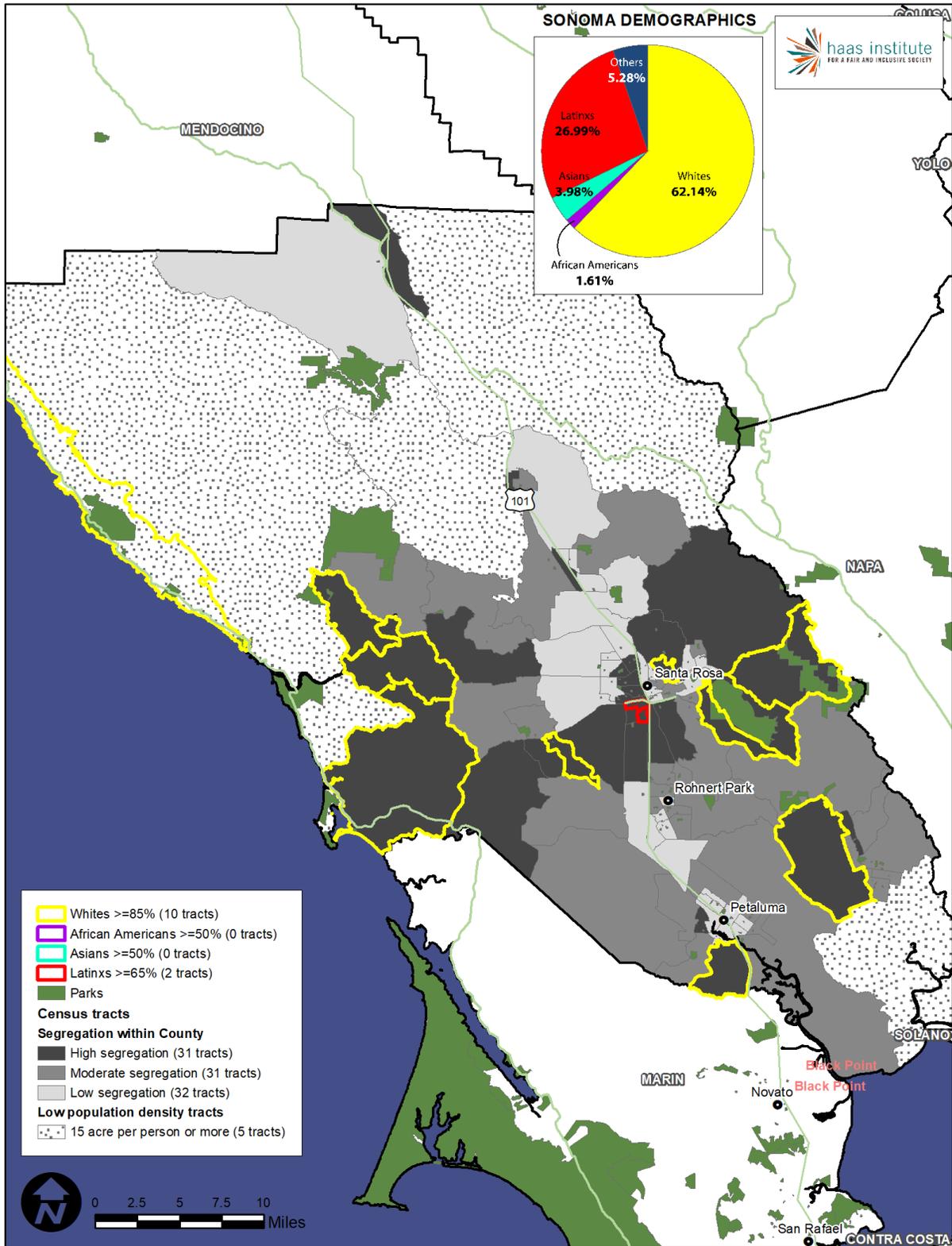
	Cotati			Bay Area
Index	2000	2010	2020	2020
Theil’s H Multi-racial	0.003	0.002	0.010	0.042

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

The Bay Area is a racially diverse region of over seven million people and more than one hundred incorporated municipalities, including the City of Cotati. Racial segregation occurs in every county and metropolitan statistical area.¹¹ This includes Cotati and Sonoma County, which has the highest percentage of white residents of any county in the Bay Area.

Across the region, white residents are the most segregated group even in counties where they are a racial plurality and/or a minority and have less exposure to members of other racial groups than any other racial group has to each other. This is particularly true of jurisdictions within Sonoma County, though the census tracts that run through Cotati experience low to medium levels of segregation comparatively and there are no tracts that include 85% or more white populations.

Figure 12: Levels of Segregation in Census Tracts within Sonoma County, 2018



Source: Racial Segregation in the San Francisco Bay Area, Part 1, Othering & Belonging Institute

Key findings on income in Cotati from the “AFFH Segregation Report: Cotati” conducted by the University of California (UC) Merced Urban Policy Lab and ABAG/MTC Staff are as follows:

- As of 2020, **white residents are the most segregated** compared to the other racial groups in Cotati as measured by the isolation index. White residents live in neighborhoods where they are less likely to encounter other racial groups.
- Among all racial groups in Cotati, the **white population’s index value has changed the most over time, becoming less segregated** from other racial groups between 2000 and 2020.
- The **highest level of racial segregation in Cotati is between Black and white residents** according to the dissimilarity index; however, this data point is based on a small population size and therefore not necessarily dependable.
- **Neighborhood racial segregation in Cotati increased** between 2010 and 2020 according to the Theil’s H-Index.

Persons with Disabilities

The Americans with Disabilities Act (ADA) defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” People with disabilities are at greater risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. According to 2019 U.S. Census data, 763 individuals over the age of 18 reported a disability of any kind in Cotati which constitutes 10.2% of the population. Table 31 breaks down the proportion of reported disability types.

Table 31: Disability by Type, 2019

Disability	value
With a cognitive difficulty	5.6%
With an ambulatory difficulty	5.0%
With an independent living difficulty	4.0%
With a hearing difficulty	2.7%
With a self-care difficulty	1.9%
With a vision difficulty	1.2%

Source: U.S. Census Bureau, American Community Survey 2019 5-Year Estimates

Within this population, there are significant differences in disability status by race and ethnicity. Asian individuals are more likely to have disabilities than are Black individuals, with the incidence of disabilities among the much larger populations of White and Hispanic residents in between (Table 32). It is possible that the small number of Black and Asian residents along with disparities in age (which are highly correlated with disability status) partially explains the disparity.

Table 32: Disability Status by Race and Ethnicity, City of Cotati, 2015-2019

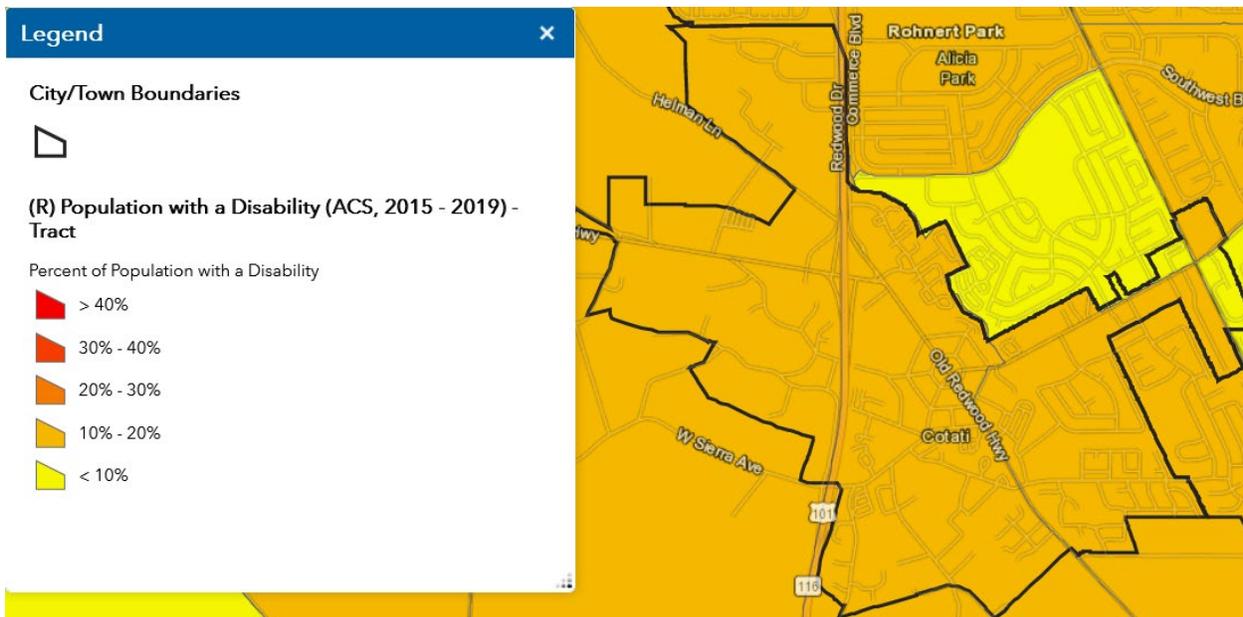
Race or Ethnicity	Total Population	Number with a Disability	% with a Disability
Total Non-Institutionalized Population	7,545	771	10.3%
White Alone, Not Hispanic or Latino	5,555	594	10.7%
Black or African American Alone*	46	0	0.0%
Asian Alone*	131	17	13.0%
Hispanic or Latino (of any race)	1,375	101	7.3%

Source: 2015-2019 American Community Survey 5-Year Estimates

Note: As a result of how ACS Table S1810 disaggregates race and ethnicity data for persons with disabilities, Black and Asian population estimates are reflective of all persons who identify as Black or Asian alone, including those who also identify as Hispanic/Latino.

The share of the non-institutionalized population with a disability in Cotati (10.2%) is two percent lower than that of Sonoma County (12%) while it is on par with that of the Bay Area (10%).¹⁶ People with disabilities are distributed citywide, with no area exhibiting a disproportionate population with disabilities.

Figure 13: Population with a Disability, Cotati



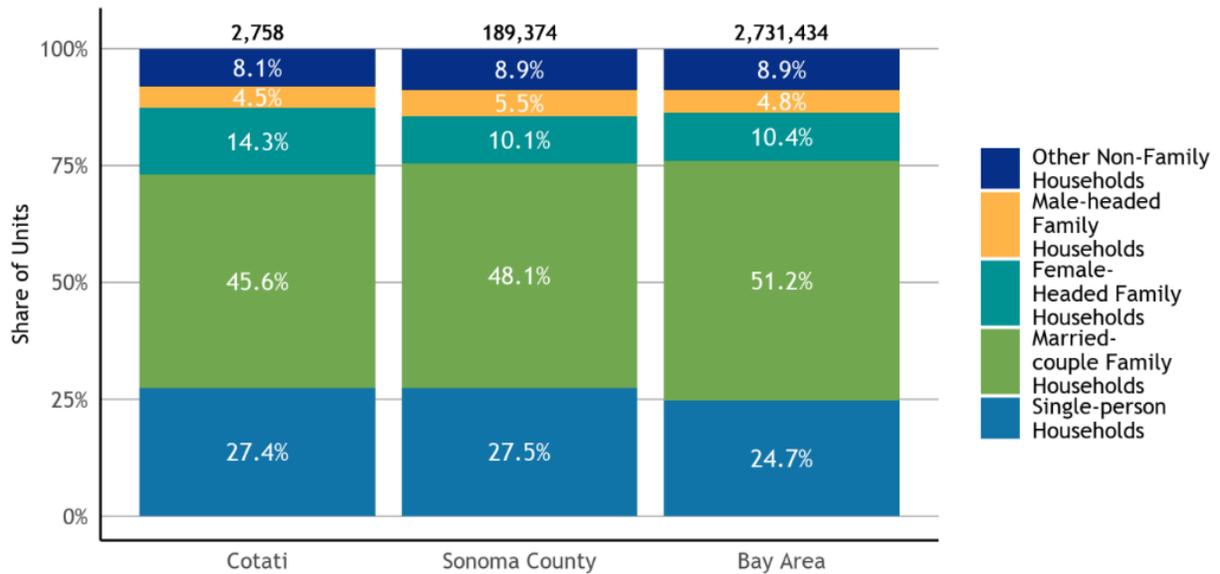
Source: U.S. Census Bureau, American Community Survey 2019 5-Year Estimates

¹⁶ Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18101

Familial Status

American Community Survey data indicates that Cotati has a comparable share of single-person households (27.4%) to both Sonoma County (27.5%) and the Bay Area (24.7%) but has four percent more Female-Headed Family Households than both Sonoma County and the Bay Area.

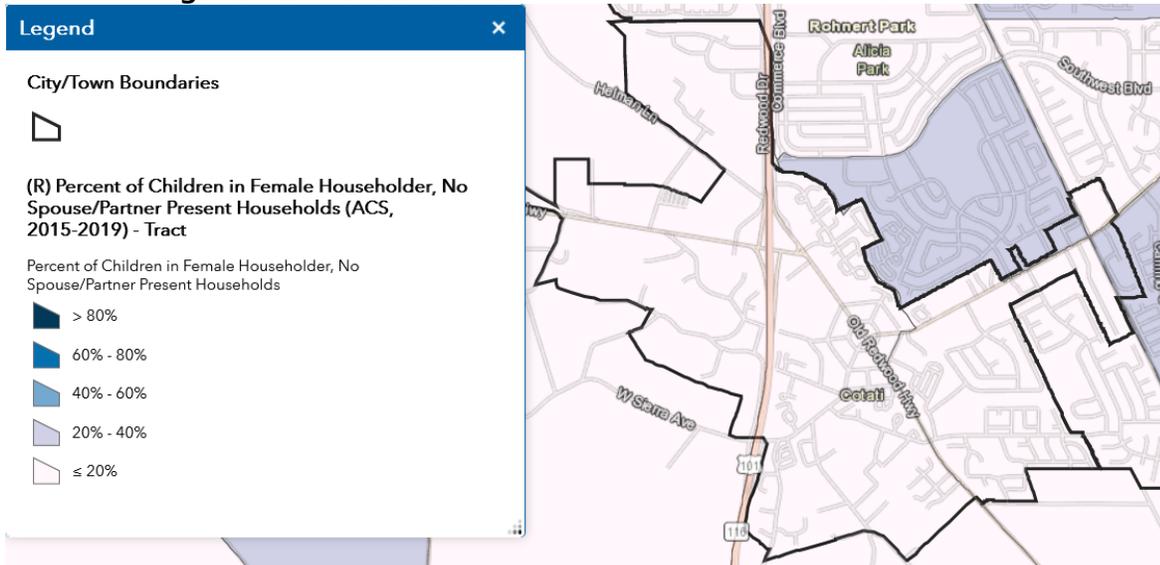
Figure 14: Household Type in Cotati



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

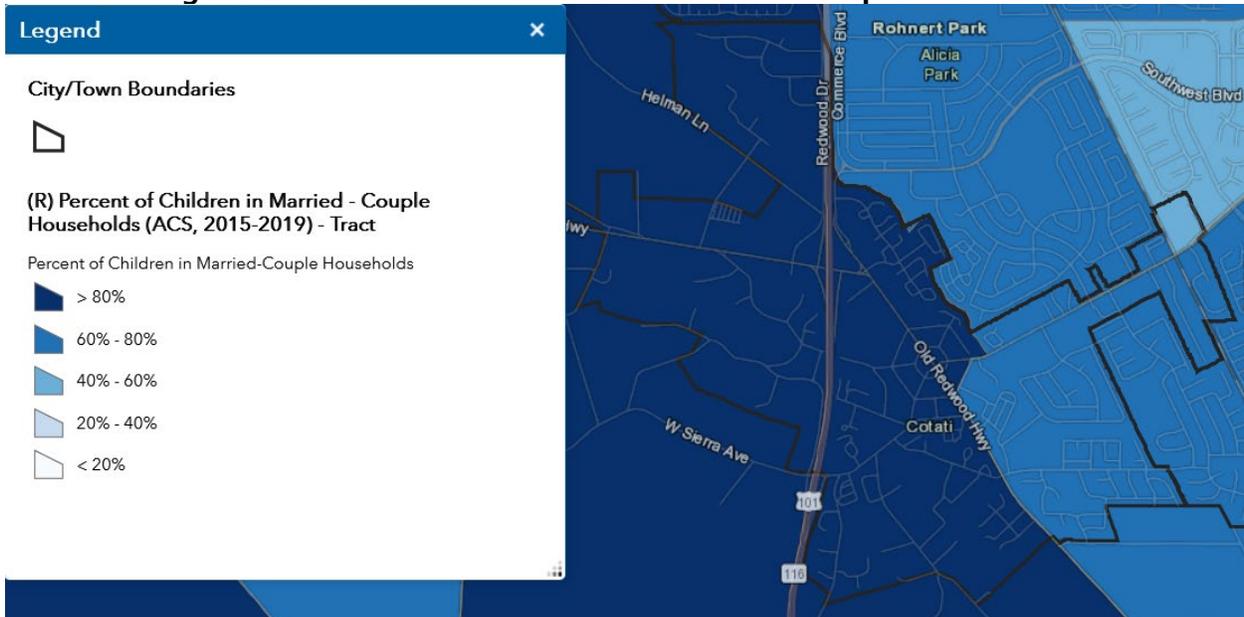
There is no concentration of children in female-headed households within Cotati (Figure 15), but the north and west sides of the City have higher proportions of children within married-couple households (Figure 16).

Figure 15: Percent of Children in Female-Headed Households



Source: U.S. Census Bureau, American Community Survey 2019 5-Year Estimates

Figure 16: Percent of Children in Married-Couple Households



Source: U.S. Census Bureau, American Community Survey 2019 5-Year Estimates

Income

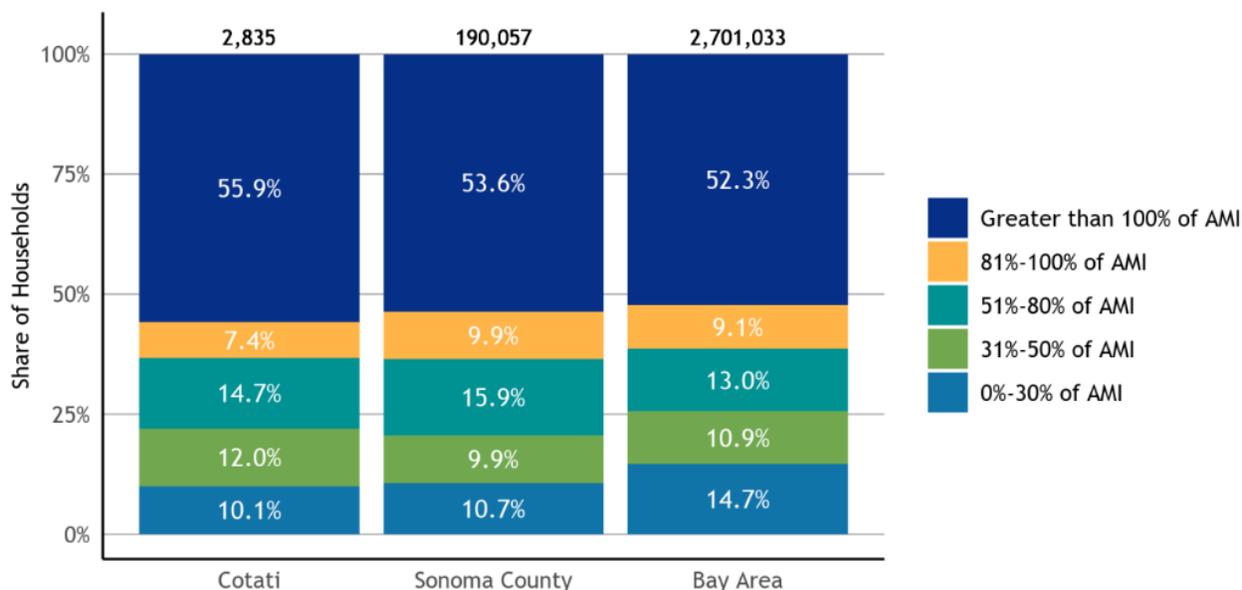
Household income is the principal factor in determining a household’s ability to balance housing costs with other basic life necessities. Households with lower incomes face additional barriers when seeking adequate housing. While economic factors that affect a household’s housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

Identifying geographies and individuals with a low- to moderate- income (LMI) is important to overcome patterns of segregation. HUD defines LMI areas as a Census tract or block group where over 51% of the population is LMI (based on HUD income definition of up to 80% of the area median income.)

Despite the economic and job growth experienced throughout the region since 1990, the income gap has continued to widen. California is one of the most economically unequal states in the nation, and the Bay Area has the highest income inequality between high-and low-income households in the state.

In Cotati, 55.9% of households earn more than the Area Median Income (AMI). This income group is slightly larger in Cotati than in Sonoma County and the Bay Area. The share of Very-Low Income householders in Cotati, however, is 2.1% larger than that of Sonoma County and 1.1% larger than the Bay Area. The AMI in Cotati in 2018 was \$82,182 meaning that a very low-income family of four should pay no more than \$1,027.28 (30% of income) in rent for it to be considered affordable by federal standards. The rate of Extremely Low-Income households in Cotati is comparable to Sonoma County and 4.6% less than the Bay Area average. Many households with multiple wage earners – including food service workers, full-time students, teachers, farmworkers, and healthcare professionals – can fall into these lower AMI categories due to stagnant wages in many industries.

Figure 17: Households by Household Income Level



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

Income demographics in Cotati for the years 2010 and 2015 are in Table 33 below. The figure also provides the income composition of the nine-county Bay Area in 2015. As of that year, Cotati had a lower share of very low-income residents than the Bay Area, a modestly higher share of low-income residents, a lower share of moderate-

income residents and a significantly higher share of above moderate-income residents.

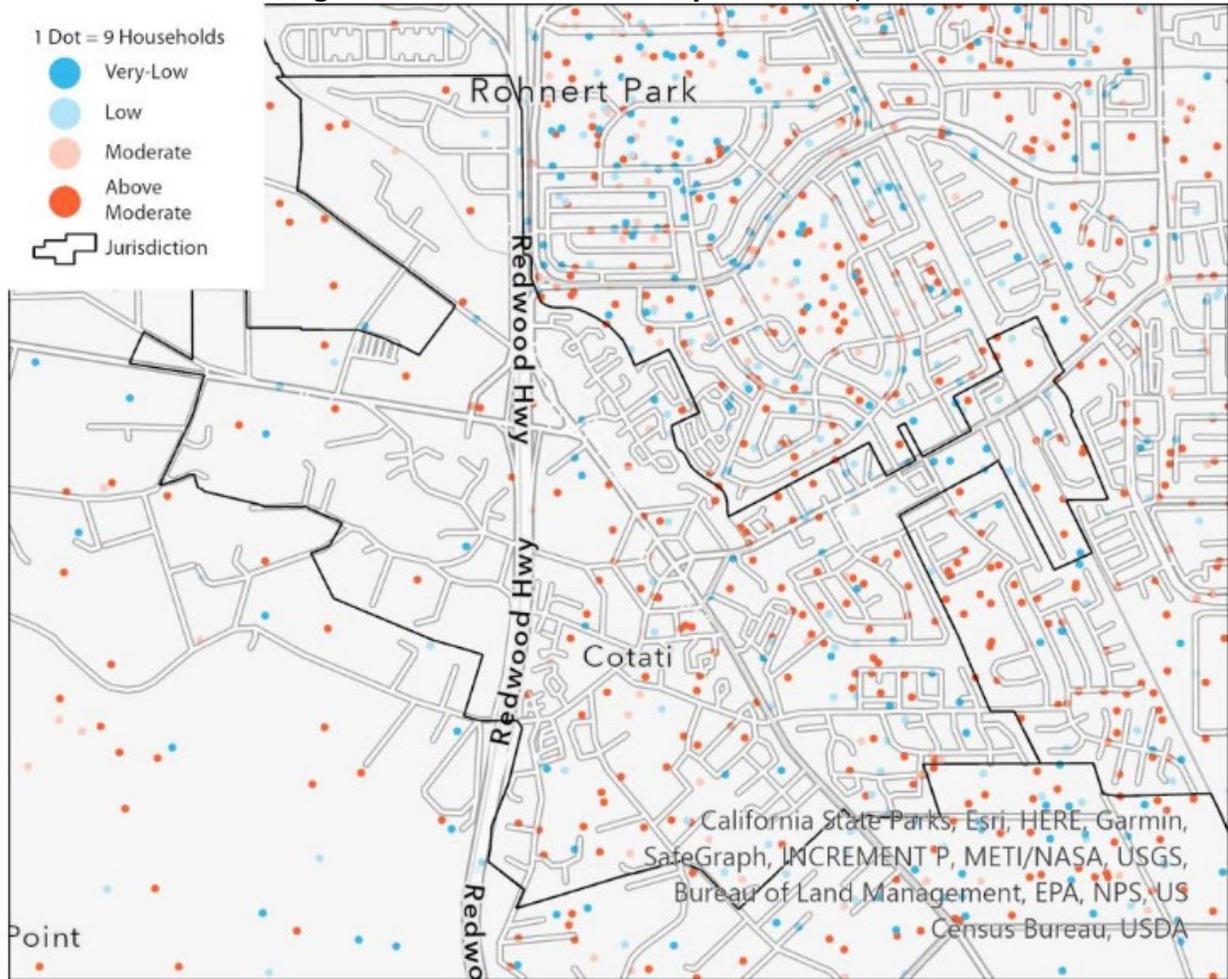
Table 33: Population by Income Group in Cotati and the Region

Income Group	Cotati		Bay Area Average
	2010	2015	2015
Very Low-Income (<50% AMI)	23.31%	24.25%	28.7%
Low-Income (50%-80% AMI)	17.03%	15.29%	14.3%
Moderate-Income (80%-120% AMI)	22.56%	13.52%	17.6%
Above Moderate-Income (>120% AMI)	37.1%	46.94%	39.4%

Source: Data for 2015 is from Housing U.S. Department of and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data

The income dot map of Cotati below offers a visual representation of the spatial distribution of income groups within the jurisdiction. As with the racial dot maps, when the dots show lack of a pattern or clustering, income segregation measures tend to be lower, and conversely, when clusters are apparent, the segregation measures may be higher as well. This map shows predominance of Above Moderate households (dark red dots) but does not reveal any income clusters within Cotati (Figure 18).

Figure 18: Income Dot Map of Cotati, 2015



Source: 2011-2015 American Community Survey (ACS)

Income Isolation Index Values for Cotati and the average Bay Area jurisdiction are present in Table 34 below. Above Moderate-Income residents are the most isolated income group in Cotati. Cotati’s isolation index of 0.430 for these residents means that the average Above Moderate-Income resident in Cotati lives in a neighborhood that made up of 43.0% Above Moderate-Income households. The degree of isolation of this income group increased between 2010 and 2015 but was still lower than the average Bay Area City.

Like the tables presented earlier for neighborhood racial segregation, the “Bay Area Average” column in Table 34 provides the average isolation index value across Bay Area jurisdictions for different income groups in 2015. The data in this column can be used as a comparison to provide context for the levels of segregation experienced by income groups in this jurisdiction. For example, the average isolation index value for Very Low-Income residents across Bay Area jurisdictions is 0.269, meaning that in the average Bay Area jurisdiction a Very Low-Income resident lives in a neighborhood that is 26.9% Very Low-Income.

Table 34: Income Group Isolation Index Values in Cotati (2010, 2015) and Average Bay Area Jurisdiction

Income Group	Cotati		Bay Area Average
	2010	2015	2015
Very Low-Income (<50% AMI)	0.234	0.275	0.269
Low-Income (50%-80% AMI)	0.189	0.148	0.145
Moderate-Income (80%-120% AMI)	0.215	0.171	0.183
Above Moderate-Income (>120% AMI)	0.382	0.430	0.507

Source: ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data, ACS 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Table 35 provides the dissimilarity index values indicating the level of segregation in Cotati between residents who are lower-income (earning less than 80% of AMI) and those who are not lower-income (earning above 80% of AMI). Segregation in Cotati between lower-income residents and residents who are not lower-income decreased between 2010 and 2015. Additionally, Table 35 shows income group dissimilarity index values for the level of segregation between residents who are very low-income (earning less than 50% of AMI) and those who are above moderate-income (earning above 120% of AMI). This supplementary data point provides additional nuance to an analysis of income segregation, as this index value indicates the extent to which a jurisdiction’s lowest and highest income residents live in separate neighborhoods.

Like other tables in this report, the “Bay Area Average” column shows the average income group dissimilarity index values for these income group pairings across Bay Area jurisdictions in 2015. For example, Table 35 indicates that the average income group dissimilarity index between lower-income residents and other residents in a Bay Area jurisdiction is 0.198, so on average 19.8% of lower-income residents in a Bay Area jurisdiction would need to move to a different neighborhood within the jurisdiction to create perfect income group integration in that jurisdiction.

In 2015, the income segregation in Cotati between lower-income residents and other residents was lower than the average value for Bay Area jurisdictions. This means that the lower-income residents are less segregated from other residents within Cotati compared to other jurisdictions in the region.

Table 35: Income Group Dissimilarity Index Values for Segregation in Cotati

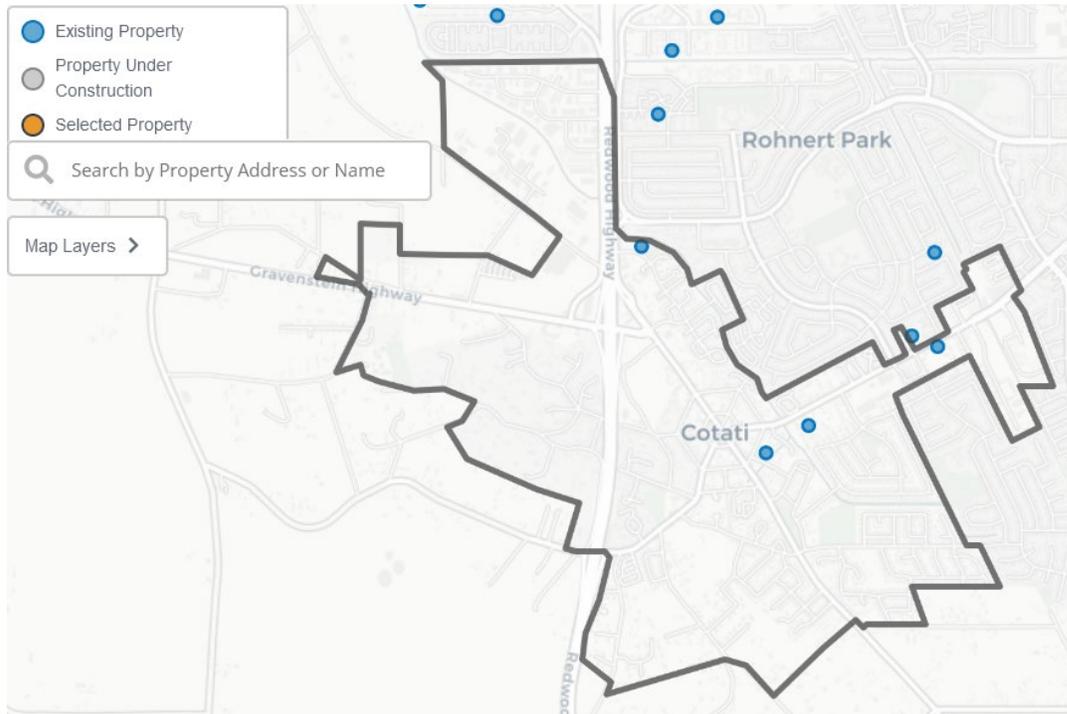
Income Group	Cotati		Bay Area Average
	2010	2015	2015
Below 80% AMI vs. Above 80% AMI	0.166	0.045	0.198
Below 50% AMI vs. Above 120% AMI	0.038	0.068	0.253

Source: ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data, ACS 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Deed-restricted affordable housing helps to meet the needs of lower-income households but can serve to further contribute to segregation by income group. There are multiple rental housing projects in the City that include deed-restricted affordable units (Figure 19). Per California Housing Partnership, these include:

- Charles Street Village, 47 affordable homes, Seniors, 2001
- Marvin Gardens, 37 affordable homes, Family, 1983
- Wilford Lane Apartments, 35 affordable homes, Special Needs, 2003
- Windwood Apartments, 28 affordable homes, Family, 1981

Figure 19: Map of Existing Affordable Rental Housing Projects in Cotati and Surrounding Area



Source: California Housing Partnership Affordable Housing Map

Key findings on income in Cotati from the “AFFH Segregation Report: Cotati” conducted by the UC Merced Urban Policy Lab and ABAG/MTC Staff are as follows:

- Neighborhood income segregation in Cotati stayed about the same between 2010 and 2015.
- Above Moderate-income residents are the most segregated compared to other income groups in Cotati. Above Moderate-income residents live in neighborhoods where they are less likely to encounter residents of other income groups.
- Among all income groups, the Low-income population’s segregation measure has changed the most over time, becoming less segregated from other income groups between 2010 and 2015.
- Segregation between lower-income residents and residents who are not lower income has decreased between 2010 and 2015. In 2015, the income segregation in Cotati between lower-income residents and other residents was lower than the average Bay Area jurisdiction.

Poverty

Poverty thresholds, as defined by the Census Bureau, vary by household type but remain constant throughout the country and does not correspond to Area Median Income. Approximately 10.0% of Cotati residents were determined to be living below the poverty level in 2020.

Across the region, state, and country, people of color are more likely to experience poverty and financial instability due to the lasting impacts of historical housing policies that exclude them from opportunities extended to white residents. These economic disparities also leave communities of color at higher risk for housing insecurity, displacement, or homelessness. In Cotati, Black or African American residents experience the highest rates of poverty followed by Other Race or Multiple Races residents (Table 36).

Table 36: Poverty Status by Race in Cotati

Racial / Ethnic Group	value
Black or African American (Hispanic and Non-Hispanic)	23.9%
Other Race or Multiple Races (Hispanic and Non-Hispanic)	16.9%
Asian / API (Hispanic and Non-Hispanic)	12.4%
Hispanic or Latino	9.9%
White, Non-Hispanic	9.1%
White (Hispanic and Non-Hispanic)	5.8%
American Indian or Alaska Native (Hispanic and Non-Hispanic)	0.0%

Source: American Community Survey, 2019 5-Year Estimates

Regionally, more than half of all households make more than 100% AMI, while 15% make less than 30% AMI (“extremely low income”). In Sonoma County, 30% AMI is equivalent to the annual income of \$35,650 for a family of four. There is no concentration of poverty within the City (Figure 20), and poverty levels have remained about the same since 2014 (Figure 21).

Figure 20: Population by Poverty Status, 2019

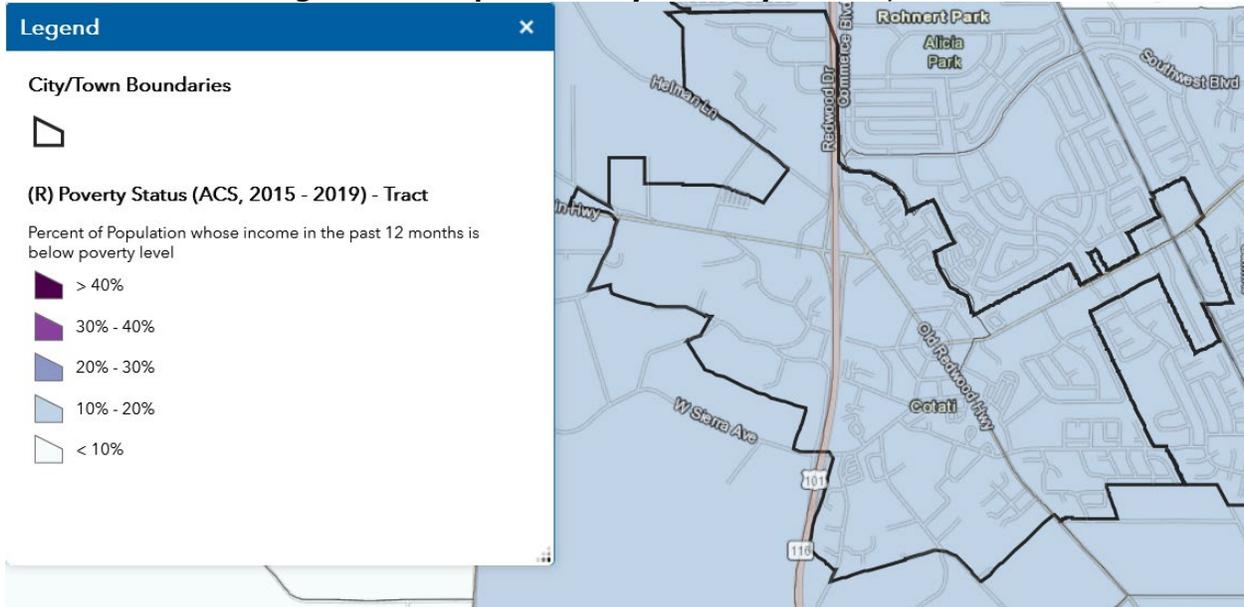
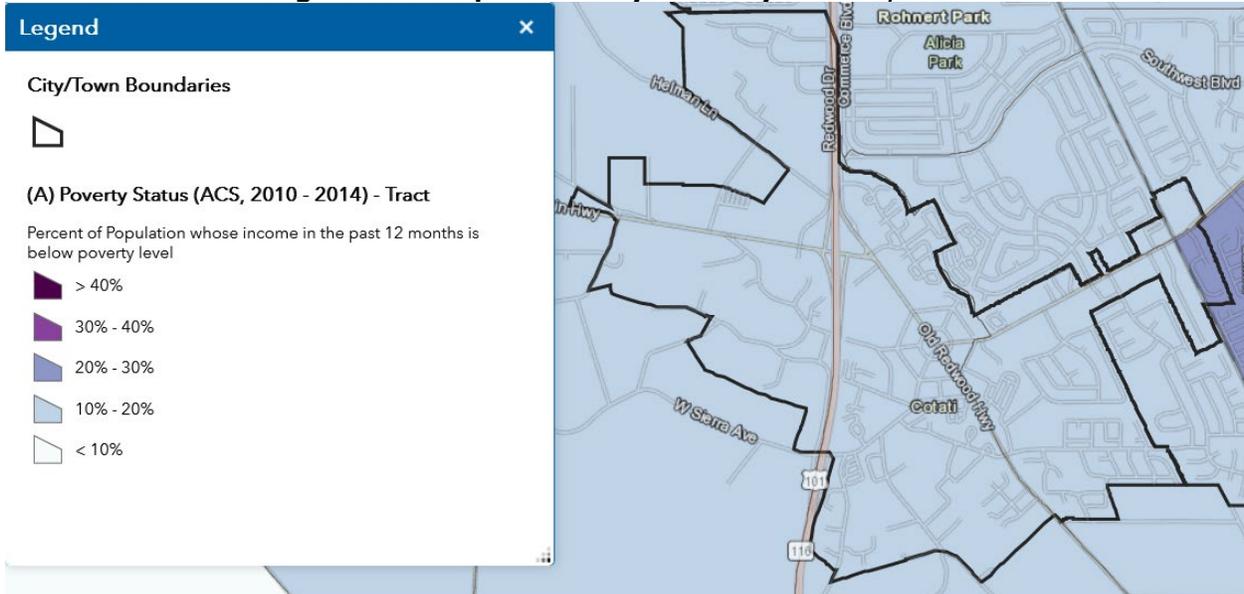


Figure 21: Population by Poverty Status, 2014



Source: American Community Survey, 2019 5-Year Estimates

As of 2019, Cotati had a smaller population of impoverished residents compared to the State of California and a slightly larger impoverished population compared to Sonoma County. In the Bay Area, more than half of all households make more than the Area Median Income, while 15% are Extremely Low Income. Households with multiple wage earners—including food service workers, full-time students, teachers, farmworkers, and healthcare professionals—can fall into lower AMI categories due to stagnant wages in certain industries.

Table 37: Percent of Population Below Poverty Level for Whom Poverty Status is Determined in California, Sonoma County, and Cotati (2019)

	California	Sonoma County	Cotati
Percentage of population below poverty line	13.4%	9.2%	10.1%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2019), Table S1701

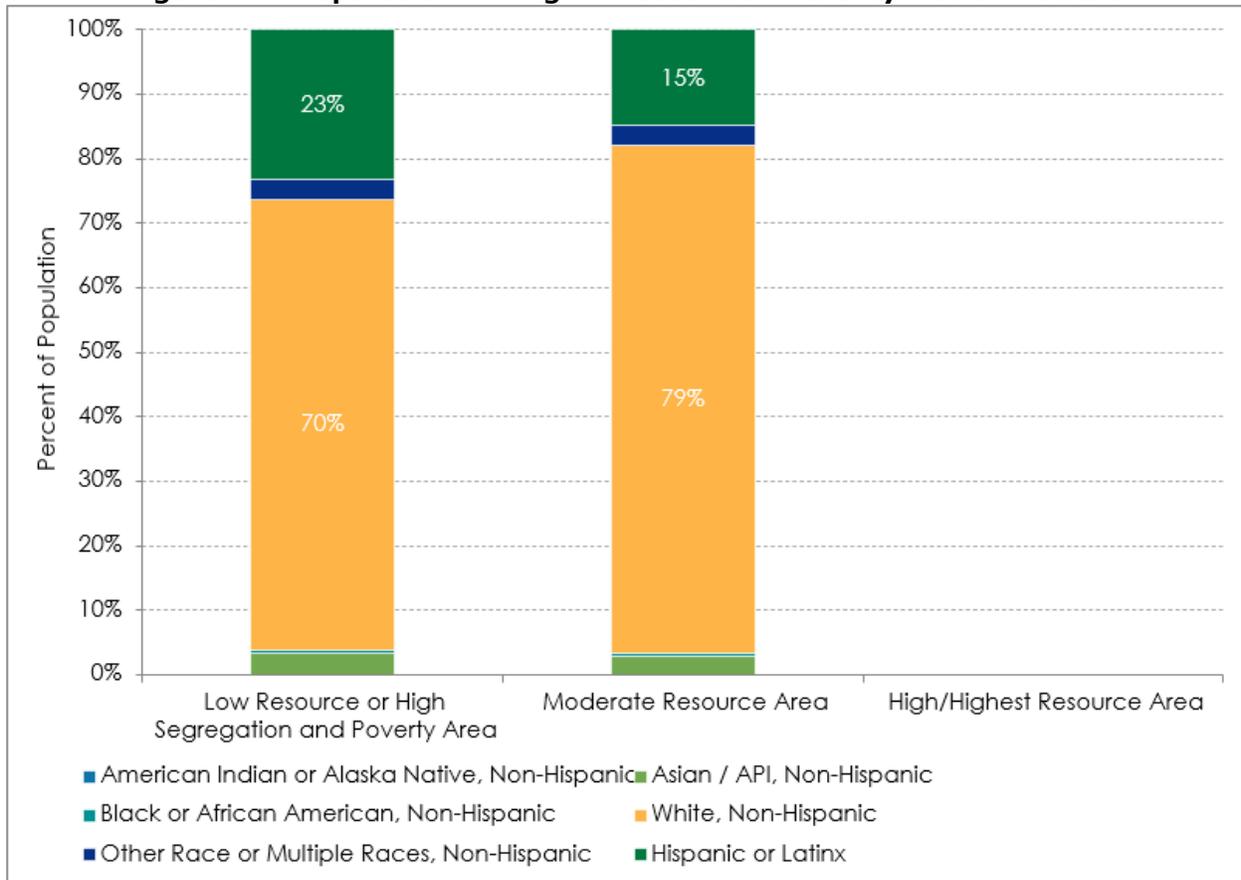
Racially & Ethnically Concentrated Areas of Poverty (R/ECAP) and Affluence (RCAA)

The U.S. Department of Housing and Urban Development (HUD) has determined that whites are the most racially segregated group in the United States and “in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, white communities.” HUD defines census tracts with a majority non-White population (greater than 50%) that have either a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower, as Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs). There are no R/ECAPs in the City of Cotati.

While RECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence should be further studied to ensure housing is integrated, a key to fair housing choice. Scholars at the University of Minnesota Humphrey School of Public Affairs have created the Racially Concentrated Areas of Affluence (RCAAs) metric to tell the story of segregation more fully in the United States. Based on their research, RCAAs are census tracts where 1) 80% or more of the population is white, and 2) the median household income is \$125,000 or greater. There are no RECAAs in Cotati.

In February 2017, the California Fair Housing Task Force (Task Force) created a map that more effectively reflects that level of racial and ethnic diversity in many parts of California. The map that was created filters areas that are both non-whites racially segregated and high poverty. Census tracts and rural block groups that have both a poverty rate of over 30% and that are designated as racially segregated are categorized by this statewide standard as “High Segregation and Poverty.” While there are no block groups of High Segregation and Poverty in Cotati, there are areas that are defined as Low Resource according to the 2022 TCAC/HCD Opportunity Map. The populations in these areas can be deconstructed by race to reflect a general relationship between race and level of resources. Of the Low Resource areas in the City of Cotati, 70% of the population is white, and 23% of the population is Hispanic/Latino. Meanwhile, the white population in Moderate Resource Areas is nine percent larger and the Hispanic/Latino population is eight percent smaller than in Low Resource areas (Figure 22).

Figure 22: Population Living in Resource Areas by Race in Cotati



Source: California Tax Credit Allocation Committee (TCAC)/California Housing and Community Development (HCD), Opportunity Maps (2020); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002

Integration and Segregation: Fair Housing Issues and Contributing Factors

Cotati has no measurable fair housing issues related to segregation and integration and is more integrated than most areas nearby and in the region.

4.5.4 Disparities in Access to Opportunities

Racial and economic segregation can lead to unequal access to opportunities within community such as access to high performing schools, good paying jobs, public transportation, parks and playgrounds, clean air and water, public safety, and other resources. A generational lack of access, particularly for people of color and lower income residents, has often resulted in poor life outcomes including lower educational attainment, higher morbidity rates, and higher mortality rates.

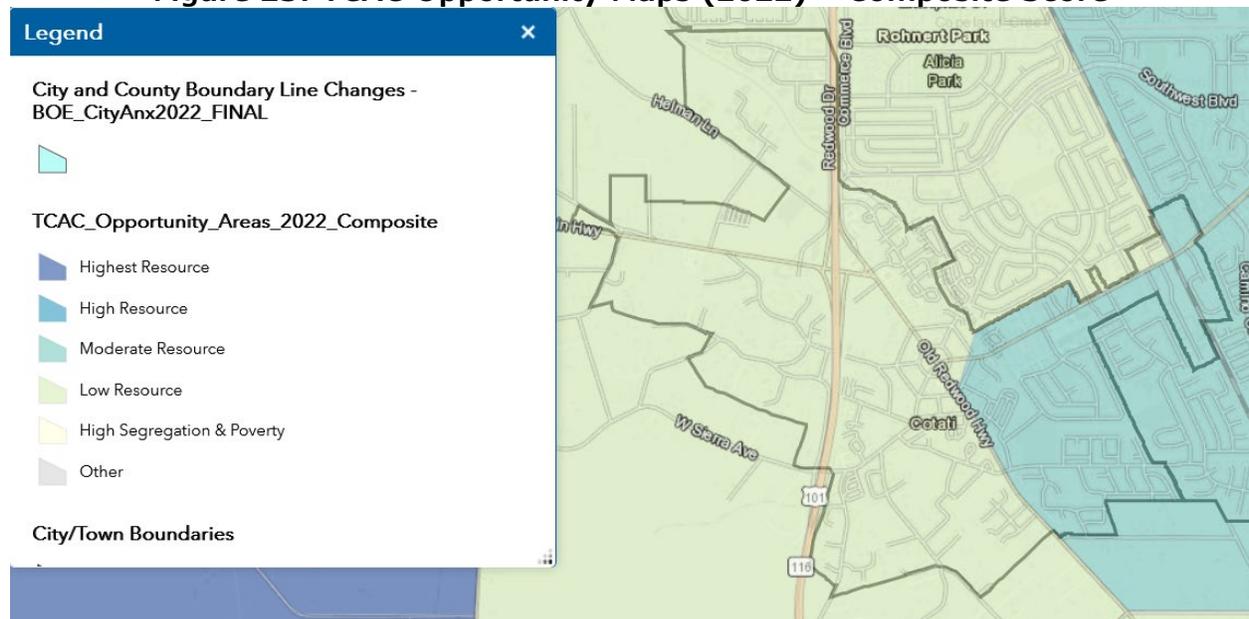
This section of the Assessment of Fair Housing identifies any socioeconomic barriers related to education, environment, employment, and transportation that could negatively impact certain communities in Cotati.

Resource Areas

The TCAC Opportunity Areas 2022 Composite Score assesses the level of resources related to education, poverty, proximity to jobs and economic opportunities, low pollution levels, and other factors in neighborhoods across the City. The Composite Score, an index that weighs all these factors, indicates that Cotati is categorized as Low Resource, except for the most eastern census tract that is Moderate Resource. Because census tract boundaries do not align neatly with City limit lines, these composite scores are influenced by activity happening in areas of the census tracts that fall outside of Cotati City limits; the westerly tract includes portions of the Cities of Rohnert Park, Petaluma, and the community of Pengrove in unincorporated Sonoma County. Education and economic scores fall into the same quartile citywide, but the environmental score of the sprawling westerly tract is notably lower than easterly tracts containing portions of Cotati east of US-101.

The resource designations of both Census tracts in Cotati are influenced by activity outside City limits. The Low Resource westerly tract is influenced by residents from the northern boundary at Wilfred Avenue including the entirety of western Rohnert Park and wrapping around Cotati to the unincorporated community of Pengrove. The Moderate Resource easterly tract is influenced by the L Section of Rohnert Park. Local factors do contribute to these distinctions, however, including the presence of older housing stock (pre-1940) in the westerly tract along Old Redwood Highway, and the City's mobile home parks concentrated along West Sierra Avenue.

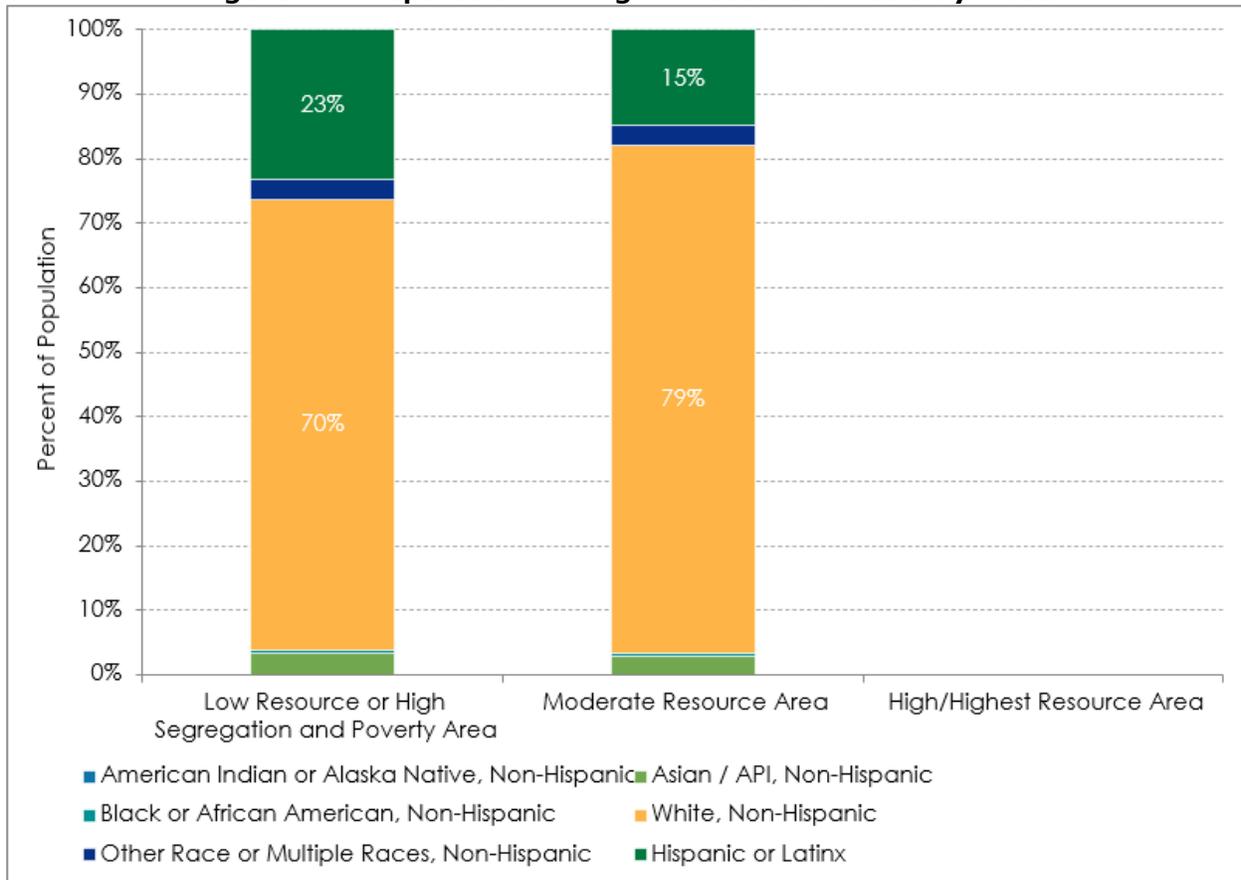
Figure 23: TCAC Opportunity Maps (2022) – Composite Score



Source: 2022 TCAC/HCD Opportunity Areas/Resource Areas

Over three quarters of those living in the Moderate Resource Area are white, and there are 8% more Hispanic/Latino residents living in Low Resource Areas than in the Moderate Resource Area (Figure 24).

Figure 24: Population Living in Resource Areas by Race

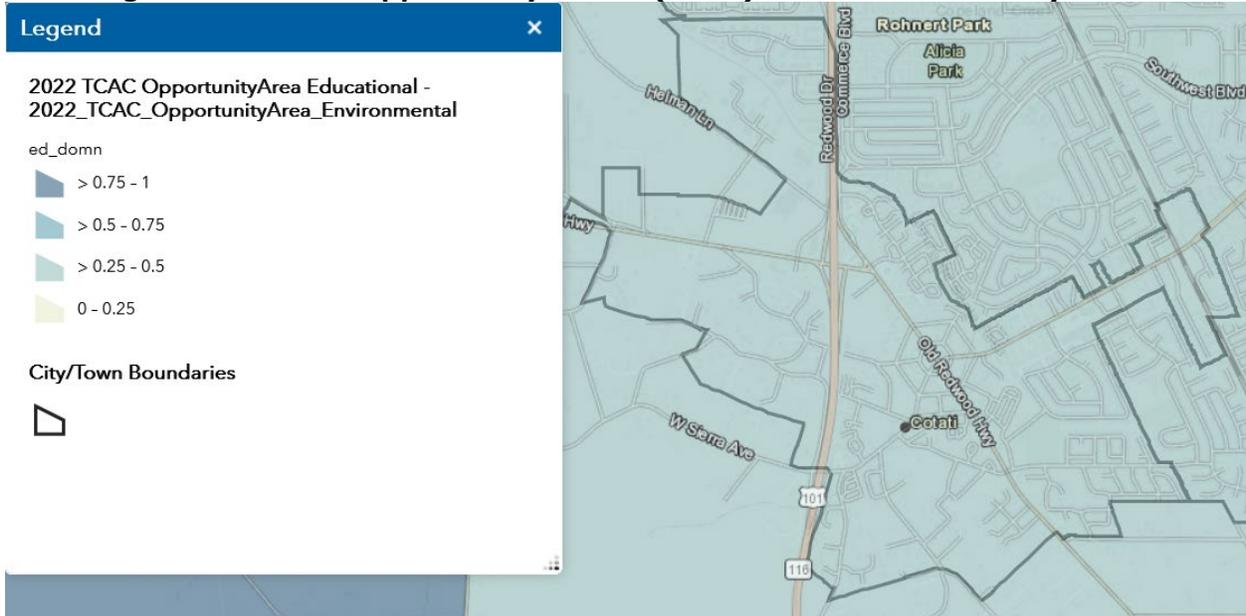


Source: California Tax Credit Allocation Committee (TCAC)/California Housing and Community Development (HCD), Opportunity Maps (2020); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002

Education

2021 TCAC Opportunity Areas Education Scores shown in Figure 25 provide an index for measuring the level of educational outcomes within a census tract. The higher the score, the more positive the outcomes. All census tracts that intersect through Cotati score between 0.25 – 0.50, indicating less positive education outcomes in the City, yet a consistent score between tracts.

Figure 25: TCAC Opportunity Areas (2022) Education Score by Tract



Source: 2022 TCAC/HCD Opportunity Areas/Resource Areas – Education

Cotati-Rohnert Park Unified School District serves 5,766 students from Transitional Kindergarten to Grade 12 in its eleven schools. The City is also close to two higher education institutions, Sonoma State University and Santa Rosa Junior College which offer various certificate and degree programs.

The California School Dashboard calculates the number of Socioeconomically Disadvantaged students in a district based on the number of students who are eligible for free or reduced priced meals or have parents/guardians who did not receive a high school diploma. In the Cotati-Rohnert Park Unified School District, 46.2% of students fall into this category (Table 38). The District has an enrollment of 5,766 students, 46% being socioeconomically disadvantaged and 17% being English learners. The largest racial/ethnic group is Hispanic with 43.5%. According to the California Department of Education, the Rancho Cotate High School graduation rate (93%) is comparable to Petaluma High (95%) and Casa Grande High (95%) to the south, and substantially higher than Elsie Allen High (70%) and Montgomery High (83%) to the north.

The Cotati-Rohnert Park Unified School District has experienced a notable increase in enrollment between 2017 to 2021, in contrast with the County as a whole which has experienced notable declines in public school enrollment over recent years. The California Education Data Partnership notes a 2.8% increase in cumulative district enrollment from 2017 to 2021, compared to a 10.5% countywide decline over the same period. Generation Housing’s State of Housing in Sonoma County report identified a lower numerical decline in households with children than Sonoma County jurisdictions of comparable size between 2000 and 2019, including Sebastopol and Healdsburg.

Table 38: Cotati-Rohnert Park Unified District Student Demographics

Student Group	Total	Percentage
English Learners	986	17.20%
Foster Youth	29	0.50%
Homeless	22	0.40%
Socioeconomically Disadvantaged	2,641	46.20%
Students with Disabilities	730	12.80%
Race/Ethnicity	Total	Percentage
African American	108	1.90%
American Indian	38	0.70%
Asian	171	3.00%
Filipino	63	1.10%
Hispanic	2,489	43.50%
Pacific Islander	27	0.50%
Two or More Races	366	6.40%
White	2,206	38.60%
Total Enrollment	5,468	

Source: California School Dashboard, Cotati-Rohnert Park Unified, 2019

The California Assessment of Student Performance and Progress from 2018-2019 for all grades shows that the school district scores for Level 4 (Exceeds) is higher than for the County and State for English Language. The Math scores are lower than both the County and State.

Figure 26: English Language Arts/Literacy Distribution – All Grades, 2018-2019

Achievement Level	State of California	Sonoma	Cotati-Rohnert Park Unified
Mean Scale Score	N/A	N/A	N/A
 Standard Exceeded: Level 4 ⁽ⁱ⁾	22.48 %	20.03 %	16.02 %
 Standard Met: Level 3 ⁽ⁱ⁾	28.62 %	30.37 %	30.04 %
 Standard Nearly Met: Level 2 ⁽ⁱ⁾	22.28 %	23.77 %	24.96 %
 Standard Not Met: Level 1 ⁽ⁱ⁾	26.63 %	25.84 %	28.98 %

Source: California Assessment of Student Performance and Progress

Figure 27: Mathematics Achievement Distribution – All Grades, 2018-2019

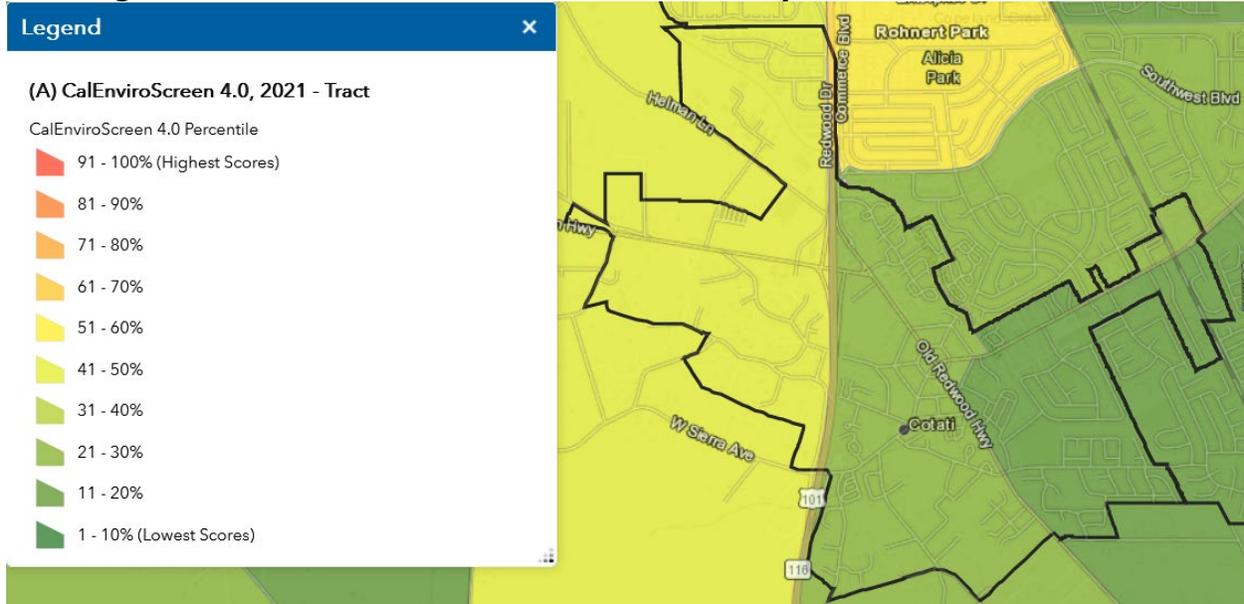
Achievement Level	Cotati-Rohnert Park Unified	Sonoma	State of California
Mean Scale Score	N/A	N/A	N/A
Standard Exceeded: Level 4	10.23 %	16.35 %	19.69 %
Standard Met: Level 3	19.99 %	21.59 %	20.04 %
Standard Nearly Met: Level 2	29.32 %	27.52 %	25.41 %
Standard Not Met: Level 1	40.45 %	34.54 %	34.86 %

Source: California Assessment of Student Performance and Progress

Access to Healthy Environment

In October 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socio-economic indicators to map and compare community environmental scores. A community within the 75th percentile or above is one with higher levels of pollution and/or has other negative environmental traits and is categorized as a “disadvantaged community.” The City of Cotati contains no census tracts within the 75th percentile and therefore does not contain any Disadvantaged Communities by COEHHA metrics. Figure 28 notes a slight disparity between the City’s Census tracts, yet this may be influenced by conditions outside of City limits due to the sprawling westerly tract as indicated in the Resource Areas subsection above. This score is likely particularly influenced by the inclusion of all portions of the City of Rohnert Park west of US-101, a mostly industrial area dominated by automotive and manufacturing businesses.

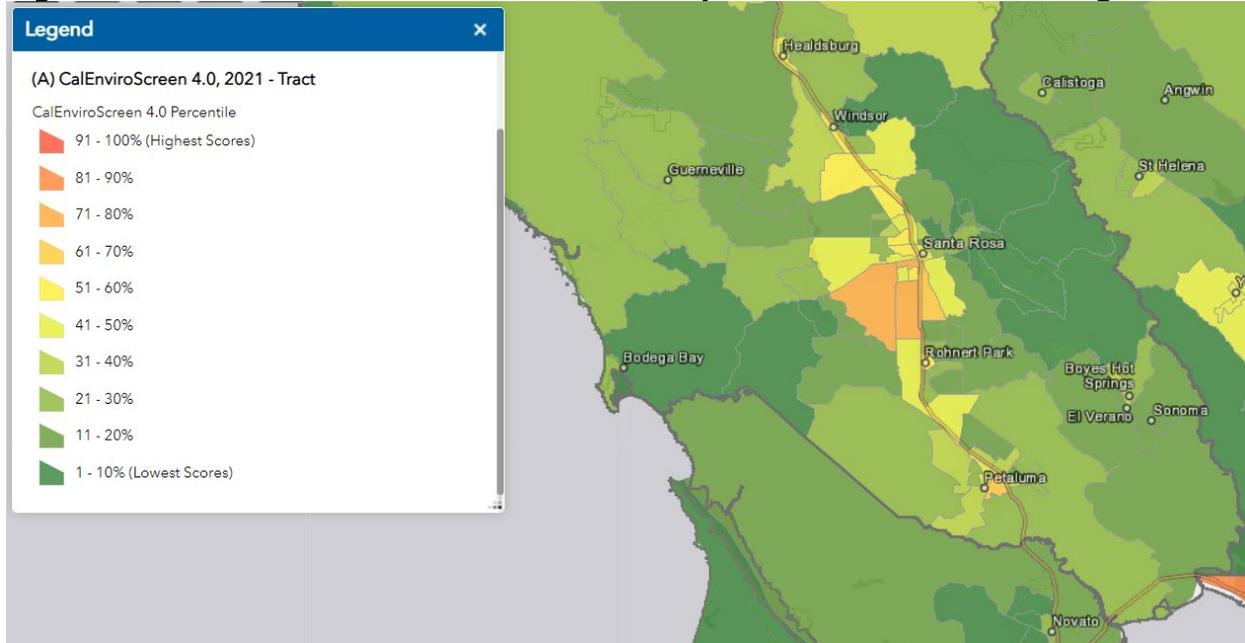
Figure 28: CalEnviroScreen 4.0 Percentiles by Census Tracts in Cotati



Source: CalEnviroScreen 4.0, 2021 - Tract

As shown in Figure 29, Cotati has similar environmental conditions to most similarly sized jurisdictions in the region.

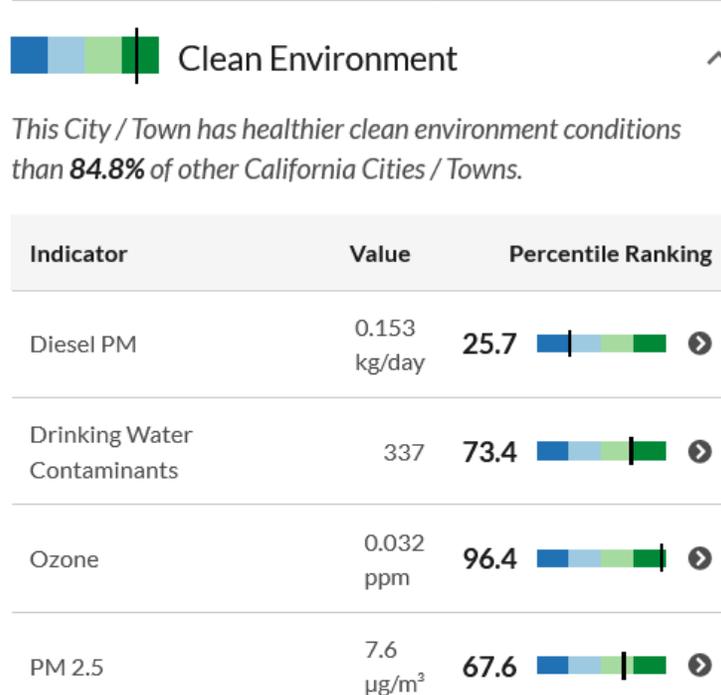
Figure 29: CalEnviroScreen 4.0 Percentiles by Census Tracts in the Region



Source: CalEnviroScreen 4.0, 2021 - Tract

The California Healthy Places Index (HPI) combines 25 community characteristics, like access to healthcare, housing, education, and more, into a single indexed HPI score. The healthier a community, the higher the HPI score. The HPI applies a positive frame focusing on assets a community has that they can build on, rather than what is lacking. According to this index, Cotati has healthier clean environmental conditions than 84.8% of other California Cities/Towns. Cotati's Ozone quality scores particularly high on this index in 96.4 percentile. The California Healthy Places Index further notes that every Census tract in Cotati has a composite score within the same quartile of 50-75%, and a higher ZIP code score (68th percentile) than the neighboring ZIP Codes of 94928 in Rohnert Park (65th percentile) and 95407 in Santa Rosa (36th percentile).

Figure 30: Clean Environment Conditions in Cotati Compared to Other California Cities/Towns



Source: The California Healthy Places Index (HPI)

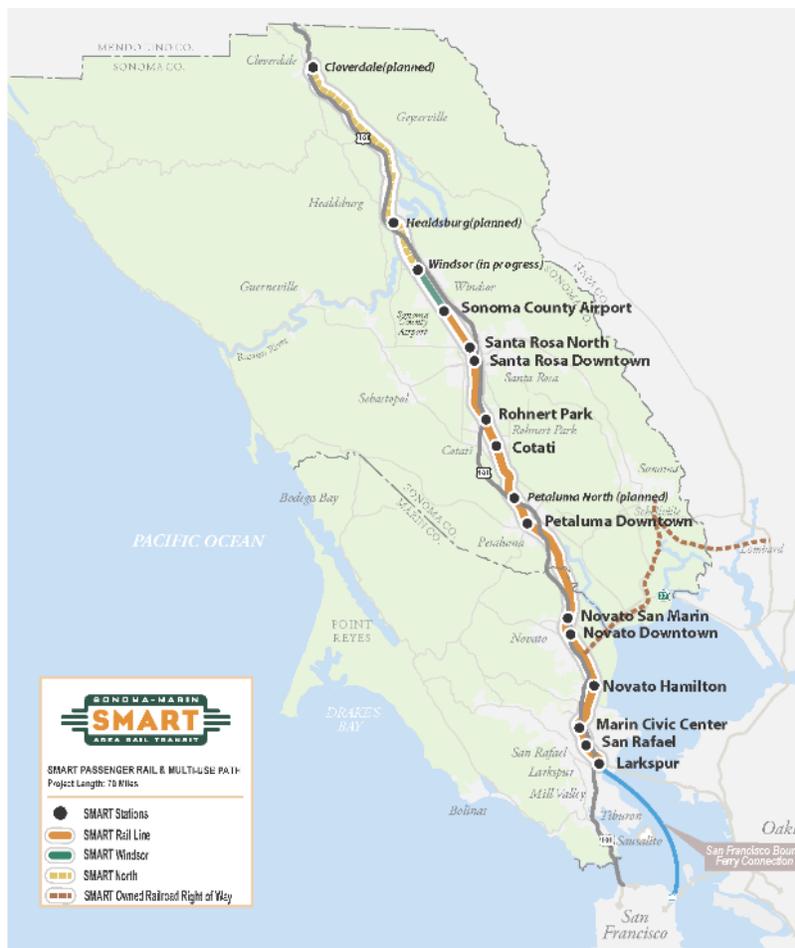
Transportation

Affordable and reliable transportation is of paramount importance to households affected by low incomes and rising housing prices. In Sonoma County, households without cars have the options of bus and train transit, bicycling, walking and an increasing network of ride-hail companies, also known as Transportation Network Companies (TNCs), all of which are less expensive than owning and driving a car or truck. Ideally, public transit would link people to job opportunities and services, especially low-income residents who are often transit-dependent. Affordable and reliable access to employment via public transportation can reduce the need for public assistance and increase housing mobility, which enables residents to locate housing outside of traditionally lower- and moderate-income neighborhoods. The lack of a robust public transit system, employment opportunities, and affordable housing may impede fair housing choice by limiting housing choice. In addition, elderly and disabled persons also often rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Public transit operators work to provide access to job opportunities, public services, and affordable housing.

Sonoma-Marín Area Rail Transit (SMART) is the San Francisco Bay Area’s newest transportation option for public transit, offering passenger rail service in Sonoma and Marin counties. SMART’s rail corridor includes 11 stations, from the Sonoma County Airport to Larkspur. The Cotati station is located at 980 East Cotati Avenue. SMART connects passengers to jobs, education centers, retail hubs and housing along the Sonoma-Marín corridor, and a bicycle-pedestrian pathway. In the future, SMART

service will be extended to Windsor, Healdsburg, and Cloverdale, and provide over 70 miles of passenger rail service. The eastern portion of Cotati has closer proximity to SMART access, and Program 1-4 is included in the Housing Element to prioritize citywide bicycle and pedestrian circulation in capital improvement for greater connection with regional transportation systems. Program 1-4 seeks to connect Lower Resource communities and new affordable housing developments with eastern portions of the City with the greatest access to transit, and establishes a commitment to prioritize these projects in the City’s Capital Improvement Plan (CIP). Western portions of the City along Highway 116 conversely have the greatest vehicular access to jobs, as noted in the Economic Development subsection below.

Figure 31: Sonoma-Marín Area Rail Transit (SMART) Service Corridor Map



Sonoma County Transit (SCT), Golden Gate Transit (GGT) and Paratransit provide bus services in Cotati. SCT is the primary transit provider for all Sonoma County jurisdictions; it provides regularly scheduled fixed-route service to major activity

centers and transit hubs within the City limits. Four SCT routes serve the City of Cotati:

- **Route 48/48X** travels daily between Santa Rosa and Petaluma and serves Rohnert Park and Cotati (on Old Redwood Highway). Route 48X is an express route deviation of Route 48 that bypasses the Rohnert Park and Cotati neighborhoods along Adrian Drive.
- **Route 26** travels between Sebastopol and Sonoma State University on weekdays, serving the Cotati Park & Ride lot on the west side of US 101 along the way.
- **Route 10** offers local service between Old Redwood Highway in Cotati and Rohnert Park's shopping areas, Sonoma State University and, on school days, to Rohnert Park primary and secondary schools.
- **Route 44** provides daily service between Petaluma, Cotati, Rohnert Park, and Santa Rosa. All routes operate on approximately 45- to 90-minute headways. Sonoma County Transit staff indicated that all service routes in Cotati operate well within maximum capacity levels.

All routes operate on approximately 45- to 90-minute headways. Sonoma County Transit staff indicated that all service routes in Cotati operate well within maximum capacity levels.

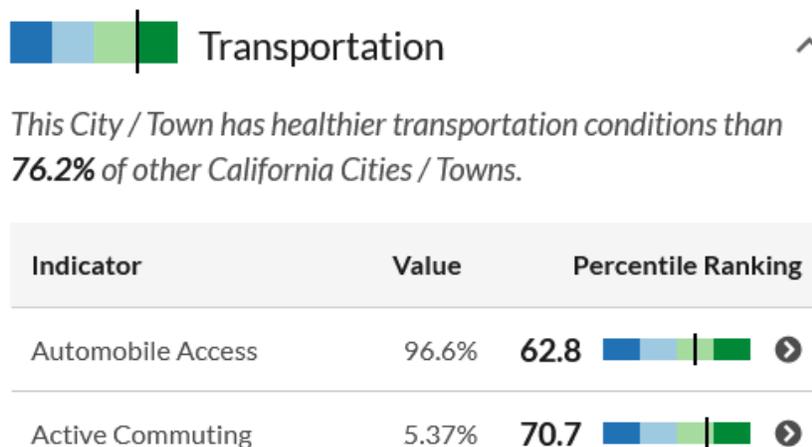
SCT supports the needs of the disabled community by ensuring that all bus lines are accessible through wheelchair lifts, with at least two on each bus. In addition, the agency offers half-priced fares to youth between the ages of five and eighteen, senior passengers 65 years and over, Medicare card holders, children under the age of five, U.S. veterans, college students, and disabled passengers with identification.

The County of Sonoma partners with public and nonprofit agencies to provide senior transportation support. This includes the Medical Transportation Management (MTM), Non-Emergent Medical Transportation (NEMT), Sonoma County Area Agenda on Aging, Center for Volunteer and Nonprofit Leadership, and others. There are also volunteer driver programs currently supported by the Area Agency on Aging.

In June 2018, Sonoma County Transit began its first “Fare-Free” local route. This program has resulted in a significant increase in ridership on the “Fare-Free” routes and riders have cited the ease of boarding without needing to plan for paying for a ride or purchasing a pass as an attraction.

The California Health Places Index (HPI) uses Active Commuting and Automobile access as indicators of healthy transportation conditions in a jurisdiction. Cotati has healthier transportation conditions than 76.2% of other California cities according to this index. The rate of Active Commuting in the City is low but still within the 70.7 percentile. Ride share and micromobility options continue to gradually fill in transportation options around traditional fixed route public options.

Figure 33: California Healthy Places Index: Transportation in Cotati

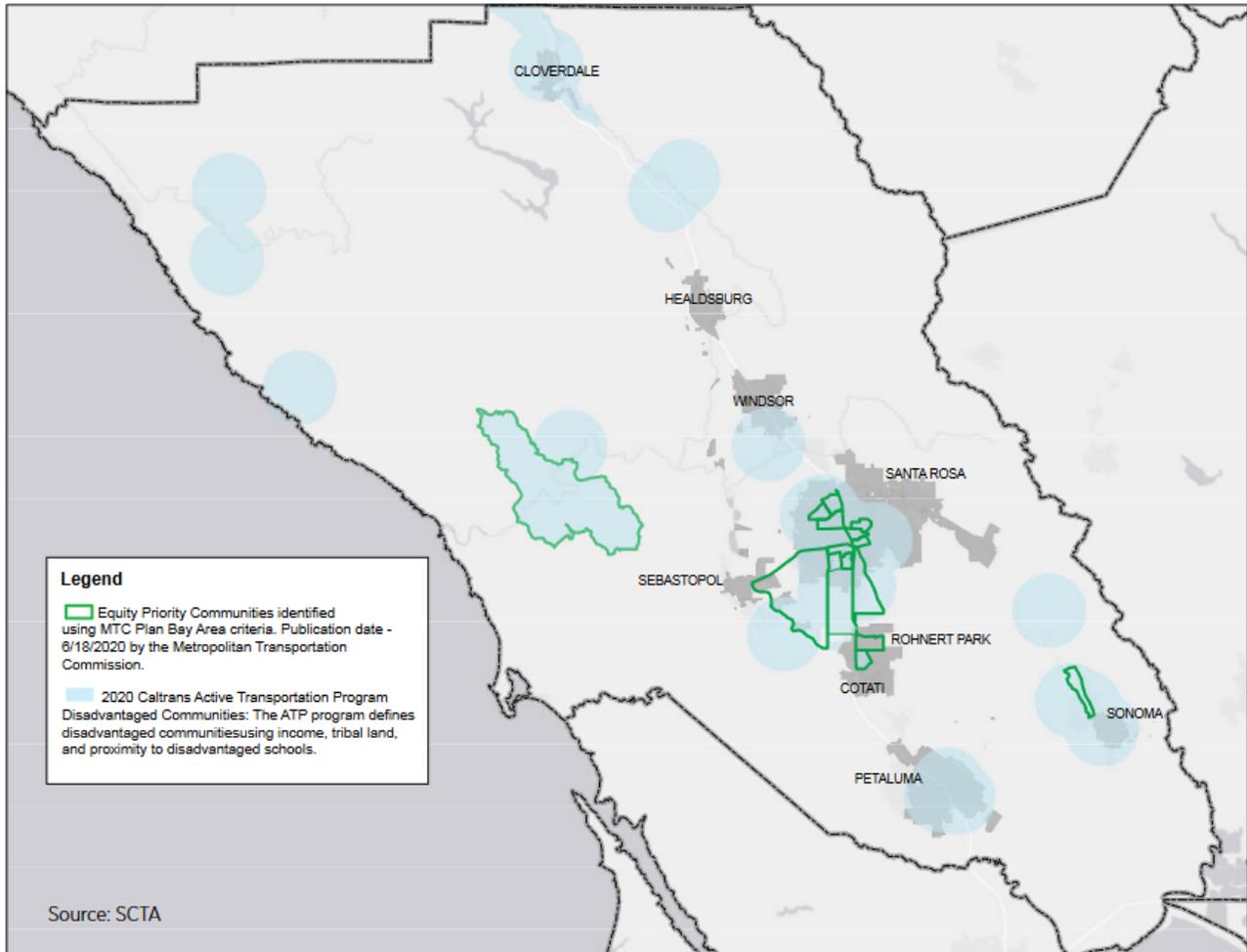


Source: California Healthy Places Index

Sonoma County Transportation Authority (SCTA) outlines current and future options for public transit in their Comprehensive Transportation Plan, Moving Forward 2050. This public document is updated every five years to ensure the plan is relevant and meets community needs. In the most recent update, released in September 2021, SCTA outlines “Equity Priority Communities” and “2020 Caltrans Active Transportation Program Disadvantaged Communities.” There is one small section of northern Cotati that falls within an Equity Priority Community areas as identified

using MTC Plan Bay Area criteria; however there are no identified 2020 Caltrans Active Transportation Program Disadvantaged Communities.

Figure 34: Sonoma County Equity Priority Communities



Source: Sonoma County Transportation Authority

The Plan suggests that rising transportation costs impact household incomes and affordability throughout Sonoma County. The Center for Neighborhood Technology (CNT) estimates that transportation and housing costs accounted for over 50% of household incomes in our county. Reducing household transportation will increase countywide affordability and improve quality of life in Sonoma County.

Economic Development and Job Access

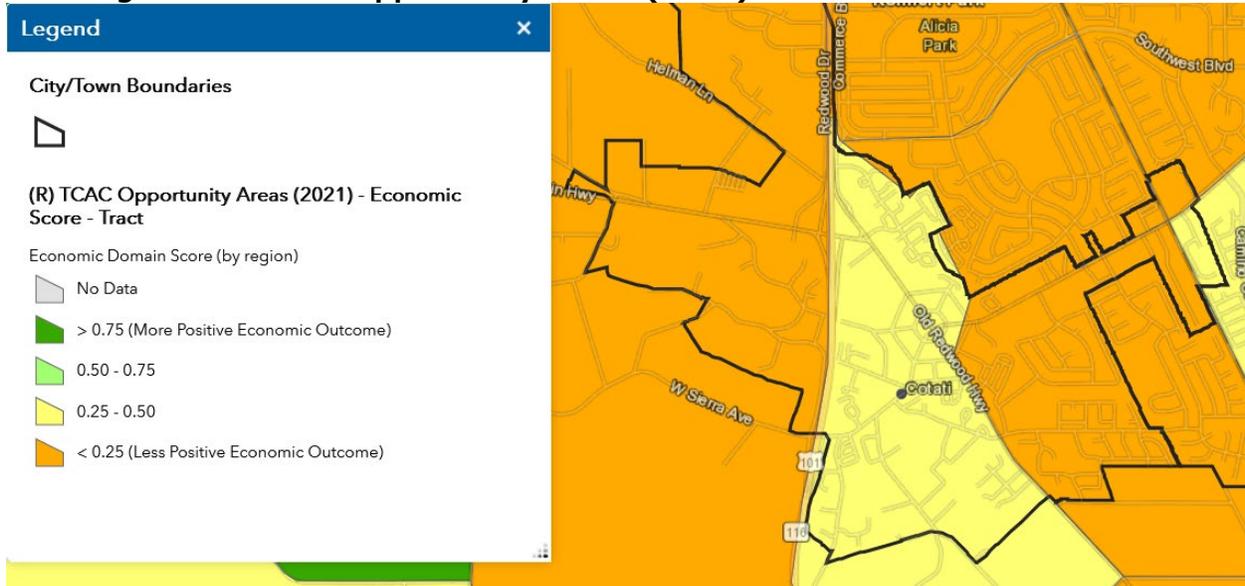
The TCAC Opportunity Maps accounts for regional differences in access to opportunities within census tracts. The Economic Domain factors in the following indicators to generate Economic Scores for each tract:

- Poverty: Percent of population with income level above 200% of federal poverty line
- Adult Education: Percent of adults with a bachelor’s degree or above

- Employment: Percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces
- Job Proximity: Number of jobs filled by workers with less than a BA that all within a given radius of each census tract
- Median Home Value: Value of owner-occupied units

A score of less than 0.25 (yellow) indicates a less positive economic outcome, while scoring greater than 0.75 (dark green) indicates greater access to economic opportunities. Most of Cotati scores in the lowest quartile by these metrics. This is likely due to the substantial presence of Sonoma State University students living off-campus (most of whom have not yet attained a Bachelor’s Degree and are less likely to be employed). Local poverty rates, job proximity, and median home value do not appear to contribute substantially to the lower scores, which range between one tenth of a point between the City’s Census tracts.

Figure 35: TCAC Opportunity Areas (2021) Economic Scores in Cotati



Source: TCAC/HCD Opportunity Areas/Resource Areas (2021) – Economic

Adequate access to FDIC-regulated banks reduces the likelihood of discrimination in lending and credit services as well as predatory lending practices that further racial and socio-economic inequities. Cotati has one of the smallest populations of all jurisdictions in Sonoma County as well as one of the smallest proportions of minority populations. The City has one FDIC-regulated full-service brick and mortar bank branches (Table 39).

Table 39: FDIC-Regulated Bank Branches by Sonoma County Municipality

Municipality	Population⁵	% Minority Population	FDIC-Regulated Full-Service Brick and Mortar Branches	FDIC-Regulated Non-Brick and Mortar Branches
Santa Rosa, CA	178,127	48.8%	38	11
Petaluma, CA	59,776	33.4%	10	1
Rohnert Park, CA	44,390	41%	8	0
Windsor, CA	26,344	46.7%	4	2
Healdsburg, CA	11,340	36.8%	11	0
Sonoma, CA	10,739	27.9%	11	0
Cloverdale, CA	8,996	42.2%	2	0
Cotati, CA	7,584	25.9%	1	0
Sebastopol, CA	7,521	21.7%	6	0
County Total	488,863	40.6%	99	13

Source: All FDIC-related data derived from: Federal Deposit Insurance Corporation, 2022
https://www7.fdic.gov/idasp/advSearch_warp_download_all.asp?intTab=1.

Future housing needs depend in part on the trajectory of the local workforce. Changes in the types and pay levels of jobs available in Cotati and the surrounding region will impact the type and cost of housing that current and future residents can afford. Employment trends indicate a need for a range of housing types that support Cotati residents who are employed in various industries. There is a particular need for more moderate- and lower-income housing units to support workers in the retail, manufacturing, and other lower-wage industries.

“Projections 2040” is the most recent in the Association of Bay Area Governments’ (ABAG) series of data on demographic, economic, and land use changes in coming decades, the current version covering the period between 2010 and 2040. The projections in Table 40 illustrates how Cotati will grow economically both in terms of the number of jobs and employed residents. Excluding past years, the period of largest job growth and employed resident in Cotati is expected in 2030.

Table 40: Projected Change in Jobs and Employed Residents in Cotati between 2010 and 2040

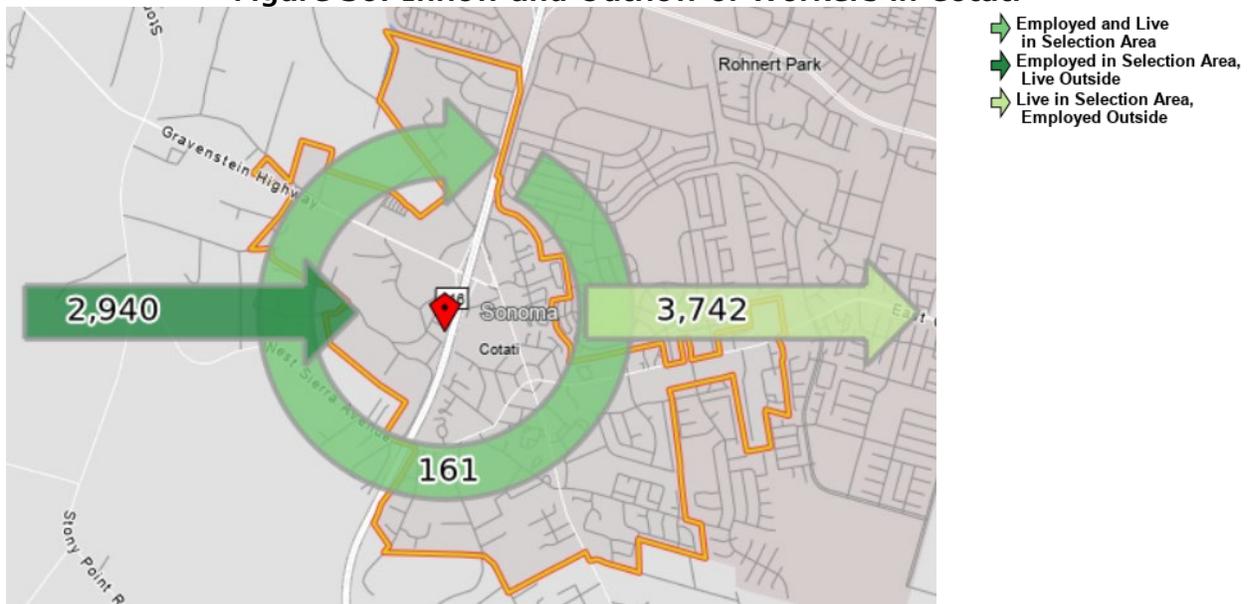
Year	Jobs	% Change	Employed Residents	% Change
2010	2,705		4,120	
2015	2,830	1.0%	4,535	10.1%
2020	2,905	4.8%	4,620	1.9%
2025	2,930	6.9%	4,825	4.4%
2030	2,900	11.5%	5,245	8.7%
2035	2,905	2.3%	5,250	0.1%
2040	2,955	10.8%	5,650	7.6%

Source: ABAG/MTC, Plan Bay Area 2040 Projections, 2017

Employment inflow/outflow analyses highlight the movement of workers commuting into and out of Cotati (Figure 36) and are useful in understanding the ratio between residents who are employed within the City and those who are employed outside of the City as well as how many workers are commuting to work from outside of the City.

As shown in Figure 36, Cotati is a net exporter of workers which means most employed people in Cotati commute outside of the City for work. Of the 6,843 workers who live and/or work in Cotati, 161 (2.4%) are employed and live in Cotati, 3,742 (54.7%) live in but are employed outside of Cotati, and 2,940 (43.0%) live outside but are employed in Cotati. Further analysis of worker flow is needed to determine if there is a housing need for non-resident employees (i.e., average length of commutes, city-wide VMT analysis, etc.).

Figure 36: Inflow and Outflow of Workers in Cotati

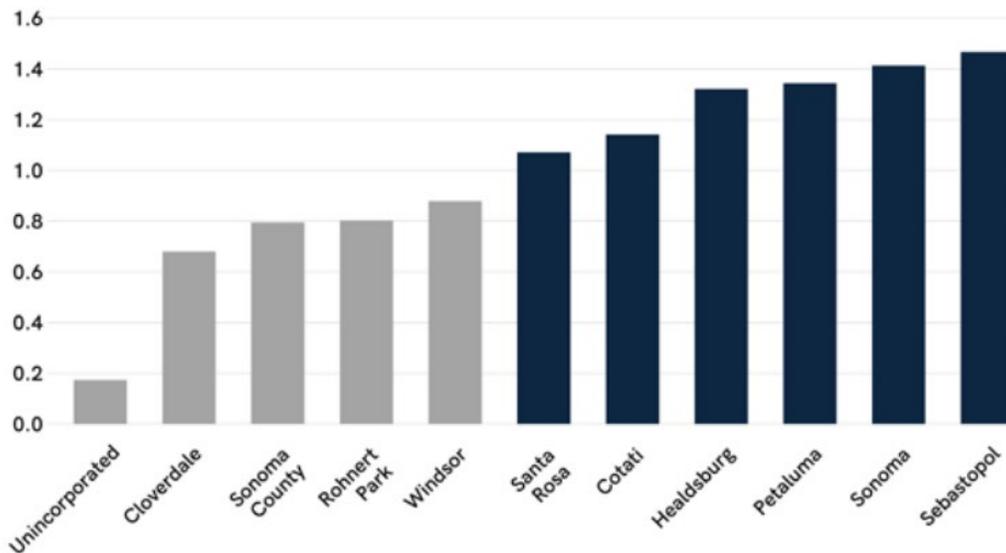


**Note: Arrows do not indicate directionality of worker flow
Source: OntheMap.ces.census.gov, 2019*

Further information on the proximity of jobs in Cotati provided by the Smart Locations Database via the AFFH Data Viewer 2.0 refers to the number of jobs available within a 45-minute drive. Under this metric, block groups in Cotati have comparable access to up to 30,000 jobs within a 45-minute drive. These figures are higher than the lowest scores within the neighboring cities of Sebastopol, Rohnert Park, and Petaluma, likely due in part to the central location of Cotati to regional job centers. The majority of Cotati’s housing sites identified in the 6th Cycle Housing Element are located within the City’s block groups with the highest scores. Figure 37 ranks jurisdictions in Sonoma County based on its respective jobs-to-housing ratio. The higher the ranking, the stronger the jobs-to-housing ratio which means that the City more adequately provides housings according to the number of jobs and vice-versa. Sonoma and Sebastopol top the list with jobs-to-housing ratios

above 1.4 (i.e., 1.4 jobs produced for every home built). Not significantly far behind, Cotati produces 1.3 jobs for every home built. All Sonoma County jurisdictions rank well below the average Bay Area jurisdiction given that cities like San Francisco and San Jose produce more than three jobs for every permitted home according to the State of Housing in Sonoma County 2022 report.

Figure 37: Ratio of All Jobs to Homes in Sonoma County Jurisdictions



Source: California Department of Housing and Community Development, Annual Progress Reports, Generation Housing

Disparities in Access to Opportunity: Fair Housing Issues and Contributing Factors

Cotati residents have access to a high-quality healthy environment, and there are no notable disparities in access to transportation, jobs, or education by protected class.

4.5.5 Disproportionate Housing Needs, Including Displacement

Disproportionate housing needs generally refer to significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions. This section analyzes these four housing needs categories as they apply to the City of Cotati.

Cost Burden and Severe Cost Burden

Housing cost burden is commonly measured as the percentage of gross income spent on housing, with 30% threshold for 'cost burden' and 50% the threshold for 'severe cost burden.' A lower-income household spending the same percent of

income on housing as a higher-income household is therefore more likely to experience a 'cost burden.' Some of the implications of high-cost burden can include housing-induced poverty, where overspending on housing leaves households little financial resources for other expenditures, and reduced savings which can impact asset accumulation. The typical contract rent for an apartment in Cotati was \$1,470 in 2019. Rental prices increased by 41.3% from 2009 to 2019. To rent a typical apartment without cost burden, a household would need to make \$59,120 per year.¹⁷

Additionally, rental costs for listed market rate units are higher than the typical contract rent for established leases, with a median monthly rental cost of \$2,800 (Table 41).

Table 41: Current Market Rate Rental Costs

# Bedrooms	1	2	3	4	5	All Units
Median Rent	\$1,913	\$2,550	\$3,000	\$3,575	\$4,725	\$28,00
Source: Zillow.com, Accessed 1/19/22						

Home prices have skyrocketed in the last decade; however, most homeowners have mortgages with fixed rates or own outright and are therefore less likely to be impacted by market increases. Renters on the other hand are subject to rent increases based on market rates and tend to experience a greater cost burden. This is the case in Cotati where 47% of renters are either cost-burdened or severely cost-burdened while only 27% of homeowners are either cost burdened or severely cost-burdened (Figure 38).

¹⁷ Housing Needs Data Report: Cotati, ABAG/MTC Staff and Baird + Driskell Community Planning, 2021-04-02

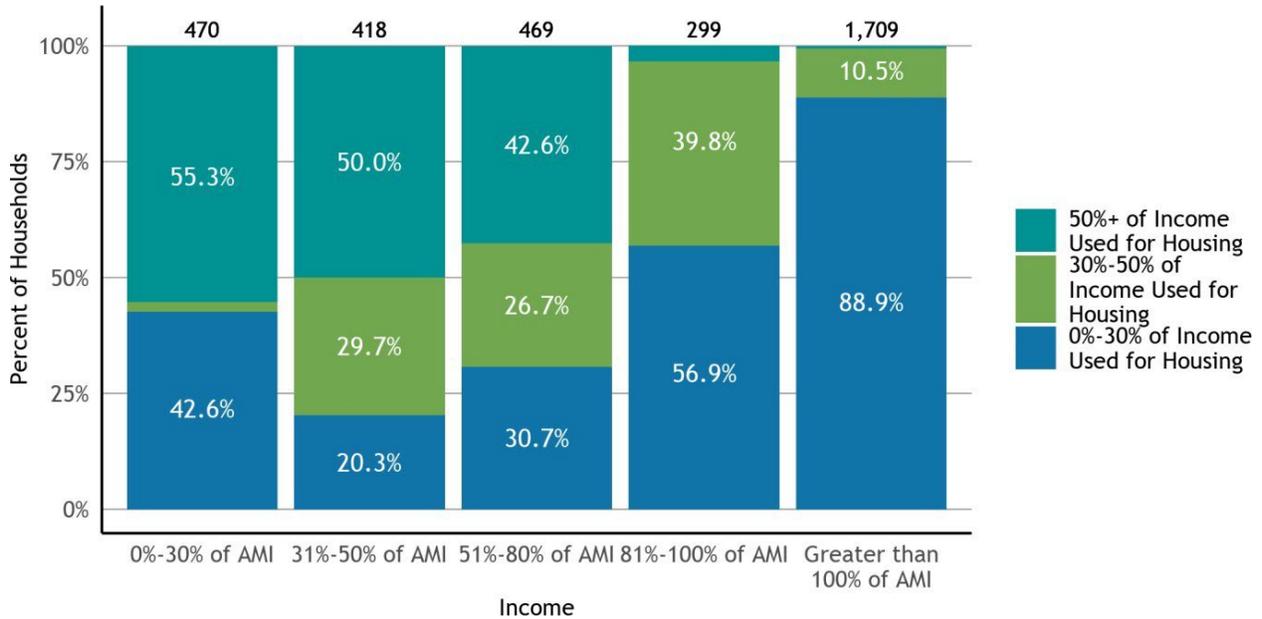
Figure 38: Cost Burden by Tenure in Cotati, 2019



Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019)

Rates of cost burden also vary across income categories. Over half of extremely low-income households in Cotati are severely cost-burdened. The proportion of severely cost-burdened households becomes exponentially smaller as income increases (Figure 39). This indicates that the lowest income households are in the greatest need of affordable housing in Cotati.

Figure 39: Cost Burden by Income Level in Cotati



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

Compared to Sonoma County and the State, Cotati has comparable rates of housing cost burden. In both Cotati and the Bay Area, 36.1% of households experience cost burden while in Sonoma County that number is slightly higher at 38.9% (Table 42). Overpayment rates for renters were in the same quintile citywide, whereas homeowners in the sprawling westerly census tract exhibited higher rates of cost burden.

Table 42: Cost Burden Severity in Cotati, County, State

Geography	0%-30% of Income Used for Housing	30%-50% of Income Used for Housing	50%+ of Income Used for Housing
Cotati	62.4%	22.4%	13.7%
Sonoma County	58.7%	21.5%	17.4%
Bay Area	61.7%	19.7%	16.4%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070, B25091

Overcrowding

Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, and half-rooms. Residential overcrowding reflects demographic and socioeconomic conditions as it has been correlated with increased risks of contracting communicable diseases, higher rates of respiratory illness, and greater vulnerability to being homeless.

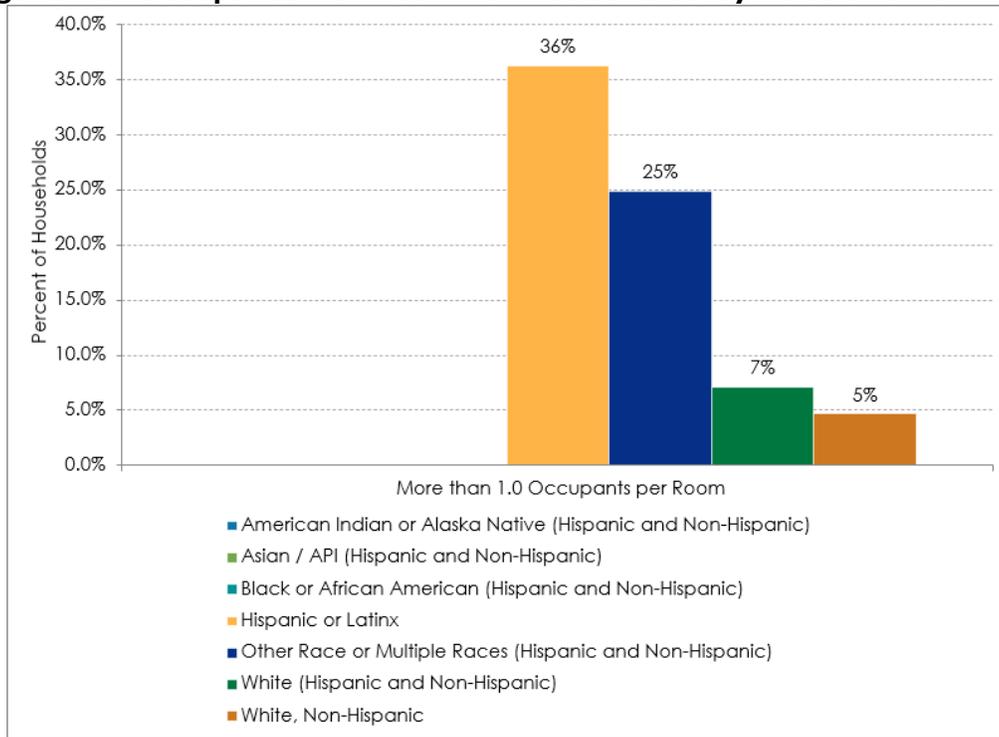
Older-adult immigrant and recent immigrant communities, families with low incomes and renter-occupied households are more likely to experience household crowding. A form of residential overcrowding known as "doubling up" is co-residing with family members or friends for economic reasons. Doubling up is the most reported living situation for families and individuals before the onset of homelessness.¹⁸

In Cotati, rates of overcrowding are highest for Hispanic households followed by Other Race or Multiple. Non-Hispanic White households experience the lowest rates of overcrowding followed by Hispanic and Non-Hispanic White households (Figure 40). Hispanic and Asian households both experience higher rates of overcrowding than the city average. As with the data discussed for disability status above, age may play a factor in racial and ethnic disparities in overcrowding. Younger adults are more likely to have minor children in their households, which, in turn, increases the likelihood of overcrowding. Conversely, older adults are more likely to reside in one- or two-person households.

Census tracts across the City exhibit similar rates of overcrowding at around 1-3%, according to estimates by the California Department of Health & Human Services (CHHS). This finding is lower than the estimates supplied by the 2017 HUD CHAS study (Figure 41).

¹⁸ *California Department of Health and Human Services*

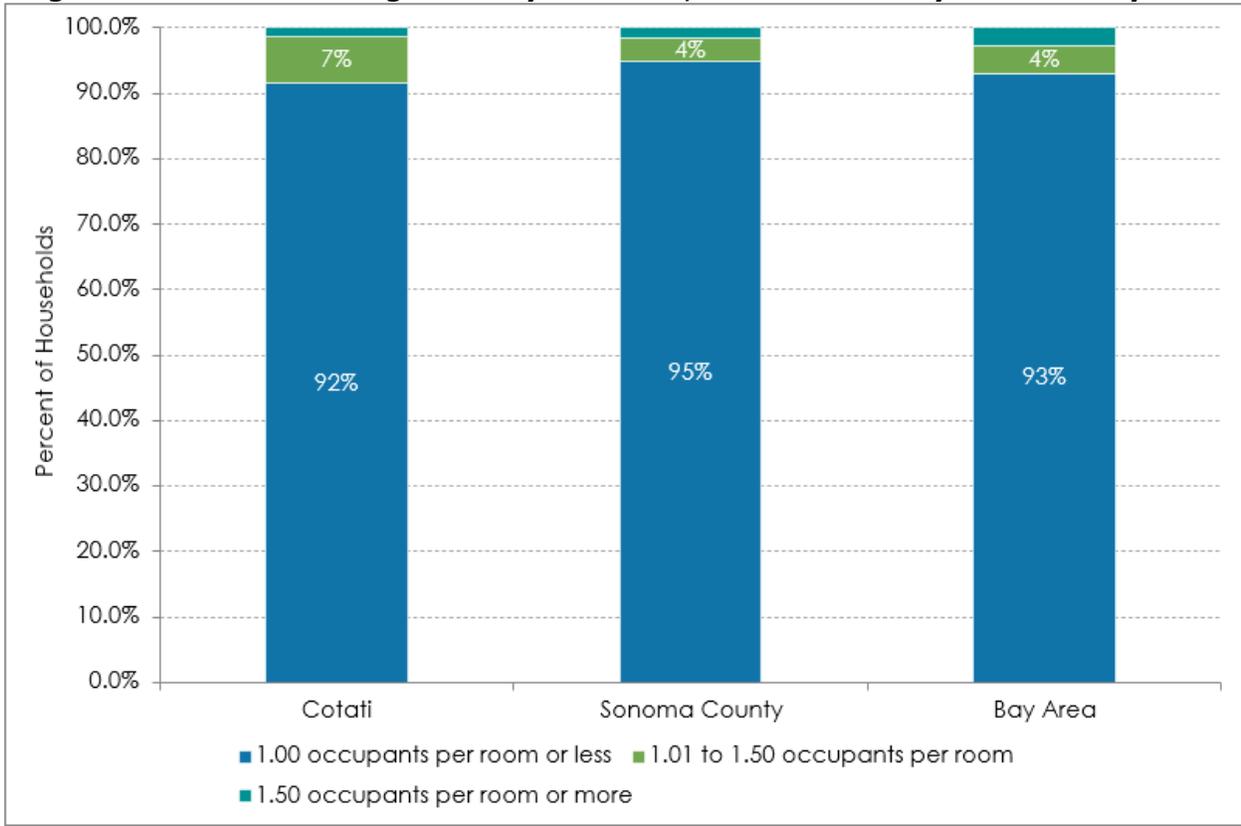
Figure 40: Occupants Per Room for Households by Race and Ethnicity



Source: 2015-2019 American Community Survey 5-Year Estimates

Cotati has 3% more households that experience both overcrowding and severe overcrowding than in Sonoma County, and 1% more than the Bay Area (Figure 41). This may be partially attributed to the number of Sonoma State University students who rent locally rather than living on campus in dormitories.

Figure 41: Overcrowding Severity in Cotati, Sonoma County and the Bay Area



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

Substandard Housing

As defined by the U.S. Census, there are two types of substandard housing problems: (1) Households without hot and cold piped water, a flush toilet and a bathtub or shower; and (2) Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. In Cotati, less than 1.2% of both owners and renters experience either of these two types of substandard housing problems (Table 43). Cotati has more substandard housing issues among homeowners than renters, while Sonoma County has more substandard housing issues among renters than owners. Data indicate a similar rate of substandard housing issues across the City, and lower rates than the neighboring cities of Rohnert Park, Santa Rosa, and Sebastopol.

Table 43: Substandard Housing Issues

Building Amenity	Cotati		Sonoma County	
	Owner	Renter	Owner	Renter
Lacking Complete Kitchen	1.2%	0.8%	0.4%	1.7%
Lacking Plumbing	1.2%	0.0%	0.4%	0.6%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019),
Table B25053, Table B25043, Table B25049

Homelessness

Those experiencing homelessness include individuals or families who lack or are perceived to lack a fixed, regular, and adequate nighttime residence, or who have a primary nighttime residence in a shelter, on the street, in a vehicle, or in an enclosure or structure that is not authorized or fit for human habitation. People experiencing homelessness have the most immediate housing needs of any population group and are most vulnerable to violence and criminalization due to their unhoused status.

California accounts for almost half (47%) of the U.S. homeless population and Sonoma County has the fourth highest number of homeless individuals for large suburban areas in the country. The 2020 Sonoma County Point-In-Time Count reported 2,745 individuals experiencing homelessness, a seven percent decrease in homeless persons since 2019. Of those experiencing homelessness in the County, the majority (63%) are white men. Between 2019 and 2020, the number of sheltered populations increased by five percent.¹⁹

The 2020 Point-In-Time Count totaled 37 individuals experiencing homelessness in Cotati which was down from 44 individuals in 2014. All 37 of these individuals were counted as unsheltered (Table 44). Of all Cotati’s residents, 0.04% are unhoused, compared to 0.5% for Sonoma County as a whole.

Table 44: Homeless Persons in Cotati by Shelter Status

Shelter Status	2018	2019	2020
Unsheltered	1	44	37
Sheltered	0	0	0
Total	1	44	37

Source: 2020 Sonoma County Homeless Census Comprehensive Report

Displacement

Shifts in neighborhood composition are framed and perpetuated by established patterns of racial inequity and segregation. Neighborhood change occurs as a result of three processes: movement of people, public policies, and investments, such as capital improvements and planned transit stops, and flows of private capital.²⁰

¹⁹ County of Sonoma Community Development Commission “Project Homekey” page

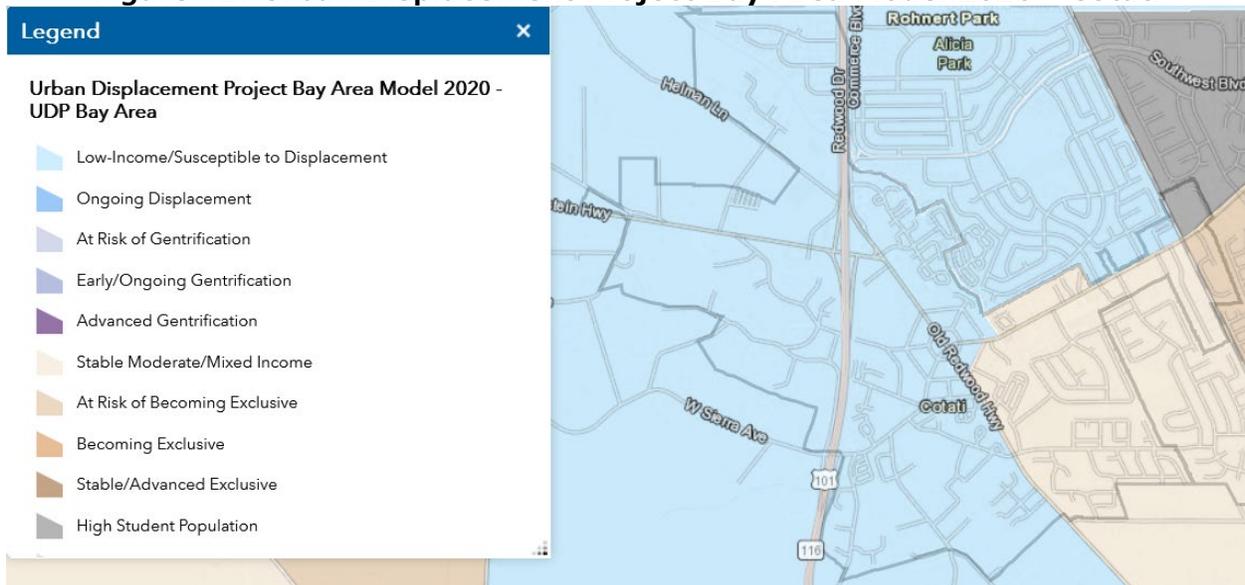
²⁰ Zuk, M., et al. (2015). Gentrification, Displacement, and the Role of Public Investment. Federal Reserve Bank of San Francisco, 32.

These processes can disproportionately impact people of color, as well as lower income households, persons with disabilities, large households, and persons at-risk or experiencing homelessness. They can also displace people to the extent of homelessness.

For the purposes of this assessment, displacement is used to describe any involuntary household move caused by property owner action or market changes. Displacement is fueled by a combination of rising housing costs, rising income inequality, stagnant wages, and insufficient market-rate housing production.²¹ Decades of disinvestment in low-income communities, coupled with investor speculation, can result in a rent gap or a disparity between current rental income and the land, and potentially achievable rental income if the property is converted to its most profitable use.

The University of California, Berkeley (UCB)'s Urban Displacement Project Bay Area Model 2020 identifies most census tracts in Cotati as Low-Income/Susceptible to Displacement. A smaller tract in the most southeastern part of the city is Stable Moderate/Mixed Income. As shown in Figure 43, Cotati has a similar or lower displacement risk compared to most jurisdictions in the region.

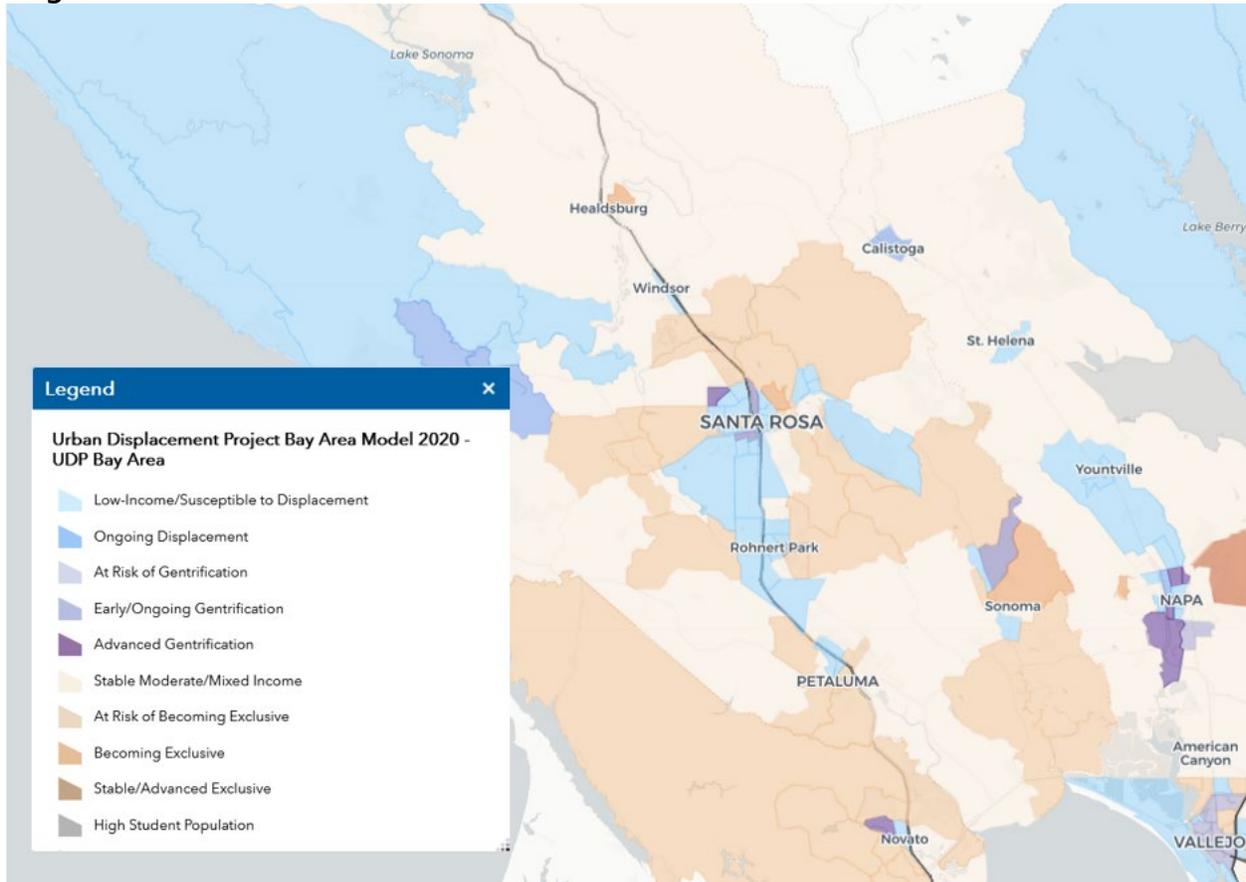
Figure 42: Urban Displacement Project Bay Area Model 2020 - Cotati



Source: Chapple, K., & Thomas, T., and Zuk, M. (2021). *Urban Displacement Project website*. Berkeley, CA: *Urban Displacement Project*.

²¹ Been, V., Ingrid, E., & O'Regan, K. (2019). Supply Skepticism: Housing Supply and Affordability. *Housing Policy Debate*, 29(1), 25-40.

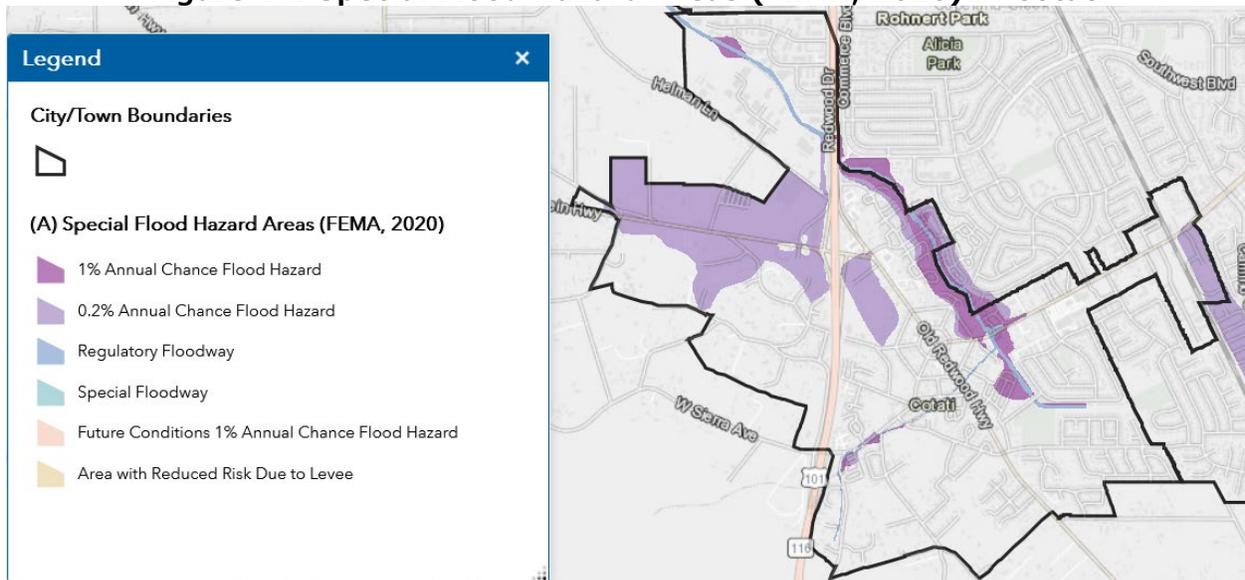
Figure 43: Urban Displacement Project Bay Area Model 2020 – North Bay Region



Source: Chapple, K., & Thomas, T., and Zuk, M. (2021). Urban Displacement Project website. Berkeley, CA: Urban Displacement Project.

Figure 44 identifies areas that are at risk of flooding and/or disaster-driven displacement. The Special Flood Hazard Areas in Cotati exist along the northeastern border of the City where there are 0.2% (light purple) and 1% (dark purple) Annual Chance Flood Hazard areas and a Regulatory Floodway. The northwestern part of the City also has a wide area that has 0.2% annual chance of flooding.

Figure 44: Special Flood Hazard Areas (FEMA, 2020) in Cotati



Source: Flood Hazard Areas from the Flood Insurance Rate Map created by the Federal Emergency Management Agency (FEMA)

Disproportionate Housing Needs and Displacement: Fair Housing Issues and Contributing Factors

The risk of displacement due to economic pressures was ranked and the most important factor contributing to fair housing issues in Cotati. The rising cost of housing in Cotati, Sonoma County, and across the Bay Area region is driving displacement of the most vulnerable populations. This is not only disruptive and, in some cases, traumatic for displaced households, but is also a primary driver of segregation at the regional scale. Despite some risk of displacement due to natural disasters, the displacement identified by the contributing factors analysis was exclusively focused on economic displacement, deemed a larger risk. Factors that contribute to disproportionate housing needs in the City of Cotati include economic pressures and community opposition. Programs described in the table below, including Program 4-3: Nondiscrimination and Fair Housing Information and Program 2-2 Streamlining Housing Development, will help to ensure that residents, tenants and property owners are aware of their rights and obligations under the law, including tenant protection measures, and will reduce discretionary reviews and permitting levels for affordable housing projects.

4.5.6 Summary of Fair Housing Goals and Priorities Based on Identified Contributing Factors

Table 45: Prioritization of Contributing Factors

Prioritized Contributing Factors	Meaningful Actions
<p>Displacement of residents due to economic pressures</p> <p>Priority: High</p>	<p>Program 4-1 Antidisplacement Actions</p> <ul style="list-style-type: none"> • Pursue grant opportunities to create a residential rehabilitation program for lower income residents. • Explore a Condominium Conversion ordinance to limit the loss of rental housing stock, as applicable. • Continue to promote programs for housing stability and eviction prevention. • Prepare a directory of trusted community partners willing to promote these programs. Utilize these partnerships to share resources in a culturally sensitive manner and incorporate place-based outreach. <p>Program 1-5 Preservation of Affordable Housing Monitor developments at risk of converting from deed-restricted affordable housing</p> <p>Program 3-4 Housing Choice Vouchers</p> <ul style="list-style-type: none"> • Monitor the status of the Section 8 waiting list on a quarterly basis and issue a citywide notification via the City’s mailing list upon periodic opening of the waiting list
<p>Community Opposition</p> <p>Priority: Moderate</p>	<p>Program 2-2 Streamlining Housing Development</p> <ul style="list-style-type: none"> • Develop a written streamlined application process in accordance with SB 35 and SB 330, including the pre-application and the procedure. • Develop Objective Design and Development Standards for multi-family, single-family and mixed-use projects. <p>Program 1-3 Non-Profit and Agency Coordination</p> <ul style="list-style-type: none"> • Convene an annual discussion on Housing Fair between housing developers, decisionmakers, advocates, and other interested parties and continue working with and develop new relationships with local agencies, nonprofit housing providers, and local organizations.
<p>Lack of affordable units appropriately sized for large families</p> <p>Priority: Moderate</p>	<p>Program 3-2 Funding for Affordable and Special Needs Housing</p> <ul style="list-style-type: none"> • Continue to seek funding for affordable and special needs housing, including affordable housing for large households • Use the Housing Fund to make housing available to very low to moderate-income Cotati residents, with an emphasis on very low and low income units for individuals and large families, affordable senior housing, and transitional/supportive housing.
<p>Lack of awareness of and funding for fair housing outreach and enforcement</p> <p>Priority: Low</p>	<p>Program 5-3 Stakeholder Engagement</p> <ul style="list-style-type: none"> • Convene an annual discussion on Housing Fair between housing developers, decisionmakers, advocates, and other interested parties and continue working with and develop

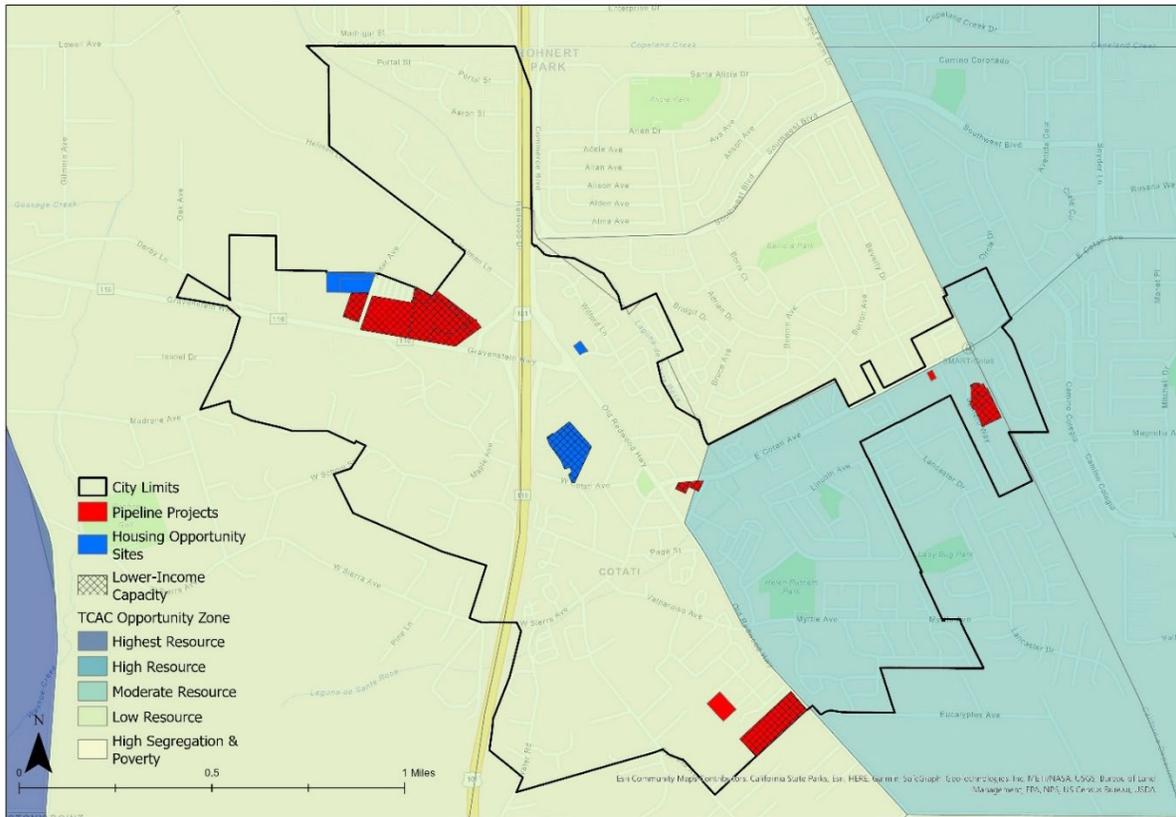
	<p>new relationships with local agencies, nonprofit housing providers, and local organizations.</p> <p>Program 4-3 Nondiscrimination and Fair Housing Information</p> <ul style="list-style-type: none"> • Require bilingual (English/Spanish) availability of rental agreements by 2025. • Continue to maintain an inventory of existing affordable rental housing and affordable ownership opportunities and programs on the City website. • Continue to provide information regarding equal housing opportunity laws and the City's equal housing opportunities procedures to the public at City Hall, the Police Department and the City's website. Include information about Fair Housing of Sonoma County to ensure residents with grievances can connect to the appropriate agencies and services.
<p>Lack of public investment in neighborhoods, including services & amenities</p> <p>Priority: Low</p>	<p>Program 1-4: Capital Improvement Program</p> <ul style="list-style-type: none"> • Maintain infrastructure in Lower Resource Areas <p>Program 2-6: Santero Way Rezoning</p> <ul style="list-style-type: none"> • Increase capacity for transit-oriented development in the Moderate Resource Area <p>Program 3-6: Prohousing Designation</p> <ul style="list-style-type: none"> • Review policies and programs within one year of Housing Element Adoption. If eligible, apply to receive the Prohousing Designation and receive an advantage in applications for competitive funding sources, including funding for infrastructure and transit.

4.5.7 Housing Sites and AFFH Considerations

Housing sites identified to meet Cotati's RHNA are distributed throughout the community in a manner that affirmatively furthers fair housing. While Cotati only contains areas designated as Low Resource and Moderate Resource, sites are distributed throughout these two areas, not concentrated by income, and supported by fair housing programs.

The resource designations of both Census tracts are influenced by activity outside City limits. The Low Resource westerly tract is influenced by residents from the northern boundary at Wilfred Avenue including the entirety of western Rohnert Park and wrapping around Cotati to the unincorporated community of Penngrove. The Moderate Resource easterly tract is influenced by the L Section of Rohnert Park.

Figure 45: Housing Sites and Resource Areas



Source: HCD/TCAC Opportunity Maps, 2022

Segregation and Integration

The Assessment of Fair Housing found no identifiable clusters of segregation by race, ethnicity, income, or protected classes. Cotati is generally more integrated than most nearby jurisdictions. Housing sites are dispersed throughout the community and promote integration.

Table 46: Housing Sites and Segregation Indicators

Census Tract	Block Group	Housing Sites	Housing Units	Lower-Income Housing Units	Population with a disability, Tract	% Households in renter-occupied housing units, Tract	% Hispanic Population, Block Group	% Non-White Population, Block Group
151201	5	4	512	49	849	36%	35%	44%
151203	1	3	104	11	555	41%	23%	35%
151204	1	2	42	3	350	42%	17%	27%
151204	2	2	61	45	350	42%	25%	37%
151204	3	1	61	30	442	42%	21%	33%

Source: American Community Survey 2019, 5-Year Estimates

Racially and Ethnically Concentrated Areas of Poverty

There are no racially/ethnically concentrated areas of poverty or racially concentrated areas of affluence within Cotati. The location of housing sites does not affect these conditions.

Disparities in Access to Opportunity

There are minimal disparities in access to opportunity by protected class and income throughout Cotati. Sites on the western side of the City are located in a Lower Resource area. Particularly, sites west of the freeway have less access to transportation and are further from amenities and resources. Program 1-4: Capital Improvement Program (CIP) is included to address this need. The block group with the most lower-income capacity is located in the area with the highest job proximity index score, improving access to opportunity. Most sites identified are located within Low Resource areas. Under Program 2-6, the City will rezone land within its Moderate Resource area to allow higher density housing and improve access to opportunity.

Table 47: Housing Sites and Access to Opportunity

Census Tract	Block Group	Sites	Units	Lower-Income Housing Units	2022 TCAC/HCD Resource Level	2022 TCAC/HCD Educational Score	2022 TCAC/HCD Environmental Score	2022 TCAC/HCD Economic Score	Job Proximity Index Score
151201	5	4	512	49	Low	0.33	0.43	0.1	82
151203	1	3	104	11	Moderate	0.43	0.97	0.22	2
151204	1	2	42	3	Low	0.26	0.77	0.26	10
151204	2	2	61	45	Low	0.26	0.77	0.26	17
151204	3	1	61	30	Low	0.26	0.95	0.11	10

Sources: HCD/TCAC Opportunity Area Maps, 2022; HUD Job Proximity Index, 2014-2017

Disproportionate Housing Needs Including Displacement

Risk of displacement and cost burden are highest amongst low-income renter households. The location of housing sites will not exacerbate these conditions, and programs are included to address this need, including Program 4-1: Antidisplacement Actions.

Table 48: Housing Sites and Housing Needs Indicators

Census Tract	Block Group	Housing Sites	Housing Units	Lower-Income Housing Units	% LMI Population, Block Group	Median Income, block group
151201	5	4	512	49	70%	\$47,120
151203	1	3	104	11	48%	\$65,417
151204	1	2	42	3	32%	\$75,542
151204	2	2	61	45	36%	\$71,250
151204	3	1	61	30	75%	\$57,202

Source: HUD, Low to Moderate Income Population, 2015; American Community Survey, Median Income, 2019 5-Year Estimates

4.5.8 Housing Programs and AFFH Considerations

The Housing Programs outlined in Section 2 address a variety of fair housing issues and opportunities, including housing mobility, the provision of new housing opportunities in higher resource areas, place-based strategies for community revitalization, anti-displacement measures, and outreach and enforcement mechanisms to ensure that the City is proactively engaging the community to access these programs. Table 49 details the metrics that the City will use throughout the planning period to measure its success in affirmatively furthering fair housing.

Table 49: Housing Program Metrics to Affirmatively Further Fair Housing

Action Area	Programs	Specific Commitment	Timeline	Geographic Targeting	2023-2031 Metrics
Housing Mobility	Housing discrimination complaints (Program 4-2)	Continue to utilize proactive process to resolve housing discrimination issues in coordination with local fair housing and legal aid organizations.	Ongoing ; annual review	Citywide	Estimated 10-12 uses of proactive process
	Reasonable accommodation for people with disabilities (Program 4-4)	Reasonable accommodations form easily accessible on website, with biannual staff review and proactive outreach to ensure program utilization.	Biannually	Citywide	Staff review, website, outreach to ensure program participation at least biannually
New Opportunities in Higher Opportunity Areas	Santero Way TOC to affirmatively further fair housing (Program 2-6)	Increase residential development in Moderate Resource areas and near amenities through Transit-Oriented Communities (TOC) or similar mechanism adjacent to the City's SMART station.	2026	Santero Way Specific Plan Area (Moderate Resource)	Housing development at or above current capacity
	Cottage housing (Program 2-4)	Continue to implement the City's Cottage Housing Ordinance and bring an SB 10 ordinance to City Council for review.	2025	Citywide; including low-density Moderate Resource areas	20 units permitted over the planning cycle

Place-Based Strategies for Community Revitalization	Capital Improvement Program (Program 1-4)	Prioritizing capital improvements in Low Resource areas and adjacent to new and existing affordable housing developments, in order to connect affordable housing to resources.	2025	Citywide; emphasis on Western Cotati & Highway 116	Improve bike & pedestrian connectivity to 49 affordable units
Displacement	Anti-displacement actions (Program 4-1)	A series of anti-displacement actions including on-going pursuit of funding sources, consideration of a condominium conversion ordinance, and establishment of a local preference policy in accordance with fair housing law.	2024-2025	Citywide	Expand application rates by 10%, conserve at least 10 rental units
Outreach & Enforcement	Participate in an annual stakeholder Housing Fair (Program 5-3)	Engagement with fair housing stakeholders to advance Housing Element program goals.	Annually	Citywide	Direct outreach to at least 3 attendees of the Housing Fair to support program objectives
	Enhanced availability of fair housing resources (Program 5-4)	Create an updated, dedicated webpage on the City's website with information on fair housing rights/resources.	2023	Citywide	Goal to reach 10 new residents with website enhancements