EXHIBIT 5

THE CASE FOR HOUSING IMPACTS ASSESSMENT:

THE HUMAN HEALTH AND SOCIAL IMPACTS OF INADEQUATE HOUSING AND THEIR CONSIDERATION IN CEQA POLICY AND PRACTICE

PHES TECHNICAL RESEARCH REPORT
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CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF PUBLIC HEALTH
OCCUPATIONAL & ENVIRONMENTAL HEALTH SECTION
PROGRAM ON HEALTH, EQUITY, & SUSTAINABILITY

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INTRODUCTION

The California Environmental Quality Act (CEQA)[1] requires governmental agencies to provide a public accounting of all potentially adverse impacts of decisions that change the environment. While some consider CEQA to be concerned exclusively with the physical environment, the aims of CEQA extend to human well being. For example, CEQA's policy goals include maintaining "...conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations," and "..,providing a decent home and satisfying living environment for every Californian." (California Government Code §21000) Under CEQA, a local agency must consider reasonably foreseeable "... environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly."[2]

Traditionally, health and human impact assessment within environmental review has focused on hazardous environmental agents such as air pollutants. While such impacts are important, the relationships between the physical environment and human health include many other neglected dimensions.

Unmet housing needs in San Francisco result in particularly significant public health costs. Inadequate or unaffordable housing forces San Francisco residents into crowded or substandard conditions; requires them to compromise access to jobs and services, and quality education; and requires them to work multiple jobs to make ends meet. The Department of Public Health witnesses these effects when we care for the homeless, in the course of our enforcement of environmental health and housing standards, and through our efforts to improve the housing of those with environmentally related illnesses such as asthma.

Unmet housing needs also have indirect environmental and economic consequences. High housing costs are disincentives for business development or expansion which also means reduced economic opportunities for residents. High cost housing in regional job centers such as San Francisco is one factor that drives development of lower cost housing on the urban fringe, contributing to traffic congestion and air pollution, as well as the loss of regional farmland and open space.[3]

As one strategy to ensure adequate affordable housing in San Francisco, the San Francisco Department of Health, in partnership with the City's Department of Planning, has researched how environmental impact analysis might more

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[1] CEQA, similar to NEPA, predated the more proscriptive environmental regulatory approaches such as the Clean Water Act aiming instead to ensure transparency and accountability in decision making. CEQA requires public agencies to produce an Environmental Impact Report (EIR) prior to making public decision that may have significant adverse environmental effects. (California Public Resources Code, Environmental Protection, §21000) An EIR must analysis on all potentially significant adverse environmental impacts, feasible alternatives, and steps to avoid or limit impacts. If an EIR concludes that a project would have significant impacts, the agency can not approve it until it either they determine that mitigation or alternatives are infeasible or that the project's benefits outweigh the adverse impacts.

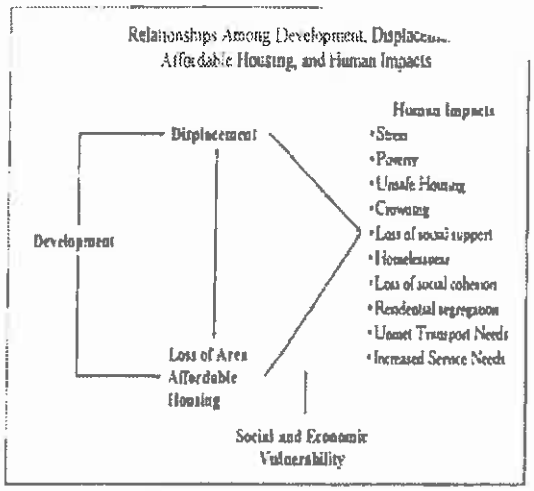
[2] CEQA Guidelines. Title 14. California Code of Regulations. (Accessed at http://ceres.ca.gov/topic/env_law/ceqa/guidelines/)

[3] http://www.brookings.edu/views/speeches/downs/20030529_downs.htm

comprehensively account for impacts on affordable housing and residential displacement.

CEQA guidelines allow cities to determine their own impacts of concern, screening criteria, assessment and evaluative methodologies, and preferred mitigation measures. In addition, though the guidelines provide a list of potential adverse impacts on the environment they do not provide a way of judging whether the effects are significant in a particular set of circumstances. One way for local jurisdictions and public agencies to ensure consistent and objective determinations in their environmental review is to adopt a 'threshold of significance.'[4]

CEQA authorizes local governments to adopt by "...ordinance, resolution, rule, or regulation" locally specific "objectives, criteria, and procedures for the evaluation of projects." (California Government Code §21082). These 'thresholds of significance' are qualitative or quantitative standards that provide local agencies a way to differentiate whether a particular environmental effect is significant. Thresholds may be based on health based standards, service capacity standards, ecological tolerance standards, policies and goals within the city's general plan, or any other standard based on environmental quality. Ideally, threshold development should involve public participation and the documentation of a threshold should include (1) a definition for the effect (2) the reasons the effect is significant (3) the criteria at which effect becomes significant (4) references and sources mitigation measures if available.



Methods to consider impacts on housing affordability and residential displacement exist; however, these methods have not been applied to impact assessment practice in San Francisco. In California, several local jurisdictions (Los Angeles, Santa Barbara, and LakeTahoe) have adopted comprehensive, environmental review guidelines which include thresholds of significance for housing impacts. San Francisco adopted level of service standards (LOS) for the evaluation of impacts on automobile and transit in 2002 but does not have consistent evaluative criteria for several other important environmental effects included effects on housing.

This technical report outlines several ways that impacts on housing affordability and residential displacement can be included in the process of environmental review. It also provides the groundwork for developing local significance thresholds criteria for housing impacts. We have organized this document into three sections: (1) Social and health consequences of housing affordability and residential displacement; (2)

[4] Thresholds of Significance: Criteria for Defining Environmental Significance. CEQA Technical Advice Series Govenor's Office of Planning and Research 1994 Accessed May 24th 2004 at: http://ceres.ca.gov/topic/env_law/ceqa/more/tas/threshld.pdf

Interpretation of CEQA policy and guidelines with regards to the analysis of social, health, and environmental justice impacts; (3) Public agency guidelines for affordable housing and displacement impact assessment.

The first section provides a scan of the public health and social science research that relates affordability and displacement to adverse human outcomes. We organized this section using a public health framework that relates project development to residential displacement and housing affordability and these effects to indirect adverse human impacts. (The framework used in this report is illustrated in the figure above.) The second section considers the impacts on affordability and displacement as indirect social impacts, as indirect human health impacts, as environmental justice impacts, and as impacts that affect long term environmental policy goals. The third section provides a scan of impact assessment methods and practice applicable to housing impacts analysis bringing together a number of federal, state, and local tools and guidelines.

SECTION I. SOCIAL AND HEALTH CONSEQUENCES OF HOUSING AFFORDABILITY AND RESIDENTIAL DISPLACEMENT

The pathways between affordable housing, residential displacement, and human health and well being are numerous and complex. The impacts of any particular project or program that affects housing affordability or displaces residents depend on both contextual and individual factors including the availability of affordable housing units, the extent of relocation assistance provided, the income and savings of displaced residents, and the availability of social support networks.

This section provides a summary of available evidence on the adverse human consequences of housing affordability and residential displacement. Sources include case studies, interviews, and studies on homelessness, and public health and social science research.

Unmet Needs for Affordable Housing in California and San Francisco

According to *Slum Housing in LA*, a recent publication by UCLA's Advanced Policy Institute, the Federal goal of "securing the health and living standards of its people..." has only been met for upper and moderate income groups, while communities that are poor in both rural and inner city areas lack adequate housing.[5] Three in ten US households have housing affordability problems.

The affordable housing crisis is particularly acute in California. In San Francisco, only 7.3% of households currently earn enough to afford the median sale price of housing.[6] In addition, the fair market rent for a two-bedroom apartment is $1,904 which is affordable only to those who make 90% of the average family's median income of $86,100.[7] Exacerbating this situation, the gap between the minimum wage and the minimum hourly wage required to afford adequate housing has increased. Currently, over 35,000 low income renters pay more than 50% of their income in rent. Even individuals earning modest wages, such as, public service employees and those in the construction trades simply cannot afford to live where they work.[8]

A related factor, affecting low income renters, is the unmet demand for subsidized housing programs. In California, over two-thirds of qualifying low income households remains on waiting lists for housing assistance.[9] The state has 186,000 rental units housing 450,000 low income people which benefited from public finance. About 70% of this stock, over 120,000 units, represents housing in the HUD Section 8 program for which rent subsidy contracts are expiring. The conversion of subsidized housing will further aggravate unmet demand for low income housing.

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[5] Richman N, Pitkin B. Understanding Slum: The Case of Los Angeles, USA. 2003 UCLA Advanced Policy Institute. Los Angeles, CA.

[6] San Francisco Planning Department. Update of the Housing Element of the General Plan. (Accessed at: http://www.ci.sf.ca.us/planning/citywide/c1_housing_element.htm)

[7] National Low Income Housing Coalition Out of Reach 2003: America's Housing Wage Climbs. (Accessed at: http://www.nlihc.org/oor2003/)

[8] Governor' Environmental Goals and Policy Report. Office of Planning and Research 2003

[9] Forbes, Elaine. 2000

While the population of San Francisco is growing, San Francisco is not currently meeting the housing production goals of moderate income, low income and very low income communities. The Mayor's Office of Housing estimates that the City needs to build 19,000 units of affordable housing between 2001 and 2005 to meet its needs. Furthermore, according to the Housing Element of the General Plan, the strongest job growth is expected in the service and retail sectors; however, much of that growth is represented by low and medium wage jobs including cashiers, waiters and cooks, sales people and clerks, and painters, carpenters and electricians.

The Relationship between Displacement and Affordable Housing

Residential displacement has become a critical issue in California where housing shortage disproportionately affects low income and minority populations. Displacement can occur in the context of demolition or redevelopment of residential property or the conversion of rental units to ownership housing. Displacement also occurs in the context of gentrification when neighborhoods change in a way that inflates rents. Structural forces that contribute to displacement of individuals and families and unsatisfactory relocation in San Francisco include the relatively high cost of housing relative to incomes, the large unmet need for housing particularly at lower income levels, and the high cost of land and housing. Given that San Francisco is a setting with a limited supply of affordable housing, residents displaced through eviction or redevelopment are unlikely to be successfully relocated into adequate and affordable housing replacement housing.

Human Health Impacts of Inadequate Housing

Residential displacement or the permanent loss of area affordable housing can be expected to lead to diverse health effects. Both displaced residents and those entering the housing market may have to pay more for housing.[10] Some may accept affordable but inadequate, substandard, or poorer quality housing. Some may move out of the city or region while others may move into a temporary living situation with a friend or family member. Finally, some may become homeless. Low income individuals and families are more susceptible to adverse consequences after displacement as they have limited options for relocation.

Stress Displacement may increase levels of psychological and physiological stress, for example, by creating a new economic strain among low income individuals. If residents are displaced away from jobs or schools, longer commutes may be a further source of stress and reduce time for leisure or family activities. For children, frequent family relocation leads to children's grade repetitions, school suspensions, and emotional and behavioral problems.[11] Living in resource poor neighborhoods, frequent school changes, and substandard housing all contribute to poor child development and school

[10] Hartman, Chester. Comment on "Neighborhood revitalization and displacement: A review of the evidence. Journal of the American Planning Association. 1979;45:488-491.

[11] Cooper, Merrill. Housing Affordability: A Children's Issue. Canadian Policy Research Networks Discussion Paper. Ottawa. 2001

performance.[12]

A number of scientific studies have demonstrated health consequences of psychosocial stress. For example, a randomized study of healthy human volunteers demonstrated that chronic stress doubled the rate at which inoculation with a common cold virus led to a clinical infection. [13] Other studies have linked the experience of stress with chronic diseases including heart disease, hypertension, and diabetes.[14] Among pregnant women, stress has also been associated with a greater likelihood for pre-term delivery and low birth weight birth – both factors that potentially lead to developmental delays and increased infant morbidity and mortality.

Poverty There is little doubt that poverty leads to poor health. Numerous research studies in diverse countries show that poverty contributes to a poorer subjective sense of health, higher mortality, less emotional stability, worse chronic conditions, and poorer physical functioning.[15]

Unaffordable housing is both a dimension of poverty and a contributor to poverty. Households with incomes several times the full-time minimum wage can pay more than half of their incomes for housing.[16] When housing is unaffordable, people often sacrifice other material needs including food, clothing, and health care services. Nationally, those with incomes in the bottom fifth of the income distribution and paying 50% of their incomes for housing have an average of $417 to cover all non-housing monthly expenses.[17] Lack of affordable housing has also been linked to inadequate nutrition, especially among children. A recent survey of American cities found that low paying jobs and high housing costs are the most frequently cited reasons for hunger.[18] Children from low-income families receiving housing subsidies showed increased growth compared with children whose families were on a subsidy waiting list, an observation consistent with the idea that subsidies provide a protective effect against childhood malnutrition.

Unaffordable housing may add to psychosocial stress. People required to work extra hours or at multiple jobs may sacrifice personal leisure family relationships. Time pressured parents may choose either more punitive or low-effort strategies to resolve conflict with children.[19] Studies have shown that economic strains such as being unable to pay the bills cause depression in mothers and harsh parenting styles. Displacement and relocation may also result in job loss with potential further aggravation of

[12] Ross, DP & Roberts, P. Income and child well being: A new perspective on the policy debate. Canadian Council for Social Development. Ottawa. 1999.

[13] Cohen, Sheldon et al. Types of Stressor that increase susceptibility to the common cold in Healthy Adults. Health Psychology. 1998; 17(3):214-223.

[14] McEwen, Bruce E. Protective and damaging effects of stress mediators. New England Journal of Medicine. 1998; 338(3): 171-179.

[15] Phipps, Shelly. The Impact of Poverty on Health: A Scan of the Research Literature. Ottawa. Canadian Institute for Health Information 2003.

[16] The State of the Nation's Housing. Joint Center for Housing Studies of Harvard University. 2003.

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[18] Sandel, M, Sharfstein, J, Shaw, R. There's no place like home: How America's Housing Crisis Threatens our Children. Housing America. San Francisco. 1999.

[19] Dunn, James R. A population health approach to housing: A framework for research. Report prepared for the National Housing research Committee and the Canada Mortgage and Housing Committee. University of Calgary. 2002.

economic strain and psychosocial stress.

Overcrowding Statewide, 24% of renter households are overcrowded while in San Francisco over 30% of renter households are characterized as overcrowded.[20] [21] Families frequently double up as a way to cope with the lack of affordable housing. Similarly, displaced residents find temporary lodging with families or friends. Overcrowding results in respiratory infections in adults and ear infection in children.[22] Overcrowding also means the lack of quiet space for children to do homework, negatively impacting their development, education, and future life opportunities.[23]

Housing Safety Over half of the San Francisco's housing was built over 50 years ago and requires significant rehabilitation to maintain habitability; 94% of the housing stock was built before 1978. Most of the city's pre-1950 dilapidated housing stock is located in low-income neighborhoods. A number of environmental conditions in older and poorly maintained housing affect health. Inadequate heating can lead to overexposure to cold. Poorly maintained paint leads to lead poisoning. Other unsafe conditions include exposed heating sources, unprotected windows and slippery surfaces that increase risks for injuries. Older units and low-income units tend also to have a greater likelihood of deferred maintenance.

[20] Govenor's Environmental Goals and Policy Report. Op Cit.
[21] Based on San Francisco data from the 1999 American Housing Survey. (Accessed at: http://www.census.gov/hhes/www/ahs.html)
[22] Krieger, J & Higgens, DL. Housing and Health: Time again for Public Health Action. American Journal of Public Health. 2002; 92: 758-768.
[23] Cooper, M. op cit.

Indoor Air Quality Irritants and allergens present in one's home environments contribute to asthma. Some of the most important allergens implicated in the development and recurrence of asthma include house dust mites, cockroach antigens, cat dander, mold spores, and pollens.[24] Old carpeting serves as a reservoir for dust, allergens and chemicals. Kitchens and baths, particularly in older housing stock, often lack adequate ventilation increasing problems associated with moisture and mold.

Since 1999, SFDPH has conducted several hundred assessments for asthmatic children and adults and identified through evaluation research the role of housing affordability as a barrier to reducing asthma triggers in the home. While SFDPH enforces laws to ensure the safety and habitability of housing, inspectors have found many instances where substandard and unhealthy conditions exist yet tenants are reluctant to initiate enforcement actions. Commonly, tenants are fearful of landlord reprisal or eviction in an unaffordable housing market.

Social Support If displaced residents are forced to relocate outside of their neighborhood, valuable supportive family and community relationships can be lost both for those leaving and well as for those remaining behind. Strong social relationships and community cohesion are protective of health in multiple ways. Neighbors, friends, and family provide material as well as emotional support. Support, perceived or provided, can buffer stressful

[24] Institute of Medicine. Clearing the Air: Asthma and Indoor Air Exposures. National Academy Press. Washington D.C. 2000.

situations, prevents damaging feelings of isolation, and contributes to a sense of self-esteem and value.[25] The magnitude of the effect of social support on health is substantial and has been illustrated by several prospective long term studies in the United States. For example, in the Alameda County Study, those with fewer social contacts (e.g. marriage, family, friends, and group membership) had twice the risk of early death, even accounting for income, race, smoking, obesity, and exercise.[26]

Homelessness One of the most severe consequences of both unaffordable housing and displacement is homelessness. Hunger and homelessness are on the rise in major American cities, according to a 2003 survey by the U.S. Conference of Mayors.[27] Requests for emergency shelter assistance increased by an average of 13 percent in the 25 large cities surveyed. Twenty-three participating cities reported that lack of affordable housing was the leading cause of homelessness.

Over 350,000 Californians are estimated to be homeless.[28] A particularly disturbing trend is the rise of family homelessness. It is estimated that between 80,000 and 95,000 homeless children exist in California.[29] The USCM survey documents that Eighty-four percent of the cities have turned away homeless families from emergency shelters due to lack of resources.

Homelessness contributes to a number of other well described physical, behavioral and mental health problems in adults and children. Lack of housing and the overcrowding found in temporary housing for the homeless have been found to contribute to morbidity from respiratory infections and activation of tuberculosis. Substandard housing, such as that used by the homeless population, often lack safe drinking water and hot water for washing; often have ineffective waste disposal, intrusion by disease vectors (e.g., insects and rats); and often have inadequate food storage, all of which have long been identified as contributing to the spread of infectious diseases.[30] A 1994 study of children living in homeless shelters in the Los Angeles area found that the vast majority (78%) of homeless children interviewed suffered from depression, a behavioral problem, or severe academic delay.[31] Among sheltered homeless men and women, age adjusted death rates are several fold higher than in the general population.[32]

Homelessness is strongly linked to hunger. Temporary housing for homeless children often lacks cooking facilities.[33] In the 2003 US

[25] Cohen, S, Underwood, LG, Gottlieb, BH. Social Support Measurement and Intervention. Oxford University Press. New York. 2000.
[26] Berkman LF, Syme SL Social networks, host resistance, and mortality: a nine-year follow-up study of Alameda County residents. American Journal of Epidemiology. 1979; 109(2):186-204.
[27] The United States Conference of Mayors Hunger and Homelessness Study December 2003.
[28] Governor's Environmental Goals and Policy Report. Op Cit.
[29] Governor's Environmental Goals and Policy Report Op Cit.
[30] US Conference of Mayors
[31] Zima BT, Wells KB, Freeman HE. Emotional and behavioral problems and severe academic delays among sheltered homeless children in Los Angeles County. American Journal of Public Health. February 1994 Vol 84: 260-264
[32] Barrow, SM, Herman, DB, Cordova P, Stuening, EL. Mortality among Homeless Shelter Residents in New York City. American Journal of Public Health. 1999; 89: 529-534.
[33] Krieger J, Higgins DL. Housing and Health: Time Again for Public Health Action. American Journal of Public Health. May 2002, Vol 92, No. 5: 758-768

Conference of Mayors' (USCM) survey, requests for emergency food assistance increased by an average of 17 percent over the past year. The USCM survey finds that 59 percent of individuals requesting emergency food assistance were members of families with children and their parents, and that 39 percent of the adults requesting such assistance were employed. Eighty-seven percent of the cities surveyed expect that requests for emergency food assistance will increase again over the next year. Ninety-one percent of cities participating in the survey expect that requests for emergency food assistance by families with children will increase next year. Eighty-eight percent expect that requests for emergency shelter will increase next year, and 80% expect requests for shelter by homeless families will increase in 2004.

Social Cohesion One of the most significant effects of eviction and displacement may be the erosion of social capital and social cohesion which are social indicators strongly associated with health, education, and neighborhood safety.[34]

The New York Times recently profiled a community, Franklin Square, as one of the few places in the NY area where housing affordability is promoted resulting in the integration of generations residing side-by-side. In addition to the richness of sharing experiences across generations, the Franklin Square community benefits from long-term residents who invest in maintaining the built environment, invest in the community, and contribute to community cohesion and youth development:

> "'[Franklin Square] It's just a wonderful, very stable community,' said Julie Soffientini, an assistant school superintendent who moved in 30 years ago and raised two daughters with her husband, Raymond. She said she appreciated the clean streets, well-kept properties and convenient local shopping."
>
> "Pupils begin at the Franklin Square Union Free School District, an elementary district with an enrollment of 1,975 in three schools, all for kindergarten through Grade 6. Statistics released by the state Department of Education in October showed that 99.3 percent of fourth grade students in the district met or exceeded state standards in math. Elementary school students in the Franklin Square district consistently score above state averages on other standardized tests."

The example provided above illustrates the positive impacts on society by long-term resident investment: cleaner streets, resulting in reduced cost of City-subsidized loitering cleaning; higher school performance, particularly among the younger aged-group, which results in higher school completion.

In contrast, the erosion of neighborhoods as a result of forced displacement results in the reduction of long-term residents who are most likely to invest in their communities. In areas where residents feel less invested because of the continual threat of displacement, one can find depilated environmental conditions, such as broken windows on buildings, loitering and illegal disposing of hazardous substances. Furthermore, neighborhoods where residents have little incentive to invest are shown to have higher high school drop out rates, as well as crime rates.

[34] Putnam, Robert. Social Capital: Measurement and Consequences. ISUMA. 2001(Spring): 41-51.

Segregation The loss of affordable housing and displacement may also lead to residential segregation and 'ghettoization'. Displacement may contribute to residential segregation (by ethnicity, income, or class) if available housing for displaced residents is not available in integrated neighborhoods. A study that examined expiring HUD Section 8 agreements with private owners in California, found that, on average, families relocated to relatively more racially-segregated communities.[35]

Racially segregated neighborhoods tend to have less neighborhood amenities such as schools, libraries and public transportation due to economic, political and linguistic isolation, and racism. Research has documented the health impacts of residential segregation. Many studies have shown, for example a strong association between segregation and homicide rates. Besides an excess in mortality, studies have also demonstrated a relationship between residential segregation and negative health outcomes including teenage childbearing, tuberculosis, cardiovascular disease, availability of food establishments serving healthy fare and exposure to toxic air pollutants.[36]

Strong evidence for the effects of segregated environments comes from the HUD Moving to Opportunity demonstration program. This program, implemented in five US cities, evaluated the health and social effects of relocating households from public or subsidized housing in high poverty neighborhoods to private rental housing in non-poverty neighborhoods. The program design involved a random assignment of families to an experimental group (vouchers for housing in low poverty neighborhoods and relocation assistance) a section 8 group (geographically unrestricted vouchers), and a control group and longitudinal follow-up of families over 10 years. The executive summary of the interim evaluation (midpoint of follow up) testify to the social value of non-poverty area residence. [37]

> From the families' perspectives, the principal benefit of the move was a substantial improvement in housing and neighborhood conditions. Families who moved with program vouchers largely achieved the single objective that loomed largest for them at baseline: living in a home and neighborhood where they and their children could feel and be safe from crime and violence. On a list of observable characteristics, their homes and neighborhoods were substantially more desirable than those where control group members lived. These benefits accrued to families in both the experimental group and the Section 8 group, although the improvements tended to be roughly twice as large for experimental group families, who were required to move to low-poverty areas, at least initially.
>
> Perhaps not surprisingly, these improvements in living environment led to significant gains in

[35] Forbes E. Eroding Neighborhood Integration: The Impact of California's Expiring Section 8 Rent Subsidy Contracts on Low-Income Family Housing. 2000 The Ralph and Goldy Lewis Center for Regional Policy Studies. UCLA, School of Public Policy and Social Research. Los Angeles, California

[36] Acevedo-Garcia D, Lochner KA, Osypuk TL, Subramanian SV. Future Directions in Residential Segregation and Health Research: A Multilevel Approach. American Journal of Public Health. 2003; 93:215-221

[37] U.S. Department of Housing and Urban Development Moving to Opportunity for Fair Housing Demonstration Program: Interim Impacts Evaluation. 2003 (accessed at www.huduser.org)

mental health among adults in the experimental group. The levels of psychological distress and depression were substantially reduced in this group. In addition, adults in both the experimental and Section 8 groups experienced substantial reductions in obesity for reasons we do not yet understand. Among the children in these families, girls appear to have benefited from the move in several ways. They experienced improved psychological well-being, reporting lower rates of psychological distress, depression, and generalized anxiety disorder, and improved perceptions of their likelihood of going to college and getting a well paid, stable job as an adult. These girls' behaviors changed as well, with a smaller proportion working instead of attending school. They were less likely to engage in risky behavior or to use marijuana. Finally, both these girls and society as a whole benefited from a reduced number of arrests for violent crimes.

Increased Transportation System Demands Displaced residents may find that affordable and adequate replacement housing only exists far from their current neighborhoods, potentially, meaning that they will live far from jobs and schools. Relocation may thus create a new demand for public transportation services or alternatively new demands for automobile purchase and use. Studies on the effects of urban sprawl have found that low income families, children and the elderly are disproportionately affected by the longer distances needed to travel as a result of relocation to the outskirts of a city or a region. The working poor rely on both urban public transit systems to hold steady jobs and access health care, child care and other critical social services. Former welfare recipients are particularly dependent upon the provision of reliable and convenient transportation services.

Increased Demands for Social Services For a project that results in significant displacement or relocation to non comparable housing, the magnitude of human health and social impacts may be severe. This may result in the need to fund and develop new social services to address the human impacts. For example, displacement may potentially result in new demand for safety net services for health and welfare, for mental health services, and for special educational services for children. In San Francisco, services for homeless adults and children cost the City millions of dollars and over the past several years demand for services has greatly exceeded capacity. The demand for such services is indirectly related to the magnitude of the adverse displacement outcomes.

Displacement in California and San Francisco

During the period from March 2002 through February 2003, a total of 1,643 various eviction notices were filed with the department. This figure includes 93 notices given due to failure to pay rent, which are not required to be filed with the department. The number of notices filed with the department for this period represents a 22% decrease over the prior year's filings (2,101).

The largest declines were in owner occupancy evictions, 516, or a 29% decrease, nuisance declined by 10% to 251 and eviction notices for breach declined by nearly 40% to 231. The only increases were in temporary capital improvement evictions which increased from 44

to 68, or a 26% increase and Ellis Act evictions, from 148 buildings to 187 for a 26% increase for the period. In San Francisco, the Ellis Act, a state law which says that landlords have the unconditional right to "go out of business" is used by property owners to 'change the use' of the building (condominium conversions) resulting in evictions.

Reasons for Just-Cause Evictions 2001/02 and 2002/03[38]

Just Cause	2001/02	2002/03
Owner-Occupied	726	516
Demolish/remove unit	113	67
Capital improvement (temporary)	44	68
Ellis eviction	148	187

While the issues of affordable housing, displacement, and gentrification are high on the public agenda, limited recent research has tracked the direct consequences of displacement on people. A 1999-2000 analysis of Ellis evictions in San Francisco conducted by the San Francisco Tenants' Union reveals that:

- Seniors, people with disabilities and children are most likely to become victims of the Ellis Act, comprising 51% of all Ellis Act evictions since 1999.

- Those most apt to be evicted are renters with long-term tenancies and affordable rents. Those evicted under Ellis had an average tenancy of over 11 years and were paying an average rent of $1,024 for a 2 bedroom apartment.

- Further, the Ellis Act is resulting in the loss of thousands of affordable units. For every new affordable unit that is built, 5 affordable units are lost.

Accounts from local housing advocacy organizations reveal some consequences of forced eviction among low-income families and the elderly. St. Peter's Housing, a Mission district-based non-profit organization serving low income families around housing issues and landlord/tenant problems, for example, report that a significant proportion of the families they serve are forced to separate to obtain temporary shelter, while other families resort to overcrowding in illegal units and yet other families are forced to leave their neighborhoods and the City in order to secure an affordable place to live.

St. Peter estimates that at least 20% of their clients have one or more family member aged 60 years or older. According to St. Peter's Housing, elderly residents and families are more frequently displaced, experience particularly high levels discrimination in securing housing, and are most vulnerable for separation as a result of eviction. The following case history illustrates the complexity of housing issues confronted by families with elderly members:

> An elderly couple was forced to separate (from their daughter and grandchildren) and to resort to live in an illegal in-law unit. The unit was so poorly maintained that the stairs leading to the entrance of the unit collapsed resulting in the broken hip of the elderly woman. The elderly woman reported the incidence to St. Peter's for advice. St. Peter reported this case the

[38] Rent Stabilization and Arbitration Board, April 28, 2003

Department of Building Inspections (DBI) whose inspector cited the owner for the illegal unit, and forced the owner to shut down the illegal unit. DBI's inspection is in itself intended to protect families from living in substandard conditions and yet, in this particularly case, served to aggravate the elderly couple living situation. The elderly couple was not only forced to separate from their family, but were now suffering from the injured hip and its incurred health care cost, and as a result of the inspection was now faced with displacement. [Personal communication, St. Peter's Housing, December 2003]

The effects of displacement as a result of the lack of affordable housing among the senior population are heightened among its Gay and Lesbian subgroups. Recent, cross-sectional evidence of GLBT elderly living in the greater Los Angeles Area shows that:

- Same-sex partners cannot share a room in most care facilities, forcing many GLBT older adults retreat back into the closet, in order to secure housing at nursing homes.
- Same-sex partners cannot receive Social Security survivor benefits.
- GLBT older adults do not have the same family support systems as their heterosexual counterparts.
- There are many government programs that target the elderly, but none are geared towards GLBT older adults.[39]

[39] Gay and Lesbian Elder Housing of Los Angeles Website: http://www.glehc.org/facts.htm, accessed on December 3, 2003

SECTION II SOCIAL, HEALTH, AND ENVIRONMENTAL JUSTICE IMPACTS IN CEQA POLICY

As discussed in the section above, the lack of housing affordability in California and its human impacts suggests that environmental impact assessment (EIA) should consider how a development project might impact housing affordability or displaced residents. Four ways in which these issues fit into the framework of the California Environmental Quality Act (CEQA) include:

- As potential indirect social and economic impacts on population and housing;
- As indirect health impacts of physical or social impacts;
- As environmental justice impacts;
- As impacts requiring evaluation for consistency with city, regional and state housing and environmental policy goals.

Adverse Social and Economic Effects of Impacts on Population and Housing

CEQA considers the loss of housing requiring construction of new housing and the displacement of people as potential adverse environmental impacts requiring analysis in the environmental checklist provided in CEQA Guidelines. The checklists screening questions include:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

However, impacts on population and housing may have particular adverse effects on parts of the population. For example, if a project replaces low income housing with market rate housing, this may disproportionately and adversely impact those with lower income. This type of impact may be considered an adverse social impact. Under CEQA, adverse social and economic impacts may be analyzed in determining the significance of physical environmental changes. Title 14, section 15064, subsection (e) of the California Administrative Code provides the following guidance:

> Economic and social changes resulting from a project shall not be treated as significant effects on the environment. *Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment.* Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. *If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant.* [Emphasis added] For example, if a project would cause overcrowding of a public facility and the overcrowding causes an

adverse effect on people, the overcrowding would be regarded as a significant effect.

Despite the guidance above, the inclusion of social and economic impacts under CEQA is controversial. Many interpret the language in section 15064, subsection (e) to mean that the analysis of indirect adverse social and economic effects may be considered in an EIR but are not, strictly speaking, required.[40] According to the California Department of Transportation: "Many people in California, including some decision-makers, harbor the general belief that CEQA addresses only purely "environmental" issues, not social, demographic, or economic issues often raised by proposed projects. This is erroneous. The assumption however is understandable due to the complex linkage that must be demonstrated between the physical, social, and economic environment, and the determination of 'Significance'."[41]

Some case law has directly addressed this issue. In Citizen's Association for Sensible Development of Bishop Area v. County of Inyo,[42] the courts reconciled the ambiguity of section 15064, subsection (e) with subsections (d) and (f) which discussed evaluation of secondary or indirect consequences of a project. In the Bishop case, the Court ruled that subsection (f) gave the lead agency discretion to determine whether the consequences of social and economic changes were significant but did not give it discretion not to consider these consequences at all. In their ruling, the Court interpreted section 15064 as follows: "the lead agency shall consider the secondary or indirect environmental consequences of economic and social changes, but may find them to be insignificant."

Indirect Health Impacts

Environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly are considered mandatory findings of significance in accordance with CEQA Guidelines Section 15065.

> A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where any of the following conditions occur: (d) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

As discussed in the evidence provided above, housing affordability and displacement affect health in numerous ways. Projects that have area or regional affects on the availability of affordable housing may be considered to have potential indirect adverse health consequences. Since displaced residents may not be relocated in adequate housing, the potential indirect health impacts of displacement also warrant consideration.

Environmental Justice Impacts

Environmental justice is rooted in the Equal Protection Clause of the U.S. Constitution and can be advanced using National Environmental

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[40] Bass, RE., Herson, AI, Bogdan, KM. CEQA Deskbook A step-by-step guide on how to comply with the California Environmental Quality Act. Solano Press. Point Arena, 2001.

[41] Guidelines for Community Impact Assessment. California Department of Transportation. 1997

[42] Citizen's Association for Sensible Development v. County of Inyo, 172Cal.App.3d 151 (1985)

Policy Act (NEPA) as well as the Civil Rights Act of 1964. Environmental Justice provides another rationale for considering the effects on affordable housing or the displacement of low income residents under CEQA. California Law defines Environmental Justice as "... the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."[43]

While environmental justice analysis and efforts in California have historically emphasized disproportionate health effects of toxic physical environmental agents, the concept of environmental justice is broader than the physical environment and human health. As stated in the 1997 President's Council of Economic Quality (CEQ) guidance adverse environmental justice effects can be also economic, social, cultural, and ecological impacts directly or indirectly related to physical environmental changes or impacts. 1997 CEQ Guidance states:

> When determining whether environmental effects are disproportionately high and adverse, agencies are to consider the following three factors to the extent practicable:
>
> (a) Whether there is or will be an impact on the natural or physical environment that significantly (as employed by NEPA) and adversely affects a minority population, low-income population, or Indian tribe. Such effects may include ecological, cultural, human health, economic, or social impacts on minority communities, low-income communities, or Indian tribes when those impacts are interrelated to impacts on the natural or physical environment; and
>
> (b) Whether environmental effects are significant (as employed by NEPA) and/or may be having an adverse impact on minority populations, low-income populations, or Indian tribes that appreciably exceeds or is likely to appreciably exceed those on the general population or other appropriate comparison group; and
>
> (c) Whether the environmental effects occur or would occur in a minority population, low-income population, or Indian tribe affected by cumulative or multiple adverse exposures from environmental hazards.

In California, Assembly Bill 1553 requires that the principles of environmental justice be incorporated into state guidelines for local general plans. As discussed below, this broader definition of environmental justice effects is consistent with adverse environmental effects under NEPA and CEQA as well as the 2003 State of California General Plan Guidelines Section on Environmental Justice and Sustainability and the 2003 Governor's Environmental Goals and Policy Report. The 2003 General Plan Guidelines include mixed-income housing development as a component of sustainability and environmental justice. Even from the standpoint of public health, inequitable social and economic effects can be equally if not more important that inequitable environment quality effects. An environmental justice analysis of projects that result in population or housing loss could focus on the potential for disproportionate impacts to low income and minority populations both living in the current units as well as effects on the market for affordable housing in the region.

[43] California Government Code Section 65040.12

Consistency with Local, Regional and State Land Use Policy

CEQA guidelines consider potential significant environmental impacts to include: "Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?" Local policies related to affordable housing can be found in the Housing Element of the General Plan, the HUD Consolidated Plan, and local ordinances related to rent and to eviction prevention.

California State law defines also a jurisdictions fair share housing goals in terms of four categories of affordability through the Regional Housing Needs Determination (RHND) process, devised to address the need for and planning of housing across a range of affordability and in all communities throughout California. Each jurisdiction within the Bay Area (101 cities, 9 counties) is given a share of the anticipated regional housing need. The Bay Area's regional housing need is specified by the California State Department of Housing and Community Development (HCD) and finalized through negotiations with Association of Bay Area Governments. The timeframe for this RHND process is January 1, 1999, through June 30, 2006, (a seven and a half year planning period). The current RHND requires 5244 units affordable to very low income residents, 2136 units affordable to low income residents, 5639 units affordable to moderate income residents, and 7363 units affordable to above moderate income residents. While San Francisco has met its market rate housing targets in recent years, it has not met moderate income, low income and very low income housing needs.

Total Need	Very Low	Low	Moderate	Above Moderate
20,372	5,244	2,126	5,639	7,363

The 2003 State of California General Plan Guidelines may also be viewed as applicable impacts on affordable housing.[44] The guideline's section on sustainability and environmental justice emphasize the need to carefully match employment potential, housing demand by income level and type, and new housing production.

The importance of ensuring adequate and affordable housing for every sector of the population to long term environmental quality and ecological sustainability is also emphasized in the 2003 Governor's Environmental Goals and Policy Report.[45] These State policies together with the emphasis on long term environmental goals in CEQA guidelines Section 15065 (b) suggests that impacts on housing affordability and adequacy are also potential mandatory findings of significance.

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[44] 2003 State of California General Plan Guidelines. Office of Planning and Research. 2003

[45] Governor's Environmental Goals and Policy Report. Office of Planning and Research. 2003 (Accessed at: http://www.opr.ca.gov/EnvGoals/PDFs/EGPR--11-10-03.pdf)

SECTION III IMPACT ASSESSMENT METHODS AND GUIDELINES FOR AFFORDABLE HOUSING AND DISPLACEMENT

A number of federal, state and local agencies consider displacement of low-income populations and loss affordable housing as potentially adverse impacts in the context of Environmental Impact Assessment. Examples of methods and guidelines are provided below:

Social Impact Assessment (SIA) The practice of SIA dates back to the construction of the trans-Alaska pipeline. At the time, critics argued that the Environmental Impact Statement (EIS) produced for that project failed to address potential social effects such as the influx of tens of thousands of non-native construction workers on the culture of the Inuit. In 1994, the U.S. Federal Government published a set of guidelines for SIA to support social assessment under NEPA.[46] Social impacts are defined as "...the consequences to human populations of any public or private actions-that alter the ways in which people live, work, play, relate to one another, organize to meet their needs and generally cope as members of society. The term also includes cultural impacts involving changes to the norms, values, and beliefs that guide and rationalize their cognition of themselves and their society." The guidelines categorized social impact variables as follows:

1. Population Characteristics mean present population and expected change, ethnic and racial diversity, and influxes and outflows of temporary residents as well as the arrival of seasonal or leisure residents.

2. Community and Institutional Structures mean the size, structure, and level of organization of local government including linkages to the larger political systems. They also include historical and present patterns of employment and industrial diversification, the size and level of activity of voluntary associations, religious organizations and interests groups, and finally, how these institutions relate to each other.

3. Political and Social Resources refer to the distribution of power authority, the interested and affected publics, and the leadership capability and capacity within the community or region.

4. Individual and Family Changes refer to factors which influence the daily life of the individuals and families, including attitudes, perceptions, family characteristics and friendship networks. These changes range from attitudes toward the policy to an alteration in family and friendship networks to perceptions of risk, health, and safety.

5. Community Resources: Resources include patterns of natural resource and land use; the availability of housing and community services to include health, police and fire protection and sanitation facilities. A key to the continuity and survival of human communities are their historical and cultural resources. Under this collection of variables we also consider possible

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46 http://www.nmfs.noaa.gov/sfa/social_impact_guide.htm

changes for indigenous people and religious subcultures.

U.S. Department of Transportation Community Impact Assessment Guidance Among transportation agencies, changes in policies have included redefining the definition of "environment" to include "the natural environment, the built environment, the cultural and social fabric of our country and our neighborhoods, and the quality of life of the people who live here,' and considering project mediated effects on community cohesion; public facilities; employment; tax and property values; displacement of people, businesses, and farms; and adverse impacts on community and regional growth.

DOT guidelines for community impact assessment consider a number of social and economic factors.[47] They further recognize that while community impact assessment should not be exhaustive, it should focus on community goals and issues of community concern and controversy. The guidelines identify that displacement can involve, neighborhoods, businesses, and people. (www.ciatrans.net) Recommended analysis of impacts on residential displacement include the number and type (multi-family, single family) of residences displaced and the particular needs of vulnerable groups (disabled, minority, elderly).

Council on Environmental Quality Environmental Justice Guidance The Council on Environmental Quality, the federal agency tasked with oversight of NEPA and government compliance with Executive Order 12898 developed guidance to assist federal agencies with addressing environmental justice concerns in the context of NEPA procedures. This guidance suggests that agencies should 'determine whether minority populations, low-income populations, or Indian tribes are present in the affected area...consider data concerning the potential for multiple or cumulative exposure to human health or environmental hazards...recognize the interrelated cultural, social, occupational, historical, or economic factors that may multiply the natural and physical environmental effects...[and]...should assure meaningful community representation in the process.[48]

California Department of Transportation The California Department of Transportation (CalTrans) reference documents for CEQA provide specific guidance for the evaluation of impacts on population and on housing displacement. The 1997 Guidelines for Community Impact Assessment point out that the disproportionate displacement of vulnerable populations can have significant adverse human impacts:

> Certain population groups such as senior citizens, low income residents and non English speaking people often have strong community ties and depend on primary social relationships and important support networks that can be severed upon relocation. Households with school aged children may consider relocation especially disruptive if school transfers would be involved. Disabled people and those

[47] Federal Highway Administration Community Impact Assessment Website (Accessed at: www.ciatrans.net)

[48] Environmental Justice: Guidance under the National Environmental Policy Act. Council on Environmental Quality. 1997.

without automobile transportation often have special relocation problems.

The guidelines suggest investigating the demographics of the residents to determine if any vulnerable groups (Low income, minority, seniors, disabled, and children) would be impacted. The guidelines suggest evaluating the effects on the stock of affordable housing:

> A loss of a substantial number of houses affordable to people with low and moderate incomes may have an effect on the community stock of affordable housing. This could have the effect of increasing the demand for housing in a given sector of the market, bidding up the cost of that housing if the market supply is constrained and thereby disproportionately affecting certain income groups.

Similarly, the 2003 Desk Guide for Environmental Justice in Transportation Planning and Investments. The environmental justice guidelines categorize social and economic impacts into land use and development, population and housing, and fiscal and economic. These guidelines suggest analysis of population and housing impacts consider a number of variables. These include:

- Property acquisition and displacement
- Access to neighborhoods
- Community Cohesion
- Safety and security
- Visual and aesthetic quality
- Property values and gentrification

A particular concern emphasized by CalTrans is impacts of displacement and relocation on neighborhood or community cohesion. The decision tree for residential displacement includes assessment of the availability of relocation housing in the community where displacement is occurring. Social impacts considerations identified by CalTrans related to cohesion include:

- Is there evidence that community cohesion exists?
- Will the proposed project affect interaction among persons and groups?
- Will the proposed project cause redistribution of the population or an influx or loss of populations?
- Will certain people be separated or set apart from others?

City of Los Angeles Thresholds Guide In its *1998 CEQA Thresholds Guide*, the City of Los Angeles uses the following screening criteria for evaluating significant effects on population and housing displacement.[49]

- *Would the project result in the net loss of any existing housing units affordable to very low income or low income households (as defined by federal and/or City standards), through demolition, conversion, or other means.*

The Los Angeles guidelines evaluate the significance of population and housing impacts by considering the following factors:

- The net change in market rate and affordable units in the project area
- The current and anticipated supply of market rate and affordable units in the project area

[49] http://www.ci.la.ca.us/EAD/EADWeb-AQD/Thresholds_PDF/introcen.pdf

- The demographics of the project area
- The consistency with city and regional housing policies

The guidelines also suggest the following two mitigation measure for displacement of affordable housing:

- Exceed the statutory requirements for relocation assistance
- Increase the number of housing units affordable to lower income households

Tahoe Regional Planning Agency (TRPA) The TRPA Initial Environmental Checklist[50] requires a response to and evidence for the following questions relevant to the displacement of low income residents and the loss of affordable housing:

- Will the proposal include or result in the temporary or permanent displacement of residents?
- Will the proposal decrease the amount of housing in the Tahoe Region historically or currently being rented at rates affordable by lower and very-low-income households?
- Will the proposal result in the loss of housing for lower-income and very-low-income households?

Mitigation of affordable housing loss is required for project approval. According to planners at the TRPA any loss of affordable housing due to redevelopment has to be either rebuilt on site or offsite taking into account similar accessibility to transport resources. A recent example of such mitigation occurred with the proposed development of the 138 unit Round Hill Vacation Resort. The development of the time share condominium involved the removal of the 186 unit Lake Park Apartments. To mitigate displacement, the project included the construction of 67 new apartment units offsite prioritized for displaced tenants, affordable housing restrictions for the new apartments, phased demolition over 24 months with eviction of no more than 8 units per month, and relocation assistance.[51]

County of Santa Barbara Santa Barbara's 1993 Environmental Thresholds and Guideline Manual[52] provide a specific threshold for the loss of affordable housing. The rationale for establishing such a threshold comes from the county's affordable housing policies. The Santa Barbara County Housing Element documents a substantial shortfall in affordable housing opportunities and the preservation of the existing affordable housing stock is a stated goal of the Housing Element. According to the Element, "the loss or demolition of existing affordable units can displace very low to moderate income persons and further restricts the housing market." The threshold for Very Low to Moderate Income Housing Units is as follows:

- *The loss of four or more very low to moderate income housing opportunities through demolition, conversion, or other means represents a significant housing impact. Affordability is determined on the basis of the applicable definitions within the County's Comprehensive Plan and Coastal Plan.*

[50] http://www.trpa.org/Applications/new_applications2003/IECFINAL%20APRIL%202002%20Comp.pdf

[51] Lyn Barnett, Tahoe Regional Planning Association,. Personal Communication. and Balloffet and Associates. Round Hill Vacation Resort / Lake vista Apartments Environmental Assessment.

[52] http://ceres.ca.gov/planning/ceqa/thresholds.html

Mitigations to assist persons residing in those units shall be applied.

Santa Barbara's CEQA guidance also provides the following mitigation measures:

- *Mitigations would include extended length of notice to quit premises, relocation expenses, demolished or converted units through physical on or off-site replacement or by the payment of fees. Onsite replacement of low or moderate income housing is the preferable alternative. If onsite replacement is infeasible, the units shall be replaced offsite. Payment of an in-lieu fee shall occur only if on and off-site replacement are proven to be infeasible. Housing mitigation fees shall be sufficient to provide replacement of the demolished or converted units.*

Appendix I Model Housing Impacts Analysis

Screening Criteria

- Will the project result a decrease in the supply of housing?
- Will the project result in an increase in the demand for housing?
- Will the proposal result in the loss of housing affordability, availability or quality for low income or otherwise sensitive populations?
- Will low income or otherwise sensitive be displaced or relocated?

Setting Variables

- The demographics of the project area and locality
- The current and anticipated supply of housing units in the project area and locality disaggregated by affordability;
- Availability of vacant units in the project area and locality disaggregated by level of affordability;
- The quality (safety, environmental conditions...) of available housing units in the project area and locality (sources: census, local housing complaint data)
- Evidence of social cohesion in project area(e.g. organization, interactions, relationships, and support among residents)
- Access to public services in the project area (transportation, schools, childcare...)
- The number and type of employment opportunities in proximity to the project area

Analysis Variables

- The net change in market rate units historically or currently being rented at rates affordable by lower and very-low-income households in the project area
- The net change in affordable (including section 8, permanently affordable, and rent-controlled) units historically or currently being rented at rates affordable by lower and very-low-income households in the project area
- Existence within the displaced population of a higher than average proportion of ethnic minority, low income, medically vulnerable or health sensitive populations among displaced residents
- The location and comparability of replacement housing for displaced households;
- Effects on support (food, advice, childcare, elder care) provided to and by displaced residents
- Increased dependence on public assistance or public services
- Changes in accessibility to or utilization of public services
- Changes in the number of family or relatives living in close proximity
- Effects on crowding: changes in the number of individuals per room in the project area
- Changes in accessibility to public transportation
- Changes in the need for automobile ownership or use

Significance Criteria

- Net loss of housing supply relative to demand in the area, locality, or region;
- Net loss of affordable housing in the project area or locality;
- Significant reduction in housing quality or safety;
- Significant number of residents relocated to non-comparable housing;
- Any residents made temporarily or permanently homeless;
- Loss of community cohesion in project area;
- Increase of local residential segregation.

Mitigation Measures

- Change land use / zoning controls to enable increased housing density;
- Develop relocation plan consistent with California State Relocation Assistance and Property Acquisition Guidelines;
- Construct of replacement affordable housing onsite or offsite;
- Housing impact fees.