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ASSSESSMENT OF FAIR HOUSING

With the adoption of AB 686, all Housing Elements completed January 1, 2019 or later must include a program that promotes and affirmatively furthers fair housing throughout the community for all persons, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, disability, or any other characteristics that are protected by the California Fair Employment and Housing Act (FEHA), Government code Section 65008, and all other applicable State and federal fair housing and planning laws. Under State law, affirmatively furthering fair housing means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

The law also requires that all Housing Elements completed as of January 1, 2021 or later include an Assessment of Fair Housing (AFH) that is consistent with the core elements of the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule from July 2015. The following section summarizes key findings from the Assessment of Fair Housing, which was completed in accordance with current HCD guidance regarding the application of the new AB686 requirements, as well as a detailed reading of the California Government Code.

The main sources of information for the following analysis are the U.S. Census Decennial Census and American Community Survey, the HCD AFFH Data and Mapping Resources Tool, the California Department of Fair Employment and Housing (DFEH), HUD Office of Fair Housing and Equal Opportunity (FHEO), the State Tax Credit Allocation Committee (TCAC), and the County of Napa.

Fair Housing Enforcement and Outreach

Fair housing complaints can be used as an indicator of the overall magnitude of housing complaints, and to identify characteristics of households experiencing discrimination in housing. Pursuant to the California Fair Employment and Housing Act [Government Code Section 12921 (a)], the opportunity to seek, obtain, and hold housing cannot be determined by an individual’s “race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, genetic information, or any other basis prohibited by Section 51 of the Civil Code.” Federal Law also prohibits many kinds of housing discrimination.

1 California Government Code § 8899.5 (a)(1)
Housing discrimination complaints can be directed to either HUD’s Office of Fair Housing and Equal Opportunity (FHEO) or the California Department of Fair Employment and Housing (DFEH).

Fair housing issues that may arise in any jurisdiction include but are not limited to:

- housing design that makes a dwelling unit inaccessible to an individual with a disability;
- discrimination against an individual based on race, national origin, familial status, disability, religion, sex, or other characteristic when renting or selling a housing unit;
- and, disproportionate housing needs including cost burden, overcrowding, substandard housing, and risk of displacement.

A limited number of complaints have been filed with FHEO over housing discrimination in Napa County in recent years. From 2013 through 2020, 43 complaints were recorded, as shown below; slightly more than one-third of complaints were conciliated or settled, a no cause determination was made for slightly less than one third of complaints, and approximately one-fourth of complaints were withdrawn after resolution.

<table>
<thead>
<tr>
<th>Resolution</th>
<th>Total, 2013-2020</th>
<th>Percent of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conciliated/settled</td>
<td>16</td>
<td>37.2%</td>
</tr>
<tr>
<td>Dismissed for lack of jurisdiction</td>
<td>1</td>
<td>2.3%</td>
</tr>
<tr>
<td>No cause determination</td>
<td>14</td>
<td>32.6%</td>
</tr>
<tr>
<td>Withdrawn after resolution</td>
<td>11</td>
<td>25.6%</td>
</tr>
<tr>
<td>Withdrawn without resolution</td>
<td>1</td>
<td>2.3%</td>
</tr>
<tr>
<td><strong>Subtotal, All Complaints</strong></td>
<td><strong>43</strong></td>
<td><strong>100.0%</strong></td>
</tr>
</tbody>
</table>

Sources: HUD, Office of Fair Housing and Equal Opportunity, 2021; BAE, 2021.

In addition to data from the FHEO, this analysis also reviewed data from the California Department of Fair Employment and Housing (DFEH). As reported in Table 2, there were a total of 18 complaints for Napa County between 2018 and 2021 year-to-date, covering 30 basis types and 32 discriminatory practices (a single complaint can include more than one of each of these two categories). Twelve of the complaints were found to have no cause, three were the subject of voluntary mediation, and three were withdrawn after resolution.

---

3 Data not available separately for unincorporated county only
Table 2: DFEH Fair Housing Complaints in Napa County by Class, Practice, and Resolution Type, 2018-2021

<table>
<thead>
<tr>
<th>Basis Type (a)</th>
<th>Total, 2018-2021 (YTD)</th>
<th>Percent of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ancestry</td>
<td>3</td>
<td>10.0%</td>
</tr>
<tr>
<td>Disability</td>
<td>11</td>
<td>36.7%</td>
</tr>
<tr>
<td>Familial status</td>
<td>5</td>
<td>16.7%</td>
</tr>
<tr>
<td>National origin/color/race</td>
<td>9</td>
<td>30.0%</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
<td>3.3%</td>
</tr>
<tr>
<td>Sexual harassment-Quid Pro Quo</td>
<td>1</td>
<td>3.3%</td>
</tr>
<tr>
<td>Total, All Basis Types</td>
<td>30</td>
<td>90.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Discriminatory Practice (a)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Denied equal terms and conditions</td>
<td>7</td>
<td>21.9%</td>
</tr>
<tr>
<td>Denied reasonable accommodation</td>
<td>7</td>
<td>21.9%</td>
</tr>
<tr>
<td>Denied reasonable accommodation for a disability or medical condition</td>
<td>5</td>
<td>15.6%</td>
</tr>
<tr>
<td>Denied rental/lease/sale</td>
<td>3</td>
<td>9.4%</td>
</tr>
<tr>
<td>Evicted</td>
<td>4</td>
<td>12.5%</td>
</tr>
<tr>
<td>Harassed</td>
<td>2</td>
<td>6.3%</td>
</tr>
<tr>
<td>Subjected to restrictive/covenant</td>
<td>2</td>
<td>6.3%</td>
</tr>
<tr>
<td>Subjected to discriminatory statements/advertisements</td>
<td>2</td>
<td>6.3%</td>
</tr>
<tr>
<td>Total, All Practices</td>
<td>32</td>
<td>40.6%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Resolution</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>No cause determination</td>
<td>12</td>
<td>66.7%</td>
</tr>
<tr>
<td>Voluntary mediation</td>
<td>3</td>
<td>16.7%</td>
</tr>
<tr>
<td>Withdrawn after resolution</td>
<td>3</td>
<td>16.7%</td>
</tr>
<tr>
<td>Total, All Resolutions</td>
<td>18</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Note:
(a) Each complaint may involve more than one basis type or discriminatory practice, but there is only one resolution per complaint.

Sources: California Department of Fair Employment and Housing, 2021; BAE, 2021.

Unincorporated Napa County Fair Housing Services
Napa County contracts with Fair Housing Napa Valley⁴ (FHNV) for fair housing services. FHNV provides assistance with monitoring and enforcing fair housing rights for residents throughout Napa County and also for Vallejo in Solano County. Services provided include landlord tenant counseling, outreach and education, and discrimination investigation.

The County directs parties to Fair Housing Napa Valley for further consideration and analysis of housing-related complaints. The Napa County Housing Authority provides a link to FHNV’s website at https://www.countyofnapa.org/467/Housing-Authority

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⁴ https://napafairhousing.org/
According to FHNV [Note: Information pending from FHNV], the organization has received xxxx inquiries about fair housing issues in Unincorporated Napa County over the xxxx time period. Following is a summary of the complaint activity and outcomes:

Integration and Segregation Patterns and Trends

Race and Ethnicity
As noted in the housing needs analysis, since 2000, the number and percentage of residents in Unincorporated Napa County identifying as White has decreased and the percentage of residents of all other races and ethnicities has increased by 10.3 percent, with the 2019 White Non-Hispanic population estimated at 17,827. The unincorporated county is still less diverse than the county overall. Based on 2019 ACS data, nearly 70 percent of the unincorporated county is White Non-Hispanic, in comparison to only 52 percent for the county and 39 percent for the region. This indicates that the incorporated areas of the county contain a much higher percentage of the county’s minority population than the unincorporated area. The largest minority group in both the unincorporated area and the incorporated area is the Hispanic/Latinx population.

Historic Patterns of Racial Discrimination
The following section discusses longer-term trends regarding race and ethnicity in Napa County overall.

Black residents were present in what is now Napa County as early as 1845. Others followed after the Civil War as freed slaves sought out new opportunities in California. The late 1800s showed ongoing patterns of segregation in Napa County along with progress on some fronts. Schools in the City of Napa were integrated in 1878, in large part due the expense of running a separate school for the small number of Black children in the city. However, discrimination in employment and housing opportunities and other factors led to a decline in the Black population in Napa County over the following decades. In 1900 the Census reported only 28 African Americans in Napa County, a decline from 106 in 1870.

According to the Coleman thesis cited above, there is no specific evidence in Napa County of the Home Owners’ Loan Corporation official “redline” maps first developed during the New Deal which reinforced housing segregation. However, some of the housing subdivisions developed during and after World War II reportedly had restrictive covenants that prohibited

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7 Ibid. See discussion of housing discrimination beginning on page 75.
Black residence in those areas, but physical evidence of those covenants is difficult to find. In at least one case, such a covenant existed for housing developed after such restrictions were declared unconstitutional and unenforceable. More likely, informal understandings between brokers and rental agents resulted in housing discrimination in Napa County.

In the late 19th Century, anti-Chinese sentiment led to the passage of the Chinese Exclusion Act in 1882, which along with other measures limited further Chinese immigration, especially for women and children, as well as closing the path to citizenship and employment for those of Chinese ancestry. Along with legal barriers, there were numerous other extralegal actions including attacks on Chinese individuals and businesses. The Exclusion Act was not repealed until the 1940s. Napa County was no stranger to the anti-Chinese trends, with boycotts of businesses employing or associated with those of Chinese ancestry, and arson fires in the county’s Chinese settlements: newspaper coverage often echoed the associated public sentiments. The Chinese population reported by the decennial Census showed a decline from 884 in 1880 to only 70 in 1930. Napa County’s history with respect to anti-Chinese racism is documented at https://napahistory.org/napa-county-and-the-anti-chinese-league/ and also at https://yesterdaysamerica.com/the-forgotten-history-of-napa-valley-chinatowns/, which describe patterns of housing segregation for the Chinese population in Napa County.

More recent trends are mixed in Napa County for various racial and ethnic groups. In 1980, Napa County was nearly 90 percent White non-Hispanic (see Table 3), with the Hispanic population making up the largest minority group with 8.7 percent of the county’s population. Since 1980, the White non-Hispanic population has steadily declined; recently released 2020 Census data indicate that this group is no longer a majority of the county’s total population, while the Hispanic population has grown to over one-third of the county’s total. Asian/Pacific Islanders were only 2.2 percent of the 1980 population, but now make up 7.9 percent of the total. No other group shown in the table makes up more than five percent of the 2020 population. The Black population, while a small percentage of the county total, increased gradually from 981 in 1980 to 2,440 in 2010, but declined to 2,300 in 2020, never constituting even two percent of the county’s population.
Table 3: Napa County Race by Ethnicity, 1980 to 2020

<table>
<thead>
<tr>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>86,466</td>
<td>89,453</td>
<td>85,932</td>
<td>76,967</td>
<td>68,909</td>
<td>-17,557</td>
</tr>
<tr>
<td>Black or African American</td>
<td>981</td>
<td>1,167</td>
<td>1,527</td>
<td>2,440</td>
<td>2,300</td>
<td>1,319</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>829</td>
<td>687</td>
<td>642</td>
<td>544</td>
<td>507</td>
<td>-322</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>2,153</td>
<td>3,391</td>
<td>3,895</td>
<td>9,299</td>
<td>10,836</td>
<td>8,683</td>
</tr>
<tr>
<td>Other (a)</td>
<td>171</td>
<td>126</td>
<td>2,867</td>
<td>3,224</td>
<td>6,638</td>
<td>6,467</td>
</tr>
<tr>
<td>Total, Not Hispanic nor Latino</td>
<td>90,600</td>
<td>94,824</td>
<td>94,863</td>
<td>92,474</td>
<td>89,190</td>
<td>-1,410</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>8,599</td>
<td>15,941</td>
<td>29,416</td>
<td>44,010</td>
<td>48,829</td>
<td>40,230</td>
</tr>
<tr>
<td>Total, All Races</td>
<td>99,199</td>
<td>110,765</td>
<td>124,279</td>
<td>136,484</td>
<td>138,019</td>
<td>38,820</td>
</tr>
</tbody>
</table>

Note: The Census Bureau has changed how it gathers race and Hispanic origin data over time, so findings about trends should be noted with caution. Especially significant was the addition in 2000 of the respondents’ ability to specify more than one race; this change is evidenced by the sharp increase in the "other" category, between 1990 and 2000, as it includes persons of two or more races starting in 2000.

(a) For 1980 and 1990, this category consists of persons of some other race alone. Beginning in 2000, it also includes persons of two or more races.


**Dissimilarity Index**

One of two key metrics recommended for use in fair housing analysis as part of the federal AFFH rule, the dissimilarity index measures the evenness with which two groups are distributed across the geographic units that make up a larger area, such as Census block groups within a jurisdiction. The index can range from zero to 100, with zero meaning no segregation, or spatial disparity, and 100 indicating complete segregation between the two groups. The index score can be interpreted as the percentage of one of the two groups that...
would have to move to produce an even distribution. An index score above 55 is considered high, while 40 to 55 is considered moderate, and below 40 is considered low.\(^8\)

The sub-city analysis, including the calculation of both the dissimilarity and isolation indexes, relies on the use of block group and Census tract level data from the U.S. Census Bureau. However, the block groups and tracts in Napa County do not necessarily follow city boundaries, especially for the cities of Napa and American Canyon. For this analysis of fair housing, the block groups and tracts that included both incorporated places and Unincorporated Napa County were removed from the unincorporated county analysis if a review of maps and aerial images indicated that most of the population of the block group or tract lived within an incorporated place. Otherwise, some lightly populated incorporated areas were unavoidably included in this analysis and some unincorporated areas of the county were not covered in the following analysis, but these areas were not substantially populated. Since data were not available for just the unincorporated portions, the calculations summarized below reflect the characteristics of entire block groups and tracts, including the portions of some block groups and tracts that extend into incorporated areas.

In 2010, Unincorporated Napa County showed moderate to high dissimilarity indexes for most minority populations, as shown in Table 4. The indexes for every group increased between 2010 and 2019, indicating a possible trend toward increased housing segregation. However, as noted above in Table 3, the population of several of the minority groups in Napa County are extremely small; as a result, the 2015 to 2019 numbers are subject to potential statistical error.

### Table 4: Dissimilarity Index, Unincorporated Napa County, 2010 and 2015-2019

<table>
<thead>
<tr>
<th>Racial and/or Ethnic Group</th>
<th>Dissimilarity Index</th>
<th>2010</th>
<th>2015-2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black or African American alone</td>
<td></td>
<td>52.6</td>
<td>70.0</td>
</tr>
<tr>
<td>American Indian and Alaska Native alone</td>
<td></td>
<td>25.1</td>
<td>83.4</td>
</tr>
<tr>
<td>Asian alone</td>
<td></td>
<td>37.4</td>
<td>55.1</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander alone</td>
<td></td>
<td>60.8</td>
<td>90.2</td>
</tr>
<tr>
<td>Some other race alone</td>
<td></td>
<td>43.4</td>
<td>80.8</td>
</tr>
<tr>
<td>Two or more races</td>
<td></td>
<td>23.4</td>
<td>48.8</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td></td>
<td>38.2</td>
<td>45.1</td>
</tr>
</tbody>
</table>

Sources: U.S. Census Bureau, 2010 Decennial Census, Table P9, ACS 2015-2019 five-year sample data, Table B03002; BAE, 2021.

Isolation Index

The other key metric recommended under the federal AFFH rule is the Isolation Index, which compares a group’s share of the overall population to the average share within a given block group. Ranging from 0 to 100, the isolation index represents the percentage of residents of a given race or ethnicity in a block group where the average resident of that group lives, correcting for the fact that this number increases mechanically with that group’s share of the overall study area’s population. Using Hispanic or Latino residents as an example, an aggregate isolation index of 45 indicates that the average Hispanic or Latino resident lives in a block group where the Hispanic or Latino share of the population exceeds the overall communitywide average by roughly 45 percent. Isolation index values close to zero indicate that members of that minority group live in relatively integrated neighborhoods.  

Table 5 summarizes isolation index scores by racial and ethnic minority affiliation. The data indicate that most racial and ethnic subpopulations in Unincorporated Napa County live in areas with relatively high degrees of racial and ethnic integration. Hispanics make up the second largest race/ethnic group in the Unincorporated County and have the highest isolation index score. Non-Hispanic Whites, the largest single race/ethnic group in Unincorporated Napa County have the second-highest score. The isolation indexes showed modest increases over the 2010 to 2019 period for all groups, but for all the groups, the isolation levels are still relatively low. Once again, it should be noted that the population of several of the minority groups in Napa County are extremely small; as a result, the 2015 to 2019 numbers are subject to potential statistical error.

<table>
<thead>
<tr>
<th>Racial and/or Ethnic Group</th>
<th>2010</th>
<th>2015-2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Hispanic White</td>
<td>14.1</td>
<td>20.5</td>
</tr>
<tr>
<td>Black or African American alone</td>
<td>2.0</td>
<td>5.4</td>
</tr>
<tr>
<td>American Indian and Alaska Native alone</td>
<td>0.2</td>
<td>4.2</td>
</tr>
<tr>
<td>Asian alone</td>
<td>4.3</td>
<td>9.4</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander alone</td>
<td>0.3</td>
<td>1.7</td>
</tr>
<tr>
<td>Some other race alone</td>
<td>0.2</td>
<td>7.0</td>
</tr>
<tr>
<td>Two or more races</td>
<td>0.8</td>
<td>3.0</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>16.8</td>
<td>22.3</td>
</tr>
</tbody>
</table>

Sources: U.S. Census Bureau, 2010 Decennial Census, Table P9, ACS 2015-2019 five-year sample data, Table B03002; BAE, 2021.

---


**Geographic Distribution of Residents by Race and Ethnicity**

Figure 1 through Figure 18 below illustrate the geographic concentrations of the overall non-White population and the non-Hispanic populations of White, Black, Native American/Alaska Native, Asian, Pacific Islanders, Some Other Race, and Two or More Races, and Hispanic or Latino residents by Census block group, for both Unincorporated Napa County and a comparison region, defined as Napa and Sonoma Counties combined. (the “North Bay Region”).

As noted above, Census block group and tract boundaries in Napa County do not always follow city boundaries, especially for the cities of Napa and American Canyon. As a result, some unincorporated areas are grouped with the incorporated cities in the maps and analysis below. And some unincorporated areas are excluded. The areas described on the maps as “Incorporated Jurisdiction Block Groups” or Incorporated Jurisdiction Tracts” are the areas that have been excluded from the analysis, but these may include unincorporated areas.

While slightly more than two-thirds of the Unincorporated County’s population overall is White Non-Hispanic, the proportion of the total population of other race/ethnic groups varies considerably by Census block group, as shown in Figure 1, ranging from 14 percent to 69 percent. Correspondingly, the percentage of White non-Hispanic persons ranges from 31 percent to 86 percent (see Figure 3). The highest minority concentrations are in a block group covering an unincorporated island within Napa city, and in a block group between Yountville and St. Helena. For the North Bay Region overall, the block groups with the highest minority population tend to be in the urban areas, with concentrations by block group ranging from only four percent up to greater than 90 percent (see Figure 2). Conversely, the highest concentrations of White non-Hispanic persons tend to be found in more rural areas of the region, ranging from eight percent to 96 percent, as shown in Figure 4.

None of the other major race/ethnic populations make up even four percent of the Unincorporated County population. However, there are concentrations of two of the groups in one particular area of the county, the community of Angwin, which has high proportions of non-Hispanic Blacks (Figure 7) and non-Hispanic Asians (Figure 9). This is an indicator of the diverse student body of Pacific Union College rather than any deliberate spatial segregation in the Unincorporated County.
Figure 1: Census Block Groups by Percent Non-White, Unincorporated Napa County

Note: Includes all categories except White non-Hispanic persons. 
Source: Esri 2018.
Figure 2: Census Block Groups by Percent Non-White, North Bay Region

Note: Includes all categories except White non-Hispanic persons.
Source: Esri 2018.
Figure 3: Census Block Groups by Percent Non-Hispanic White, Unincorporated Napa County

Source: Esri 2018.
The largest minority population in the Unincorporated County is the Hispanic/Latino population, at 21.4 percent of the area's total, as shown in above in the housing needs assessment. By block group, the percentage varies widely, from six percent to 64 percent (see Figure 5). This group is most concentrated to the southeast of St. Helena and in block groups adjacent to Napa city. Regionwide, there are areas with a somewhat lower and somewhat higher concentrations of the Hispanic/Latino population, with the proportions ranging from six percent to 88 percent by block group. Mirroring the geographic distribution of minorities overall, the highest concentrations are generally in the more urban areas of the North Bay Region (see Figure 6).
Figure 5: Census Block Groups by Percent Hispanic or Latino, Unincorporated Napa County

Source: Esri 2018.
The Black non-Hispanic population of Unincorporated Napa County is extremely small, accounting for less than three percent of the area’s population according to 2015-2019 American Community Survey data as discussed in the housing needs assessment. Three block groups in the area have no Black non-Hispanic residents, and the highest proportion is 6.5 percent in Angwin, likely related to the presence of Pacific Union College (see Figure 7). For the North Bay Region, the range by block group is from zero to 26 percent, as shown in Figure 8. The single block group at 26 percent is the block group for the Napa State Hospital, a psychiatric hospital in Napa city operated by the State of California. The only other block group with a non-Hispanic Black population making up more than 10 percent of the total is in American Canyon. Other block groups with high concentrations tend to be clustered in and around Santa Rosa.
Figure 7: Census Block Groups by Percent Non-Hispanic Black, Unincorporated Napa County

Source: Esri 2018.
As noted in the housing needs assessment, non-Hispanic Asians and Pacific Islanders make up 4.5 percent of Unincorporated Napa County’s population. As seen in Figure 9, the proportion of non-Hispanic Asians by block group varies from less than 0.5 percent to 18.9 percent, with the highest proportion found in Angwin, again likely due to the presence of Pacific Union College – no other block group in the Unincorporated County is more than 10 percent Asian non-Hispanic.

For the North Bay Region, the proportion of population that is Asian non-Hispanic ranges from zero to 58 percent. The three block groups with the highest concentrations (greater than 40 percent) are associated with American Canyon (see Figure 10). These areas have shown more growth in recent years than the county overall and the high minority presence may indicate a declining level of discrimination in the region.
Figure 9: Census Block Groups by Percent Non-Hispanic Asian, Unincorporated Napa County

Source: Esri 2018.
The Hawaiian Native/Pacific Islander population in Unincorporated Napa County is extremely small. By Census block group, the proportions range from none to less than 0.8 percent (see Figure 11). Regionally, this population is also fairly small; the highest concentration by block group is only four percent, as illustrated in Figure 12.
Figure 11: Census Block Groups by Percent Non-Hispanic Pacific Islander, Unincorporated Napa County

Source: Esri 2018.
As displayed in Figure 13, the non-Hispanic Alaska Native/Native American population in the Unincorporated County is also extremely small, ranging from zero to only 1.4 percent by block group. Regionally, the proportion in all but one block group was less than three percent. One rural block group in northwest Sonoma County showed non-Hispanic Native Americans making up approximately ten percent of the population (see Figure 14.)
Figure 13: Census Block Groups by Percent Non-Hispanic Native American, Unincorporated Napa County

Source: Esri 2018.
Yet another very small race/ethnic cohort in the Unincorporated County and the North Bay Region is the non-Hispanic Some Other Race Alone population as shown in Figure 15 and Figure 16. In Unincorporated Napa County, the percentage by block group ranges from zero to only 0.7 percent, and in the entire North Bay Region, the largest concentration by block group is only 1.2 percent.
Figure 15: Census Block Groups by Percent Non-Hispanic Other Race Alone, Unincorporated Napa County

Source: Esri 2018.
Based on 2020 Census data, persons of two or more races and non-Hispanic make up the second-largest minority race/ethnic group in Napa County; however, this group makes up only four percent of the Unincorporated County total. Concentration by block group ranges from less than 0.5 percent to six percent of total population.\textsuperscript{11}

\textsuperscript{11} Range is based on 2015-2019 ACS data.
Figure 17: Census Block Groups by Percent Non-Hispanic Persons of Two or More Races, Unincorporated Napa County

Source: Esri 2018.
Figure 18: Census Block Groups by Percent Non-Hispanic Persons of Two or More Races, North Bay Region

Source: Esri 2018.
Persons with a Disability
As discussed in the housing needs assessment, approximately 13 percent (3,300 persons) of the civilian noninstitutionalized population in Unincorporated Napa County is estimated to have one or more of the six disability types specified by the American Community Survey. This proportion is similar to the County overall but higher than for the Bay Area.

Figure 19 shows the percent of persons with a disability by Census tract for the Unincorporated County using ACS data from 2015-2019. The tracts range from 8.2 percent to 15.8 percent of the civilian noninstitutionalized population having one or more type of disability. The highest proportion is found in a large tract that is northernmost in the county and is thinly populated.

As shown in Figure 20, the North Bay Region shows some Census tracts with very high proportions of disabled persons. There are five tracts reporting that over 20 percent of the non-institutionalized civilian population is disabled, with one of those tracts showing almost three-fourths of this population as disabled. This tract is home to the Napa State Hospital, a state run facility for involuntarily held mentally disabled persons (e.g., persons found not guilty of a crime due to insanity); there is little other population in the tract. A closer look at the data indicates that the disabled proportion anomaly may be due to a misclassification of hospital residents as being non-institutionalized. Additionally, this lightly populated tract contains an affordable housing project, the Skyline Apartments, that has 19 units targeted towards very low-income households with at least one disabled member. The second highest concentration of disabled was found in the tract containing the recently closed Sonoma Developmental Center. This facility closed in 2018, but the data from ACS covers a period beginning in 2015.

These high concentrations of reported disabled persons thus appear to be associated with institutionally dominated Census tracts, which may indicate a data collection problem to some degree rather than clusters of disabled in the non-institutionalized population. Otherwise, while disabled persons may face difficulty finding suitable housing in Unincorporated Napa County, these findings do not indicate any geographic pattern of housing discrimination for disabled persons in the area.
Figure 19: Population with a Disability by Census Tract, Unincorporated Napa County

Familial Status

Family status affects housing choices both in the type of housing desired and the ability to afford that housing. Households with more than one adult, especially married couple households, tend to have higher incomes and thus can better afford housing. Unincorporated Napa County has a higher proportion of married-couple households compared to the County overall and the Bay Area, with 62 percent of households reporting as married-couple families compared to 53 percent for the county and 51 percent of the region. Most children under 18 in Unincorporated Napa County live in married-couple households. By Census tract, between 53 percent and 100 percent of children under 18 reside in married-couple households (as shown in Figure 21), indicating no areas within the Unincorporated County with a majority of children in single-parent or other non-married couple households. With the exception of the large northernmost tract, the higher concentrations of children under 18 in married couple households are to the north of Napa city. For the North Bay Region, the proportion of children in married-couple households ranges from 27 to 100 percent. There does not appear to be a clear pattern as to the location of the tracts with low percentages, but the highest percentages appear to be in more rural areas (see Figure 22).
Figure 21: Percent of Children in Married-Couple Households, 2015-2019, Unincorporated Napa County

Households with only one parent or guardian present, especially female-headed households, are more likely to face problems in finding affordable housing. Figure 23 shows the distribution in the Unincorporated County of the percent of children in female-headed households with no spouse or partner present, with the proportion of children in this type of households ranging from none to 35 percent. That highest concentration is found in the thinly populated northernmost tract. Three other tracts show concentrations greater than 15 percent. For the North Bay Region, the proportion of children in female-headed households with no spouse or partner present ranges from none to 64 percent (see Figure 24). The only tract over 40 percent is the tract containing the Napa State Hospital; this tract has a very small reported population; some persons may be misclassified as being in households (see discussion above regarding this problem regarding the disabled and non-institutionalized population). ACS 2015-2019 shows only 11 children under 18 living in any type of household in this tract. The other tracts showing 30 percent or more of children in female-headed households are scattered throughout the region, typically being the same tracts with a low percentage of children in married couple households.
Figure 23: Percent of Children in Single-Female Headed Households, Unincorporated Napa County

Figure 24: Percent of Children in Single-Female Headed Households, Los Angeles County

Income
As shown in Table 6, for the 2015-2019 ACS survey period the median annual household income in the Unincorporated County, at $108,961, compared to only $83,000 for the North Bay Region. Only 8.3 percent of the Unincorporated County’s households reported incomes below $25,000; while 12.5 percent of those in the overall North Bay Region have incomes at this level. For the upper end of the income scale, over one-third of the Unincorporated County’s households had incomes of $150,000 or more, while only 22.1 percent of the North Bay Region’s households had income in that range.

Table 6: Household Income Distribution and Median Income, 2015-2019

<table>
<thead>
<tr>
<th></th>
<th>Unincorporated Napa County</th>
<th>North Bay Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household Income</td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Less than $14,999</td>
<td>490</td>
<td>5.4%</td>
</tr>
<tr>
<td>$15,000 to $24,999</td>
<td>256</td>
<td>2.8%</td>
</tr>
<tr>
<td>$25,000 to $34,999</td>
<td>407</td>
<td>4.5%</td>
</tr>
<tr>
<td>$35,000 to $49,999</td>
<td>831</td>
<td>9.2%</td>
</tr>
<tr>
<td>$50,000 to $74,999</td>
<td>1,216</td>
<td>13.5%</td>
</tr>
<tr>
<td>$75,000 to $99,999</td>
<td>963</td>
<td>10.7%</td>
</tr>
<tr>
<td>$100,000 to $149,999</td>
<td>1,661</td>
<td>18.4%</td>
</tr>
<tr>
<td>$150,000 and above</td>
<td>3,198</td>
<td>35.4%</td>
</tr>
<tr>
<td><strong>Total Households</strong></td>
<td><strong>9,022</strong></td>
<td><strong>100.0%</strong></td>
</tr>
<tr>
<td><strong>Median Household Income</strong></td>
<td><strong>$108,691</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>North Bay Region</td>
<td></td>
</tr>
<tr>
<td>Household Income</td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Less than $14,999</td>
<td>16,831</td>
<td>6.6%</td>
</tr>
<tr>
<td>$15,000 to $24,999</td>
<td>13,851</td>
<td>5.8%</td>
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<tr>
<td>$25,000 to $34,999</td>
<td>15,831</td>
<td>6.6%</td>
</tr>
<tr>
<td>$35,000 to $49,999</td>
<td>23,858</td>
<td>10.0%</td>
</tr>
<tr>
<td>$50,000 to $74,999</td>
<td>38,754</td>
<td>16.3%</td>
</tr>
<tr>
<td>$75,000 to $99,999</td>
<td>33,243</td>
<td>14.0%</td>
</tr>
<tr>
<td>$100,000 to $149,999</td>
<td>44,098</td>
<td>18.5%</td>
</tr>
<tr>
<td>$150,000 and above</td>
<td>52,610</td>
<td>22.1%</td>
</tr>
<tr>
<td><strong>Total Households</strong></td>
<td><strong>238,079</strong></td>
<td><strong>100.0%</strong></td>
</tr>
<tr>
<td><strong>Median Household Income</strong></td>
<td><strong>$83,206</strong></td>
<td></td>
</tr>
</tbody>
</table>

Notes:
Incomes are in 2019 dollars.

Figure 25 below shows the geographic distribution of households by median annual household income by block group in Unincorporated Napa County. The lowest median annual income by block group is slightly more than $50,000, and the highest is over $230,000. The highest medians are found in block groups to the east of Napa city and a block group to the northeast.
of Yountville; there is not a clear pattern as to the location of the low-median block groups. Regionally, median annual household incomes range from less than $10,000 to more than $200,000 (see Figure 26). The lowest household median income is found in the block group containing the Napa State Hospital; the income levels may reflect problematic data where some group quarters population has been improperly placed in households. Generally speaking, the lower median income levels are found in the more urbanized areas of the North Bay Region, especially Napa city and Santa Rosa.

12 See additional discussion above regarding the problematic data from the block group and census tract containing this group quarters facility.
Figure 25: Distribution of Median Household Income by Block Group, Unincorporated Napa County

Figure 27 displays additional information regarding income levels in Unincorporated Napa County, showing the percentage of persons in low- to moderate-income households by Census tract. The percentage by tract ranges from 15 percent to 50 percent, with the highest percentage in the tract surrounding Yountville. The North Bay Region shows a broader range, with the percentage of persons in low- to moderate-income households by tract ranging from 9.7 percent to 100 percent, as shown in Figure 28. The tract at 100 percent contains the Napa State Hospital, perhaps leading to data problems once again due to misclassification of persons into households rather than in group quarters. No other tract has more than about 75 percent of its population in households at low and moderate income levels.
Figure 27: Percent of Low to Moderate Income Households by Census Tract, Unincorporated Napa County

Sources: HUD; U.S. Census American Community Survey, 2011-2015 data.
As shown in Figure 29, which displays poverty status by Census tract in Unincorporated Napa County, the percentage of population in poverty ranges from 1.1 percent to 11.3 percent, indicating that while the population in poverty is limited, there are some persons living in poverty in the Unincorporated County. The highest concentrations are in tracts in the south portion of the county, bordering the cities of Napa and American Canyon. Tracts with higher poverty are scattered across the North Bay Region, in both rural and urban areas (see Figure 30). Excluding the tract containing the Napa State Hospital, the percent of population in poverty ranges from 1.1 percent to 23.5 percent.
Figure 29: Poverty Status, Unincorporated Napa County

Note: “Incorporated Jurisdiction Tracts” are defined as those whose population largely resides within incorporated cities and towns and may include some nearby unincorporated areas. Conversely, unincorporated area tracts may include small portions of incorporated jurisdictions.

Racially and Ethnically Concentrated Areas of Poverty

The overall distribution of households in poverty by race is discussed in the Housing Needs Assessment chapter. To assist communities in identifying racially and ethnically concentrated areas of poverty (also known as RCAPs and ECAPs), HUD developed a definition that relies on a racial and ethnic concentration threshold, as well as a poverty test. The racial and ethnic concentration threshold requires that an RCAP or ECAP have a non-White population of 50 percent or more. The poverty test defines areas of “extreme poverty” as those where 40 percent or more of the population lives at or below the federal poverty line, or those where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. Based on these criteria, there are no R/ECAP areas in Unincorporated Napa County or elsewhere in the North Bay Region.

Racially and Ethnically Concentrated Areas of Affluence

R/ECAPs show one side of concentrations by race and wealth. On the other side are “areas of affluence” where non-minority affluent populations are concentrated. HCD devised a measure
which calls out Census tracts with relatively high concentrations of both White population and higher household incomes, as detailed in the HCD AFFH Data and Mapping Tool. These areas are designated as “Racially Concentrated Areas of Affluence,” or RCAAs.

There are no RCAAs in Unincorporated Napa County or the larger North Bay Region.

**Disparities in Access to Opportunity**

AB 686 requires the needs assessment to include an analysis of access to opportunities. To facilitate this assessment, HCD and the State Tax Credit Allocation Committee (TCAC) convened an independent group of organizations and research institutions under the umbrella of the California Fair Housing Task Force, which produces an annual set of Opportunity Maps. The maps identify areas within every region of the state “whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families – particularly long-term outcomes for children.”

TCAC and HCD created these “Opportunity Maps,” using reliable and publicly available data sources to derive 21 indicators to calculate opportunity index scores for Census tracts in each region in California. The TCAC/HCD Opportunity Map categorizes Census tracts into five groups based on the opportunity index scores:

- Highest Resource
- High Resource
- Moderate Resource/Moderate Resource (Rapidly Changing)
- Low Resource
- High Segregation & Poverty

Before an area receives an opportunity index score, some Census tracts are filtered into the High Segregation & Poverty category. The filter identifies Census tracts where at least 30 percent of population is below the federal poverty line and there is a disproportionate share of households of color. After filtering out High Segregation and Poverty areas, the TCAC/HCD Opportunity Map allocates the 20 percent of tracts in each region with the highest relative opportunity index scores to the Highest Resource designation and the next 20 percent to the High Resource designation. The remaining non-filtered tracts are then evenly divided into Moderate Resource and Low Resource categories.

As illustrated in Figure 31, Unincorporated Napa County has no tracts with High Segregation and Poverty, but otherwise has tracts ranging across the other four categories. The highest resource tracts are largely concentrated in the western part of the county and to the northeast of Napa city.

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Elsewhere in the North Bay Region tracts cover a broad range of categories, once again with the exception of the High Segregation and Poverty category (see Figure 32). Within Sonoma County, the Highest Resource tracts are concentrated largely to the west of Santa Rosa and Petaluma toward the coast.
Figure 31: 2021 TCAC/HCD Opportunity Map by Census Tract, Unincorporated Napa County

Sources: California Tax Credit Allocation Committee; HCD; U.S. Census Bureau, American Community Survey, 2014-2018 five-year sample data; BAE, 2021.
Access to Education

One of the factors used to develop the Opportunity Index discussed previously is education. The Opportunity Index considers three education criteria in equal measure: math proficiency for 4th graders, reading proficiency for 4th graders, high school graduation rates, and the student poverty rate, to create an “Education Domain” score ranging from 0 to 100 percent for each Census tract (or in some cases, rural block group), with a higher score representing better educational opportunities.\(^\text{14}\) Figure 33 shows the Education Domain scores for subareas of Unincorporated Napa County. The geographic distribution is very similar to that for the overall Opportunity Index, with the highest scores tending to be found in the western part of the county and tracts to the northeast of the city of Napa, and the lowest scores to the east.

\(^{14}\) The methodology for this can be found in [https://www.treasurer.ca.gov/ctcac/opportunity/2021-hcd-methodology.pdf](https://www.treasurer.ca.gov/ctcac/opportunity/2021-hcd-methodology.pdf).
Figure 33: TCAC Education Domain Score, Unincorporated Napa County

Sources: California Tax Credit Allocation Committee; HCD, 2021; BAE, 2021.
As illustrated in Figure 34, the level of the scores across the North Bay Region also tend to be mirror the scores of the overall Opportunity Index, with high scores tending toward rural areas and lower scores in the more urbanized areas.

**Access to Employment**

For AFFH reports, HUD has developed the Jobs Proximity Index as a way to measure access to employment. As stated by HUD:

The Jobs Proximity Index quantifies the accessibility of a given residential neighborhood (Census Block Group) as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily.

The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. Specifically, a gravity model is used, where the accessibility (Ai) of a given residential block group is a summary description of the distance to all job locations, with the distance from any single job location positively...
weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. More formally, the model has the following specification: Where $i$ indexes a given residential block-group, and $j$ indexes all $n$ block groups within a CBSA. Distance, $d$, is measured as “as the crow flies” between block-groups $i$ and $j$, with distances less than 1 mile set equal to 1. $E$ represents the number of jobs in block-group $j$, and $L$ is the number of workers in block-group $j$. 

Interpretation Values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.\(^{15}\)

In Unincorporated Napa County, the highest job proximity indexes are found in block groups surrounding the city of St. Helena (as shown in Figure 35). While this seems counterintuitive, this may be due to limited population relative to the number of jobs in those rural and semi-rural areas due to the wine industry. The North Bay Region similarly shows the highest indexes largely in rural areas or smaller cities, with the exception of Santa Rosa, which has a large population and is also a job center (see Figure 36).

\(^{15}\) [https://hudgis-hud.opendata.arcgis.com/datasets/HUD::jobs-proximity-index/about](https://hudgis-hud.opendata.arcgis.com/datasets/HUD::jobs-proximity-index/about). The index is currently based on U.S. Census Longitudinal Employer-Household Dynamics data from 2014.
Figure 35: Jobs Proximity Index Score, Unincorporated Napa County

Transportation

Public transit in Napa County is provided by the Vine, operated by Napa Valley Transportation Authority (NVTA). The Vine runs multiple bus routes, ranging from local on-call shuttles to intercity operations within the county, as well as providing connections outside the county in Vallejo, with BART at the El Cerrito Del Norte station, and to Fairfield and Amtrak in Suisun City. Routes operate on a mix of schedules, including weekdays, Monday through Saturday, and seven days a week, excluding holidays.\footnote{See \url{https://vinetransit.com/routes/} for complete route and schedule information.}
The Center for Neighborhood Technology (CNT)\textsuperscript{17} has developed a metric, the H+T (Housing and Transportation) Index that takes into account housing and transportation costs for a typical household. By their metric, in order to remain affordable, housing costs plus transportation costs should equal 45 percent or less of total household income. They

\textsuperscript{17}https://htaindex.cnt.org/\textunderscore \textunderscore \textunderscore\textunderscore \textunderscore. For more on the methodology, see https://htaindex.cnt.org/about/HTMethods_2016.pdf.
estimate this burden at the Census block group level, so disparities in this total estimated cost can be seen at a local or a regional level.

Based on their estimates, for many of the Census block groups for Unincorporated Napa County, the costs of housing plus transportation would be excessively high for what CNT calls a typical moderate-income household, as shown in Figure 38. This means that a household with an income in this range would, on average, be cost-burdened when considering combined housing and transportation costs.

For the North Bay Region the block groups with high housing plus transportation cost burdens tend to be in rural areas; the low costs burdens are found in the urban nodes of the region (see Figure 39).

However, while the costs may represent an undue burden for a “typical” moderate income household, many households have higher incomes and would not necessarily be burdened. These households may be able to sustain these higher housing and transportation costs. However, the combined costs act to restrain the ability of households at moderate and low incomes to live in much of Unincorporated Napa County.
Figure 38: Percent of Income to Housing + Transportation for a Typical Moderate-Income Household in Unincorporated Napa County

Source: Housing + Transportation Index, Center for Neighborhood Technology.
Access to a Clean Environment

CalEnviroScreen provides a methodology to assist in identifying whether a local community is disproportionately burdened by pollution. For every Census tract in the state, CalEnviroScreen produces a score using environmental, health, and socioeconomic information derived from government sources, with higher scores associated with a higher pollution burden. The original layer was developed by California's Office of Environmental Health Hazard Assessment on behalf of the California Environmental Protection Agency and released in early 2017. The analysis here uses the draft CalEnviroScreen version 4.0, released in the first half of 2021. As shown in Figure 40 below, the highest score (indicating the worst environmental conditions) is found in the tract to the east of Napa city and American Canyon. The tract north of Napa city and surrounding Yountville also exhibits a relatively high score.

18 For more information, go to https://oehha.ca.gov/calenviroscreen.
Figure 40: Areas of High Pollution in Unincorporated Napa County

Sources: CalEnviroScreen Version 4.0 DRAFT

Legend:
- Green: 1% - 10%
- Yellow: 11% - 20%
- Red: 21% - 30%
- Dark Red: ≥31%
- Gray: Missing/Insufficient Data

Sources: County of Napa, County of Solano, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, CIA, HERE, NPS

Sources: CalEnviroScreen Version 4.0 DRAFT
Regionally, the highest scores tend to be concentrated in or near more urbanized areas, especially Napa city and Santa Rosa. However, for the Unincorporated County and the larger region, with one exception none of the subareas score in the highest/worst quartile, indicating that regionally the area is not so disproportionately burdened for pollution.

**Disproportionate Housing Needs and Displacement Risk**
The following section assesses the extent to which protected classes in Unincorporated Napa County, particularly members of racial and ethnic minority groups, experience disproportionate housing needs and are at risk for displacement.

**Minority Homeownership Rates**
Rates of home ownership often vary widely by race and ethnicity, both within local jurisdictions and throughout larger regions. As shown in Table 7, in Unincorporated Napa County, 77 percent of all households are homeowners. The homeownership rate is highest for non-Hispanic Whites at 84 percent, and lowest for Hispanic and some other race alone.
householders\(^{19}\), at only 44 and 45 percent, respectively. These trends likely reflect a combination of economic factors and historic discrimination in the housing market.

Overall homeownership rates are higher for Unincorporated Napa County than for the entire North Bay Region; while this is in part due to a lower proportion of minorities who typically have lower homeownership rates, the homeownership rates for most race/ethnic groups are higher in the Unincorporated County than in the North Bay Region.

**Table 7: Distribution of Homeowners by Race/Ethnicity, Unincorporated Napa County**

<table>
<thead>
<tr>
<th>Householder by Race</th>
<th>Household Tenure</th>
<th>Total Household</th>
<th>Ownership Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Owner</td>
<td>Renter</td>
<td></td>
</tr>
<tr>
<td>White Alone</td>
<td>6,540</td>
<td>1,641</td>
<td>8,181</td>
</tr>
<tr>
<td>Non-Hispanic White Alone</td>
<td>6,145</td>
<td>1,206</td>
<td>7,351</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>112</td>
<td>49</td>
<td>161</td>
</tr>
<tr>
<td>Some other race alone (a)</td>
<td>219</td>
<td>270</td>
<td>489</td>
</tr>
<tr>
<td>Two or more races</td>
<td>109</td>
<td>82</td>
<td>191</td>
</tr>
<tr>
<td>Total, All Races</td>
<td>6,980</td>
<td>2,042</td>
<td>9,022</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>538</td>
<td>880</td>
<td>1,218</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Householder by Race</th>
<th>Household Tenure</th>
<th>Total Household</th>
<th>Ownership Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Owner</td>
<td>Renter</td>
<td></td>
</tr>
<tr>
<td>White Alone</td>
<td>128,670</td>
<td>68,083</td>
<td>196,753</td>
</tr>
<tr>
<td>Non-Hispanic White Alone</td>
<td>118,530</td>
<td>55,825</td>
<td>174,365</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>6,351</td>
<td>3,013</td>
<td>9,364</td>
</tr>
<tr>
<td>Some other race alone (a)</td>
<td>8,820</td>
<td>15,282</td>
<td>24,102</td>
</tr>
<tr>
<td>Two or more races</td>
<td>3,828</td>
<td>4,032</td>
<td>7,860</td>
</tr>
<tr>
<td>Total, All Races</td>
<td>147,669</td>
<td>90,410</td>
<td>238,079</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>17,881</td>
<td>26,543</td>
<td>44,424</td>
</tr>
</tbody>
</table>

\(^{19}\) Several minority groups have been combined due to small sample sizes with high margins of error for the individual groups. See table footnote.


**Mortgage Loan Approvals by Race/Ethnicity and Income**

The inability to obtain a mortgage can be a barrier to home ownership; historically, minorities have tended to have more difficulty obtaining loans, creating a significant barrier to
homeownership. An analysis of HMDA data for loans in Unincorporated Napa County in 2020 indicates that Black non-Hispanic and Hispanic households have a slightly lower rate of loan approvals than White non-Hispanic applicants. It should be noted, however, that these proportions are based on small numbers of loan applications, especially for the Black households, who showed only 30 applications in 2020. The other minority race category was only responsible for nine applications. As a result, these statistics alone may not be a reliable indicator of discrimination in loan disposition.

**Figure 42: Disposition of Home Loans by Race/Ethnicity for Unincorporated Napa County, 2020**

![Disposition of Home Loans by Race/Ethnicity](image)

Notes:
Hispanic applicants include all persons claiming Hispanic origin regardless of race. Analysis excludes refinance loans and those originated by lenders not subject to HMDA. Excludes applications that were withdrawn and files that were closed due to incompleteness. Includes FHA, FSA/RHS, and VA home loans on 1-4 family and manufactured dwellings by income, race, and ethnicity of applicant.


**Geography of Mortgage Lending**

Figure 43 on the following page illustrates the geographic distribution of originated home loans by Census tract in 2019 in Unincorporated Napa County. The highest rate of loan origins (over 125 per 1,000 units) was found in the rural tract to the east of Napa city and American Canyon. There does not appear to be any correlation between concentrations of non-White households and loan origination rates in Unincorporated Napa County.
In the North Bay Region, the highest loan origination rates tend to be in the more urbanized southern areas, either in and around Napa city and American Canyon or along the 101 corridor in Sonoma County. However, the highest rates are in more suburban areas, with the urban cores where incomes tend to be lower and the rural areas showing the lowest loan origination rates.
Figure 43: Number of Loans Originated Per 1,000 Housing Units in Unincorporated Napa County by Census Tract, 2019

Sources: HMDA; BAE, 2021
Figure 44: Number of Loans Originated Per 1,000 Housing Units in the North Bay Region by Census Tract, 2019

Prevalence of Housing Problems

Table 8 and Table 9 report the relative prevalence of housing problems among households with incomes equal to, or less than, the area median by race and ethnicity. Households of a given racial or ethnic heritage are considered to have a disproportionately greater need for housing assistance if they experience housing problems at a significantly greater rate (ten percentage points or more) than do households within the same income level as a whole, regardless of race or ethnicity. For example, 82.7 percent of all very low-income households (i.e., incomes between 30 and 50 percent of AMI) in Unincorporated Napa County experienced at least one of the four housing problems between 2013 and 2017, as did 100 percent of very low-income Black households. In this case, very low-income Black households exhibit a disproportionately greater need for housing assistance that could help to eliminate their current housing problems. According to these data, Black, Asian, Native American, and Hispanic households experienced housing problems at rates that, at one or more income levels, exceeded the areawide average by at least ten percentage points. The results are similar for severe housing problems, with Black, Asian, Native American, and Hispanic
households being disproportionately impacted in at least one income category. Note that the sample size is very small in most instances where the housing problems rate for a given subgroup is greater than the overall Unincorporated County average, so these results should be considered with caution. For example, the CHAS data report only 45 extremely low-income Black households in Unincorporated Napa County, all of whom experienced housing problems.20

Table 8: Housing Problems Rate by Race/Ethnicity, Unincorporated Napa County

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Percent of AMI</th>
<th>Total 100% or Lower</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30%</td>
<td>31-50%</td>
</tr>
<tr>
<td>White</td>
<td>76.3%</td>
<td>79.6%</td>
</tr>
<tr>
<td>Black/African American</td>
<td>100.0%</td>
<td>78.9%</td>
</tr>
<tr>
<td>Asian</td>
<td>76.2%</td>
<td>93.7%</td>
</tr>
<tr>
<td>American Indian</td>
<td>n.a.</td>
<td>100.0%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>n.a.</td>
<td>n.a.</td>
</tr>
<tr>
<td>Hispanic</td>
<td>100.0%</td>
<td>76.2%</td>
</tr>
<tr>
<td>Subtotal, Housing Problems</td>
<td>82.7%</td>
<td>80.1%</td>
</tr>
<tr>
<td>Average Rate +10%</td>
<td>92.7%</td>
<td>90.1%</td>
</tr>
</tbody>
</table>

Notes:
Housing problems include lack of complete kitchen; lack of complete plumbing facility; more than one person per room; cost burden greater than 30% of income. Includes all households within incomes at or below 100% of area median income. Figures may not sum to total due to rounding. Cells highlighted in red indicate sub-groups for which the rate of housing problems exceed the average rate of a given income group by ten percentage points or more.


Table 9: Severe Housing Problems Rate by Race/Ethnicity, Unincorporated Napa County

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Percent of AMI</th>
<th>Total 100% or Lower</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30%</td>
<td>30-50%</td>
</tr>
<tr>
<td>White</td>
<td>57.7%</td>
<td>41.7%</td>
</tr>
<tr>
<td>Black/African American</td>
<td>88.9%</td>
<td>78.9%</td>
</tr>
<tr>
<td>Asian</td>
<td>76.2%</td>
<td>93.7%</td>
</tr>
<tr>
<td>American Indian</td>
<td>100.0%</td>
<td>17.3%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>n.a.</td>
<td>n.a.</td>
</tr>
<tr>
<td>Hispanic</td>
<td>54.0%</td>
<td>48.4%</td>
</tr>
<tr>
<td>Subtotal, Housing Problems</td>
<td>61.3%</td>
<td>48.0%</td>
</tr>
<tr>
<td>Average Rate +10%</td>
<td>71.3%</td>
<td>58.0%</td>
</tr>
</tbody>
</table>

Notes:
Housing problems include lack of complete kitchen; lack of complete plumbing facility; more than 1.5 persons per room; cost burden greater than 50% of income. Includes all households within incomes at or below 100% of area median income. Figures may not sum to total due to rounding. Cells highlighted in red indicate sub-groups for which the rate of housing problems exceed the average rate of a given income group by ten percentage points or more.


20 Furthermore, the 45 number is actually based on a smaller sample to which a weight has been applied to represent the actual universe of extremely low income Black households.
Housing Cost Burden
As described in the housing needs assessment, overpayment for housing is defined as a household paying more than 30 percent of its gross income on housing related expenses, such as rent, utilities, or mortgage payments. By this measure 34 percent of all households in Unincorporated Napa County were cost-burdened during the 2015-2019 ACS survey period. This proportion is similar to that for Napa County overall and for the Bay Area. Approximately two-thirds of households earning less than 80 percent of the HAMFI were cost-burdened in Unincorporated Napa County, compared to only 21 percent of households with incomes at 80 percent of HAMFI and above.

Figure 45 shows the geographic distribution of overpayment for renters in Unincorporated Napa County and Figure 46 shows the geographic distribution of overpayment for homeowners. Overall, 39 percent of renters overpaid for housing, and the proportion of renters who were overpaying for housing in 2019 ranged from 18 percent to 55 percent by Census tract, (see Figure 45). The highest proportions were found in the northernmost Census tract in the county, and in the tract in the southeastern corner of the county.

Approximately 32 percent of homeowners in the Unincorporated County were overpaying for housing, and as shown in Figure 46, the percentage of those overpaying by tract ranges from 20 percent to 38 percent. The highest proportion is in the northernmost tract, which is rural and not densely populated.
Figure 45: Overpayment by Renters, Unincorporated Napa County

% of Renter Households with Gross Rent $30% of Household Income by Tract

- <30%
- 30% - 39%
- 40% - 49%
- ≥50%

Sources: Esri, HERE, NPS, USGS, Avenza, IGN, NPS

Figure 46: Overpayment by Homeowners, Unincorporated Napa County

For the North Bay Region, the proportion of renters overpaying for housing ranged from 18 percent to 74 percent, as shown in Figure 47 above. The highest proportions (over two thirds of renter households) were found in urban areas in the southern parts of the two counties. For owners (see Figure 48) the proportions range from 16 to 49 percent. The tracts with a low proportion of burdened owners (less than 20 percent) are found around Napa city and in scattered locations in southern Sonoma County. The tracts with a high proportion (greater than 40 percent) of burdened homeowners are all in Sonoma County, with some in urban areas and some in more rural areas.
Overcrowded Households

Overcrowding of residential units, in which there is more than one person per room, can be a potential indicator that households are experiencing economic hardship and are struggling to afford housing. All tracts in the Unincorporated County are less than or equal to the statewide average of 8.2 percent overcrowded, ranging from zero to 5.8 percent (see Figure 49).

The North Bay Region has a number of Census tracts where the percentage of overcrowded households exceeds the statewide average of 8.2 percent. Most of these tracts are in urban areas in the region, in both counties (see Figure 50). This is evidence that many households in the county are unable to afford suitable housing.
Figure 49: Overcrowded Households, Unincorporated Napa County

Sources: U.S. Census American Community Survey, 2015-2019 data.

Sources: County of Napa, County of Solano, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, NPS
Resident Displacement
The most significant displacement issue experienced in Unincorporated Napa County is resident displacement from wildfires. Since 2017, wildfires have destroyed 1,329 housing units in the unincorporated area. Within a given area, wildfires are indiscriminate in their effect on racial and ethnic groups. As minorities are under-represented in the unincorporated area, they were likely not disproportionately affected by displacement due to wildfires. Napa County is not aware of any other significant displacement issues in the unincorporated area.

Fair Housing Issues and Contributing Factors
Napa County is not aware of any specific existing fair housing issues affecting the unincorporated area and its residents and prospective residents. Existing patterns of tenure in the Unincorporated County’s residential areas are primarily influenced by socioeconomic factors, such as the high cost of real estate. It is acknowledged that there is a relatively limited supply of multifamily rental housing within the Unincorporated Area. This is primarily due to the fact that very limited access to community water and sewer systems and reliance
on private wells and septic systems limits the ability to build at densities supporting multifamily housing development in most locations. This likely limits the ability of lower-income households to secure housing within the Unincorporated Area, and this may have a disproportionate effect on households with disabled and/or minority group members, as these households often have lower incomes compared to the population as a whole.

**Contributing Factors**
Following is an assessment of common factors that could potentially contribute to fair housing issues.

**Land Use and Zoning Laws**
[Note to staff: Pending completion of governmental constraints analysis.]

**Occupancy Restrictions**
Occupancy standards sometimes can impede housing choice for fair housing protected classes such as families with children or disabled persons. For example, some jurisdictions’ zoning regulations have attempted to limit occupancy to five related persons occupying a single-family home, or to strictly establish an occupancy standard of no more than two persons per bedroom. Such regulations can limit housing availability for some families with children or prevent the development of group housing.

The County Zoning Ordinance complies with fair housing laws. For example, a “family” is defined as "one or more persons living together under a single management conducted by one or more of the persons in the group." Additionally, group housing, including for disabled persons, and transitional and supportive housing is subject to the same restrictions as residential dwellings of the same type.

The County enforces the California Building Standards Code, as adopted by the California Building Standards Commission on behalf of every jurisdiction in the State. The most recent update is the 2019 edition, adopted by Napa County on January 1, 2020. The County adopted the 2019 California Building Standards Code with no additional local amendments. The Building Standards Code is standardized and enforced by most communities without local changes in order to ensure that new construction is safe and sound. Adoption of a standardized building code facilitates housing production because it allows builders familiar with codes in other areas to easily work in Napa County, thus improving the local availability of qualified housing contractors. This should allow the local housing production capacity to more easily respond to increases in demand for construction services.

**Residential Real Estate Steering**
Steering is infrequently an alleged act in a housing discrimination complaint. [Pending confirmation from FHNV]. Napa County is not aware of any allegations of steering of minorities or other protected classes of prospective residents in Unincorporated Napa County.
Patterns of Community Opposition
Community opposition to housing in Unincorporated Napa County does not focus on the characteristics of protected classes of prospective residents; rather, to the extent that it occurs, opposition to housing tends to be related to concerns about wildfire safety, water and infrastructure availability, and protection of agricultural resources.

Economic Pressures
Factors such as increased rents or increased land and development costs for new housing could create economic pressures that could contribute to fair housing issues, to the extent that members of protected classes often have lower incomes, which means they are disproportionately affected by high housing costs. As discussed in the Governmental Constraints chapter, the County of Napa has limited direct impact on development costs, with County-imposed fees representing a relatively small proportion of overall costs for developing housing within the Unincorporated Area. The County has limited ability to control other economic pressures, such as increasing land costs, or increasing rents that are largely driven by regional housing supply and demand dynamics that are beyond the County’s control. However, ensuring that the County adequately plans to accommodate its Regional Housing Need Allocation, including providing sites that can accommodate housing for lower-income households is a key responsibility to ensure that the County does not contribute to economic pressures by unnecessarily constraining the local supply of land available for housing development.

Major Private Investments
Major private investments have the potential to stimulate changes in the local housing market. For example, major investments that stimulate local employment growth can increase local demand for housing and if the supply of housing does not increase commensurately, this can lead to increased competition for housing and, potentially, increased costs and consequent displacement of lower-income households who may not be able to afford the higher housing costs. Additionally, private investments in the form of redevelopment of existing residential buildings could lead to displacement of existing residents. In these situations, lower-income residents are at greatest risk, as their limited incomes mean that they will have fewer viable choices to secure replacement housing.

In the Unincorporated Area, major private investments take the form of luxury single-family homes, wineries, and visitor accommodations. As indicated above, these types of development create demand for increased numbers of supporting service workers, which tend to have lower wages and consequently struggle to afford market rate housing in the local area.

Municipal or State Services and Amenities
Unincorporated Napa County has a land area of 716.59 square miles, and a 2020 population of 22,842, according to the 2020 Census. With much of this land area devoted to vineyards
preserved as agricultural land, or otherwise undeveloped, the Unincorporated County has maintained a semi-rural environment. Napa County provides municipal services consistent with this character, including General Government services, County Public Works services for maintenance of roadways and other County infrastructure, and the Sheriff’s Department for law enforcement. Fire protection in the Unincorporated area is provided by Napa County Fire under contract with the California Department of Forestry and Fire Protection (CalFire).

Residents and visitors enjoy the wineries, agricultural lands, and there are ample opportunities for recreation including cycling, golfing, hiking, and boating. Notable landmarks and points of interest in the county include many wineries (some of them historic structures), fine dining, historic small-town downtowns in the incorporated cities, Lake Berryessa, and Robert Louis Stevenson State Park. Several annual events and festivals occur throughout the year. These venues and events attract many day trippers and overnight guests to the county but also are accessible to local residents for their enjoyment and provide much of the employment base.

**Foreclosure Patterns**
For a number of factors, lower-income and minority households are more likely to face foreclosure than others. According to a 2009 presentation by the Federal Reserve Bank of San Francisco\textsuperscript{21}, during the housing boom leading up to the 2008 housing crisis, just over one-fourth of California households received a “high cost” (i.e., subprime) loan, and these loans were more prevalent among minority borrowers than for borrowers as a whole. As of October 2021, RealtyTrac reports 24 properties in Napa County that were in pre-foreclosure, six were subject to auction, and one was a bank-owned property. All of these properties, except one in Silverado, which is in pre-foreclosure, are in the incorporated cities of the county. This indicates that foreclosures are not a significant fair housing issue in Unincorporated Napa County.

**Unresolved Violations of Fair Housing or Civil Rights Laws**
[Pending information from FHNV.]

**Support or Opposition from Public Officials**
The County operates the Napa County Housing Authority (NCHA), which is focused primarily on the housing needs of farm workers, particularly those in the migrant/seasonal category who, in turn, support the County’s key agricultural industry through three farm worker centers providing housing. The County Supervisors also support fair housing, as evidenced by the operation of the Napa County Housing Commission (NCHC), an advisory body to the Housing Authority and Board of Supervisors, which was reconstituted in late 2015 to expand its focus from overseeing the three farmworker centers to including reviews of any project requesting

\textsuperscript{21} https://www.frbsf.org/community-development/files/california_0409.pdf
funding from the County's Affordable Housing Fund. The County also maintains a contract with the Fair Housing Napa Valley for various fair housing services.

**Discrimination in the Housing Market**
Complaints of housing discrimination in Napa County are somewhat uncommon. As summarized previously in Table 1, from 2013 through 2021 YTD, there were 43 complaints recorded by the HUD office of Fair Housing and Equal Opportunity (FHEO), with 16 of them resulting in conciliation or settlement, with the remainder dismissed, withdrawn, or found to have a lack of cause. From 2018 through 2021 to date 18 complaints were filed with DFEH; 12 were found to have a lack of cause, three were resolved by voluntary mediation, and three were withdrawn after resolution.

[Note to staff: to be supplemented when information is obtained from Fair Housing Napa Valley.]

**Lack of Fair Housing Education**
Fair housing issues can arise when property owners and/or residents are not fully aware of their rights and responsibilities as they pertain to fair housing. As previously mentioned, Napa County contracts with Fair Housing Napa Valley for fair housing services.

[Pending info from FHNV on fair housing education and outreach activities.]

**Lack of Resources for Fair Housing Agencies and Organizations**
To ensure the availability of fair housing resources to local residents, prospective residents, and property owners and managers, Napa County maintains its contract with Fair Housing Napa Valley to support its mission to provide these services.

**Disproportionate Housing Needs Among Racial/Ethnic Groups**
These needs were discussed previously under the headers *Disproportionate Housing Needs and Displacement Risk* and *Prevalence of Housing Problems*. Potential issues identified included:

- Minority homeownership rates in Unincorporated Napa County are above the overall homeownership rate in the North Bay Region, but mortgage loan approval denial rates may be higher for Black applicants and Other Minority Race Applicants as well as for Hispanic applicants. However, the data for non-Hispanic minorities may be unreliable due to relatively small numbers of applicants.
- Black, Asian, Native American, and Hispanic households experienced housing problems or severe housing problems at rates that, at one or more lower income levels, exceeded the areawide average by at least ten percentage points. Note that the sample size is very small in most instances where the housing problems rate for a given subgroup is greater than the overall Unincorporated County average, so these results should be considered with caution.
Fair Housing Priorities and Goals

[Note to staff: This section will be developed based on public input.]