



**Tameeka Bennett**  
**Program Manager of Equitable Development**



# Moms4Housing



# SMC

## AFH 2017

October 20, 2017

VIA EMAIL

Jeff Jackson  
Chief, Program Compliance Branch  
Fair Housing and Equal Opportunity, Region IX  
U.S. Department of Housing and Urban Development  
One Sansome St., Suite 1200  
San Francisco, CA 94104  
Tel: (415) 489-6400

Re: Concerns Regarding the San Mateo County Regional Assessment of Fair Housing

Dear Mr. Jackson:

Over the course of the past year, the undersigned organizations actively participated in the Assessment of Fair Housing process conducted by San Mateo County, Daly City, South San Francisco, Redwood City, San Mateo City, the Housing Authority of San Mateo County, and the Housing Authority of South San Francisco.<sup>1</sup> Unfortunately, the final Assessment of Fair Housing (“AFH” or “Final AFH”) submitted on October 4, 2017 contains serious deficiencies that we believe render it inconsistent with fair housing law and substantially incomplete under 24 C.F.R. § 5.162(b).

Specifically, the AFH fundamentally fails to satisfy the regulatory requirements of § 5.154 by omitting important information about segregation, disparities in access to opportunity, racially/ethnically concentrated areas of poverty (“R/ECAPS”), disproportionate housing needs, and the publicly supported housing analysis, and by failing to adequately respond to comments offered through the community participation process.

As described below, the AFH repeatedly violates core elements of § 5.154 and the analysis prescribed in the Assessment Tool. By ignoring important information relevant to the analysis of fair housing issues in San Mateo County, its constituent jurisdictions, and the region, the AFH renders a fundamentally flawed analysis that does not meet the requirement of § 5.154(d)(2) and (3), and the accompanying guidance in the Assessment Tool, to assess fair housing issues and their contributing factors. The AFH also fails in key places to satisfy the requirement in § 5.154(c) to use available local data and local knowledge in its analysis, and it systematically violates the requirement of § 5.154(d)(6) to either adopt comments made through the community participation process or explain the basis for rejection of comments or recommendations.

<sup>1</sup> San Mateo County hired BBC Research & Consulting to assist with the community participation process and completion of the AFH.

# AB 686

“take meaningful actions, to combat discrimination, overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics...”