



August 27, 2021

Jane Riley, AICP
Director of Housing Policy
4 LEAF, Inc.
2126 Rheem Drive
Pleasanton, CA 94588

Co-Chairs
Thomas L. Sager
Hon. Shira Scheindlin

Secretary
Eleanor H. Smith

Treasurer
David Smith

General Counsel
Nicholas T. Christakos

*President and
Executive Director*
Kristen Clarke

RE: Regional Analysis of Impediments to Fair Housing Choice

Dear Ms. Riley:

On behalf of the Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), I am pleased to submit a proposal for the provision of consulting services to assist in the development of the Regional Assessment of Fair Housing (AFH) for the Napa/Sonoma Region.

The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee) is a national, nonpartisan, nonprofit civil rights legal organization that was formed in 1963 at the request of President John F. Kennedy to enlist the private bar's leadership and resources in combating racial discrimination and the resulting inequality of opportunity. We are mission-driven rather than profit-motivated, and we provide ongoing support beyond the contract period. Although as a nonprofit organization we are not a minority- or women-owned business, more than fifty percent of our 60-member staff are female and more than fifty percent are people of color.

Our experience in providing high quality fair housing planning services is unmatched. We are currently conducting the regional Analysis of Impediments (AI) for the DC Metropolitan Region, including Northern Virginia and Maryland and recently completed a regional AI for Orange County and the Twin Cities Region. We have conducted or are currently preparing over twenty AIs and Assessments of Fair Housing (AFHs); a small sample includes the City of Los Angeles, Santa Clara County, San Luis Obispo County, and Contra Costa County. We also serve as a fair housing technical assistance subcontractor to the U.S. Department of Housing and Urban Development (HUD).

We are trusted experts on the Affirmatively Furthering Fair Housing Rule, the AI and AFH processes, and the fair housing planning requirements of California's A.B. 686. Cities and counties, philanthropic foundations, community-based organizations, and HUD itself all turn to us for help, and we consistently deliver the highest quality services under time and resource-constrained circumstances. Our approach marries intensive community engagement, in-depth policy and legal analysis, refined data analysis, knowledge of best practices for implementation, and outstanding writing skills to deliver AFHs that have the potential to make good on the Fair Housing Act's promise of increased access to opportunity for all.

We have a perfect track record with HUD – all of our AFHs and AIs have been accepted at the first submission. We encourage you to read our AFHs and AIs and speak to our references. Links to our AFHs and AIs and our list of references are included in this proposal.

If you have any questions or would like any additional information regarding this proposal, please do not hesitate to contact me by phone at (202) 662-8303, by e-mail at dglauber@lawyerscommittee.org, or at the office of the Lawyers' Committee for Civil Rights Under the Law located at 1500 K St NW, Suite 900, Washington, D.C., 20005.

Sincerely,

A handwritten signature in cursive script that reads "Diane Glauber".

Diane Glauber
Director, Fair Housing and Community Development

SECTION 1: QUALIFICATIONS & EXPERIENCE

The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee) is a national, nonpartisan, nonprofit civil rights legal organization that was founded in 1963 at the request of President John F. Kennedy to enlist the private bar's leadership and resources in combating racial discrimination and the resulting inequality of opportunity. The Lawyers' Committee pursues this critical work through its projects, which address critical issues such as fair housing and community development, voting rights, educational opportunities, economic justice, criminal justice, and hate crimes. The organization with its over 80 full-time staff is located in Washington, DC.

"The Lawyers' Committee for Civil Rights Under Law provides the highest quality fair housing planning services available. Their expertise and commitment to their clients and the communities they serve is unmatched. At times, we have had difficulty finding fair housing consultants who could meet our complex needs, but the Lawyers' Committee always delivers."

*Claudia Monterrosa, Los Angeles Housing +
Community Investment Department*

By engaging in policy advocacy and the provision of technical assistance, the Lawyers' Committee's Fair Housing & Community Development Project works to foster residential integration and increase access to opportunity. Our legal and policy acumen, community focus, and commitment to a balanced approach have made the Fair Housing & Community Development the go-to source for responsive, high-quality technical assistance to HUD grantees that are completing AIs and AFHs. As an official HUD technical assistance provider, we have contributed to the drafting of HUD's *AFFH Rule Guidebook* and other HUD training materials. HUD has asked us to advise the City of Philadelphia and the Philadelphia Housing Authority on how to bolster their community engagement process in the face of criticism from advocates and assist the Mid America Regional Council and five cities in the Kansas City metropolitan area to increase buy-in into effective goals and strategies for addressing fair housing issues and contributing factors.

As consultants to local governments, public housing authorities, and states, we have led innovative efforts to develop AFHs and AIs that serve as models for HUD grantees across the country.

SECTION 2: KEY PERSONNEL

There will be three attorneys and one legal assistant assigned to the Cumberland County AI if selected. The staff assigned to the project are highly experienced with fair housing laws and regulations and fair housing related issues and are fair housing technical assistance subcontractors to HUD. Additionally, our legal assistant is from Portland and currently based there.

Diane Glauber, Director of the Fair Housing & Community Development Project, has led efforts to develop AFHs and AIs for the City of Los Angeles and the Housing Authority of the City of Los Angeles; the City of Santa Monica and the Santa Monica Housing Authority, Orange County, the City of Ontario, California (twice), Fall River, Massachusetts, the Greater Attleboro/Taunton, Massachusetts HOME Consortium. As a HUD technical assistance provider, she has helped grantees overcome major barriers with respect to community engagement and the development of effective goals and strategies in Philadelphia and the Kansas City metropolitan region. With the support of a major philanthropic foundation, she helped streamline the AFH drafting process in New Orleans, the very first grantee to have its AFH accepted by HUD under the 2015 AFFH rule. Diane's work has intersected with HUD programs in a variety of ways that combine to give her a 360° view of how to effectively increase access to opportunity for members of historically marginalized communities in a resource-constrained environment. In addition to working as a civil rights lawyer, she has been a high-ranking city official, an affordable housing developer, a grant maker, and a HUD employee. Diane earned her J.D. from the University of Maryland School of Law, her M.P.A. from the Wagner School of Public Service at New York University, and her B.A. in History from Emory University. She is a clinical professor at the Community Development Clinic at the University of Baltimore School of Law.

Thomas Silverstein, Associate Director in the Fair Housing & Community Development Project, has led efforts to develop AIs for the District of Columbia, Contra Costa County, California, San Luis Obispo County, California, and the State of Louisiana. He is currently spearheading the Lawyers' Committee's work on the production of a regional AFH for Contra Costa County, California, and its entitlement cities. He has been a primary drafter for all of the AIs and AFHs that the Lawyers' Committee has developed. As a HUD technical assistance provider, he has helped guide grantees in the Kansas City metropolitan region through the collection and analysis of supplemental data regarding access to proficient schools. Thomas is a frequent panelist on topics relating to HUD's AFFH rule. He has published articles on the subject in the ABA Journal of Affordable Housing & Community Development Law, the University of Baltimore School of Law's Journal of Land and Development, and The Hill. In addition to providing technical assistance and consulting services, he litigates high impact Fair Housing Act cases, writes *amicus curiae* briefs on cutting-edge issues in civil rights and housing law, and participates in federal, state, and local policy advocacy efforts. He has significant expertise with respect to both the use of data and geospatial mapping to analyze fair housing issues and best practices for leveraging federal housing programs to foster meaningful community integration for persons with disabilities. Thomas earned his J.D. from the University of Virginia School of Law and his B.A. in English from the College of William & Mary. He is an adjunct professor at the Fair Housing Clinic at the University of Maryland School of Law.

Malcolm Peyton-Cook, joined the Lawyers' Committee on June 1, 2021, as a Counsel for the Fair Housing and Community Development Project. As Counsel for the Fair Housing and Community Development Project, Malcolm will assist in program areas, including affirmatively furthering fair housing, impact litigation to enforce the Fair Housing Act, national, state, and local housing policy advocacy, and support to community organizations. Prior to joining the Lawyers' Committee, Malcolm worked as a Tenants' Rights Attorney at Legal Services of NYC and TakeRoot Justice both located in New York, NY. Malcolm also has prior experience in fair housing law, having previously worked at Fair Housing Justice Center in New York, NY and Baltimore Neighborhoods Inc. in Baltimore, MD. Malcolm earned a Bachelor of Arts in Political Science from Amherst College (2010), a Law Degree from Washington University School of Law (2013), and an L.L.M. from American University's Washington College of Law (2014).

Violet Sulka/Hewes is a recent graduate of Wellesley College with a Bachelor of Arts Major in Peace and Justice Studies and a Minor in Economics. Violet interned with the Lawyers' Committee over the past two semesters and was recently hired as a legal assistant. Violet has been working on our AIs/AFHs over the last eight months and has experience in doing statistical analyses, running regressions, and performing visualizations of data. Violet has also drafted numerous contributing factors for several jurisdictions and has edited sections of our AIs/AFHs. Violet is a Youth Steering Committee Member with Maine Youth Justice and was a researcher with both the Wellesley College Knapp Social Science Center and the Massachusetts Institute of Technology Norman B. Leventhal Center for Advanced Urbanism.

Diane Glauber

Director of Fair Housing and Community Development | dglauber@lawyerscommittee.org | 202-662-8303

Work Experience

Lawyers' Committee for Civil Rights Under Law, Washington DC 2010–Present

Director of Fair Housing and Community Development

Provide training and technical assistance to help jurisdictions affirmatively further fair housing. Jurisdictions include Los Angeles, Santa Monica, Orange County, Ontario, Fall River, Taunton, Kansas City, Philadelphia, and New Orleans. Provide oversight and coordination on legal matters with national law firms and fair housing and community development organizations. Supervise staff attorneys and legal fellows.

Mayor's Office, Baltimore, MD 2007–2010

Director of Human Services

Supervised and directed all general operations of a \$55 million agency with 100 employees, including strategic planning, grants administration, staff supervision, financial management and evaluation. Worked with elected officials, city agencies, service providers, consumers, and the business and philanthropic communities to develop and implement strategies to assist homeless and low-income residents.

Enterprise Community Investment, Inc., Columbia, MD 2002–2007

Director, Syndication Programs

Led national initiatives to create and preserve affordable housing in partnership with organizations such as the National Affordable Housing Trust and the Corporation for Supportive Housing, which resulted in the creation and preservation of over one-thousand affordable housing units. Coordinated a \$10 million loan fund and negotiated predevelopment and acquisition loans and related legal documents.

Education

The University of Maryland School of Law, Baltimore, MD, Juris Doctor

The Wagner School of Public Service, New York University, NY, M.P.A. in Nonprofit Management

Emory University, Atlanta, GA, B.A. in History

Publications

Diane Glauber and Thomas Silverstein, "Leveraging the Besieged Assessment of Fair Housing Process to Create Common Ground among Fair Housing Advocates & Community Developers." 26 A.B.A. *Journal of Affordable Housing & Community Development Law* (2018).

Diane Glauber and Philip Tegeler, "Affirmatively Furthering Fair Housing in REO-to-Rental Programs." *FHLB of San Francisco Community Development Investment Review* (February 2014).

"Innovative Post-Disaster Community-Based Housing Strategies," in *Building Community Resilience Post-Disaster*, edited by Dorcas Gilmore and Diane Standaert, ABA Forum on Affordable Housing and Community Development Law (2013).

Teaching

Adjunct Faculty, *University of Baltimore School of Law*

Course taught: Community Development Clinic

2014 - Present

Thomas Silverstein

Associate Director | tsilverstein@lawyerscommittee.org | 202-662-8316

Work Experience

Lawyers' Committee for Civil Rights Under Law 2013 - Present

Associate Director, Fair Housing & Community Development Project, Washington, DC

- Conducted or conducting Analysis of Impediments of Fair Housing Choice for Washington, D.C.; Contra Costa County, CA; Ontario, CA; San Luis Obispo, CA; Madison County, IL; and the State of Louisiana.
- Provided technical assistance for Assessments of Fair Housing for the Kansas City region; and New Orleans, LA.
- Advise community-based organizations on policy advocacy initiatives relating to fair housing and affordable housing.
- Participate in all stages of impact fair housing litigation from investigation to appeals.
- Participate in the drafting of amicus curiae briefs on major fair housing issues.

Bazon Center for Mental Health Law 2012 - 2012

Legal Intern, Washington, DC

- Conducted legal research and drafted memoranda in support of litigation under the Americans with Disabilities Act and the Rehabilitation Act.
- Researched and drafted memoranda about current clinical practices in the field of treating and housing people with serious mental illness.
- Monitored legislative and regulatory developments affecting disability rights.

Central Virginia Legal Aid Society 2011 - 2011

Legal Intern, Charlottesville, VA

- Researched and drafted memoranda on various consumer law topics.
- Interviewed clients and investigated the factual basis for possible claims and defenses.
- Drafted pleadings and correspondence.

Lawyers' Committee for Civil Rights Under Law 2008 - 2010

Legal Assistant, Washington, DC

- Conducted case intakes. Summarized and analyzed intakes for attorney review.
- Conducted demographic research in support of litigation.

Education

University of Virginia School of Law, Charlottesville, VA

- J.D., 2013

College of William and Mary, Williamsburg, VA

- B.A., 2008

Additional Information

- Adjunct Faculty, Fair Housing Clinic, University of Maryland School of Law
- Awards: 2013 Pro Bono Award, University of Virginia School of Law; Elsie Hughes Cabell Endowed Scholarship, Recipient
- Lectures/Presentations: Virginia Chapter of the American Planning Association Annual Conference, Panelist; ABA Forum on Affordable Housing and Community Development Law Annual Meeting, Panelist; Virginia Governor's Housing Conference, Panelist

Malcolm Peyton-Cook

Counsel | mpeyton-cook@lawyerscommittee.org | 216-534-3588

Work Experience

Lawyers' Committee for Civil Rights Under Law 2021 - Present

Counsel, Fair Housing and Community Development, Washington, D.C.

- Represent clients at all stages of impact litigation to enforce the Fair Housing Act and other statute
- Provide technical assistance to community organizations and jurisdictions on the Fair Housing Act's duty to affirmatively further fair housing (AFFH)
- Develop, analyze, and promote policy changes in the areas of affordable housing, fair housing, tenants' rights, and equitable development
- Research best practices and draft policy documents and legislative language to support the Lawyers' Committee and their partner organizations' policy campaigns

Legal Services NYC 2020 - 2021

Staff Attorney, Tenants Rights Coalition, New York, NY

- Represented clients in a wide range of landlord-tenant issues in NY Housing and NY Supreme Court
- Organized groups of tenants and helped them establish tenants associations in their buildings
- Taught CLE's for attorneys on landlord-tenant issues

TakeRoot Justice 2017 - 2020

Staff Attorney, Tenants' Rights and Housing Justice, New York, NY

- Represented clients in a wide range of landlord-tenant issues in NY Housing and NY Supreme Court
- Advocated/lobbied for civil rights issues through participation in citywide coalitions
- Conducted trainings and workshops to a broad range of constituent groups on housing and civil rights issues

Fair Housing Justice Center 2015-2017

Investigative Coordinator, New York, NY

- Coordinated rental, sales, and design fair housing tests
- Consulted and managed housing research study/testing project with Newsday Newspaper
- Organized and maintained database for grant management

Baltimore Neighborhoods Inc. 2014-2015

Senior Fair Housing Specialist, Baltimore, MD

- Coordinated sales, rental, accessibility, and lending fair housing tests
- Conducted initial intake and initial analysis of all fair housing complaints
- Advocated for/represented clients in administrative complaints

Education

American University Washington College of Law, Washington, D.C.

- L.L.M, Law and Government, 2014
- Program on Law and Government, Black Law Student Association, Presidential Management Fellowship Semi-Finalist 2014

Washington University School of Law, St. Louis, MI

- J.D., 2013
- Scholar in Law Scholarship (Full Tuition), Black Law Student Association, Civil Rights Law Society (Co-Founder and President), Wiley Rutledge Moot Court, David M. Becker Public Interest Fellow

Amherst University, Amherst, Massachusetts

- B.S., Political Science, 2010
- Amherst College Fellowship for Action (2008), Columbia University Visiting Scholar (2008), College Democrats, Black Student Union

Violet Sulka/Hewes

Legal Assistant | vsheves@lawyerscommittee.org | 207-838-6787

Work Experience

Lawyers' Committee for Civil Rights Under Law

Legal Assistant

Undergraduate Intern

Washington, D.C.

June 2021 – present

Sept. 2020 – May 2021

- Assist the Fair Housing and Community Development Project with drafting Analyses of Impediments to Fair Housing, researching fair housing policies, and preparing maps using GIS

Maine Youth Justice

Youth Steering Committee Member

Portland, ME

June 2020 – present

- Organize and support youth-led, community-based advocacy to end youth incarceration and invest in communities in Maine
- Create social media campaigns for closing Long Creek Youth Development Center and removing School Resource Officers (SROs) from Maine public schools and testify in school board and city council meetings
 - In July 2020, the Portland School Board passed a resolution removing SROs from district schools
 - In June 2021, the Maine House and Senate passed LD 1668 which, if implemented, will create a plan to close Long Creek Youth Development Center by June 2023 and reinvest nearly \$19 million into a continuum of community-based alternatives

MIT Norman B. Leventhal Center for Advanced Urbanism

Research Assistant

Cambridge, MA

June 2020 – Sept. 2020

- Performed background research on the direct and indirect effects of the pandemic for the Equitable Resilience to COVID-19 project under Professor Alan Berger
- Identified interconnected and cascading pathways of harm for different marginalized communities
- Created interactive tool mapping community resources using GIS
- Designed, performed, and analyzed interviews to explore the lived experiences of essential workers and their families

Wellesley College Knapp Social Science Center

Women & Gender Studies Knapp Fellow Student Researcher

Wellesley, MA

March 2020 – June 2021

- Conducted literature reviews, media searches, and analysis related to courts, state programs, and organizers working with Commercially Sexually Exploited Children (CSEC) under Professor Jennifer Musto
- Wrote interview memos and survey research to identify and code emerging themes

Municipality of Valparaíso's Migrant Health Access Program

Community Outreach Intern

Valparaíso, Chile

Aug. 2019 – Oct. 2019

- Developed interactive presentations on integrative health, sexual health, public health access, conflict de-escalation, self-advocacy, and cultural competency for immigrants and healthcare professionals
- Guided bi-weekly workshops of 10-25 people on community resource development, public health access, and self and community advocacy

Education

Wellesley College, Wellesley, MA

B.A., Peace & Justice Studies and Economics, 2021

AFH/AI EXPERIENCE

The Lawyers' Committee for Civil Rights Under Law has assisted in the preparation of the following final AFHs/AIs where links are available. The highlighted reports have goals and strategies that are most similar to what we proposed in the first draft.

Twin Cities, 2020

[https://www.stpaul.gov/departments/financial-services/2020-regional-analysis-impediments-fair-housing-choice-ai-public#:~:text=The%20Twin%20Cities%20Regional%20Analysis,Fair%20Housing%20Act%20\(FHA\).](https://www.stpaul.gov/departments/financial-services/2020-regional-analysis-impediments-fair-housing-choice-ai-public#:~:text=The%20Twin%20Cities%20Regional%20Analysis,Fair%20Housing%20Act%20(FHA).)

Orange County, 2020

<https://cityoforange.org/DocumentCenter/View/11059/Final-2020-2024-Analysis-of-Impediments>

Ontario, 2020

<https://lawyerscommittee.org/wp-content/uploads/2021/01/Ontario-AFH-Final-Draft.pdf>

Santa Monica, 2020

[FinalAFH_04_01_2020.pdf \(smgov.net\)](#)

Fall River, 2019 <https://www.fallriverma.org/wp-content/uploads/2019/10/Analysis-of-Impediments-to-Fair-Housing-Choice.pdf>

District of Columbia, 2019

https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/event_content/attachments/D.C.%20Draft%20Analysis%20of%20Impediments%20to%20Fair%20Housing%20Choice%209.27.2019%20%281%29.pdf

Greater Attleboro/Taunton HOME Consortium, Massachusetts 2018 (https://www.taunton-ma.gov/sites/tauntonma/files/uploads/final_draft_taubon_ai_12-2018.pdf)

Contra Costa County, 2018 (<http://www.cccounty.us/ai>)

Los Angeles, California 2017 (<https://hcidla.lacity.org/assessment-fair-housing>)

Madison County, Illinois 2017

(https://www.co.madison.il.us/Community_Development/Madison%20County%20Final%20AI.pdf)

San Luis Obispo County, California 2016 (<https://www.slocounty.ca.gov/Departments/Planning-Building/Housing/Housing-Forms-Documents/Informational-Documents/Analysis-of-Impediments-to-Fair-Housing-Choice.aspx>) and 2019

Philadelphia, Pennsylvania 2016 (<http://ohcdphila.org/wp-content/uploads/2017/01/afh-2016-for-web.pdf>)

Kansas City Region, Missouri and Kansas 2016 (<http://www.marc.org/Regional-Planning/Housing/Related-Projects/Affirmatively-Furthering-Fair-Housing-Assessment>)

New Orleans, Louisiana 2016 (<https://www.nola.gov/community-development/documents/2016-updated-afh-plan-090516/afh-plan-090516-final/>)

Ontario, California 2015 (https://www.ontarioca.gov/sites/default/files/Ontario-Files/Housing-Municipal-Services/CDBG-Home-ESG/analysis_of_impediments_to_fair_housing_choice_update_2015.pdf)

REFERENCES

The team's references are the best source for insight into the strengths that we bring to essential fair housing planning processes. We encourage you to reach out to the following individuals to learn more about our experience.

Project: City of Los Angeles Assessment of Fair Housing
Claudia Monterrosa, Director, Public Policy & Research
Los Angeles Housing + Community Investment
Department 1200 W. 7th Street, Los Angeles, CA 90017
Phone: (213) 713-5205
claudia.monterrosa@lacity.org

Project: San Luis Obispo County Analysis of Impediments
Ted Bench, Planner
San Luis Obispo County, CA Planning and Building Department
976 Osos Street, Room 200, San Luis Obispo, CA 93408
Phone: (805) 781-5701
tbench@co.slo.ca.us

Project: City of Ontario Analysis of Impediments to Fair Housing Choice
Katryna Gonzalez, Housing Manager
City of Ontario Housing and Municipal Services Agency
208 West Emporia Street
Ontario, CA 91762
Phone: (909) 395-2322
kgonzalez@ci.ontario.ca.us



Eric Garcetti, Mayor
Rushmore D. Cervantes, General Manager

April 11, 2018

Reference Letter for Lawyers' Committee for Civil Rights Under Law for Assessment of Fair Housing Consulting Services and Technical Assistance

To Whom It May Concern:

The Housing + Community Investment Department of the City of Los Angeles (HCIDLA) highly recommends the Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee) as a technical assistance provider, capacity builder and consultant for its expertise and quality of services related to Affirmatively Furthering Fair Housing (AFFH) and the Assessment of Fair Housing (AFH).

In August 2016 through early 2017, the Lawyers' Committee provided TA to HCIDLA through a grant from the Ford Foundation. The objectives of the TA were to assist HCIDLA in preparing its roadmap to completing a Joint AFH with the Housing Authority of the City of Los Angeles (HACLA).

Given the increasing housing challenges facing Los Angeles and the importance of completing the City of Los Angeles' first AFH Plan, the Lawyers' Committee's assistance confirmed the need for us to complete our AFH with HACLA and to collaborate, as much as practically possible, with the County of Los Angeles.

At the beginning of this engagement, the Lawyers' Committee provided training for the HCIDLA Executive Team regarding the goals and objectives of the AFH and the TA, and immediately began providing HCIDLA with tools and products to facilitate the development of the framework for completing the City's AFH. The Lawyers' Committee provided HCIDLA with a calendar template, sample survey instruments and community engagement marketing materials. As the engagement went on, the Lawyers' Committee also provided HCIDLA with sample AFHs from around the country that contained solid examples to build upon.

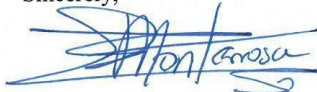
After reviewing several proposals for consultants to assist HCIDLA with its AFH, the City selected a consultant in late 2016. The Lawyers' Committee was not one of the applicants. After a few months, HCIDLA's leadership realized the selected consultant needed to be changed and as a result terminated its relationship with the selected consultant in February 2016. During a second procurement process, the Lawyers' Committee applied and was selected as the new AFH consultant for the City. HCIDLA began working with the Lawyers' Committee, in earnest, in May 2017. In just over three months, the Lawyers' Committee complemented the City's existing community engagement efforts with further meaningful participation of residents and stakeholders, accurately and thoroughly analyzed the HUD-provided data, reviewed and vetted extensive local data for inclusion in the AFH, developed a comprehensive set of draft Goals and Strategies and delivered a draft for public comment by early August.

The Lawyers' Committee continued to remain highly responsive to our needs including working on weekends and evenings to meet established milestone deadlines. The Lawyers' Committee also developed a comprehensive set of maps based on HCIDLA's request and guidance for Los Angeles using HUD and local data. The maps will be used to help inform decision-making across the City by various stakeholders, public and private, to help improve the quality life for the residents of Los Angeles.

Lawyers' Committee's expertise in this area, and thoughtful and deliberate approach in delivering high quality services has increased our capacity to identify strategies to help decrease segregation, increase integration, identify and mitigate disproportionate housing needs, and, decrease disparities in access to opportunity. The City of Los Angeles will implement the Goals and Strategies developed through the AFH process.

We could not have selected a more qualified and expert team to work with to complete the City's AFH. Our partnership with the Lawyers' Committee is very important to the City and we are very happy to have worked alongside them in reaching our AFH key milestones in record time. We could not have completed the AFH Draft Plan without the Lawyers' Committee and we will continue to partner with them on this and other key policy initiatives.

Sincerely,

A handwritten signature in blue ink, appearing to read "Monterrosa", with a stylized flourish underneath.

Claudia Monterrosa, Director
Public Policy & Research
Los Angeles Housing + Community Investment Department



SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

Promoting the wise use of land - Helping to build great communities

May 31, 2016

Thomas Silverstein, Esq.
1401 New York Avenue, NW, Suite 400
Washington, DC 20005-2124

RE: Lawyers' Committee for Civil Rights Under Law

Dear Mr. Silverstein:

I wish to thank you for a "job well done!" The County of San Luis Obispo contracted with the Lawyers Committee for Civil Rights Under Law (LCCR) for preparation of the 2015-2020 Analysis of Impediments To Fair Housing Choice (AI). I am the County's project manager for this task. LCCR completed its contractual obligations in a courteous and professional manner. LCCR provided:

- An impressive analysis of the County's demographic, housing market, and potential impediments to fair housing choice.
- A concise evaluation of those housing impediments and crafting of workable solutions - all with an eye on the criteria set by the federal fair housing laws and the newly adopted provisions of Affirmatively Furthering Fair Housing.
- Prompt and thorough responses to concerns raised by stakeholder groups.
- Acceptance of the County's 2015-2020 AI by the HUD / Los Angeles Civil Rights Compliance Division.

If anyone would like to contact me regarding LCCR's performance on completing the County's AI, I can be reached by phone at (805) 781-5701, or by e-mail at: tbench@co.slo.ca.us.

Sincerely,

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Ted Bench, Senior Planner

Housing & Economic Development

CITY OF



ONTARIO

HOUSING AND MUNICIPAL SERVICES AGENCY

PAUL S. LEON
MAYOR

DEBRA DORST-PORADA
MAYOR PRO TEM

ALAN D. WAPNER
JIM W. BOWMAN
PAUL VINCENT AVILA
COUNCIL MEMBERS

May 26, 2016

AL C. BOLING
CITY MANAGER

SHEILA MAUTZ
CITY CLERK

JAMES R. MILHISER
TREASURER

RE: Lawyers' Committee for Civil Rights Under Law

To Whom It May Concern:

The City of Ontario contracted with the Lawyers' Committee for Civil Rights Under Law to provide consulting services in connection with the update to the City's Analysis of Impediments to Fair Housing Choice (AI). I was the City's lead on the production of the AI update, and I worked closely with Diane Glauber of the Lawyers' Committee on the project. At every step of the process, Diane and her team met or exceeded our expectations. Despite the extremely ambitious timetable on which we were preparing the AI, the Lawyers' Committee was able to draft a document that provided a comprehensive analysis of our community and demonstrated the care invested in balancing competing considerations.

If you have any questions about my experience working with Diane and her team, please do not hesitate to contact me at (909) 395-2322 or kgonzalez@ci.ontario.ca.us.

Sincerely,

Katryna Gonzalez
Project Manager

SECTION 3: PROPOSED APPROACH, METHODOLOGY AND TASKS

The team employs a proven, time-tested approach to developing Assessments of Fair Housing (AFHs). Each step in the process is cumulative, with initial outreach to stakeholder groups providing the foundation for their later participation in the formal public comment process and with the preliminary analysis of American Community Survey and other data informing the process of gathering and then analyzing local data. Along the way, we consistently communicate with project staff or consultant to ensure that we are developing the AFH in a manner that is consistent with the client's expectations and to gain access to valuable local knowledge and insight. We work assiduously to achieve those goals while minimizing the demands placed on the client.

Below are the steps in the iterative process of conducting an AFH, what we will expect from the Participating Jurisdictions at all stages in the project, and the calendar for the completion of each individual task as well as the delivery of the final product.

Our research will be informed by the Affirmatively Furthering Fair Housing Assessment Tool and the department's AFFH Rule Guidebook published at the end of 2015 as well as California HCD's AFFH Guidance Memo.

Project Kick-Off

We will begin the AFH process by meeting virtually with staff from the Participating Jurisdictions. At our kick-off meeting with staff, we will begin by giving a brief presentation on the AFH process and ask staff to share their high-level thoughts on what they perceive to be the major systemic issues facing members of protected classes in the housing market in each county. Lastly, we will provide an overview of the timeline and process for the completion of the AFH.

We strive to devise recommendations that reflect a full understanding of what the practical implications of the implementation of those recommendations would be. If we suggest rezoning for increased density near a future bus stop, we want to have a vivid picture of what development around that site would look like in context and a full sense of the effects of the rezoning on adjacent areas that may require mitigation.

Data Gathering and Analysis

Both HUD-provided, California HCD-provided, and local data are essential to any effective AFH. We have extensive experience utilizing data and mapping tools. Our team will begin a preliminary review of the standard maps and tables at the very outset of work on the AFH. Based on follow-up questions spurred by the HUD- and state-provided data and on our experience in California, we will then begin collecting and analyzing supplemental local data with assistance of staff from the Participating Jurisdictions. Independently, we will conduct a review of existing studies and publicly available data sources from universities, city and county agencies, state agencies, and federal agencies. In the draft and final AFH reports, we will present data and maps in a visually appealing, user-friendly manner.

Through our fair housing planning work, we have learned where to look for data that is necessary to fully answer the questions in the Assessment Tool:

- The Federal Bureau of Labor Statistics is a better data source for disparities in access to employment than is the American Community Survey 5-Year Estimates,
- Home Mortgage Disclosure Act data from the Federal Financial Institutions Examination Council remains essential to understanding the barriers to housing faced by racial and ethnic minorities and female-headed households. Although there is often a nexus between fair housing and affordable housing, the focus of HUD-provided data on low-income renters can obscure the obstacles that middle-income Black and Latino families experience in an often-discriminatory housing market.

Review of Substantive Policies and Practices

In order to determine what factors contribute to fair housing issues in the jurisdictions, one of the most essential components of the AFH process will be the exhaustive review of a wide range of the policies and practices of both public and private actors. The team has the legal and policy expertise to ascertain the fair housing implications of zoning and land use ordinances, the allocation of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds, state and local tenant protections, tenant selection and admissions and occupancy policies, student assignment policies, and a wide variety of other policies and practices that directly implicate the contributing factors that HUD has identified. As experienced fair housing litigators, we know how to determine whether there is a connection between a given policy and a harmful outcome like residential racial segregation or the confinement of persons with disabilities in large institutions. In our experience as a technical assistance provider, we have found that, for many jurisdictions and consultants, the analysis of contributing factors is the most difficult aspect of an AFH to get right. By contrast, it is one of our foremost strengths.

Our review of policies and practices begins with a thorough review of a wide variety of planning documents that often describe and sometimes directly include relevant policies and practices. These plans are likely to include the Participating Jurisdictions' last AIs; their Consolidated Plans, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports (CAPERs); the Housing Authorities' 5-Year Plans, Annual Agency Plans, and Housing Choice Voucher Administrative Plans; and other priority documents identified by staff from the Participating Jurisdictions. From there, we delve into the policies referenced in those documents directly. In particular, this step includes the detailed review of local ordinances. Then, particularly for contributing factors for which private actors are primarily responsible, we review available studies on industry practices, such as real estate advertising, acceptance of Housing Choice Vouchers, and property appraisals. Lastly and prior to drawing any definitive conclusions and with the consent of staff from the Participating Jurisdictions, we will attempt to learn the perspective of the public and private actors whose policies and practices are at issue in order to get a sense of the justification for policies and practices that appear to contribute to fair housing issues.

Community Engagement/Public Hearings

Although much of the community engagement has been completed, we will ask Participating Jurisdictions if there are key stakeholders that we should engage with to inform them about the process, our timeline, and opportunities for participation. Although much of our work will be conducted remotely, we are available for in-person meetings when it is safe to do so.

In completing the Community Participation Process section of the final AFH report, we will summarize all comments received and explain the rationale for why the Participating Jurisdictions have not accepted any comments, if applicable.

We have set in the schedule 30 days for a public comment period, and will be available either remotely or in-person to present at City Council and Board of Supervisor meetings; the cost is included in the overall budget.

Technical Assistance

We will provide technical assistance and training to Participating Jurisdictions on affirmatively furthering fair housing within the context of their Housing Element. We will also be available for individual consultation throughout the AFH process and beyond as needed at no additional cost.

Production of the AFH Report and Ongoing Assistance

The team will synthesize the data, legal and policy analysis, and community and stakeholder input described above into an AFH report that can serve as an effective basis for transformative action by the Participating Jurisdictions. The AFH will be a well-written, insightful plan that breaks complex issues down into terms that all can understand in order to ensure maximum buy-in into the process. We will organize the report in accordance with the requirements of HUD's Assessment Tool, covering the following sections:

Cover Sheet

- Executive Summary
- Community Participation Process
- Assessment of Past Goals and Actions
- Fair Housing Analysis
 - Demographic Summary
 - General Issues
 - Segregation/Integration
 - Racially or Ethnically Concentrated Areas of Poverty
 - Disparities in Access to Opportunity
 - Disproportionate Housing Needs
 - Publicly Supported Housing Analysis
 - Disability and Access Analysis
 - Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

- Fair Housing Goals and Priorities

Following submission of the AFH, the team will remain available to the Participating Jurisdictions to assist in any follow-up conversations and to advise on how to incorporate actions that advance the goals and priorities into their subsequent planning documents such as the Consolidated Plan, the Annual Action Plan, and the 5-Year and Annual Public Housing Agency Plans. We forge lasting relationships with our clients and are always happy to offer our ongoing expertise.

SECTION 4: PROPOSED SCHEDULE

Dates	Tasks
September 2021	Project Kick-Off Meeting
September 2021	Preliminary Analysis of Data and Maps
September 2021	Collect Plans, Procedures, and Studies Describing Public and Private Policies and Practices
September 2021	Identification and Analysis of Supplemental Local Data Sources
October 2021	Review of Substantive Policies and Practices.
October 2021	Meetings with Stakeholders as Recommended
January 2022	Prepare First Draft AFH and Submit Draft to the Participating Jurisdictions.
January-February 2021	Participating Jurisdictions Review Draft AFH and Comments are Incorporated
February 2022	Formal Public Comment Process, Including Presenting at Public Hearings
March 2022	Revise Draft AFH Based on Public Comment
April 2022	Final AFH Completed and Submitted to the Participating Jurisdictions

SECTION 5: COST

The budget proposal includes all work and expenses associated with the preparation of the Assessment of Fair Housing. There will be no travel or miscellaneous expenses. We will request one payment at the completion of the AFH.

Task	Cost
Collection of and analysis of supplemental local data	\$10,000
Analysis of HUD-provided data and maps	\$20,000
Community engagement process as needed	\$5,000
Analysis of contributing factors	\$15,000
Preparation of AFH	\$40,000
Development of goals and strategies for each Participating Jurisdictions	\$20,000
Ongoing training and technical assistance to Participating Jurisdictions	\$10,000
Participation at Public Hearings	\$10,000
<i>Total</i>	<i>\$130,000</i>