



Affirmatively Furthering Fair Housing – State and Federal Law

Thursday, Sept. 21, 2023

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Affirmatively Furthering Fair Housing – AFFH CalCities Annual Conference 2023



**Annual Conference
September 21, 2023**

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Affirmatively Furthering Fair Housing (AFFH)

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Introduction – Crossover to the League City Attorneys Department Housing Practicum Series

In early 2023 the City Attorneys Department President, Eric Danly, established the housing practicum series to provide more substantive resources related to housing law. The working group was thus formed, grown, and selected and has presented five practicums to date. These were focused on discretionary and ministerial housing projects, and most recently the Surplus Land Act, as recommended from CalCities attorney members. One topic that shifted to this Annual Conference is *Affirmatively Furthering Fair Housing* (AFFH), which topic materially affects both discretionary and ministerial projects, RHNA methodology, and housing element law.

I. AFFH FEDERAL AND STATE

Affirmatively Furthering Fair Housing (AFFH) means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity.

A. AFFH is used as a noun and a verb.

1. For context, AFFH is woven into and is a substantive part of land use planning and zoning, including the RHNA process, preparation and adoption of housing elements, housing element implementation, and is a condition to receiving and spending federal funds related to housing and community development.

2. The duty to AFFH extends to all public agencies' activities and programs relating to housing and community development.

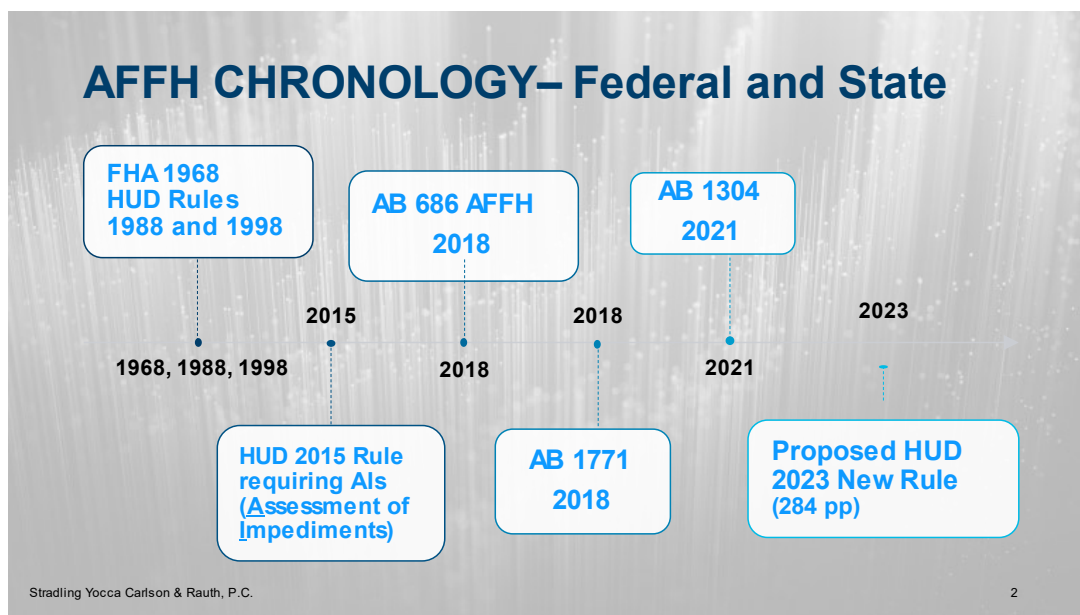
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B. AFFH roots are in federal law, 1968 Fair Housing Act (FHA) (42 U.S.C. §3601, *et seq.*)

1. HUD found that the FHA alone was not adequate to address longstanding patterns of residential segregation in U.S., thus, Congress added AFFH to the FHA, then AFFH was implemented by HUD Rules in 1998, 2015, and, as proposed, 2023, each Rule implementing FHA’s established mandate to AFFH.

C. Statutory and Policy objectives and elements under both federal and state law include:

1. replacing segregated living patterns with truly integrated and balanced living patterns;
2. transforming racially and ethnically concentrated areas of poverty into areas of opportunity; and
3. fostering and maintaining compliance with civil rights and fair housing laws.



II. CALIFORNIA LEGISLATURE’S OBJECTIVE

A. Assembly Bill (AB) 686 (2018). The California Legislature’s objective in enacting a State AFFH mandate in 2018’s AB 686 is “*to have more potential to ‘replace segregated living patterns with truly integrated and balanced living patterns’ than the federal rule because states have the unique authority to directly intervene in local planning and zoning, rather than just withholding funding.*”

1. In April 2021, the California Department of Housing and Community Development (HCD) issued a Guidance Book to implement and provide direction on AFFH, in particular to implement the statutory provisions established in AB 686 (2018) and AB 1304 (2021): (https://www.hcd.ca.gov/community-development/affh/docs/AFFH_Document_Final_4-27-2021.pdf#page=23).

B. CA Background to AB 686. The Primary Framework was established in 1980 by the California Fair Employment and Housing Act (FEHA), which prohibits housing discrimination

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as to personal characteristics of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, or genetic information.

1. AFFH added to State Law under AB 686 (2018), which codified and defined AFFH by adding Government Code § 8899.50, and amending Government Code §§ 65583, 65583.2 that introduced a mandatory duty to *Affirmatively Further Fair Housing* into California housing and community development laws.

2. AFFH is now part of public agencies' (including all cities) planning processes and guiding documents for housing and community development.

3. AFFH is a mandatory component of all Housing Elements.

C. Affirmatively Furthering Fair Housing is also defined as taking meaningful actions that “overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for communities of color, persons with disabilities, and others protected by California law.

1. AFFH requires the State, cities, counties, and public housing authorities to administer their programs and activities related to housing and community development in a way that AFFH. It:

a. prohibits them from taking actions materially inconsistent with their AFFH obligation; and

b. requires the AFFH obligation to be interpreted consistently with U.S. Department of Housing and Urban Development (HUD) regulations and rules, albeit AFFH State law requirements are not now more stringent than federal requirements.

D. Objectives of AB 686 and Implementation to Date. AB 686's objective and requirements include:

1. Opportunity Maps (see later section), including construction of housing in resource-rich neighborhoods, such as areas with good schools, better housing, nearby good jobs, accessible transportation, community amenities, environmental safety such as clean water, clean air, etc.

2. RHNA numbers assigned to local jurisdictions and the cities' Housing Elements must integrate fair housing policies and goals in land use planning and zoning processes.

3. Implement state law and amend and clarify AFFH to keep AFFH as a statewide focus and thereby avoid political shifts at the federal level.

III. GOVERNMENT CODE § 8899.50(a) - DEFINITION OF AFFH

A. Section 8899.50(a)(i) provides: “Affirmatively furthering fair housing’ means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil

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rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency’s activities and programs relating to housing and community development.”

IV. RHNA METHODOLOGY AND HOUSING ELEMENT LAW AFFH COMPONENT

A. RHNA. AB 1771 (2018) requires AFFH to be addressed in the RHNA plan.

1. About every eight years, the Regional Housing Needs Allocation (also referred to as Regional Housing Needs Assessment) (both, RHNA) process is undertaken by the regional Councils of Government (COGs) to assign each city and county its “fair share” of new housing units to plan for. The housing assessment and allocation is intended to meet both existing need in the community and projected growth in the region and affirmatively further fair housing. The COG must address AFFH in each RHNA plan.

a. RHNA process requires all cities and counties to plan for the housing needs of their communities and residents, at all income levels, to plan for growth and to ease regional housing crises. Every city must prepare, and have approved by State HCD, a Housing Element to implement the RHNA allocation for the applicable 8-year planning cycle.

(i) For example, SCAG is in the sixth (6th) planning cycle (October 2021 through October 2029); for the 6th cycle SCAG determined a “need” of 1,341,827 housing units that were distributed to all 197 SCAG jurisdictions (six counties -- Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura -- that include 191 cities.)

B. AFFH section of Housing Element must include:

1. analysis of federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, displacement risk; and

2. identify and examine such patterns, trends, areas, disparities, and needs, both within a local jurisdiction and in comparison to its region, based on characteristics protected by FEHA and California Government Code §65008.

C. California Government Code § 65583.2(c) provides that “the analysis shall determine whether the inventory can provide for a variety of types of housing, including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing, and whether the inventory affirmatively furthers fair housing.”

1. Gov. Code § 65583(c)(9)(A)(i)-(v):

“Affirmatively further fair housing in accordance with Chapter 15 (commencing with Section 8899.50 of the California Government Code) of Division 1 of Title 2. The program shall include an assessment of fair housing in the jurisdiction that shall include all of the following components:

(i) A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and fair housing outreach capacity.

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- (ii) An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk.
- (iii) An assessment of the contributing factors for the fair housing issues identified under clause (ii).
- (iv) An identification of the jurisdiction’s fair housing priorities and goals, giving highest priority to those factors identified in clause (iii) that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance, and identifying the metrics and milestones for determining what fair housing results will be achieved.
- (v) Strategies and actions to implement those priorities and goals, which may include, but are not limited to, enhancing mobility strategies and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement.”

D. Amendments to AB 686 by AB 1771 (2018), AB 1304 (2021) added or amended California Government Code §§ 8899.50, 65008, 65583, 65583.2, 65584, 65584.01, 65584.04, 65584.05, 65584.06, all related to and clarifying AFFH under California law.

1. AB 1771 (2018) AFFH shall be addressed in RHNA plan and thereby Housing Elements; objective to increase access to “areas of high opportunity for lower-income residents”, while avoiding displacement and affirmatively furthering fair housing.

a. Heightened focus on racial equity in RHNA process and thereby in Housing Elements with specific mandate that opportunity sites AFFH.

b. If city cannot show adequate sites to meet RHNA, including areas of high opportunity, city required to complete rezonings within statutory timeframe.

2. AB 1304 (2021) clarified Housing Element component must include analysis of racially Concentrated Areas of Affluence and the Assessment of Fair Housing component must include analysis of patterns and trends at both a local and regional scale.”

V. HCD AFFH DATA VIEWER

A. Statewide Data. HCD developed a statewide AFFH Data Viewer that assembles various data sources and provides options for addressing each of the components within the full scope of the assessment of fair housing. AFFH Data Viewer utilized to address data components of AFFH but must be used in combination with other data such as local or regionally available data. Mapping includes educational, economic, and environmental indicators. The AFFH Data Viewer is intended to be useful to a broad audience, such as local and regional governments, and especially city and county staffs, consultants, and the public—those involved in the Housing Element process.

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1. <https://affh-data-and-mapping-resources-v-2-0-cahcd.hub.arcgis.com/>

B. Data Organization. AFFH Data Viewer consists of map data layers organized by:

1. Fair Housing Enforcement and Outreach Capacity;
2. Segregation and Integration;
3. Disparities in Access to Opportunity;
4. Disproportionate Housing Needs, including Displacement Risks;
5. Racially and Ethnically Concentrated Areas of Poverty and Affluence; and
6. Supplemental Data.

VI. CALIFORNIA HCD AND TCAC (TAX CREDIT ALLOCATION COMMITTEE) “OPPORTUNITY MAP”

A. Objectives. HCD and TCAC have issued an AFFH “opportunity map” that is designed toward rebalancing the State’s portfolio of affordable housing to align with AFFH goals, and thereby provide access to more neighborhoods to the end users of affordable housing when compared to historical segregation patterns and existing availability.

B. Tool for TCAC, CDLAC and HCD Funding Awards. The Opportunity Map is a tool to help ensure that California’s funding and investments in affordable housing do not perpetuate discriminatory patterns and works to reverse them. People of color, and other disadvantaged persons want the chance to live in a broader set of neighborhoods – accordingly, it is the State’s objective to remove constraints on housing choices.

1. The Opportunity Map is used by TCAC via Tax Credit reservation, California Debt Limit Allocation Committee (CDLAC) via bond allocation, and California HCD funding such as Multifamily Housing Program (MHP) awards.

a. For example, as set forth in the TCAC, CDLAC, MHP regulations and in the HCD MHP Super NOFA (Notice of Funding Availability) there is a “basis boost” in the “tiebreaker” score when a proposed development with covenanted units is located in a high resource neighborhood.

b. HCD issued an “*HCD AFFH Survey*” about AFFH that closed on July 7, 2023, in which the public, cities, public entities, and housing practitioners were encouraged to participate. Data collected from this survey has yet to be released as this paper is written.

2. HCD and TCAC treatment of rural versus urban areas differs.

3. <https://belonging.berkeley.edu/2023-ctcac-hcd-opportunity-map>.

C. Continue to Refine Methodology. HCD, TCAC, CDLAC, local and regional governmental agencies, housing advocates and other stakeholders will continue to develop and improve the methodology in creating the opportunity maps (as well as Data Viewer) to focus on the AFFH goals of enhancing and expanding housing choice in neighborhoods, especially areas with higher resources.

1. Best practices to be used by COGs as to RHNA assessment, data, and allocations.

2. Issues in low resource areas cannot be denied or ignored, with solutions through laws, regulations, enforcement, program tools, funding, and better pathways toward AFFH.

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3. Objective to lessen and prevent further concentrations of poverty, disparate impact, segregation.

4. Aid cities to implement AFFH and further fair housing policies by updating and making data sets and opportunity maps available and relevant to local policy makers so community goals will result in better outcomes for residents.

VII. ENFORCEMENT: CIVIL RIGHTS DEPARTMENT OF BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY

A. The **Civil Rights Department (CRD)** of the *California Business, Consumer Services, and Housing Agency* (formerly the Department of Fair Employment and Housing (DFEH)) is charged with the protection of residents from employment, housing and public accommodation discrimination, and hate violence. In 2015, Kevin Kish was appointed by Governor Edmund G. Brown Jr. as the Director of the Civil Rights Department and in 2020 he was reappointed by Governor Gavin Newsom.

1. CRD enforces California civil rights laws—vested with powers and duties to receive, investigate, and conciliate complaints related to:

- a. AFFH laws
- b. Fair Employment and Housing Act (FEHA) (Gov. Code § 12900, *et seq.*);
- c. Unruh Civil Rights Act (1959) (Civil Code § 51, *et seq.*);
- d. Ralph Civil Rights Act of 1976 (Civil Code § 51.7);
- e. Disabled Persons Act (1968) (Civil Code § 54, *et seq.*); and

(i) CRD pays private law firms to prosecute CRD lawsuits, including those against cities and counties.¹

VIII. AFFH FEDERAL LAW AND REGULATIONS

A. HUD Proposed 2023 New Rule (88 FR 8516). January 2023 U.S. Department of Housing and Urban Development (HUD) Proposed “New Rule” re AFFH.

1. HUD comment period ended April 24, 2023.
2. HUD Fact Sheet re 2023 Proposed New Rule:
<https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH%20Fact%20Sheet.pdf>

B. Background to Proposed 2023 Rule.

1. **1988 and 1998 HUD Rules Implementing FHA.** HUD found that the Fair Housing Act alone was not adequate to address longstanding patterns of residential segregation in the U.S.

¹ This was stated in a recent article critical of the CRD in their role in filing lawsuits against cities and counties (and private businesses) related to discrimination, harassment, and workers’ civil rights. Swaim, Will. “The California Agency That Has Gone So Rogue Even Newsom Can’t Control It”. *National Review*, April 13, 2023. Rpt in *Orange County Register*, May 14, 2023. The article describes the “bounty-hunter provision” created by SB 1038 (2012); the “CRD does not pay out all settlement money to victims of harassment or discrimination. Instead, it relies on massive settlements to help cover the agency’s operating costs, including paying private law firms to prosecute its lawsuits.”

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a. Congress added AFFH to the 1968 Fair Housing Law and was then implemented by HUD rules in 1988, 1998, 2015, and as proposed in 2023.

2. 2015 HUD Rule; AIs. HUD issued 2015 Rule by regulation (amended 1998) that requires local governments receiving federal funds (e.g., Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), etc.) and public housing authorities to complete an *Assessment of Fair Housing and Analysis of Impediments* (AI) as a condition of receiving funds. (80 CFR 5.150-5.180, amended 1998 HUD Rule.)

a. Participating jurisdictions (PJs) (cities counties) and public housing authorities (PHAs) must identify policies, practices, or conditions that caused disparities in access to housing and broader opportunities experienced by communities of color, persons with disabilities, and other groups protected by the Fair Housing Act (“protected groups”).

b. HUD mandates that local governments and housing authorities identify meaningful goals to address the impacts such systemic issues as residential segregation, housing cost burden, and unequal educational or employment opportunities to the extent these issues create and/or perpetuate discrimination against protected groups.

c. Over the years, AI was considered ineffective by U.S. Government Accountability Office (GAO) as recipients completed an AI and then “put on a shelf.”

(i) This resulted in data collection without addressing real issues and effective implementation.

(ii) There was no AI template and little to no training by HUD.

(iii) Correction was via litigation under the False Claims Act—not procedurally easy—but more successful than action under Fair Housing Act.

C. HUD Proposed 2023 New Rule. The “New Rule” will implement AFFH to promote fair housing choice, eliminate disparities in housing, and foster inclusive communities.

1. The proposed New Rule reinstates and expands 2015 Rule.

2. Objective to alleviate years, decades of housing discrimination toward ensuring local jurisdictions’ neighborhoods, all communities, offer residents opportunities and pathways to advance, thrive and succeed.

a. Objective to take active steps to promote and implement fair housing choice, foster inclusive communities, and eliminate disparate impacts and disparities in housing.

3. The New Rule will:

a. Streamline the required fair housing analysis for local communities, states, and public housing agencies and require them to set ambitious goals to address fair housing issues facing their communities, among other landmark changes;

b. Require recipients/subrecipients to create an “Equity Plan” that focuses on undoing past inequities, focus on correction as the intended outcome;

c. Have a complaint process to take action to address, correct, undo past inequities; and

d. HUD will issue a “template” Equity Plan that focuses on structural changes to past inequities, akin to the ‘preventative health care versus correction of actual problem — intended as an “action plan”.

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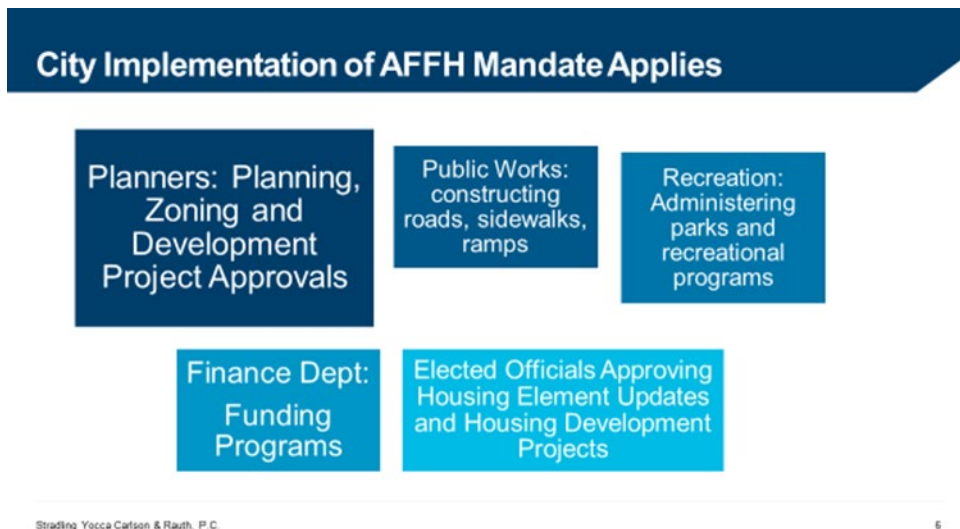
D. Equity Plan. Each PJ must prepare an Equity Plan every five years (in connection with Consolidated Plan); Equity Plan is a condition of receiving federal funds; updated via annual Action Plan, as necessary.²

1. Each Equity Plan to:
 - a. Address all discrimination issues, including disability and age discrimination, not just race;
 - b. Be used as a tool for accountability; and
 - c. Identify goals that respond to the community issues that were identified during the required community outreach and engagement. HUD recommends “theme” approaches such as housing for disabled veterans, disabled seniors, and accessibility for seniors to create momentum to alleviate issues.

E. Examples of Problems that need to be Addressed to Effect AFFA

1. Planners, public works staff, other city departments receive little training in AFFH;
2. Increase Section 8 housing voucher payment standards in resource-rich neighborhoods;
3. Enact source-of-income laws that prohibit owners/landlords from refusing to rent to Housing Choice Voucher holders;
4. Support public and private fair housing and legal aid organizations that provide legal assistance to victims of discrimination;
5. HUD staff has noted that public works improvement plans are important to affect AFFH (e.g., crosswalks, sidewalks with curb cuts are necessary part of action plan because curb cuts are solutions that assist seniors, disabled persons in wheelchairs, persons using strollers for children, etc.); and
6. Need for action plan with goal to create or maintain diverse neighborhoods, but e.g., a development project with housing that has all very small units (e.g., studio to 1-bedroom apartments) may or will not achieve the AFFH objective to increase opportunities for a protected class: families with children.

² All PJs and PHAs that receive federal funds must prepare a Consolidated Plan every five years and an Annual Action Plan. “The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CPD formula block grant programs: Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, Housing Trust Fund (HTF) Program, Emergency Solutions Grant (ESG) Program, and Housing Opportunities for Persons With AIDS (HOPWA) Program. The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER).”
https://www.hud.gov/program_offices/comm_planning/conplan#:~:text=What%20is%20the%20Consolidated%20Plan,%2C%20place%2Dbased%20investment%20decisions.



IX. KEY AFFH FEDERAL AND CALIFORNIA CASE LAW

A. *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project, Inc.*, 135 S.Ct. 2507 (2015)

1. Leading U.S. Supreme Court opinion re AFFH which held that disparate-impact claims are cognizable under the Fair Housing Act.

2. USSC 5-4 Opinion by Justice Kennedy; Justice Thomas filed dissent; Justice Alito filed a separate dissent in which Chief Justice Roberts and Justices Scalia and Thomas joined.

3. Key points:

a. Fair Housing Act is to be analyzed based upon disparate impacts of actions, not on intent of the actors.

b. Inclusive Communities Project, an organization dedicated to racial and economic integration of communities, filed suit against the Texas Department of Housing and Community Affairs (TDHCA) alleging that the allocation of Low Income Housing Tax Credits was disproportionately awarded to developments within minority neighborhoods to the neglect of developments within Caucasian neighborhoods, which caused concentration of low-income housing in minority neighborhoods thereby constituting segregation in violation of the Fair Housing Act.

c. The District Court found TDHCA’s allocation of Low Income Housing Tax Credits was a *prima facie* case of disparate impact, and imposed burden on TDHCA to show allocation based on compelling governmental interest. The Fifth Circuit affirmed.

d. The U.S. Supreme Court held the Fair Housing Act had a role in moving the nation towards a more integrated society; the policies that segregate minorities, even if unintentional, violate Fair Housing Act. The U.S. Supreme Court did provide caution against policies imposing racial quotas.

e. It is also important that governmental policies evidence there is access to high-means neighborhoods with high-level resources toward resolving issues in low-income neighborhoods.

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B. *Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193 (review denied)

1. Issued in April 2023, the first California appellate case to apply the 2018 AB 686 mandate to AFFH.

a. City of Clovis' met the site identification requirement of the housing element law, not by upzoning its land use districts, but by applying a high-density-housing overlay zone allowing higher densities, but maintaining base zoning that permitting development at lower densities than required by the minimum density requirements in California Government Code 65583.2(h) violated Housing Element Law and that such failure found inconsistent with and in violation with City's duty to affirmatively further fair housing.

b. Plaintiff Martinez' discrimination claims alleged disparate impact in violation of Fair Housing Act, 42 U.S.C. §3601, *et seq.*, FEHA California Government Code §12900, *et seq.*, and California Government Code §65008 (b)(1)(C) that were found to be sufficiently evidenced by statistical facts with segregative effects. Therefore, the Court of Appeal reversed the trial court's ruling for the City on demurrer to these claims and remanded for further proceedings. It expressly rejected a standard that required a plaintiff to show discriminatory motive, allowing a claim to pursue disparate impact alone.

(i) City of Clovis had engaged in a "longstanding pattern and practice of evading statutory obligations to create opportunities for low-income people and households of color."

(ii) Appellate Court held that AFFH is judicially enforceable writ of mandate action under Code of Civil Procedure §1085.

(1) While this plaintiff did not seek damages and the City lost only the pleading battle, this case demonstrates a much more demanding form of enforcement of housing element requirements than those used to date, which primarily lead to writs to rewrite a housing element. This theory promised far more intrusive remedies.

RESOURCES

- 1. HUD - AFFH Notice of Proposed Rulemaking**
<https://www.hud.gov/AFFH>
- 2. HUD Fact Sheet and Frequently Asked Questions: Affirmatively Furthering Fair Housing, Notice of Proposed Rulemaking**
<https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH%20Fact%20Sheet.pdf>
- 3. State HCD - Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements**
https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf
- 4. Office of Policy Development and Research (PD&R) supports HUD's efforts to help create cohesive, economically healthy communities**
<https://search.usa.gov/search?affiliate=housingandurbandevlopment&query=AFFH>

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5. **Highlights of HUD’s Proposed Affirmatively Furthering Fair Housing (AFFH) Rule for Aging and Disability Advocates**
<https://justiceinaging.org/wp-content/uploads/2023/03/Highlights-of-HUDs-Proposed-Affirmatively-Furthering-Fair-Housing-AFFH-Rule-for-Aging-and-Disability-Advocates.pdf>
6. **Reaffirming the Federal Commitment to Fair Housing: Lessons from California in Implementing AFFH**
<https://turnercenter.berkeley.edu/blog/affh-california-federal-rule/>
<https://www.housinglab.co/about>
7. **National Housing Law Project: Affirmatively Furthering Fair Housing**
<https://www.nhlp.org/initiatives/fair-housing-housing-for-people-with-disabilities/affirmatively-furthering-fair-housing/>
8. **Association of Bay Area Governments: HCD AFFH Data & Mapping Resources**
<https://abag.ca.gov/technical-assistance/hcd-affh-data-mapping-resources>
9. **National Housing Law Project: AFFH**
<https://www.nhlp.org/initiatives/fair-housing-housing-for-people-with-disabilities/affirmatively-furthering-fair-housing/>