



AGENDA REPORT

TO: Jestin D. Johnson
City Administrator


FROM: Emily Weinstein, Director
Department of Housing and
Community Development

William Gilchrist, Director
Planning and Building
Department

SUBJECT: Informational Report On The City's
Efforts to Establish An Equitable Lead
Hazard Abatement Program And A
Proactive Rental Inspection Program

DATE: May 28, 2024

City Administrator Approval


Jestin Johnson (Jun 13, 2024 22:52 PDT)

Date: Jun 13, 2024

RECOMMENDATION

Staff recommends that The Life Enrichment Committee Receive This Informational Report From the City Administrator On the City's Efforts to Establish An Equitable Lead Hazard Abatement Program (ELHAP) And A Proactive Rental Inspection Program (PRIP) As Described in the City's Racial Equity Impact Analysis On Eliminating Lead Paint Hazards, Including Information On the Following: (1) The Expected Timeline For Development Of ELHAP Using The Lead Settlement Funds And The Extent The City Will Partner With The County's Existing Lead Poisoning Prevention Program In The Development And Implementation Of The Program; (2) Potential Challenges In The Development And Implementation Of The ELHAP And Plans To Sustain The ELHAP After The Lead Settlement Funds Are Expended; (3) Proactive Rental Inspection Program (PRIP) For Rental Housing In Oakland And Its Impact In Identifying Lead Hazards In Units; (4) Community Engagement Process in the Development of the ELHAP and PRIP; 5) Current Lead Enforcement by Planning and Building.

EXECUTIVE SUMMARY

The City of Oakland Department of Race and Equity commissioned the *Racial Equity Impact Analysis: Eliminating Lead Paint Hazards in Oakland & Alameda County (September 2021)*, which provided nine recommended actions to address lead hazards in the City of Oakland and

Life Enrichment Committee
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Jestin D. Johnson, City Administrator

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Alameda County. The report recommended establishment of an Equitable Lead Hazard Abatement Program (ELHAP) that would ensure lead hazards within the City of Oakland were eliminated in a holistic, equitable, and sustained manner. The City of Oakland's Housing and Community Development Department (Oakland HCD or "HCD") will obtain a consultant through an Request For Proposal (RFP) to design the ELHAP, during the remainder of 2024. The results from the consultant's analysis will directly inform the development of Oakland's Proactive Rental Inspection Program (PRIP), which will be managed by the Planning and Building Department (PBD).

BACKGROUND / LEGISLATIVE HISTORY

Equitable Lead Hazard Abatement Program (ELHAP):

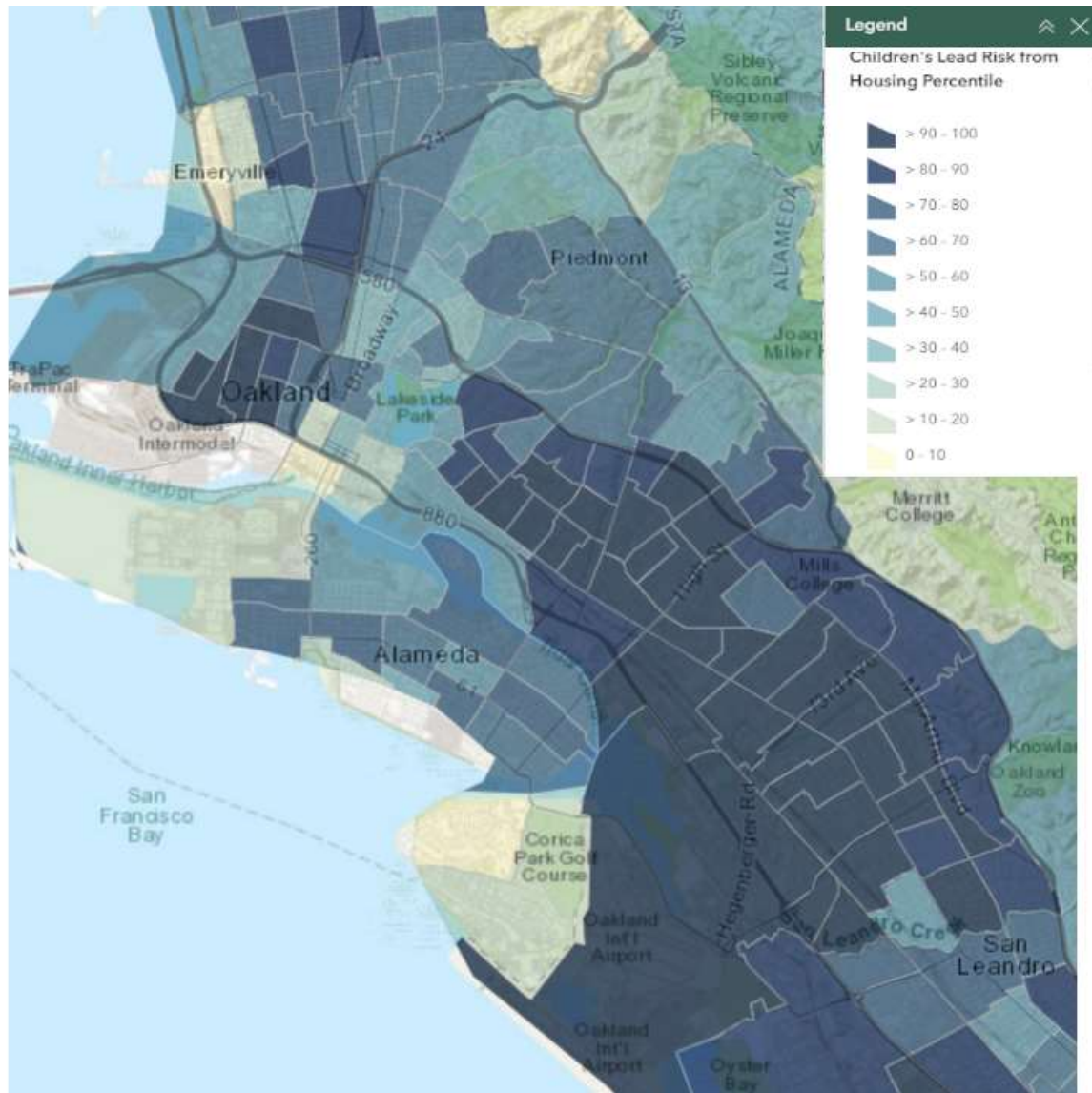
In 2001, ten cities and counties in California, including the City of Oakland and the County of Alameda brought a lawsuit against companies that manufactured, distributed, and promoted lead paint. The parties resolved the lawsuit via settlement under which Defendants agreed to pay a total of \$305M through various installments over the course of seven years. In October 2019, the public entities entered a Memorandum of Understanding to satisfy their obligations under various contingency fee agreements with outside counsel, and to allocate among the prosecuting jurisdictions the balance of settlement funds. The City of Oakland and County of Alameda received a \$23,985,922.92 settlement fund allocation.

Approximately \$14M (60%) of the lead settlement funds would be spent in the City of Oakland for lead poisoning prevention purposes. From the 60% settlement funds allocated to Oakland, 20% of the funds are allocated to fund work pursuant to recommendations in the Racial Equity Impact Analysis. The remaining 40% of the lead settlement funds are held in trust by the County of Alameda for use in lead poisoning prevention services and activities pending the City and County agreeing on programming and disbursement. ([CMS 88978](#)): Development of ELHAP would provide the required programming for disbursement of the remaining lead settlement funds.

An estimated 80,000 rental units in Oakland were built before 1978 and are presumed to contain lead-based hazards. In addition, as per a 2020 UC Berkeley study¹ relating to ADUs, there are an estimated 12,000 unpermitted ADU rental units that may also contain lead-based hazards. These form the basis of units that an ELHAP would seek to address.

2021's "Racial Equity Impact Analysis: Eliminating Lead Paint Hazards in Oakland & Alameda County" report commissioned by the Department of Race and Equity recommended the establishment of an Equitable Lead Hazard Abatement Program that would ensure lead hazards within the City of Oakland are eliminated in a holistic, equitable, and sustained manner (https://cao-94612.s3.amazonaws.com/documents/Lead-Paint-REIA_9-23-21_FINAL.pdf).

¹ [OAKLAND ADU INITIATIVE EXISTING CONDITIONS AND BARRIERS REPORT](#)



Map of Oakland indicating potential risk for lead exposure in children living in low-income communities with older housing, CalEnviroScreen 4.0, <https://oehha.ca.gov/calenviroscreen/maps-data>

Proactive Rental Inspection Program (PRIP):

Poor housing habitability conditions can contribute to a wide array of health problems including, but not limited to; childhood lead poisoning, asthma and respiratory conditions resulting from exposure to mold and pests, and increased rates of injury and mortality among the elderly. Improperly maintained properties and substandard housing can also have a negative effect on neighboring property values and contribute to blight. Identifying and working to correct exterior and interior code violations through avenues such as Proactive Rental Inspection Programs benefits tenants, property owners, and the community.

Code enforcement programs are typically complaint-based and, therefore, reactive in nature. In a complaint-based system, once code enforcement confirms a violation, cases may have already deteriorated to the extent that the housing is substandard. By this time, compliance measures can result in the displacement of tenants due to the severity of the housing conditions or the means required to bring the property into compliance. With a PRIP, rental units would be inspected regularly, allowing owners to identify and resolve code violations early when the remediation impacts may be less severe. However, during the first ten years (first cycle) of proactive rental inspections the City of Oakland should expect a dramatic increase in demand for services and interventions such as: financial assistance (e.g., rental subsidies); relocation, housing navigation, and counseling services for tenants; and financial assistance (e.g., major rehabilitation and deferred code compliance relocation payments) for small property owners due to inspection findings.

The City Council received an [informational report in 2016](#) on establishing a Proactive Rental Inspection Program focusing on Healthy Housing initiatives in coordination with the County of Alameda Healthy Housing Program. Community outreach occurred and initial program parameters were established in 2019. The next steps included the determination of inspection and enforcement processes that also accounted for race and equity disparities in the rental unit conditions. This information then formed a basis for determining the sequence of inspections and the resources needed to implement the program, to achieve its goal of rental unit remediation.

The January 31, 2023 adopted Housing Element Plan of the 2045 General Plan ([CMS 89565](#)), as approved by State of California Department of Housing and Community on February 17, 2023, also included the establishment of a PRIP to improve housing habitability conditions as per Chapter 4, Action 2.1.3 ([City of Oakland | 2023-2031 Adopted Housing Element \(oaklandca.gov\)](#)).

ANALYSIS AND POLICY ALTERNATIVES

This is an informational report relating to the status of the city's efforts to establish ELHAP and PRIP as described in the city's Racial Equity Impact Analysis on eliminating lead-based paint hazards. However, it is expected that upon adoption of ELHAP and PRIP, both programs will advance holistic community safety and housing, economic, and cultural security by providing the means and methods to proactively verify and correct housing violations as it relates to minimum habitability standards as established by the Oakland Municipal Code and establish programs to mitigate impacts created by proactive inspection findings thereby addressing lead-based paint hazards, improving occupant health and preventing displacement.

(1) The Expected Timeline For Development Of ELHAP Using The Lead Settlement Funds And The Extent The City Will Partner With The County's Existing Lead Poisoning Prevention Program In The Development And Implementation Of The Program

As noted in the *Racial Equity Impact Analysis: Eliminating Lead Paint Hazards in Oakland & Alameda County* recommendations, the City of Oakland shall partner with the County of Alameda toward: the development of lead abatement programs for property owners and rental properties; housing relocation due to lead hazards; referral of children for lead blood testing; and training programs relating to best management practices of lead hazards for property owners and construction specialists.

The recommendations span multiple regulatory and implementation areas and call for cooperative operations between the City and County, as well as across administrative departments within the city. Oakland Housing and Community Development Department (HCD) has issued a Request for Proposals (RFP) to identify a consultant that will design a lead-based paint response program, including possible design of a lead-based paint abatement program. HCD expects to select a consultant by August 2024 with an award made soon after. Planning and Building will collaborate with HCD and their consultant on the development of the ELHAP; results from the analysis will be incorporated into PRIP's design and implementation.

The PRIP and ELHAP must be adopted concurrently to ensure that impacts related to inspections and enforcement are mitigated under coordinated notice and compliance, to minimize tenant displacement and consolidate the economic impacts of corrective action by owners into one compliance plan. While proactive rental inspections will identify lead hazards, there would be no programming in place as required by the joint agreement between the County of Alameda and City of Oakland for the release of the remaining 40% of lead settlement funds to address lead hazards. Lead hazards would need to be addressed at a later time once ELHAP is in place, thereby requiring repeat inspections to prevent displacement due to mitigation of lead hazards which are a substandard condition. =. Further, if PRIP is adopted prior to ELHAP, there would be a need to identify sources of annual funding in the range of \$20M to stand-up PRIP and provide mitigation services such as; relocation, housing navigation, and counseling services for tenants; and financial assistance (e.g., major rehabilitation and deferred code compliance relocation payments) for small property owners due to inspection findings.

(2) Potential Challenges In The Development And Implementation Of The ELHAP And Plans To Sustain The ELHAP After The Lead Settlement Funds Are Expended

The entire lead settlement funds to the City of Oakland totals \$14M. ([CMS 88978](#)) However, only \$9.6M of the \$14M (and any residual non expended funds from the 20 percent allocated to fund certain work pursuant to recommendations in the Racial Equity Impact Analysis) would be available for implementation and sustainment of ELHAP activities. Based on Planning and Building's analysis of estimated costs and impacts related to implementation of ELHAP and a PRIP and given the age of Oakland's housing stock where an estimated 80,000 rental units were built before 1978², the available settlement funds would fall quite short for the implementation of all recommended actions for a robust and sustainable ELHAP.

Upon the adoption of a PRIP and ELHAP, PBD estimates yearly impacts to the City of Oakland of at least \$20M for the first ten years of program implementation for mitigation and staffing.

² American Housing Survey 2022

Oakland HCD budgetary impacts have not been fully determined but would be substantial. HCD will determine departmental budgetary impacts once the ELHAP program design has been completed and insights from this process have been incorporated into the PRIP program design. While inspections performed under PRIP are designed to be self-sustaining via per-unit program fee assessments, the initial implementation of PRIP would necessitate a one-time \$3M investment utilizing lead settlement funds and/or other funding sources to standup PRIP and conduct inspections during the first year of the program. The per-unit program fee assessment would not address mitigation of inspection impacts, as doing so would necessitate a per unit fee in excess of \$300.

In addition, PBD anticipates an increase in code enforcement activity during the first ten years of PRIP implementation due to the escalation of enforcement for substandard or non-compliant PRIP properties and an increase in permit applications and inspections related to repairs of rental properties. Depending on the number of unpermitted units and/or exterior repairs there may be a slight increase in zoning applications. The increase in code enforcement, permitting and zoning would necessitate additional staff.

Shifting to a proactive model of code enforcement inspection will likely uncover code violations that would require the property owner to pay for temporary or permanent relocation. The Code Compliance Relocation Program (CCRP; O.M.C. 15.60), administered by HCD, requires owners to pay for relocation costs when tenants must be relocated to make repairs when there are severe violations that threaten life, limb, health, or safety.

The CCRP ordinance currently does not allow property owners to pay for temporary (less than sixty days) accommodations directly; the tenant must pay and then seek reimbursement from the property owner. For permanent (more than sixty days) relocation, landlord payment is not reimbursement-based on based on actual expenses incurred.

However, when a tenant is eligible under CCRP, but the owner cannot or will not make these payments, the City may pay the tenant directly and seek reimbursement from the owner. This will result in an increase in staff time required to respond to inquiries and process applications from tenants. This will likely result in an increase in the number of cases where the City covers the cost of relocation and attempts to recoup costs from the owner. Currently, there is no data available that would allow for an accurate estimate of these impacts.

Additionally, because there is a severe shortage of housing units in the city that are affordable to low- and moderate-income tenants, tenants who are displaced due to violations would need support in identifying temporary or permanent housing. HCD currently does not provide this service and does not have funding to engage a nonprofit service provider to provide this service.

Other City functions that may also experience impacts will be:

- The Rent Adjustment Program within HCD, due to an increase in tenant and property owner requests for information and an increase in petitions filed;
- Economic and Workforce Development to identify providers that offer lead-based paint best practices and Environmental Protection Agency, Renovate Right Program (EPA-RRP) trainings for construction professionals and homeowners;
- Fire Prevention Bureau, due to escalation of Fire Code violations;

- Information Technology Division (ITD), due to additional computer equipment and telecommunications;
- Equipment Services, due to an increase in City vehicle procurement and maintenance; and
- The City Attorney's Office for legal representation and any legal actions due to PRIP and ELHAP.

Sustainment of Lead Settlement Funds:

Because no ongoing funding sources exist, staff will need to explore partnerships with external agencies. For example, Oakland HCD may, as part of the RFP consultant's work to establish lead abatement programs, consider resuscitating the Rental Housing Rehabilitation Program to provide low- to below-market rate interest loans to property owners to undertake lead abatement and rehabilitation/repairs of rental properties. Such a program may provide for recycling of lead settlement funds, while also maintaining affordability of rental units in exchange for lower interest rates.

Alternatively, the City of Oakland in partnership with the County of Alameda, may consider a social impact bond to sustain ELHAP activities long after the exhaustion of lead settlement funds. Social impact bonds are typically contracts with a public sector entity and/or governing authorities, whereby the bond pays for better social outcomes in certain areas and passes on part of the savings achieved to investors. Repayment of the bond could be based on quantifiable reductions in the number of lead poisoned children, reduction in medical care visits due to lead poisoning, or other metrics such as the total number of units where lead abatement has taken place.

Other possible funding options may include public-private or philanthropic partnerships, partnering with health-based institutions, or seeking additional funding from the Federal Government or the State of California.

(3) Proactive Rental Inspection Program (PRIP) For Rental Housing In Oakland And Its Impact In Identifying Lead Hazards In Units

As stated in Oakland HCD's RFP to acquire a consultant to design the ELHAP: *"The consultant responding to this lead-based paint abatement...RFP will need to engage with Planning and Building staff to ensure the alignment of the Proactive Rental Inspection Program with Lead Abatement as a cornerstone of the code enforcement process and propose a plan for connecting code enforcement cases from the Proactive Rental Inspection Program with appropriate resources to resolve lead-based hazards...This should ultimately lead to a clear process map that connects the Proactive Rental Inspection Program and the Lead Paint Abatement Program"*.

As noted previously, PBD is synchronizing the start of PRIP with the development of ELHAP to mitigate the impacts created by the proactive rental inspections of approximately 100,787³ rental

³ American Community Survey 2022

units, of which 80,000 were built before 1978 and are presumed to contain lead-based hazards. In addition, as per a 2020 UC Berkeley study⁴ relating to ADUs, there is an estimated 12,000 unpermitted ADU rental units, that may also contain lead-based hazards.

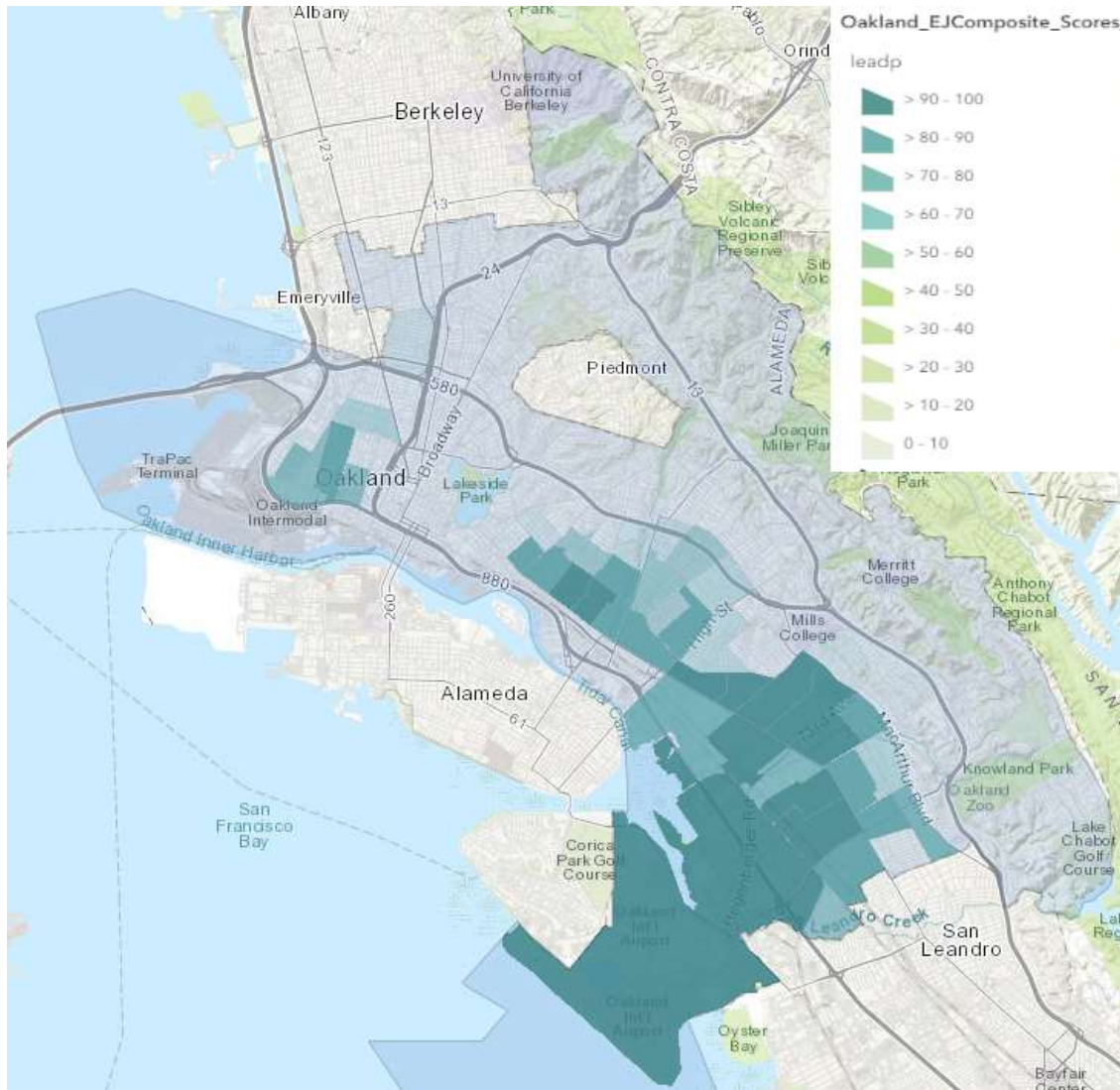
Shifting from a complaint-based reactive model to a proactive one would dramatically increase demand from our most marginalized residents for services and interventions that the City of Oakland is not currently equipped to meet. These services and interventions include financial assistance (e.g., rental subsidies); relocation, housing navigation, and counseling services for tenants; and financial assistance (e.g., major rehabilitation and deferred relocation payments) for small property owners. A universal, proactive model that covers all rental units, regardless of building age and size, geography, and demographic characteristics of tenants, whether single family home or apartment, has significant budgetary and operational ramifications. Therefore, it is critical that while PRIP program design and scope are nearly complete, that PRIP implementation and inspections start once ELHAP programs are in place to mitigate impacts to both property owners and tenants where compliance will be required.

Following the City's Racial Equity Impact Analysis (REIA) process and incorporating insights from the forthcoming ELHAP program design will inform the structure of a sustained PRIP program that is iterative, tenant-centered, data-informed, equity-driven, and financially sustainable.

The PRIP design will incorporate data provided within the Racial Equity Impact Analysis to focus the initial citywide roll-out of proactive inspections of rental units in census tracts where the following five indicators are present:

1. High incidence of lead hazards along with pre-1978 buildings;
2. Health disparity indicators;
3. Socio-economic indicators;
4. Total number of units on a property to focus on larger sites first;
5. Prior code enforcement complaints on property.

⁴ [OAKLAND ADU INITIATIVE EXISTING CONDITIONS AND BARRIERS REPORT](#)



Map Of Oakland Proposed Priority Neighborhoods In East Oakland And West Oakland For Year 1 Of PRIP Implementation: 60th Percentile And Higher Lead Risk For Children In Low-Income Communities With Older Housing

(4) Community Engagement Process in the Development of the ELHAP and PRIP

The Civic Design Lab (CDL) led the initial community engagement process for PRIP in 2017: <https://www.civicedesignlab.org/healthyhousing>. The multi-pronged community engagement included surveys, interviews, and community workshops with renters, property owners, and code enforcement staff. This was followed by a PRIP Consultant Request for Qualifications (RFQ) for Program Design in 2019: <https://www.oaklandca.gov/news/2019/request-for-proposals-for-proactive-rental-inspection-program>. In 2023, the adopted Housing Element Plan of the 2045 General Plan included the establishment of PRIP to preserve and improve existing

housing stock as per Action 2.1.3: <https://www.oaklandca.gov/documents/2023-2031-adopted-housing-element>

During extensive neighborhood outreach for the 2045 General Plan, "Many Oaklanders described housing quality issues they were living with, such as overcrowding, unsafe building conditions, and lack of maintenance, caused by landlord neglect, lack of funds for upkeep or housing burden, or fear of reporting these issues. Community-recommended strategies to address these issues included programs/grants to landlords and homeowners to make repairs; universal design to allow all Oaklanders to remain in their homes as they age, or to help mobility impaired residents; and tax credits or programs to address other housing habitability concerns, like indoor air quality."

The adopted Environmental Justice Element of the 2045 General Plan reiterated housing quality concerns from the Housing Element, re-emphasized inequities in lead risk from the Lead REIA, and included PRIP in Goal EJ-4.3: https://cao-94612.s3.us-west-2.amazonaws.com/documents/EJ-Element_Adopted-9.26.23_89907-C.M.S.pdf

Soon after the August 2023 action by the Alliance of Californians for Community Empowerment (ACCE) and senior residents to expedite PRIP implementation, <https://oaklandside.org/2023/08/11/acce-senior-housing-oakland-rental-inspection/>, newly hired staff for the Building Bureau confirmed with staff in Department of Race and Equity that it is best for ELHAP to be designed before PRIP is implemented.

Thus, after ELHAP is designed, community engagement to finalize PRIP will resume in 2025. The Building Bureau will engage with tenant associations, affordable housing nonprofits, healthy housing nonprofits, rental housing associations, and related business groups. A website, social media, print media, listserv, and more will be created to inform the public about PRIP, including when on the agenda for Board and Commission meetings and City Council meetings.

(5) Current Lead Enforcement by Planning and Building

As it relates to the identification and enforcement of lead hazards as per recommended action 1a of the *Racial Equity Impact Analysis: Eliminating Lead Paint Hazards in Oakland & Alameda County* report, in December 2022, as part of PBD's triennial building and housing codes adoption, City Council approved Oakland Municipal Code (OMC) 15.08 Article XIII- Lead Based Control and Abatement, allowing the Planning and Building Department to enforce lead-based hazards, as required by State Assembly Bill 838 (Friedman) and signed by Governor Newsom on September 28, 2021. Adoption of OMC 15.08- Article XIII gives authority to the Building Official or designees to enforce lead-based hazards, lead hazard safe work practices and require individuals disturbing presumed lead-based hazards to have Environmental Protection Agency (EPA) Renovate Right Program (RRP) and or State of California Department of Public Health (CDPH) training and certification. It should be noted that City inspectors cannot perform lead risk assessments as those can only be performed by state certified lead inspectors/assessors.

The Planning and Building Department has established a Lead-Based Paint Permit that requires obtaining a paint permit and inspections, to ensure that lead safe work practices are being

adhered to for properties built before 1978 undergoing exterior or interior painting activities. In addition, all other construction projects that may disturb any paint are also required to follow lead safe practices by submitting lead abatement workplans as part of their building permit application and to retain EPA's Renovate Right Program-certified contractors to perform the work. Failure to adhere to safe lead work practices has resulted in issuance of stop work orders and assessment of fines, in addition to referrals to State of California Occupational Health Safety Administration (CalOSHA) for worker protection violations, as worker protection cannot be enforced by local jurisdictions.

PBD has the authority to enforce lead hazards and has been actively enforcing lead hazards for the last year as required by municipal and state law. Furthermore, Governor Newsom signed AB548 (Boerner) on October 11, 2023, requiring cities to develop policies and procedures for proactive inspection of adjacent units whenever an inspector or code enforcement officer has determined that the unit where the complaint was made has substandard conditions or is in violation of the State Health and Safety codes. If the local enforcement agency determines the substandard condition and/or violations of the Health and Safety Codes could reasonably affect other units, AB548 requires notice to be given to the property owner and tenants, as specified, and those units inspected as well. Lead hazards are a substandard condition that may trigger inspection of adjacent units, thereby potentially creating the need for tenant relocations of multiple units due to lead remediation.

PBD is an enforcement agency. Therefore, mitigating impacts related to enforcement actions would necessitate the implementation of ELHAP and increased funding and staffing for other city departments and agencies to provide programs and resources to mitigate enforcement actions, including the infrastructure and capacity to undertake testing of properties for lead hazards, overseeing lead remediation/ abatement work, code compliance relocation, rent adjustment program enforcement, housing rehabilitation programs or escalation of fire code violations.

FISCAL IMPACT

This is an informational report and has no immediate fiscal impact. With the completion of the consultancy work for ELHAP and its integration with PRIP, the City Administration shall bring a fiscal impact report for consideration as needed to implement both programs, for Council approval.

PUBLIC OUTREACH / INTEREST

No Public outreach has been conducted for this informational report beyond the required posting to the City's website. However, the report cites previous outreach efforts concerning the PRIP itself.

COORDINATION

This report was prepared in consultation with Housing and Community Development, Economic and Workforce Development Department, Fire Prevention Bureau, City Attorney Office, and the City Administrator's Office.

SUSTAINABLE OPPORTUNITIES

The following areas of impact and opportunity are noted for further consideration.

Economic: ELHAP and PRIP may have economic benefits related to increased construction investment and activity. In addition, there may be reduced requests for services for code enforcement, housing relocation, and rent adjustment petitions upon inspection of all rental units and correction of habitability deficiencies and remediation of lead hazards.

Environmental: Reduction in lead hazards will benefit all Oaklanders who may be exposed to lead hazards due to deteriorated lead-based paint and improper disturbance of lead-containing materials during construction activities.

Race & Equity: Adoption of ELHAP and PRIP would correct longstanding disparities within historically marginalized communities living in substandard conditions, who may be reluctant to submit complaints and may need outside assistance to make their buildings safer. In addition, remediating and eliminating lead hazards that have predominantly affected these communities leading to poor health -such as asthma, birth defects, learning disabilities, and mental health problems- would ensure that marginalized communities can thrive.

ACTION REQUESTED OF THE CITY COUNCIL

Staff recommends that The Life Enrichment Committee Receive This Informational Report From the City Administrator On the City's Efforts to Establish An Equitable Lead Hazard Abatement Program (ELHAP) And A Proactive Rental Inspection Program (PRIP) As Described in the City's Racial Equity Impact Analysis On Eliminating Lead Paint Hazards, Including Information On the Following: (1) The Expected Timeline For Development Of ELHAP Using The Lead Settlement Funds And The Extent The City Will Partner With The County's Existing Lead Poisoning Prevention Program In The Development And Implementation Of The Program; (2) Potential Challenges In The Development And Implementation Of The ELHAP And Plans To Sustain The ELHAP After The Lead Settlement Funds Are Expended; (3) Proactive Rental Inspection Program (PRIP) For Rental Housing In Oakland And Its Impact In Identifying Lead Hazards In Units; (4) Community Engagement Process in the Development of the ELHAP and PRIP; 5) Current Lead Enforcement by Planning and Building.

For questions regarding this report, please contact William Gilchrist, Director, at 510-238-2936.

Jestin D. Johnson, City Administrator

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Date: May 28, 2024

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Respectfully submitted,


Emily Weinstein (Jun 10, 2024 13:23 PDT)

EMILY WEINSTEIN
Director, Department of Housing and
Community Development



WILLIAM A. GILCHRIST
Director, Planning and Building
Department

Reviewed by:
Alain G. Placido, Acting Building Official
Planning and Building Department

Prepared by:
Rodolfo Dueñas, Business Analyst III
Planning and Building Department

Prepared by:
Hoang Banh, Program Analyst III
Planning and Building Department

Attachments (2):

A- Racial Equity Impact Analysis, March 2024.

B- Racial Equity Impact Analysis, September 2021.

Life Enrichment Committee
June 25, 2024