

RESOLUTION NO. 15-46

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
LANCASTER APPROVING THE ANALYSIS OF
IMPEDIMENTS TO FAIR HOUSING CHOICE AND FAIR
HOUSING PLAN

WHEREAS, the Department of Housing and Urban Development (“HUD”) requires recipients of Community Development Block Grant funds to affirmatively further fair housing; and

WHEREAS, as part of the Analysis of Impediments to Fair Housing Choice and Fair Housing Plan, the City of Lancaster certifies that it affirmatively furthers fair housing; and in furtherance of that certification, an Analysis of Impediments to Fair Housing Choice and Fair Housing Plan was prepared in accordance with HUD regulations; and

WHEREAS, the initial Analysis of Impediments to Fair Housing Choice and Fair Housing Plan was accepted and approved June 14, 1997; and

NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF LANCASTER, AS FOLLOWS:

Section 1. The Analysis of Impediments to Fair Housing Choice and Fair Housing Plan has been prepared.

Section 2. The Analysis of Impediments to Fair Housing Choice and Fair Housing Plan is hereby accepted and approved, and the City Manager, or his designee, is authorized to sign certifications or other documentation, as required by the Department of Housing and Urban Development, to that effect.

Section 3. The City Manager, or his designee, is authorized to update the Analysis of Impediments to Fair Housing Choice and Fair Housing Plan in accordance with and as required by Department of Housing and Urban Development technical and/or regulatory requirements, as necessary.

PASSED, APPROVED, and ADOPTED this _____ day of _____, 2015, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

ATTEST:

APPROVED:

BRITT AVRIT, CMC
City Clerk
City of Lancaster

R. REX PARRIS
Mayor
City of Lancaster

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss
CITY OF LANCASTER)

CERTIFICATION OF RESOLUTION
CITY COUNCIL

I, _____, _____ City of Lancaster, California,
do hereby certify that this is a true and correct copy of the original Resolution No. 15-46, for
which the original is on file in my office.

WITNESS MY HAND AND THE SEAL OF THE CITY OF LANCASTER, on this _____
day of _____, _____.

(seal)

City of Lancaster

Analysis of Impediments to Fair Housing Choice

City of Lancaster

Department of Housing & Neighborhood Revitalization

44933 Fern Avenue

Lancaster, CA 93534

661.723.6233

2015

Acknowledgment

The Ramsay Group, LLC, would like to extend its gratitude to all the individuals and agencies that made this report possible. The following are organizations and individuals who were instrumental in assisting with the formulation of this report by lending their time and/or respected advice. We are grateful for your assistance.

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CITY OF LANCASTER'S HONORABLE CITY COUNCIL MEMBERS:

Mayor R. Rex Parris
Vice Mayor Marvin Crist
Council Member Ronald D. Smith
Council Member Ken Mann
Council Member Angela E. Underwood-Jacobs

LANCASTER NEIGHBORHOOD VITALIZATION COMMISSION

Finally, we would like to give a special thanks to the citizens of Lancaster who allowed us the opportunity to visit their beautiful community, while providing us with critical survey information relating to their fair housing experience. Their participation was essential in shaping this analysis, which will influence fair housing activities in the City of Lancaster for years to come.

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Section 1

INTRODUCTION AND SUMMARY OF ANALYSIS

Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, educational, employment or other goals. In recognizing equal housing access as a fundamental right, the federal government and the State of California have both established fair housing choice as a right protected by law.

This report presents a demographic profile of the City of Lancaster, assesses the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents. This report also analyzes the conditions in the private market and the public sector that could limit the range of housing choices or impede a person's access to housing. As the name of the report suggests, the document reviews "impediments" to fair housing. Although this report also assesses the nature and extent of housing discrimination, it primarily focuses on identifying impediments that could prevent equal housing access and developing solutions to mitigate or remove such impediments.

This Analysis of Impediments to Fair Housing Choice provides an overview of laws, regulations, conditions and other possible obstacles that could affect an individual's or household's access to housing in Lancaster. The AI includes:

- A comprehensive review of Lancaster's laws, regulations and administrative policies, procedures and practices, as well as an assessment of how they affect the location, availability and accessibility of housing, and
- An assessment of conditions, both public and private, affecting fair housing choice.

The scope of analysis and the format used for this AI adhere to recommendations contained in the *Fair Housing Planning Guide* developed by HUD.

Background

What Is Fair Housing?

Federal fair housing laws prohibit discrimination in the sale, rental or lease of housing, and in negotiations for real property, based on race, color, religion, sex, national origin, familial status and disability. California fair housing laws build on the federal laws, including age, marital status, ancestry, source of income, sexual orientation and "any arbitrary discrimination" as the protected categories under the laws. The following definition is used for this report:

"Fair housing describes a condition in which individuals of similar income levels in the same housing market have a like range of choice available to them regardless of race, color, ancestry, national

origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor.”

Fair Housing Legal Framework

The federal Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988 (42 U.S. Code §§ 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, such as the sale, rental, lease or negotiation for real property. The Fair Housing Act prohibits discrimination based on race, color, religion, sex and national origin.

In 1988, the Fair Housing Act was amended to extend protection to familial status and people with disabilities (mental or physical). In addition, the Amendments Act provides for “reasonable accommodations,” allowing structural modifications for persons with disabilities, if requested, at their own expense, for multi-family dwellings to accommodate the physically disabled.

The California Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA; Part 2.8 of the California Government Code, Sections 12900-12996) prohibits discrimination and harassment in housing practices.

The Unruh Act (California Government Code Section 51) protects Californians from discrimination in public accommodations and requires equal access to the accommodations. The Unruh Act provides broad protection and has been held by the courts to prohibit any arbitrary discrimination on the basis of personal characteristics or traits, and applies to a range of types of housing.

The Ralph Civil Rights Act (California Civil Code Section 51.7) prohibits violence and threats of violence and specifies that housing situations are protected under this Act, including houses, apartments, hotels, boarding housing and condominiums. Violators of the Ralph Act can be sued for actual or emotional damages, in addition to civil penalties.

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual’s constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes. However, convictions under the act are not allowed for speech alone unless that speech itself threatened violence.

In addition to these acts, California Government Code Sections 111135, 65008 and 65589.5 prohibit discrimination in programs funded by the state and in any land-use decisions.

Housing Issues, Affordability and Fair Housing

The U.S. Department of Housing and Urban Development (HUD) Fair Housing and Equal Opportunity Division distinguishes between housing affordability and fair housing. Economic factors that affect a household’s housing choices are not fair housing issues per se. Only when the relationship between household income, household type, race/ethnicity and other factors create misconceptions, biases and differential treatment would fair housing concerns arise.

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either one or both parties regarding their rights and responsibilities. Tenant/landlord disputes and housing discrimination cross paths when fair housing laws are violated and result in differential treatment.

What Is an Impediment to Fair Housing Choice?

According to HUD's *Fair Housing Planning Guide*, and based within the legal framework of federal and state laws, impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of age, race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor which restrict housing choices or the availability of housing choices, or
- Any actions, omissions, or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor.

To affirmatively promote equal housing opportunity, a community must work to remove impediments to fair housing choice. Furthermore, eligibility for certain federal funds require compliance with federal fair housing laws. Specifically, to receive HUD Community Planning and Development (CPD) formula grants, a jurisdiction must:

- Certify its commitment to actively further fair housing choice.
- Maintain fair housing records.
- Conduct an analysis of impediments to fair housing choice.

Methodology and Citizen/Public Participation

The scope of this Analysis of Impediments adheres to the recommended content and format included in Volumes 1 and 2 of the "Fair Housing Planning Guide" published by the U.S. Department of Housing and Urban Development's Office of Fair Housing and Equal Opportunity.

Methodology

HUD requires jurisdictions that receive federal funding for community development activities to assess the status of fair housing in their community. As a recipient of Community Development Block Grant (CDBG) funds, Lancaster should update its Analysis of Impediments to Fair Housing (last updated in 2002) and report the findings and progress in the Consolidated and Performance Evaluation Report (CAPER) submitted to HUD.

Citizen Participation

This Analysis Impediments Report has been developed to provide an overview of laws, regulations, conditions or other possible obstacles that could affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals and service providers. To assure that the report responds to community needs, the development of the AI includes a community outreach program consisting of public review, a resident survey, service provider interviews, and a public hearing.

The City values citizen input on how well city government serves its residents. The public participation effort for the 2015 Analysis of Impediments to Fair Housing Choice (AI) adheres to the City's adopted Citizen Participation Plan.

To solicit public feedback on fair housing choice in the City of Lancaster and in consideration of possible impediments, information was gathered from many different sources, including:

- **Communication with people seeking fair housing**
- **Comments and information from public meetings and public forums**—including a focus group made up of affordable housing advocates and social service providers.
- **Neighborhood surveys**—including comments from citizens in many parts of the city about types of housing they have and any impediments they have encountered.
- **Review of Home Mortgage Disclosure Act data**—Compilation and analysis of Home Mortgage Disclosure Act data from the Federal Financial Institutions Examination Council.
- **Review of public documents**— the following data sources were used to complete this AI.
 - City of Lancaster General Plan Housing Element (2014)
 - U.S. Census Bureau American Community Survey, 2007-2011
 - U.S. Census, 2010
 - City of Lancaster 2010 – 2015 Consolidated Plan
 - Housing Rights Center
 - California Department of Finance
 - Community Development Commission of the County of Los Angeles
 - Federal Financial Institutions Examination Council (FFIEC)

Public Participation

In the preparation of the Analysis of Impediments, the City has consulted with public and private departments; social service agencies; and other non-profit organizations to review potential impediments to fair housing choice in the public and private sector. The City met with several representatives to provide information about the Analysis of Impediments and its process. The City of Lancaster specifically contacted the following agencies:

- A Child with a Child Inc.
- The Independent Living Center of Southern California, Inc. (ILCSC)

- Corporation for Supportive Housing
- National Alliance on Mental Illness – Antelope Valley
- Asian Youth Center- Antelope Valley
- Lancaster Planning Department
- Lancaster Housing Authority
- Southern California Association of Governments
- Southern California Edison
- State Department of Education
- U.S. Department of Housing and Urban Development
- California Building Industry Association
- Los Angeles County Sanitation District
- State Department of Housing and Community Development
- California Housing Partnership Corporation
- Greater Antelope Valley Economic Alliance
- Los Angeles Times
- Greater Antelope Valley Association of Realtors
- Antelope Valley Building Industry Association
- Edwards Air Force Base Housing Office
- Air Force Plant 42
- City of Palmdale
- Homeless Access Solutions Center/Valley Oasis
- Mental Health America
- Antelope Valley Partners for Health
- California Department of Developmental Services

Summary of Community Advisory Meetings and Focus Group

Community Meetings

Lancaster residents and public and private agencies either directly or indirectly involved with fair housing issues in Lancaster were invited to participate in two community advisory committee meetings on the following dates and below location:

- October 29, 2014
American Heroes Park,
Community Building, 642 West Jackman Avenue
Lancaster, CA 93534
- December 10, 2014
Cedar Center for the Arts, Main Hall,
44851 Cedar Avenue
Lancaster, CA 93534

A total of sixty-five agencies servicing the greater Antelope Valley were invited to participate:

L.A.Co.Dept. of Public Health, 335-B East Ave. K-6, Lancaster CA 93535, Carolyn Essex, cessex@ph.lacounty.gov
 City of Palmdale, 38300 Sierra Hwy, Palmdale CA 93550, Sophia Reyes, sreyes@cityofpalmdale.org
 L.A.Co. Probation Dept, 14540 Haynes Street, Van Nuys CA 91411, Frank Trejo, frank.trejo@laprob.org
 Homeless Solutions Access Center, 45134 Sierra Hwy, Lancaster CA 93534, Nick Matthews, nmatthews@avdvc.org
 L.A.Co.Dept. of Mental Health, 349-A E. Ave K-6, Lancaster CA 93535, Angela Coleman, acoleman@dmh.lacounty.gov
 Emancipation Services Div Spa 1&2, 3530 Wilshire Blvd Ste 400, Los Angeles CA 90010, Lili Ahmadi, ahmadl@dcfs.lacounty.gov
 Homeless Solutions Access Center/AVDVC, 45134 Sierra Hwy, Lancaster CA 93534, Patti Rivetti, privetti@avdvc.org
 Homeless Shelter Board, 44661 Yucca Ave, Lancaster CA 93534, Peggy Edwards, pegwards@pacbell.net
 Mental Health America, 506 W. Jackman St., Lancaster CA 93534, Judy Cooperberg, jcooperberg@mhala.org
 L.A.Co. Board of Supervisors, 1113-A W. Ave. M-4, Palmdale CA 93551, Norm Hickling, NHickling@lacbos.org
 United Way, 42442 10th St. W., Lancaster CA 93534, Sue Porter, sporter@unitedwayla.org
 L.A.Co. Dept. of Mental Health, 37212 E. 47th St.#105, Palmdale CA 93552, Sonia Hicks, shicks@dmh.co.la.ca.us
 L.A.Co.Board of Supervisors, 1113-A W. Ave. M-4, Palmdale CA 93551, Richard Grooms, rgrooms@lacbos.org
 Grace Resource Center, 45134 Sierra Hwy, Lancaster CA 93534, Steve Baker, popabaker@yahoo.com
 CA Employment Development Dept., 1420 W Ave I, Lancaster CA 93534, J.D. Giles, jjiles@edd.ca.gov
 Valley Oasis, PO Box 2980, Lancaster CA 93539, Carol Crabson, ccrabson@avdvc.org
 Partners In Care Foundation, 732 Mott St #150, San Fernando CA 91340, Gifford Cole, gcole@picf.org
 Mental Health America, 506 W Jackman St., Lancaster CA 93534, Jamie Gonzalez, jgonzalez@mhala.org
 United Way, 523 W. 6th St., Los Angeles CA 90014, Christine Marge, cmarge@unitedwayla.org
 L.A.Co.Dept. of Mental Health, 349-A E. Ave K-6, Lancaster CA 93535, Earl Whitt, ewhitt@dmh.lacounty.gov
 City of Palmdale, 38300 Sierra Hwy, Palmdale CA 93550, Terry Rascoe, trascoe@cityofpalmdale.org
 Altman, Lunche & Blitstein, 16255 Ventura Blvd STE1110, Encino CA 91436, Donald Arnold, don.arnold@altmanlaw.com
 City of Palmdale, 38300 Sierra Hwy, Palmdale CA 93550, Terri-Lei Wheeler, twheeler@cityofpalmdale.org
 Catalyst Foundation, 44748 ½ Elm Ave, Lancaster CA 93534, Dave Maghore, davem@qnet.com
 L.A.Co.Dept. of Mental Health, 349-A E. Ave K-6, Lancaster CA 93535, Debra Berzon-Leitelt, dberzonleitelt@dmh.lacounty.gov
 Los Angeles Homeless Svc Auth, 811 Wilshire Blvd #6, Los Angeles CA 90017, Clementina Verjan, cverjan@LAHSA.org
 Catalyst Foundation, 44748 ½ Elm Ave, Lancaster CA 93534, Dave Maghore, catalyst@qnet.com
 Los Angeles Homeless Svc Auth, 811 Wilshire Blvd #6, Los Angeles CA 90017, Clementina Verjan, cverjan@lahsa.org
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 Lancaster School District, 44711 Cedar St., Lancaster CA 93534, A. Aguilera, aguilara@lancsd.org
 L.A.Co. Sheriff Dept, 501 W Lancaster Blvd, Lancaster CA 93534, J. Rose, jarose@lasd.org
 City of Palmdale, 38300 Sierra Hwy, Palmdale CA 93550, Patricia Morales, pmorales@cityofpalmdale.org
 Mental Health America, 506 W Jackman St., Lancaster CA 93534, Paul Drake, pdrake@mhala.org
 A.V. High School Dist., 44811 Sierra Hwy, Lancaster CA 93534, Ken Scott, kscott@avhsd.org
 Housing Rights Center, 520 S. Virgil Ave. STE 400, Los Angeles CA 90020, marzate@housingrightscenter.org
 Mental Health America, 506 W Jackman St., Lancaster CA 93534, Diane Curtis, dcurtis@mhala.org
 Desert Vineyard Church, 1011 E. Ave. I, Lancaster CA 93535, D. Swift, dswift@desertvineyard.org
 Lancaster Homeless Shelter, 44611 Yucca Ave., Lancaster CA 93534, Stacy Waddel, stacy.lcshelter@gmail.com
 Nat'l Alliance on Mental Illness, 44349 Lowtree Ave. STE 104, Lancaster CA 93534, Jean Harris, jean.harris@nami-av.org
 Cal Bank & Trust, 831 W. Lancaster Blvd, Lancaster CA 93534, Angela Underwood, angela.underwood@CALBT.com
 A.V. High School Dist., 44811 Sierra Hwy, Lancaster CA 93534, CK Reitz, ckreitz@avhsd.org
 L.A.Co. Dept of Public Social Svcs, 349-B E. Ave. K-6, Lancaster CA 93535, Heriberto Cueva, HeribertoCueva@dpss.lacounty.gov
 Children's Bureau, 44404 16th St. W., Lancaster CA 93534, Patrishia Hodgman, patrishahodgman@all4kids.org
 Lancaster Homeless Shelter, 44611 Yucca Ave., Lancaster CA 93534, Yvonne, Yvonne.lcshelter@gmail.com
 Center for Aging Resources, 447 N. El Molino Ave., Pasadena CA 91101, S. Ponce, sponce@cfar1.org
 Penny Lane Center, 43423 Division St. STE 102, Lancaster CA 93535, Sal Red, salred@pennylane.org
 Mental Health America, 506 W Jackman St., Lancaster CA 93534, Nicole Moser, nmoser@mhala.org
 L.A.Co. Dept of Public Social Svcs, 349-B E. Ave. K-6, Lancaster CA 93535, Silvana Siguenza, SilvanaSiguenza@dpss.lacounty.gov
 Palmdale Schools Head Start, 975 E. Ave. P-8, Palmdale CA 93550, Iris Arroyo, IXArroyo@palmdalesd.org
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 Bartz-Altadonna Comm. Health Center, 43322 Gingham Ave. #105, Lancaster CA 93535, Cecil, cecil@bachc.org
 Ind. Living Cntr. Of So. Cal., 1505 W. Ave J, Lancaster CA 93534, K. Baldwin, kbaldwin@ILCSC.org
 Bartz-Altadonna Comm. Health Center, 43322 Gingham Ave. #105, Lancaster CA 93535, Joanna, joanna@bachc.org
 Tarzana Treatment Center, 44447 10th St W., Lancaster CA 93534, J. Summers, jsummers@tarzanatc.org
 Asian Youth Center, 43423 Division St., Lancaster CA 93535, Cindy Robles, cindy.robles@asianyouthcenter.org
 AV Partners for Health, 44226 10th St. W., Lancaster CA 93534, Michele Kiefer, mkiefer@avph.org
 AV Comm. Clinic, 45104 10th St. W, Lancaster CA 93534, J. Cook, JCook@avclinic.org
 High Desert Medical Group, 43839 15th St. W., Lancaster CA 93534, Rafael Gonzalez, rgonzalez@hdmg.net
 Kaiser Permanente, 43112 15th St. W., Lancaster CA 93534, Phillip J. Tuso, phillip.j.tuso@kp.org
 AV Hospital, 1600 W. Ave. J, Lancaster, CA 93534, Jack Burke, jack.burke@avhospital.org
 L.A.Co. Dept of Health Svcs, 335-B E. Ave. K-6, Lancaster CA 93535, B.R. Brooks, brbrooks@dhs.lacounty.gov
 Cal-Vet, 1227 O St., Sacramento CA 95814, pao@calvet.ca.gov
 Lancaster Veteran Home, 45221 30th St W., Lancaster CA 93536, Norman Andrews, norman.andrews@calvet.ca.gov
 L.A. Co. Dept. of Military and Veteran Affairs, 351 E. Temple St. Rm B-307, L.A. Ca. 90012, R. Ortiz, rortiz@mva.lacounty.gov
 VA Clinic, 340 E. Ave. I STE 108, Lancaster CA 93535, Marianne Sage, marianne.sage@va.gov
 Charter College, 43141 Business Center Pkwy STE 102, Lancaster CA 93535, Jessica Federico, Jessica.federico@chartercollege.edu
 AV Veteran Center, 38925 Trade Center Dr., Palmdale CA 93551, Daniel Morales, Daniel.morales@va.gov

The meetings provided the opportunity for the Lancaster community to gain awareness of fair housing laws and for residents and service agencies to share fair housing issues and concerns. To ensure that the fair housing concerns of low- and moderate-income and special needs residents were addressed, individual invitation letters were distributed via mail and e-mail, if available, to agencies and organizations that serve the low- and moderate-income and special needs community.

Meeting times and dates were placed in Lancaster’s newspaper and posted conspicuously at City Hall and the Lancaster branch of the County Library. Due to extensive outreach efforts, attendance at the public meetings included several service providers and citizen groups that work with residents considered a protected class according to HUD’s definition. These community members and service providers supplied first-hand insight into fair housing issues and concerns.

Focus Group

In addition, a focus group was held to discuss the development of the Analysis of Impediments to Fair Housing Choice. The purpose of the focus group was to provide fair housing advocates and providers within the community a forum to express their views on the fair housing needs of special needs groups and the community at large. The focus group was held at the following location:

December 10, 2014
 Cedar Center for the Arts in the Main Hall
 44851 Cedar Avenue
 Lancaster, CA 93534

The following organizations contributed to the focus group:

- A Child with a Child Inc.
- The Independent Living Center of Southern California, Inc. (ILCSC)
- Corporation for Supportive Housing

- National Alliance on Mental Illness – Antelope Valley
- Asian Youth Center- Antelope Valley
- Lancaster Planning Department
- Lancaster Housing Authority

Resident Survey

To supplement the citizen advisory meetings, a survey was made available to Lancaster residents at City Hall, Lancaster public library, and Lancaster Senior Center. The survey was also available online at the City’s website, via a dedicated address. Spanish versions of the survey were provided to reflect the diversity of Lancaster’s residents. During the eight week survey period, completed surveys were submitted by 26 Lancaster residents.

Affordable Housing and Special Needs Survey

- Arbor on Date / 44927 Date Avenue/ Lancaster, Ca. 93534
- Arbor Fields Estates / 530 W. Jackman / Lancaster, Ca. 93534
- Arbor Gardens / 710 West Kettering/ Lancaster, Ca. 93534
- Cedar Creek Senior / 1530 West Avenue K-8/ Lancaster, Ca. 93534
- Laurel Crest Estates / 531 W. Jackman Street/ Lancaster, Ca. 93534
- Arbor on Date / 44927 Date Avenue/ Lancaster, Ca. 93534
- Arbor Fields Estates / 530 W. Jackman/ Lancaster, Ca. 93534
- Arbor Gardens / 710 West Kettering/ Lancaster Ca. 93534
- Cedar Creek Senior / 1530 West Avenue K-8/ Lancaster, Ca. 93534
- Laurel Crest Estates / 531 W. Jackman Street/ Lancaster, Ca. 93534

Service Provider Interviews

In addition, interviews were conducted with the Housing Rights Center (HRC), the Housing Authority of the County of Los Angeles and the California Department of Fair Employment and Housing. The interviews gave in-depth context and insight into housing conditions and fair housing issues for residents in Lancaster. The City of Lancaster contracts with the HRC to provide fair housing services in the City of Lancaster. The HRC is active in the City, holding workshops and trainings each year related to fair housing.

Public Review

During a 15-day public review period, the draft Analysis of Impediments document was made available at the following locations:

- City of Lancaster Department of Housing & Neighborhood Revitalization, 44933 Fern Avenue, Lancaster CA 93534
- City of Lancaster Public Library, 601 W Lancaster Blvd, Lancaster, CA 93534

Notice of public review was published in the Antelope Valley Press. In addition, all persons that attended the community advisory meetings were e-mailed and/or faxed the location of the public review document on the City's Web site and asked to provide any further comments for incorporation.

Reporting Staff and Data Sources

This report, prepared through a collaborative effort between City staff and The Ramsay Group, LLC, under contract to the City of Lancaster, is funded through Community Development Block Grant (CDBG) funds.

Organization of Report

The Analysis of Impediments is divided into six sections:

Section 1: The Introduction and Summary of the Analysis defines fair housing; the purpose of this report; and a summary of conclusion and impediments.

Section 2: The Jurisdictional Demographic Profile presents the demographic, housing and income characteristics of Lancaster. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed.

Section 3: Private Sector Policy and Practices analyzes private activities that could impede fair housing choices in Lancaster.

Section 4: Public Policies and Practices evaluate various public policies and actions that could impede fair housing choices in Lancaster.

Section 5: Fair Housing Practices evaluate the fair housing services available to residents and identifies fair housing complaints and violations in Lancaster.

Section 6: Fair Housing Analysis and Housing Plan provide conclusions and recommendations about fair housing issues in Lancaster.

At the end of this report, a page is attached that includes the endorsement of the City Manager and a statement certifying that the AI represents Lancaster's official conclusions regarding impediments to fair housing choice and the actions necessary to address identified impediments.

Status of Prior Impediments and Recommendations

HUD requires the City to analyze past performance with respect to the resolution of impediments to fair housing choice that were identified in prior Analyses of Impediments. The following impediments were cited in previous reports:

1. Prior Impediment No.1: The City of Lancaster is experiencing rapid change of many types: population growth, urbanization, and the onset of a variety of urban problems. Growing racial diversity has accompanied these other changes, but Lancaster has thus far managed to escape the patterns of racial segregation that have beset most older cities. Indeed, Lancaster and its surrounding area have become substantially more integrated over the past generation. Moreover, a large majority of Lancaster's residents have been supportive of its growing diversity and have contributed to a general atmosphere of racial tolerance.

At the same time, there is considerable evidence that private housing discrimination occurs frequently in Cities throughout California. Although it affects only a fraction of housing transactions, our research suggests that there are nonetheless hundreds of acts of discrimination in Cities each year. Moreover, the City of Lancaster's current fair housing provider is ineffective, providing little presence in the community and performing inadequate investigations of the problems that come to its attention. These factors, in addition to occasional open acts of racial hostility, have given many minority residents of Lancaster a feeling of guardedness and concern about the broader racial climate.

Prior Recommendation. Lancaster can improve its racial climate, and its efforts to combat housing discrimination, through the following steps:

1) The City should monitor its fair housing provider more closely to insure that it is meeting the substantive goals of the fair housing contract.

2) The City's fair housing agency should increase its presence in the community through better outreach efforts, should become a visible player in the City's planning activities and its non-profit network, and should play a leading role in pursuing implementation of the other recommendations of this report.

3) The City should consider ways in which positive information about the City's growing racial diversity and high level of racial tolerance can be communicated to the public

4) Given the high rate of racial change occurring in Lancaster, the City should use annual HMDA data to monitor the racial makeup of the city's neighborhoods. If patterns of segregation begin to displace the current pattern of wide racial dispersion, the City should consider affirmative measures to encourage integration.

5) The City should support efforts to better assess the level of housing discrimination in the City by, for example, engaging in full application testing in a sample of housing searches by actual home seekers, and conducting affirmative investigations of discrimination where there is evidence of possible discrimination.

Current Status: Resolved. The City of Lancaster hired the consultant Housing Rights Center to implement and monitor fair housing activities within the City and to implement the recommendations cited above. Since July 1, 2000, the City of Lancaster has contracted with the Housing Rights Center to provide fair housing services for its residents.

2. Prior Finding. Our research shows that although most home purchasers in Lancaster do not get their financing from local banks, the banking community in general (especially mortgage brokers) are providing a large stream of conventional and FHA financing for Lancaster home buyers. A high proportion of Lancaster transactions are financed through these mechanisms, and there is no evidence that banks and brokers are discriminating against minority home buyers. The one problem we identified in this area is a low rate of financing in some of Lancaster's oldest housing tracts in the center of the city. Local real estate brokers with whom we spoke suggested that this results from the commercial zoning of the area, which makes the homes nonconforming uses that banks will not finance.

Prior Recommendation. The City should investigate the role that its current zoning laws play in making it difficult for residents of central Lancaster to obtain conventional financing for home purchases, and should pursue corrective actions consistent with its other planning and housing goals.

Current Status: Resolved. In 1997 the City of Lancaster comprehensively updated the General Plan and the corresponding Zoning Maps thereby resolving the issue of nonconforming uses.

3. Prior Finding. The City of Lancaster pursues an array of housing initiatives that directly address a wide range of the emerging housing issues in the community. Its programs and planning process, however, only indirectly incorporate fair housing issues and perspectives.

Prior Recommendations.

(1) Lancaster's fair housing agency should become more directly involved in the consolidated plan process, submitting suggestions and reacting to plan drafts.

(2) The City's next Consolidated Plan should examine (a) how well the City's programs provide access to all groups based on their program eligibility; (b) how City programs should balance the competing goals of reversing neighborhood deterioration and facilitating economic and racial integration.

Current Status: Resolved. In 2000 the City of Lancaster hired the consultant Housing Rights Center to implement and monitor fair housing activities within the City. In addition, the Housing Rights Center assisted staff and consultants with the 2000-2005 Consolidated Plan. Lancaster housing, planning, and economic development staff, Housing Rights Center, other consultants and the citizens of Lancaster worked together to create housing programs to balance the competing goals of reversing neighborhood deterioration and facilitating economic and racial integration.

New Impediments to Fair Housing Choice and Recommendation

The 2015 Analysis of Impediments revealed new impediments to fair housing choice in the City of Lancaster.

- 1. 2015 Impediment No. 1: Discrimination against Persons with Disabilities.** Housing Rights Center (HRC) Fair Housing Discrimination Complaint data indicates that a majority of discrimination complaints from 2006-2009 were based on physical or mental disability. The high percentage of disability-related complaints in Lancaster was consistent with data from other cities at that time and revealed a lack of understanding and sensitivity of the fair housing rights of the disabled.

Physical and mental disability fair housing discrimination complaints continue to be the most common basis for fair housing discrimination complaints in Lancaster. There were a total of 236 complaints within the last five fiscal years, and 149 (63 percent) are related to physical and mental disabilities complaints.

Recommendation: To address the lack of understanding and sensitivity to the fair housing needs of physically and mentally disabled people, it is recommended that the City provide for additional workshops geared toward disabled housing issues including reasonable accommodation and emphasizing that landlords may not refuse to rent on the basis of disability or any arbitrary factor. These workshops should be designed to specifically address this population's particular housing needs and rights. Additionally, it is recommended that the City provide for additional discrimination testing to be conducted by the Housing Rights Center on the topic of disabilities.

- 2. 2015 Impediment No 2: Lack of Awareness of Fair Housing Laws.** A general lack of knowledge of fair housing rights and responsibilities continues to exist. Increased fair housing complaint intake by Housing Rights Center and interaction with housing providers and housing seekers during workshops demonstrates a lack of understanding of both Federal and State fair housing laws.

Recommendation: Coordinate with Housing Rights Center to enhance its outreach efforts to real estate professionals with fair housing questions or concerns in Lancaster and the region, It is recommended that the City continue existing efforts to provide for expanded participation in fair housing education workshops for prospective homebuyers, renters, and providers of housing such as multifamily management companies, independent landlords and real estate agents or brokers to facilitate awareness of fair housing laws and the rights and responsibilities of tenants and landlords under California law.

- 3. 2015 Impediment No. 3: Race/Ethnic Relations.** Race/Ethnic relations may contribute to bias or stereotypes that have an impact on Fair Housing Choice. Fair housing complaint data from 2006-2009 indicates that race/ethnicity was the second-leading cause of housing discrimination in the City.

Recommendation: In partnership with community nonprofits, fair housing organizations, other government agencies and special districts, continue to provide public information programs disseminating information on fair housing laws, inclusion and diversity.

Section 2

JURISDICTIONAL DEMOGRAPHIC PROFILE

Historical Summary

Born in the late 1800's as a prosperous community along the new Southern Pacific Railroad between Los Angeles and San Francisco, Lancaster, California has evolved from a farming community to a host city to one of the premier aviation research and development regions of the nation. Lancaster is proud of its record of achievement and progress since its incorporation in 1977.

Much of Lancaster's historic population growth was directly related to the growth of the aerospace industry. Population growth was, to a large extent tied to the economic ups and downs of that industry. As employment at Edwards Air Force Base and Air Force Plant 42 expanded, local population growth increased. During times when spending for aerospace programs were curtailed, population growth decelerated.

During the 1980's, the Antelope Valley economy was transformed by the new growth incentive of affordable housing. With the advent of the affordable housing market, population growth became less dependent upon fluctuations in the local economy. While the aerospace industry has remained the largest local employer, it is no longer the primary growth inducer it once was. It now competes with the tremendous attraction that affordable housing holds for many first-time homebuyers, primarily from the Los Angeles area.

An examination of historic population growth reveals that Lancaster had a period of rapid expansion between 1950 and 1960 reflecting growth in the local aerospace industry, contrasted with a decade of little population growth between 1960 and 1970. The 1980s was another period of expansion. During this decade, the City population increased at an average annual rate of 10.3 percent. With the onset of the recession in 1991, Lancaster's growth rate again dropped averaging 2.2 percent per year between 2000 and 2010, from 2.2 to 3.2 percent per year. While Lancaster's growth rate has increased and decreased in response to short-term economic cycles, the City's share of total County population has steadily increased over the long term. In 1960, Lancaster's share of the total County population equaled 0.5 percent. However, by 2010 that share had increased to 1.6 percent.

Between 2000 and 2010, Lancaster's population increased 31.9 percent, from 118,718 to 156,333 persons, compared to an increase of 2.6 percent for Los Angeles. This reflects the continued growth that occurs in areas such as Lancaster, where land for development is more available.

Lancaster is becoming increasingly diverse, with percentage increases among the Hispanic, black, and Asian populations, as well as those that identify themselves as some other race and two or

more races. Those identified as Hispanic increased from 24 to 38 percent of the population, from the year 2000 to 2010.

Lancaster, with a population of over 156,333 residents and located at an elevation of 2,350 feet above sea level, has grown into a bustling urban destination. Downtown Lancaster has also experienced a great deal of change in recent years. In spite of the dissolution of the Redevelopment Agency in 2012, the City of Lancaster has continued its economic development efforts by attracting a variety of new restaurants, businesses, and housing opportunities to the downtown area.

The City and community members are making efforts to enhance Lancaster's future workforce. Enrollment at Antelope Valley College has increased, CSU Bakersfield has established a satellite campus, and the Lancaster University Center was founded to allow residents to obtain Bachelor's and Master's degrees right here in Lancaster.

These and other efforts have garnered various state and national awards for the City. The most notable of these include nineteen Helen Putnam Awards from the League of California Cities, A City Livability Award in 2000 recognizing outstanding achievement, leadership and special innovation from the United States Conference of Mayors, and the Eddy Award for Most Business-Friendly City from the Los Angeles County Economic Development Corporation in 2007 and again in 2014. Lancaster also received the 2007 American Public Works Association's Best Environmental Project Award from the High Desert Branch for its project, the Amargosa Creek Detention Basin Desedimentation and Habitat Preservation.

Demographic Summary

The primary sources for the demographic data used to prepare the Analysis of Impediments were the U.S. Census Bureau (2000), the American Community Survey 2006-2010, and the California Department of Finance.

Population Growth Summary

Table 2-1 shows historic population trends and growth rates for Lancaster. As described in the Lancaster Housing Element, an examination of historic population growth shows that Lancaster had a period of rapid expansion between 1950 and 1960 reflecting growth in the local aerospace industry, contrasted with a decade of little population growth between 1960 and 1970. The 1980s was another period of expansion. During this decade, the City population increased at an average annual rate of 10.3 percent. With the onset of the recession in 1991, Lancaster's growth rate again dropped averaging just 2.2 percent per year between 1990 and 2000 inclusive.

Lancaster experienced a modest increase in the growth rate between 2000 and 2010, from 2.2 to 3.2 percent per year. While Lancaster's growth rate has increased and decreased in response to short-term economic cycles, the City's share of total County population has steadily increased over

the long term. In 1960, Lancaster’s share of the total County population equaled 0.5 percent. However, by 2010 that share had increased to 1.6 percent.

**Table 2-1
Population History for Lancaster**

| Year | City of Lancaster Population | % of County Population | Average Annual Growth | Average Annual Growth Rate (%) | Los Angeles County Population | Average Annual Growth Rate (%) |
|------|------------------------------|------------------------|-----------------------|--------------------------------|-------------------------------|--------------------------------|
| 1950 | 10,250 | 0.2% | - | - | 4,151,687 | - |
| 1960 | 31,503 | 0.5% | 2,125 | 20.7% | 6,038,771 | 4.5% |
| 1970 | 33,460 | 0.5% | 196 | 0.6% | 7,032,075 | 1.6% |
| 1980 | 48,027 | 0.6% | 1,457 | 4.4% | 7,477,503 | 0.6% |
| 1990 | 97,291 | 1.0% | 4,926 | 10.3% | 8,863,184 | 1.9% |
| 2000 | 118,718 | 1.2% | 2,143 | 2.2% | 9,519,338 | 0.7% |
| 2010 | 156,633 | 1.6% | 3,792 | 3.2% | 9,818,605 | .3% |

Sources: Bureau of the Census, State Department of Finance, 2010 U.S. Census

Age and Sex Characteristics Summary

Table 2-2 provides a perspective of the City’s population by age distribution. In 2000, the largest age group was 35-44 representing 17.5 percent of the population. In 2010, the largest age group was 25-34 with 14.1 percent. In 2000, the largest senior age group was 65-74 representing 4.6 and in 2010 the largest senior age group was 65-74 representing 4.5 percent, which was not a significant change in this age group.

According to the 2010 Census, approximately 1 out of every 3 residents was under the age of 20. This likely reflected the increased number of families with young children living and working within the City. In addition, according to the 2010 Census 56.1 percent of the City’s population was under the age of 35 and 8.1 percent of the population over the age of 65.

Table 2-2
Age Distribution Profile of Lancaster

| Age Group | 2000 | | 2010 | |
|--------------|---------------|------------|----------------|------------|
| | Number | % of Total | Number | % of Total |
| Under 5 | 9544 | 8 | 12,484 | 8 |
| 5 to 9 | 11295 | 9.5 | 12,423 | 7.9 |
| 10 to 14 | 10970 | 9.2 | 13,188 | 8.4 |
| 15 to 19 | 10209 | 8.6 | 14,968 | 9.6 |
| 20 to 24 | 7650 | 6.4 | 12,704 | 8.1 |
| 25 to 34 | 16379 | 13.8 | 22,099 | 14.1 |
| 35 to 44 | 20830 | 17.5 | 20,476 | 13.1 |
| 45-54 | 13763 | 11.6 | 21,950 | 14 |
| 55 to 59 | 4438 | 3.7 | 7,775 | 5 |
| 60 to 64 | 3439 | 2.9 | 5,907 | 3.8 |
| 65 to 74 | 5466 | 4.6 | 7,022 | 4.5 |
| 75 to 84 | 3562 | 3 | 4,071 | 2.6 |
| 85 and over | 1173 | 1 | 1,566 | 1 |
| Total | 118718 | 100 | 156,633 | 100 |

Source: U.S. Census Bureau, 2000, 2010

Note: Totals may not add to 100% because of rounding

The 2000 Census reported 3,834 single-parent households with children under age 18 in Lancaster, representing 12.4 percent of all households in the City. Of these single-parent households, 2,907 were female-headed households, representing 3 out of every 4 single-parent households and 9.4 percent of all households. The percentage of female-headed households in Lancaster was slightly higher than in either the county or the state.

As Table 2-3 demonstrates, in Lancaster 73.7 percent of households are family households. This is 6.3 percent higher than Los Angeles County and 5.1 percent higher than California. Of these family households, 17 percent are female-headed households with no husband present, and 10.8 percent of these female-headed households have children under the age of 18.

**Table 2-3
Household Status (2010)**

| | Lancaster | | Los Angeles County California | | California | |
|--|---------------|---------------|----------------------------------|---------------|-------------------|---------------|
| | Estimate | Percent | Estimate | Percent | Estimate | Percent |
| Total Family households (families) | 33,585 | 73.70% | 2,170,227 | 67.40% | 8,495,322 | 68.60% |
| Nonfamily households | 11,998 | 26.30% | 1,047,662 | 32.60% | 3,897,530 | 31.40% |
| Total Households | 45,583 | 100% | 3,217,889 | 100% | 12,392,852 | 100% |
| Family Household Characteristics | | | | | | |
| Married-couple family | 22,871 | 50.20% | 1,465,486 | 45.50% | 6,166,334 | 49.80% |
| With own children under 18 years | 12,548 | 27.50% | 735,852 | 22.90% | 2,977,944 | 24.00% |
| Male householder, no wife present, family | 2,946 | 6.50% | 213,313 | 6.60% | 713,876 | 5.80% |
| With own children under 18 years | 1,645 | 3.60% | 90,266 | 2.80% | 332,166 | 2.70% |
| Female householder, no husband present, family | 7,768 | 17.00% | 491,428 | 15.30% | 1,615,112 | 13.00% |
| With own children under 18 years | 4,906 | 10.80% | 261,586 | 8.10% | 895,195 | 7.20% |
| Other Household Characteristics | | | | | | |
| Householder living alone | 9,670 | 21.20% | 822,194 | 25.60% | 3,022,366 | 24.40% |
| Households with one or more people under 18 years | 21,284 | 46.70% | 1,229,270 | 38.20% | 4,686,550 | 37.80% |
| Households with one or more people 65 years and over | 8,996 | 19.70% | 727,410 | 22.60% | 2,879,687 | 23.20% |

Source: US Census Bureau, ACS, 2006-2010

Race and Ethnicity Summary

Table 2-4 provides a breakdown of the 2000 and 2009 racial and ethnicity distribution of the City. From 2000 to 2009, there was one change in the ethnic characteristics of the City. Most notable was the increase in the Hispanic population. In 2000, Hispanics were 24.1 percent of the population. By 2009, the proportion of Hispanic residents had increased to 38 percent.

Lancaster, like many Southern California communities, has experienced changes in the racial and ethnic composition of residents over the past decade. One of the biggest changes has been the decrease in the population that identified themselves as “white.” From the year 2000 to 2010, those that identified themselves as white decreased significantly from 62.8 percent to 49.6 percent—a decrease of 13.2 percent.

**Table 2-4
Race and Ethnicity of Lancaster Residents**

| Race/Ethnic Category* | 2000 | | 2010 | |
|--|----------------|------------------|----------------|------------------|
| | Number | Percent of Total | Number | Percent of Total |
| RACE | | | | |
| White | 74,573 | 62.80% | 77,734 | 49.60% |
| Black or African American | 19,009 | 16% | 32,083 | 20.50% |
| American Indian and Alaska Native | 1,213 | 1% | 1,519 | 1% |
| Asian | 4,523 | 3.80% | 6,810 | 4.30% |
| Native Hawaiian and Other Pacific Islander | 278 | 0.20% | 362 | 0.20% |
| Some other race | 13,190 | 11.10% | 29,728 | 19% |
| Two or more races | 5,932 | 5% | 8,397 | 5.40% |
| Total population | 118,718 | 100% | 156,633 | 100 |
| <i>Ethnicity</i> | | | | |
| Hispanic/Latino (of any race) | 28,644 | 24.10% | 59,596 | 38% |
| Not Hispanic or Latino | 90,074 | 75.90% | 97,037 | 62% |
| Source: U.S. Census Bureau, US Census Bureau, 2010 | | | | |
| Note: Totals may not add to 100% because of rounding | | | | |

Racial Integration

Lancaster is becoming increasingly diverse, with percentage increases among the Hispanic, black, and Asian populations, as well as those that identify themselves as some other race and two or more races, see Table 2-5. Those identified as Hispanic increased from 24 to 38 percent of the population, from the year 2000 to 2010. With this understanding, the City should be sensitive to specific housing needs of various cultures, including those that choose to live as multi-generational household.

The City of Lancaster completed an analysis of race and ethnicity within its neighborhoods to determine if there were any areas of racial/ethnic minority concentration to create “Planning Strategies, Evaluation Process and Funding Decisions” for housing projects and programs funded by United States Department Housing & Urban Development (HUD).

| Table 2-5 Population by Race | | | | |
|--|-------------------|------------------|-------------------|------------------|
| Race | 2000 | | 2010 | |
| | Number of persons | Percent of total | Number of persons | Percent of total |
| White | 74,573 | 62.8% | 77,734 | 49.6% |
| Black or African American | 19,009 | 16.0% | 32,083 | 20.5% |
| American Indian and Alaska Native | 1,213 | 1.0% | 1,519 | 1.0% |
| Asian | 4,523 | 3.8% | 6,810 | 4.3% |
| Native Hawaiian and other Pacific Islander | 278 | 0.2% | 362 | 0.2% |
| Some other race | 13,190 | 11.1% | 29,728 | 19.0% |
| Two or more races | 5,932 | 5.0% | 8,397 | 5.4% |
| Total | 118,718 | 100% | 156,633 | 100% |
| Population by Race – Hispanic or Not Hispanic | | | | |
| Hispanic | 28,644 | 24.1% | 59,596 | 38.0% |
| Not Hispanic | 90,074 | 75.9% | 97,037 | 62.0% |
| White | 62,256 | 52.4% | 53,576 | 34.2% |
| Black or African American | 18,548 | 15.6% | 30,859 | 19.7% |
| American Indian and Alaska Native | 706 | 0.6% | 663 | 0.4% |
| Asian | 4,348 | 3.7% | 6,474 | 4.1% |
| Native Hawaiian and other Pacific Islander | 231 | 0.2% | 295 | 0.2% |
| Some other race | 426 | 0.4% | 621 | 0.4% |
| Total | 118,718 | 100% | 156,633 | 100% |

“A “Minority” is a racial or ethnic group, members of which have been subjected to prejudice or cultural bias by virtue of belonging to the group, without regard to individual qualities. Such groups include, but are not limited to:

- (1) African Americans. Persons having origins in any of the African racial groups of Africa.
- (2) Hispanic Americans. All persons of Mexican, Puerto Rican, Cuban, South or Central American, Caribbean and other Spanish or Portuguese culture or origin.
- (3) Native Americans. Persons having origins in any of the original peoples of North America or the Hawaiian Islands, in particular, American Indians, Eskimos, Aleuts and Native Hawaiians.
- (4) Asian-Pacific Americans. Persons having origins in Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the U.S. Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, Taiwan and India.

A “Minority Neighborhood” is a neighborhood in which any one of the following statistical conditions exists:

- (1) The percentage of households in a particular racial or ethnic minority group is at least 20 points higher than that minority’s percentage in the housing market as a whole;
- (2) The neighborhood’s total percentage of minority persons is at least 20 points higher than the total percentage of minorities for the housing market area as a whole; or
- (3) In the case of a metropolitan area, the neighborhood’s total percentage of minority persons exceeds 50 percent of its population.
 - a. A “Housing Market Area” most often corresponds to a Metropolitan Statistical Area (MSA). The City of Lancaster’s MSA is the County of Los Angeles.

The methodology for race reporting for the 2010 Census excludes “Hispanic or Latino” as a race, but reports “Hispanic or Latino” as an ethnicity instead. “Hispanic and Latino” refer to a multiracial ethnicity composed primarily of indigenous, European and African peoples and, most commonly, people of mixed race, including those described as “mestizo” (mixed European and indigenous heritage) and “mulato” (mixed European and African heritage).

For the purposes of race reporting, those who are Hispanic or Latino, often choose “white,” “some other race,” or “two or more races,” since “Hispanic or Latino” is not an option for race; however, they can report themselves as “Hispanic or Latino” in a separate ethnicity survey.

The reported percentages for race, including “White,” “Black or African American,” “American Indian and Alaska Native,” “Asian,” “Native Hawaiian and Other Pacific Islander,” “Some Other Race,” and “Two or More Races” will add up to 100%. The reported percentages for ethnicity, in terms of “Hispanic or Latino” or “Not Hispanic or Latino” will also add up to 100%. They are to be viewed as separate surveys, but together, they paint an overall picture of both race and ethnicity. This is the methodology that the US Census has chosen to use.

Upon review of the census data applicable to its neighborhoods, it was determined that the City of Lancaster has two areas of minority or ethnic concentration, located in Census tracts 9006.06 and 9007.04.

Following are the policies for HUD-funded affordable housing developments within the City of Lancaster:

1. Complies with the Federal Fair Housing Act and the duty to affirmatively further fair housing;

2. Expands housing choice for lower-income and minority family households;
3. Deconcentrates poverty and reduces residential racial segregation;
4. Proactively identifies and eliminates barriers to development tax credit housing for families in low-poverty areas; and
5. Provides incentives to promote the development of mixed income housing that includes both affordable and market-rate units.

Following are the procedures for HUD funded affordable housing developments within the City of Lancaster:

1. Encourage the siting of affordable family housing developments so that they expand housing choices available to lower-income families.
2. Mandate the use of affirmative marketing and tenant selection plans to ensure that affordable housing developed under city developments is operated in an inclusive and nondiscriminatory manner that, among other things, attracts populations less likely to apply.
3. Impose a duty on each affordable housing development to collect and maintain occupancy data by site on race and national origin, as well as the number of households using Housing Choice Vouchers.
4. Require that each affordable development establish and maintain an enforcement mechanism to ensure that affordable developments are not refusing to rent to applicants with Housing Choice Vouchers.
5. Define the essential elements of a “concerted community revitalization plan.” Any plan should place a high burden on an affordable housing developer to show how the proposed housing will contribute to revitalization and explain how it is objectively achievable within a specific time frame.”

Household Profile

Information on household characteristics aids in understanding changing housing needs. The Bureau of the Census defines a household as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, and unrelated individuals living together. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households.

Table 2-6 compares various household trends in Lancaster. Seventy-two percent (72 percent of the City's households were family households at the time of the 2000 Census. Perhaps the most significant change since 2000 was the percent change in married with children (39.9 percent change). Second, Lancaster also experienced an increase in the number of households that are single persons (38 percent change), representing 21.2 percent of the City's population. Together, those households that are Married without Children and Other Family comprise 43.7 percent of the City population. Non-family households include single persons and unrelated individuals sharing housing accommodations.

Household size identifies sources of population growth and/or overcrowding in individual housing units. A city's average household size will increase over time with an increase in larger families or may decline where the population is aging. In 2000, the average household size in Lancaster was 2.92, and it increased to 3.3 in 2011. This increase is attributable to the increase in the proportion of family households versus non-family households, which essentially remained the same over the five (5) year period covered by the ACS estimate. The data in Table 2-6 shows that City's average household size and number of family and non-family households.

Table 2-6
Household Size and Status

| Household Type | 2000 | | 2010 | | Percent Change |
|-------------------------------|---------------|---------------|---------------|---------------|----------------|
| | Number | Percent | Number | Percent | |
| Family Households | | | | | |
| Married With Children | 10,779 | 28.1% | 12,548 | 27.5% | +39.9% |
| Married Without Children | 7,301 | 19.1% | 9,202 | 20.2% | +19.4% |
| Other Families | 9,398 | 24.6% | 10,714 | 23.5% | +14.0% |
| Non-Family Households | | | | | |
| Single Persons | 6,995 | 18.3% | 9,670 | 21.2% | +38.2% |
| Non-Families | 3,784 | 9.9% | 3,449 | 7.6% | -8.8% |
| Total | 38,224 | 100.0% | 45,583 | 100.0% | +19.3% |
| Average Household Size | 3.10 | | 3.28 | | +5.8 |

Income Summary

In evaluating household income, households, are oftentimes grouped into different income groups in relation to the County Median Family Income (MFI) and adjusted for household size. This provided a useful comparison of changes in the City's household income distribution over time.

The City's income distribution is indexed to the Area Median Income (AMI) to provide a comparison of changes in Lancaster over time and relative to the larger county area. To analyze income

distribution, households are put into different income groups. HUD defines four categories of household income adjusted for household size:

- Extremely low income households with incomes equal to 30 percent or less of the AMI
- Very low income households with incomes of 31 percent to 50 percent of the AMI
- Low-income households with incomes of 51 percent to 80 percent of the AMI
- Moderate-income households with incomes of 80 percent to 120 percent of the AMI

The terms *very low, low, moderate, and above moderate income* are most often associated with the California Health and Safety Code or HUD definitions. The state’s low-income levels tend to be slightly higher than those of HUD. In either case, the income levels set the assistance threshold for many of the housing programs offered by the state or HUD.

Table 2-7 shows the distribution of household incomes for Lancaster, Los Angeles County and California for 2010, based on Census income data for 2010.

Lancaster had a similar percentage of households making less than \$35,000 than Los Angeles County. Only 32.3 percent of households in Los Angeles County earned less than \$35,000 in 2010, whereas 34.3 percent of households in Lancaster earned less than \$35,000. On the high end of the income spectrum, 18.8% percent of Lancaster households earned more than \$100,000 in 2010 compared to 24.9 percent of households in the county.

Although it appears that Lancaster’s income levels are close in comparison to Los Angeles County and the State of California, the City of Lancaster has a higher percentage of households earning \$25,000 or less.

Table 2-7
Household Income Distribution (2010)

| Income | Lancaster | | LA County | | California | |
|------------------------|---------------|----------------|------------------|----------------|------------------|----------------|
| | Households | % of Total | Households | % of Total | Households | % of Total |
| Less than \$10,000 | 4,106 | 9.00% | 199,280 | 6.20% | 329,646 | 3.90% |
| \$10,000 to \$14,999 | 2,983 | 6.50% | 186,531 | 5.80% | 259,632 | 3.10% |
| \$15,000 to \$24,999 | 4,814 | 10.60% | 338,792 | 10.50% | 698,102 | 8.20% |
| \$25,000 to \$34,999 | 3,734 | 8.20% | 314,841 | 9.80% | 721,699 | 8.50% |
| \$35,000 to \$49,999 | 6,567 | 14.40% | 422,011 | 13.10% | 1,039,938 | 12.20% |
| \$50,000 to \$74,999 | 9,085 | 19.90% | 567,038 | 17.60% | 1,510,291 | 17.80% |
| \$75,000 to \$99,999 | 5,742 | 12.60% | 386,173 | 12.00% | 1,162,671 | 13.70% |
| \$100,000 to \$149,999 | 5,728 | 12.60% | 432,762 | 13.40% | 1,459,066 | 17.20% |
| \$150,000 to \$199,999 | 1,669 | 3.70% | 178,048 | 5.50% | 645,076 | 7.60% |
| \$200,000 or more | 1,155 | 2.50% | 192,413 | 6.00% | 669,201 | 7.90% |
| Total | 45,583 | 100.00% | 3,217,889 | 100.00% | 8,495,322 | 100.00% |

Source: US Census Bureau, American Community Survey 2006-2010
Note: Totals may not add up to 100% because of rounding

Employment Summary

Local economic characteristics, although not directly related to fair housing, influence local housing needs. Like many cities across the country and particularly in California, Lancaster has been significantly affected by the economic downturn of recent years. As of the last census, Lancaster had an unemployment rate of 10.0%, which is higher than the 7.9% national average.

The unemployment rate for Lancaster remains high, as of October 2012, at 14.6 percent, compared to 10.3 percent for Los Angeles County. The unemployment rate is high due to the housing downturn that began in 2007, where many of those who lost work were employed in housing related industries, such as construction and real estate. Due to the slow recovery those jobs have not returned to the City of Lancaster.

Jobs Held by Residents

Those living in Lancaster work in a variety of sectors, including educational services, health care and social assistance, retail trade, and manufacturing. Many living in Lancaster continue to commute long distances for work. More than one-third of those employed commute more than 30 minutes each way to work.

Jobs-housing balance continues to be an important issue facing the growth of Lancaster. Many living in Lancaster continue to commute long distances for work. The expansion of local job opportunities and the diversification of the City's employment base remain critical for achieving economic self-sufficiency.

Major Employers

The Greater Antelope Valley Economic Alliance (GAVEA) published the largest employers of the Antelope Valley, including Lancaster, Palmdale, and other parts of Kern County, such as Mojave (see Table 2-8).

| Table 2-8 | |
|---|---------------------|
| Antelope Valley Largest Employers (2011) | |
| Company | Number of Employees |
| Edwards Air Force Base | 10,808 |
| China Lake Naval Weapons | 9,172 |
| County of Los Angeles | 3,953 |
| Lockheed Martin | 3,000 |
| Palmdale School District | 2,682 |
| Antelope Valley Hospital | 2,619 |
| Northrop Grumman | 2,573 |
| AV Union High School District | 2,037 |
| Wal-Mart (5) | 1,922 |
| California Correctional Institute | 1,915 |
| Bank of America | 1,863 |
| Antelope Valley Mall | 1,800 |
| California State Prison – LA County | 1,622 |
| Lancaster School District | 1,420 |
| Antelope Valley College | 1,304 |
| Kaiser Permanente | 929 |
| Jacobs Technology | 920 |
| Rio Tinto | 817 |
| Westside School District | 800 |
| Palmdale Regional Hospital | 782 |

Housing Summary

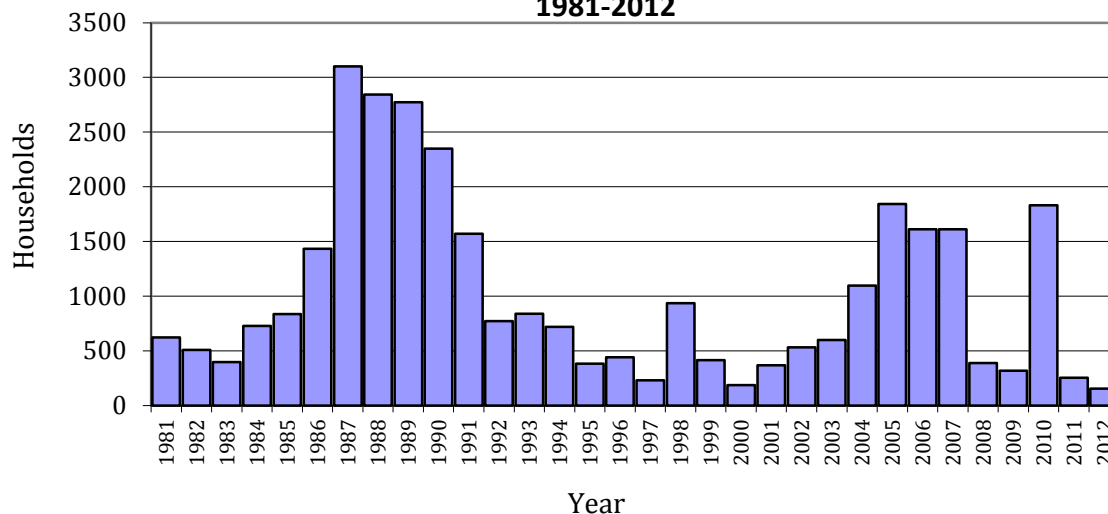
Fair Housing is also concerned with the availability of a range in types and prices of housing. This section provides an overview of the housing market and the dynamics affecting housing availability. Later sections of this report study build on the analysis and evaluate the City’s Zoning Ordinance and land use regulations to assess the status of fair housing in the community.

Available Housing Units Summary

Housing construction peaked in 2005 when the City issued 2,799 permits for housing units. Reflecting the housing downturn statewide and nationwide, permit issuance declined greatly since 2007. The City has averaged 272 annual housing permits over the last five years. Historically, over the last 33 years since 1980, the City has averaged 792 permits for housing units per year.

Household formation followed a similar trend to that of housing construction, with peaks in the late 1980s and the mid-2000s, see Table 2-9. The increase shown in 2010 reflects a reporting adjustment, as a result of Census 2010. Household formation for year 2010 more likely resembled the figures of the two years prior and the two years after. Between 1990 and 2000, household formation increased at an annual rate of 1.6 percent. Between 2000 and 2010, the rate increased slightly to 2.3 percent.

**Table 2-9
Lancaster Annual Household Formation
1981-2012**



The percentage of homeowners in Lancaster has experienced a slight decline from 62.9 percent in 1990 to 60.4 percent in 2010. Meanwhile, the percentage of single family homes has increased from 63.3 percent in 1990 to 71.1 percent in 2010. The data suggests that there are many renter households living in single-family structures, and points to need for the City to encourage the diversification of future housing construction, review Table 2-10.

**Table 2-10
Lancaster Housing Mix**

| | 1990 | | 2000 | | 2010 | |
|-----------------------------|--------|---------|---------|---------|---------|---------|
| | Number | Percent | Number | Percent | Number | Percent |
| Single-family | 22,925 | 63.3 | 28,222 | 67.6 | 36,879 | 71.1 |
| Multi-family | 9,191 | 25.4 | 10,029 | 24.0 | 11,073 | 21.4 |
| Mobile homes | 4,104 | 11.3 | 3,494 | 8.4 | 3,883 | 7.5 |
| Total housing units | 36,220 | | 41,745 | | 51,835 | |
| Occupied (total households) | 32,905 | | 38,224 | | 46,992 | |
| Vacancy | 9.15 | | 8.43 | | 9.34 | |
| Persons per household | 2.828 | | 2.922 | | 3.157 | |
| Household population | 93,041 | | 111,703 | | 148,374 | |
| Group quarter population | 4,259 | | 7,015 | | 8,259 | |
| Population | 97,300 | | 118,718 | | 156,633 | |

Source: CA Department of Finance

Household Characteristics Summary

From Table 2-11, the largest contrast we find is between the number of households that are owner-occupied (62.9 percent) and households that are renter-occupied (37.1 percent). Household characteristics also influence housing preferences and needs. For instance, single-person households or seniors often occupy smaller apartments or condominiums due to the lower cost and size of such homes. Families with children often prefer larger single-family homes. Understanding changes in household composition can thus provide insight into current and future housing needs.

**Table 2-11
Households by Tenure**

| | 1990 | | 2000 | | 2010 | |
|--------|--------|---------|--------|---------|--------|---------|
| | Number | Percent | Number | Percent | Number | Percent |
| Owner | 20,708 | 62.9 | 23,394 | 61.2 | 28,366 | 60.4 |
| Renter | 12,193 | 37.1 | 14,815 | 38.8 | 18,626 | 39.6 |
| Total | 32,901 | | 38,209 | | 46,992 | |

Source: US Census 2010

Housing Conditions Summary

Like any other asset, housing gradually deteriorates over time. If not regularly maintained housing can deteriorate into disrepair, depress neighboring property values, discourage reinvestment, and eventually impact quality of life in an entire neighborhood. Maintaining quality housing is thus an important community goal. This section therefore analyzes and discusses the age and condition of Lancaster housing and neighborhoods.

Lancaster’s housing stock consists of a variety of housing types. Table 2-12 shows the type and number of units in the City. A majority of the housing was single-family detached units (34,933) as of 2010. According to the US Census Bureau American Community Survey, between 2000 to approximately 2010, more than 7,676 single-family detached units were built in Lancaster making up nearly 15.3% of the total housing stock during that time. According to the US Census Bureau American Community Survey, between 2000 to approximately 2010, more than 3,095 multifamily housing units of 20 units or more were built in Lancaster, comprising over 6.2 % of the total housing stock during that time. After 1980, approximately 11,073 multifamily housing units were built, comprising over 65% of the total rental housing stock today.

Table 2-12
Composition of Housing Stock in Lancaster (2010)

| | Number | Percent |
|----------------------|---------------|----------------|
| Single Family | | |
| 1-unit, detached | 34,933 | 69.50% |
| 1-unit, attached | 808 | 1.60% |
| Multifamily | | |
| 2 units | 771 | 2% |
| 3 or 4 units | 2,244 | 5% |
| 5 to 9 units | 2,594 | 5.20% |
| 10 to 19 units | 2,027 | 4.00% |
| 20 or more units | 3,095 | 6.20% |
| Mobile home | 3,692 | 7.30% |
| Boat, RV, van, etc. | 71 | 0.10% |
| Total | 50,235 | 100.00% |

Source: U.S. Census Bureau, ACS 2006-2010

Table 2-13
Age of Housing Stock and Housing Stock Conditions by Tenure (2010)

| YEAR STRUCTURE BUILT | Lancaster | | LA County | | California | |
|---|---------------|----------------|------------------|----------------|-------------------|----------------|
| | Units | % of Total | Units | % of Total | Units | % of Total |
| Built 2005 or later | 3,707 | 7.40% | 54,241 | 1.60% | 453,148 | 3.30% |
| Built 2000 to 2004 | 3,969 | 7.90% | 109,255 | 3.20% | 966,431 | 7.10% |
| Built 1990 to 1999 | 8,743 | 17.40% | 208,791 | 6.10% | 1,436,836 | 10.60% |
| Built 1980 to 1989 | 14,943 | 29.70% | 403,248 | 11.80% | 2,115,180 | 15.60% |
| Built 1970 to 1979 | 8,050 | 16.00% | 496,376 | 14.50% | 2,522,733 | 18.60% |
| Built 1960 to 1969 | 2,838 | 6.00% | 518,500 | 15.10% | 1,901,791 | 14.00% |
| Built 1950 to 1959 | 6,271 | 12.50% | 722,473 | 21.10% | 1,929,414 | 14.20% |
| Built 1940 to 1949 | 982 | 2.00% | 396,035 | 11.60% | 910,656 | 6.70% |
| Built 1939 or earlier | 732 | 1.50% | 516,817 | 15.10% | 1,316,435 | 9.70% |
| Total Housing Units | 50,235 | 100.00% | 3,425,736 | 100.00% | 13,552,624 | 100.00% |
| HOUSING TENURE | | | | | | |
| Owner –occupied | 28,656 | 62.90% | 1,552,091 | 48.20% | 7,112,050 | 57.40% |
| Renter-occupied | 16,927 | 37.10% | 1,665,798 | 51.80% | 5,280,802 | 42.60% |
| Total Occupied housing units | 45,583 | 100.00% | 3,217,889 | 100.00% | 12,392,852 | 100.00% |
| YEAR HOUSEHOLDER MOVED INTO UNIT | | | | | | |
| Moved in 2005 or later | 19,828 | 43.50% | 1,068,344 | 33.20% | 4,436,890 | 35.80% |
| Moved in 2000 to 2004 | 12,240 | 26.90% | 800,529 | 24.90% | 3,077,886 | 24.80% |
| Moved in 1990 to 1999 | 8,555 | 18.80% | 708,413 | 22.00% | 2,562,082 | 20.70% |
| Moved in 1980 to 1989 | 3,000 | 6.60% | 297,160 | 9.20% | 1,136,926 | 9.20% |
| Moved in 1970 to 1979 | 1,076 | 2.40% | 192,428 | 6.00% | 693,693 | 5.60% |
| Moved in 1969 or earlier | 884 | 1.90% | 151,015 | 4.70% | 485,375 | 3.90% |

Source : U.S. Census Bureau, ACS 2006-2010

The age of housing is commonly used by State and federal agencies as a factor in estimating rehabilitation needs. Typically, most homes begin to require major repairs or have significant rehabilitation needs at 30 to 40 years of age.

According to the 2010 Census, a much higher percentage of housing in Lancaster was built after 1980, when compared to LA County and California. The highest production of new housing (29.7%) occurred within the City between 1980 and 1989. Although not definitive without a housing condition survey, having newer housing stock tends to indicate less substandard housing within Lancaster.

Cost Burden

Housing is generally the largest single expense item for households. Households that pay more than 30 percent of their gross income toward housing, including utilities are considered as overpaying or cost burdened. Households that pay more than 50 percent of their gross income are considered as severely overpaying. The majority of low-income, very low-income, and extremely low-income households overpays for housing and is cost burdened. Up to 60 percent of extremely low-income households pay over 50 percent of their income toward housing.

Among property owners, lower income households tend to overpay for housing more so than moderate income owners, see Table 2-14. The issue of housing overpayment is of greater concern among renters. For renter households making less than \$20,000 per year, 93 percent overpay for housing. Likewise, 85 percent of renter households making between \$20,000 and \$34,999 per year overpay. Meanwhile only 5 percent of households making \$75,000 or more per year pay more than 30 percent of their gross income toward housing, see Table 2-15.

Table 2-14
Housing Costs as a Percentage of Household Income – Owner Occupied Units (2011)

| Income / Percentage of Income Toward Housing | Number of Households | Percentage within Income Range |
|--|----------------------|--------------------------------|
| Less than \$20,000 | 2,827 | |
| Less than 20 percent | 356 | 13% |
| 20 to 29 percent | 236 | 8% |
| 30 percent or more | 2,235 | 79% |
| \$20,000 to \$34,999 | 2,981 | |
| Less than 20 percent | 559 | 19% |
| 20 to 29 percent | 291 | 10% |
| 30 percent or more | 2,131 | 71% |
| \$35,000 to \$49,999 | 3,805 | |
| Less than 20 percent | 872 | 23% |
| 20 to 29 percent | 472 | 12% |
| 30 percent or more | 2,461 | 65% |
| \$50,000 to \$74,999 | 6,202 | |
| Less than 20 percent | 1,528 | 25% |
| 20 to 29 percent | 1,560 | 25% |
| 30 percent or more | 3,114 | 50% |
| \$75,000 or more | 12,481 | |
| Less than 20 percent | 5,559 | 45% |
| 20 to 29 percent | 4,561 | 37% |
| 30 percent or more | 2,361 | 19% |
| Zero or negative income | 543 | |
| Total owner-occupied housing units | 28,839 | |

Table 2-15**Housing Costs as a Percentage of Household Income – Renter Occupied Units (2011)**

| Income / Percentage of Income Toward Housing | Number of Households | Percentage within Income Range |
|--|----------------------|--------------------------------|
| Less than \$20,000 | 5,974 | |
| Less than 20 percent | 48 | 1% |
| 20 to 29 percent | 358 | 6% |
| 30 percent or more | 5,568 | 93% |
| \$20,000 to \$34,999 | 2,997 | |
| Less than 20 percent | 170 | 6% |
| 20 to 29 percent | 289 | 10% |
| 30 percent or more | 2,538 | 85% |
| \$35,000 to \$49,999 | 2,968 | |
| Less than 20 percent | 158 | 5% |
| 20 to 29 percent | 1,142 | 38% |
| 30 percent or more | 1,668 | 56% |
| \$50,000 to \$74,999 | 2,576 | |
| Less than 20 percent | 632 | 25% |
| 20 to 29 percent | 1,301 | 51% |
| 30 percent or more | 643 | 25% |
| \$75,000 or more | 2,445 | |
| Less than 20 percent | 1,506 | 62% |
| 20 to 29 percent | 822 | 34% |
| 30 percent or more | 117 | 5% |
| Zero or negative income | 846 | |
| Total renter-occupied housing units | 18,460 | |

Overcrowded Housing

A household is defined as living in overcrowded housing conditions if the household has 1–1.5 people per room. The household is said to have severely overcrowded conditions if there are more than 1.5 people per room. In Lancaster, the 2010 Census found that 2,382 households encountered some degree of overcrowding. Of these, approximately 1,836 households lived in overcrowded conditions and 546 lived in severely overcrowded conditions per Table 2-16.

However, on a percentage basis, Lancaster’s overcrowding was less severe than that for Los Angeles County and California. Although Lancaster’s severe overcrowding for total occupied units was 1.2 percent, Los Angeles County and California experienced severe overcrowding of 4.7 percent and 2.7 percent, respectively.

Table 2-16
Overcrowding (2010)

| | Lancaster | | LA County | | California | |
|--|---------------|-------------|------------------|-------------|-------------------|-------------|
| | Units | % of Total | Units | % of Total | Units | % of Total |
| OCCUPANTS PER ROOM | | | | | | |
| 1.00 or less | 43,201 | 94.80% | 2,830,436 | 88.00% | 11,405,780 | 92.00% |
| 1.01 to 1.50 | 1,836 | 4.00% | 235,086 | 7.30% | 653,352 | 5.30% |
| 1.51 or more | 546 | 1.20% | 152,367 | 4.70% | 333,720 | 2.70% |
| Total Occupied housing units | 45,583 | 100% | 3,217,889 | 100% | 12,392,852 | 100% |
| Housing Tenure | | | | | | |
| Owner-occupied | 28,656 | 62.90% | 1,552,091 | 48.20% | 7,112,050 | 57.40% |
| Renter-occupied | 16,927 | 37.10% | 1,665,798 | 51.80% | 5,280,802 | 42.60% |
| Average household size of owner-occupied unit | 3.22 | (X) | 3.17 | (X) | 2.97 | (X) |
| Average household size of renter-occupied unit | 3.07 | (X) | 2.79 | (X) | 2.79 | (X) |
| Source: U.S. Census Bureau, ACS 2006-2010 | | | | | | |

The rise in multigenerational households to help cope with rising expenses and the loss of income associated with today’s economy could explain the increase in overcrowding. A U.S. Census Bureau report noted that in 2009, in households where kids lived with either or both parents, nearly 2 million households included both grandparents, another 2.8 million included a grandmother and another 655,000 included a grandfather, for a total of about 5.5 million multigenerational households.

Affordable Housing Summary

In recent years, the City has undertaken a number of projects to improve the supply of affordable housing through quality construction. In other projects, however, the City has addressed the need for affordable housing by facilitating the acquisition and rehabilitation of dilapidated projects into safe, decent, and affordable housing for Lancaster residents.

According to the federal government, rental housing is considered "affordable" if the people living there pay no more than 30 percent of their income for rent. According to mortgage lenders, a home is affordable if the mortgage payment is not more than 35 percent of the borrower's income. Therefore, affordability depends on income.

As seen in Table 2-17, approximately 53 percent of those housing units with a mortgage pay 30 percent or more of their income for housing costs. This is similar to rates in Los Angeles County (55.1 percent) and California (52.3 percent). In Lancaster 43.7 percent spend 35 percent or more of their income on their housing unit with a mortgage.

Those who live in housing units without a mortgage pay a much lesser percentage of their income on housing costs. For instance, 39 percent of monthly owners pay less than 10 percent of their household income for housing costs.

Lancaster residents pay a much higher rate (more than 30 percent of their income) for household rent. Approximately 62.4 percent of renters in Lancaster pay more than 30 percent of their household income on rent, while only 56.5 percent in Los Angeles County and 55 percent in California pay more than 30 percent or more of their household income. This shows that 7 percent more Lancaster residents are paying more than 30 percent of their household income on rent.

**Table 2-17
Housing Costs As A Percentage of Household Income**

| | Lancaster | | LA County | | California | |
|--|---------------|-------------|------------------|-------------|------------------|-------------|
| | Units | % of Total | Units | % of Total | Units | % of Total |
| SELECTED MONTHLY OWNER COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME (SMOCAP) | | | | | | |
| Housing units with a mortgage | | | | | | |
| Less than 20.0 percent | 4,698 | 21.00% | 256,481 | 21.50% | 1,205,339 | 22.40% |
| 20.0 to 24.9 percent | 2,958 | 13.20% | 144,603 | 12.10% | 699,082 | 13.00% |
| 25.0 to 29.9 percent | 2,894 | 12.90% | 134,883 | 11.30% | 654,725 | 12.20% |
| 30.0 to 34.9 percent | 2,077 | 9.30% | 115,857 | 9.70% | 549,693 | 10.20% |
| 35.0 percent or more | 9,792 | 43.70% | 542,581 | 45.40% | 2,261,640 | 42.10% |
| Total housing units with a mortgage | 22,419 | 100% | 1,194,405 | 100% | 5,370,479 | 100% |
| Housing unit without a mortgage | | | | | | |
| Less than 10.0 percent | 2,221 | 39.00% | 160,574 | 46.30% | 771,913 | 45.50% |
| 10.0 to 14.9 percent | 947 | 16.60% | 61,610 | 17.80% | 310,566 | 18.30% |
| 15.0 to 19.9 percent | 878 | 15.40% | 35,322 | 10.20% | 178,275 | 10.50% |
| 20.0 to 24.9 percent | 528 | 9.30% | 23,013 | 6.60% | 112,782 | 6.60% |
| 25.0 to 29.9 percent | 205 | 3.60% | 14,054 | 4.10% | 73,527 | 4.30% |
| 30.0 to 34.9 percent | 134 | 2.40% | 10,661 | 3.10% | 52,793 | 3.10% |
| 35.0 percent or more | 777 | 13.70% | 41,548 | 12.00% | 198,148 | 11.70% |
| Total housing units without a mortgage | 5,690 | 100% | 346,782 | 100% | 1,698,004 | 100% |
| GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME (GRAP) | | | | | | |
| Occupied units paying rent | | | | | | |
| Less than 15.0 percent | 943 | 6.00% | 150,160 | 9.40% | 485,739 | 9.70% |
| 15.0 to 19.9 percent | 1,392 | 8.90% | 169,363 | 10.60% | 558,976 | 11.10% |
| 20.0 to 24.9 percent | 1,588 | 10.10% | 186,329 | 11.70% | 615,756 | 12.30% |
| 25.0 to 29.9 percent | 1,954 | 12.50% | 186,656 | 11.70% | 596,289 | 11.90% |
| 30.0 to 34.9 percent | 1,256 | 8.00% | 144,276 | 9.00% | 474,176 | 9.40% |
| 35.0 percent or more | 8,523 | 54.40% | 757,818 | 47.50% | 2,294,341 | 45.70% |
| Total occupied units paying rent | 15,656 | 100% | 1,594,602 | 100% | 5,025,277 | 100% |

Source: U.S. Census Bureau, ACS 2006-2010

Notes: Excludes units where monthly owner costs or gross rent could not be computed, accounting for possible differences with total occupied housing units from other survey numbers. May not add to 100% due to rounding.

As Table 2-18 demonstrates, there were approximately 4,925 Low Income Housing Tax Credit (LIHTC) affordable units as of July of 2011. Approximately 949 units total were specifically designated for senior residents. Arbor court designated 35% of its units to disabled residents. A total of approximately 2203 units were available only to those with an income at or below 50 percent of AMI.

Based on the US Census numbers provided earlier, there are 45,583 occupied housing units in the City. With a total of 4,925 multi-family units contracted as affordable housing units, approximately 10.8 percent of total occupied units in the City of Lancaster receive some form of assistance for housing costs.

**Table 2-18
Assisted Multi-Family Affordable Housing Units**

| Project Name | Type of Tenants | 0-25% AMI | 26-30% AMI | 31-50% AMI | 51-60% AMI | 61-75% AMI | 76-80% AMI | 81-120% AMI | Total Affordable Units |
|--|-----------------|-----------|------------|-------------|------------|------------|-------------|-------------|------------------------|
| | | (Units) | (Units) | (Units) | (Units) | (Units) | (Units) | (Units) | |
| Brierwood MHP | All | | | 62 | | | 239 | 63 | 364 |
| Desert Sands MHP | All | | | 25 | | | 91 | 7 | 123 |
| Friendly Village MHP | All | | | 366 | | | 54 | 44 | 464 |
| Hacienda MHP | All | | | 185 | | | 55 | 24 | 264 |
| Willows Apartments | All | | | | | | 72 | 22 | 94 |
| Woodcreek Garden | All | | | 58 | | | 83 | 35 | 176 |
| Sunset Creek | All | | | 311 | 474 | | 407 | | 1192 |
| Montecito Apartments | All | | | 30 | | | 30 | | 60 |
| Newporter Apartments | All | | | | | | 59 | | 59 |
| Westpark Villas Apts | All | | | 35 | | | 34 | | 69 |
| High Valley Apts | All | | | | | | 65 | | 65 |
| Antelope Pines | All | | | | | | 134 | 50 | 184 |
| Silver Winds | Senior | | | 29 | | | | | 29 |
| Sierra Retirement Village | Senior | | 96 | | | | | | 96 |
| Cedar Creek | Senior | | | 42 | | | 95 | | 137 |
| Auroa Village | Senior | | | | | | | | 0 |
| Arbor Gardens-NC | Senior | | | 32 | 120 | | | | 152 |
| Arbor GardensRehab | Senior | | | 16 | 56 | 8 | | | 80 |
| Aurora Village II | Senior | | | 78 | | | 77 | | 155 |
| Arbor Grove | Senior | | 15 | 90 | 45 | | | | 150 |
| Laurel Crest | All | | | 90 | | | 90 | | 180 |
| Arbor Court | 35% disabled | 16 | 16 | 52 | | | | | 84 |
| Poppyfield | All | | 35 | 155 | | | | | 190 |
| Arbor Lofts | All | | 8 | 48 | 24 | 4 | | | 84 |
| Essex Apartments | Senior | 15 | | 134 | 1 | | | | 150 |
| Arbor on Date | All | | | 24 | 36 | | 60 | | 120 |
| Sagebrush I | All | | 8 | 48 | 28 | | | | 84 |
| Sagebrush II | All | | 12 | 72 | 36 | | | | 120 |
| | | | | | | | | | |
| Totals | | 31 | 190 | 1982 | 820 | 12 | 1645 | 245 | 4925 |
| Source: City of Lancaster | | | | | | | | | |
| Note: AMI refers to Area Median Income | | | | | | | | | |

Special Housing Needs Summary

The Americans with Disabilities Act defines a disability as a “physical or mental impairment that substantially limits one or more major life activities”. People with disabilities have special housing needs because of their fixed income, higher health cost, and need for accessible and affordable housing. These residents have more difficulty finding decent and affordable housing or receiving fair housing treatment due to special circumstances.

Some physical disabilities include loss or impairment of limbs, disabling disease or condition, or impairment of speech, hearing or sight, and the developmentally disabled. The most common special housing needs of the disabled are affordability and access.

Persons with Disabilities also include those that are developmentally disabled which include persons who exhibit mental retardation, cerebral palsy, epilepsy, autism or other conditions similar to persons with mental retardation.

Elderly

Approximately 15.4 percent of Lancaster households are elderly households, even though only 8.1 percent of Lancaster’s population is 65 years of age and older. Although the elderly tend to have higher homeownership rates compared to the general population, many elderly householders still experience housing problems and housing cost burdens. The median income for elderly householders age 65 and over is \$33,450. Over 80 percent of households making less than \$35,000 per year overpay for housing, spending at least 30 percent of their income toward housing, therein elderly are characterized as a special needs group.

Large Families and Female Headed Households

Large family households are characterized as a special needs group because they require a greater number of rooms per dwelling unit to avoid overcrowding. The American Community Survey indicates that up to 19 percent of all Lancaster households are large households with five persons or more (8,926 out of 47,299 households). By comparison, only 8 percent of Lancaster households live in a dwelling unit with five or more bedrooms; however, more than 27 percent of households live in a dwelling unit with four bedrooms.

Incomes of larger households, with five or more persons, are comparable to incomes of smaller households, with one to four persons. The median income for larger households ranges from \$50,417 to \$88,516. However, larger households, tend to have a lower home ownership rate than smaller households. Over 43 percent of larger households are renter households, compared to 38 percent for smaller households.

Female headed householders make up 32 percent of all Lancaster households and approximately 40 percent of all female headed households have children less than 18 years of age. These households

generally have lower incomes and may lack the resources needed for adequate child care or job training services, often making the search for affordable, decent and safe housing more difficult. Female family households with no husband present had an annual median income of \$28,610 and female non-family households had a median income of \$23,005. These figures are significantly lower than the annual median income of \$50,316 for all Lancaster households. This information indicates the need for social and housing services specific to female headed households.

Farmworkers

The State of California requires jurisdictions to consider farmworkers when assessing housing needs because farmworkers tend to have significant housing problems that result from high rates of poverty and overcrowding.

According to the 2007-2009 American Community Survey, an estimate of 270 persons residing in Lancaster were reported to be working in the agricultural industry, including supervisors (ACS Table B24010). Also, the Greater Antelope Valley Economic Alliance reports an employment of 555 persons in the agricultural and mining industries for 2010 (Los Angeles County – Antelope Valley). Agriculture in Lancaster has declined during the past decades and is expected to continue to do so as the City continues to urbanize. Census 2010 reports an estimate of 99 percent of Lancaster housing units as within an urban area (51,441 out of 51,835), and just 1 percent of housing units (394 out of 51,835) as within a rural area.

The farmworker population in Lancaster is not expected to require significant amounts of additional housing in the future. However, the City recognizes that farmworker households exist, and will continue to implement policies to encourage and facilitate the construction of farmworker housing. These housing units may be accessory dwelling units located on properties within the Rural Residential zone, in those cases where the land is under active commercial agricultural production.

Families and Persons in Need of Emergency Shelters

According to Housing and Urban Development (HUD), a person is considered homeless only when he or she resides in one of the following places described below at the time of the count. An unsheltered homeless person resides in a place not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, or on the street. A sheltered homeless person resides in an emergency shelter or in transitional housing for homeless persons who originally came from the streets or emergency shelters.

The 2013 Greater Los Angeles Homeless Count Report indicates approximately 6,957 homeless persons in the Antelope Valley. This is a significant increase compared to the 2011 LAHSA count of 1,412 homeless persons; however, much of this can be attributed to the counting methodology, which now includes the “hidden homeless.” The hidden homeless avoid emergency shelters and generally avoid interference with a homeless lifestyle that most often involves camping in the open

desert. Of the 6,957 homeless persons reported for the Antelope Valley, 4,843 are the hidden homeless, and 2,114 are from shelter and street counts.

Of the 2,114 persons from shelter and street counts, 851 persons are from counts specifically within Lancaster. The Opt-in Summary Reports from LAHSA shows 699 unsheltered homeless persons and 152 sheltered homeless persons for Lancaster. The counts for unsheltered homeless mostly represent single adults; and others included in the count are derived numbers from the number of cars, vans, campers/RVs, tents and encampments that were counted and reported.

Table 2-19 shows information from the 2010 American Community Survey, 1-Year Estimates, on the number of individuals with disabilities in Lancaster by age group. Approximately 9.7 percent of the total civilian non-institutionalized population in Lancaster were reported to have some form of disability. Out of 47,674 individuals under the age of 18, approximately 3.8 percent were reported to have some form of disability. A larger percentage at 7.8 percent for those individuals aged between 18-64 years old. The age group with the highest percentage of individuals with disabilities were seniors over the age of 65. Out of 13,743 seniors, approximately, 5,893 or 42.9 percent were reported to have some form of disability.

**Table 2-19
Persons with Disabilities in Lancaster**

| | Estimate | Percent |
|--|---------------|--------------|
| Total Civilian Non-institutionalized Population | 151,374 | |
| Under 18 years | 47,674 | |
| With a disability | 1,815 | 3.80% |
| 18 to 64 years | 89,957 | |
| With a disability | 6,981 | 8% |
| 65 years and over | 13,743 | |
| With a disability | 5,893 | 42.90% |
| Total Number of Population with Disability | 14,689 | 9.70% |

Source: 2010 American Community Survey, 1-year Estimates

Section 3

PRIVATE SECTOR POLICIES AND PRACTICES

Fair housing opportunity is covered by Federal and State regulations and court decisions that prohibit discrimination in the rental, sale, negotiation, advertisement, or occupancy of housing on the basis of protected class. Implementation of fair housing practices is achieved through a network of realtors, apartment associations, housing associations, fair housing providers, and the courts. This chapter provides an overview of the private sector housing industry in Lancaster and its interrelationship with fair housing choice and equal housing opportunity.

Discriminatory practices in home mortgage lending have evolved in the past five to six decades. In the 1940s and 1950s, racial discrimination in mortgage lending was easy to spot. From government-sponsored racial covenants to the redlining practices of private mortgage lenders and financial institutions, ethnic minorities were denied access to home mortgages in ways that severely limited their ability to purchase a home. By employing high pressure sales practices and deceptive tactics, some mortgage brokers pushed minority borrowers into high-cost subprime mortgages that were not well suited to their needs and led to financial problems. According to data from the 2007 Home Mortgage Disclosure Act (HMDA), four of every 10 home purchase mortgages issued to minorities in 2006 were subprime loans twice the number of subprime loans issued to White borrowers.

Owner Occupied Housing

Part of the American dream involves owning a home in a good neighborhood near schools, parks, shopping centers, jobs and other community amenities. Homeownership strengthens individual households and entire neighborhoods because owner-occupants have made an investment in their own personal property as well as the neighborhood and community. This fosters a greater sense of pride in the appearance and condition of not only the home but of the neighborhood as well. It also promotes owner involvement in the community because owner-occupants have a personal stake in the area and tend to be more active in decisions affecting the community. Fair housing opportunity laws protect an individual or family's right to occupy suitable housing in any location. Ensuring fair housing is an important way to not only preserve but to improve the housing opportunities for all residents in Lancaster.

The Homeownership Process

Purchasing a home presents many challenges to the would-be owner. One of the main challenges in buying a home is the process by which an individual or family must acquire the property. The time required to find a home, the major legal and financial implications surrounding the process, the number of steps required and financial issues to be considered can be overwhelming to prospective buyers. Throughout this time consuming and costly process, fair housing issues can surface in many ways. Discriminatory practices in the home buying process can occur through the:

- Advertising of homes for sale;
- Lending process;
- Appraisal process;
- Actions of real estate agents and sellers; and
- The issuance of insurance.

Advertising

The first thing a potential buyer is likely to do when evaluating a home purchase is search advertisements either in magazines, in newspapers or via the Internet to get a feel for what the market offers. Language in advertising is sometimes an issue within the realm of real estate. Advertisements cannot include discriminatory references such as the use of words describing current or potential residents or the neighbors or the neighborhood in racial or ethnic terms. Some commonly used statements that are discriminatory include the following:

- Adults preferred
- Perfect for empty nesters
- Conveniently located by a particular church
- Ideal for married couples without kids

Even the use of models in ads has been questioned, based on the idea that it appears to appeal to a certain race. In addition, selecting media or locations for advertising that deny information on listings to certain segments of the housing market could also be considered discriminatory. Even if an agent does not intend to discriminate in an ad, it would still be considered a violation to suggest to a reader whether a protected class is preferred. In cities where there is a sizable Hispanic population, the homeownership process offers opportunities for fair housing violations to arise due to the natural tendency to advertise in a specific language such as Spanish. Although the advertisements might not violate fair housing laws, these advertisements could limit opportunities for other racial/ethnic groups to find housing. Recent litigation has set a precedent for violations in advertisements that hold publishers, newspapers, the Multiple Listing Service, real estate agents and brokers accountable for discriminatory ads. As a reminder to choose words carefully, the Multiple Listing Service now prompts a fair housing message when a new listing is being added.

Lending

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, a credit check, an analysis of ability to repay and the amount for which one is eligible, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA), however, there is no guarantee that individual loan officers or underwriters will not misuse the information. A report on mortgage

lending discrimination by the Urban Land Institute outlines four basic stages in which discrimination can occur:

- Advertising and outreach
- Pre-application inquiries
- Loan approval/denial and terms/conditions
- Loan administration

A number of different individuals take part in the various stages of this process, and any of them could potentially discriminate. Further areas of potential discrimination include differences in the level of encouragement, financial assistance, types of loans recommended, amount of down payment required and level of customer service provided.

Real Estate Agents

Finding a real estate agent is normally the next step, which can be done by looking in newspapers, searching the Internet and primarily through referrals. The agent will find the home that fits a buyer's needs, desires and budget based on the amount they are qualified for by the lending institution. Realtors may act as agents of discrimination by unintentionally or even intentionally steering potential buyers to or from a particular neighborhood. In a jurisdiction with a significant Hispanic population, a real estate agent might assume that a non-Hispanic buyer would not be interested in living in the city or that Hispanic buyers would prefer living in a Hispanic community. This situation could also apply to other protected classes who might be steered away from certain areas on the presumption that they might not want to live there based on the existing demographic makeup of the neighborhood.

Agents might also discriminate by whom they agree to represent, whom they turn away and the comments they make about their clients. However, the California Association of Realtors (CAR) has included language on many of its forms disclosing fair housing laws to those involved. Many realtor associations also host fair housing trainings and seminars to educate their members on the provisions and liabilities of fair housing laws. The Equal Opportunity Housing Symbol is also located on all forms as a reminder.

Appraisals

Banks order appraisal reports to determine whether a property is worth the amount of the loan requested. Generally speaking, appraisals are based on the comparable sales of properties surrounding the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made and location. Some neighborhoods with higher concentrations of minorities might appraise lower than like properties in neighborhoods with lower concentrations. Unfortunately, this practice is geared toward a neighborhood and not an applicant and therefore is not a direct violation of fair housing law that can easily be addressed. One effect of this practice, however, is that it tends to keep property

values lower in a given neighborhood, thereby restricting the amount of equity and capital available to those residents. Individual appraisers are the ones making the decisions on the amounts, thus there is room for flexibility in the numbers. As appraisers are individually licensed, similar to real estate agents, they risk losing their license for unfair practices.

Sellers

A seller might not want to sell his/her house to certain purchasers based on classification biases protected by fair housing laws, or he/she might want to accept offers only from a preferred group. Often, sellers are home when agents show the properties to potential buyers and could develop certain biases based on this contact. Sellers must sign the Residential Listing Agreement and Seller's Advisory forms, which disclose that a seller understands fair housing laws and practices of nondiscrimination. Yet enforcement is difficult because a seller may have multiple offers and choose one based on a bias.

Home Loan Activity

In the past, fair lending practices were not always employed by financial institutions. Credit market distortions and other activities such as redlining prevented some groups from equal access to credit. The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community. The CRA is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low- and moderate-income neighborhoods. The CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions.

In tandem with the CRA, the HMDA, initially enacted in 1975 and substantially expanded in 1989, required banks to disclose detailed information about their mortgage lending. The law aimed to curb discrimination in such lending to create more equal opportunity to access credit. The disclosure requirement compelled banks, savings and loan associations and other lending institutions to report annually the amounts and geographical distribution of their mortgage applications, origins and purchases disaggregated by race, gender, annual income and other characteristics. The data, collected and disclosed by the Federal Financial Institutions Examination Council (FFIEC), were made available to the public and to financial regulators to determine if lenders were serving the housing needs of the communities where they were located.

Detailed FFIEC data for conventional and government-backed home purchase and home improvement loans in Lancaster are presented in Tables 3-1 and 3-2. The FFIEC data provide some insights regarding the lending patterns that exist in a community. However, the data are only an indicator of potential problems; the data lack the financial details of the loan terms to conclude definite redlining or discrimination.

Conventional versus Government-Backed Financing

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loan associations and thrift institutions. To assist low- and moderate-income households that might have difficulty in obtaining home mortgage financing in the private market due to income and equity issues, several government agencies offer loan products that have below market rate interest and are insured (“backed”) by federal agencies. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA) and the Rural Housing Services/Farm Service Agency (RHA/FSA). Often, government-backed loans are offered to consumers through private lending institutions. Local programs such as first-time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements.

Conventional Loans

According to the Federal Financial Institutions Examination Council (FFIEC) data for 2010, approximately 2,894 households (for a total of \$409,255,000) applied for conventional loans in the City of Lancaster based on census tracts numbers. Among all applications received that year, the percentage of loans originated was 49.4 percent, and the percentage of applications denied was 21.5 percent.

The amount of loans is based on FFIEC data that uses Census tracts numbers to determine HMDA data. Not all census tract numbers match City of Lancaster City borderlines, so some Census Tract information may include individuals that fall within a census tract number but might not necessarily be living within the City border and vice versa.

When broken down by race and ethnicity for the City of Lancaster, participation in the housing market differed at varying levels. Whites participated at the highest level, submitting 1948 conventional loan applications amounting to \$280,687,000. Pacific Islanders were the lowest participants in the conventional loan market, only submitting 15 applications in 2010, for a total of \$1,493,000.

In the City of Lancaster Whites also had the highest conventional loan origination rate of 51 percent followed by 50 percent for Asians, 46.1 percent for African Americans, 45.1 percent for Hispanic/Latinos, 40 percent for Pacific Islanders, and the lowest loan origination rate 32.1 percent for American Indians.

When it comes to conventional loan applications being denied in the City of Lancaster, there was more variation than with government-backed loans when compared across race and ethnicity. African Americans had the highest denial rate at 28.4 percent followed by Pacific Islanders at 26.7 percent, Hispanic/Latinos at 24.2 percent, and Whites at 21.1 percent. American Indians had the lowest percentage of applications denied at 14.3 percent.

Government-Backed Loans

According to the FFIEC data, approximately 4926 households (for a total of \$830,336,000) applied for government-backed loans (FHA, VA, FSA or RHS loans) in the City of Lancaster based on census tracts numbers. Among all applications received that year, the percentage of loans originated was 46.4 percent, and the percentage of applications denied was 12.2 percent.

Also that year, when broken down by race and ethnicity, participation in the market varied. Whites once again had the highest participation levels, similar to conventional loans, submitting 2976 government-backed loan applications, amounting to \$514,589,000. Pacific Islanders were the lowest participants in government-backed loans with only 26 applications submitted in 2010, for a total amounting to \$4,747,000.

Whites also had the highest loan origination rate of 47.1 percent followed by 46 percent for Hispanic/Latinos, 45.5 percent for African Americans, 43.8 percent for American Indians, and 39.3 percent for Asians. The lowest government-backed loan percentage rate was for Pacific Islanders at 34.6 percent.

When it comes to government-backed loan applications being denied, the applications denied across race and ethnicity categories varied significantly less than for conventional loans. The denial rates were never more than 6 percentage points apart. For instance, Asians had the highest denial rate at 16.8 percent, followed by African Americans at 15.6 percent, Pacific Islanders at 15.4 percent, Hispanic/Latinos at 13.1 percent, and American Indians at 12.5 percent. The lowest denial rate for government-backed loans was for whites at 11.2 percent.

Table 3-1
Loan Application Number by Race and Ethnicity (2010)

| | Apps Received | Loans Originated | Apps Approved, not accepted | Apps Denied | Apps Withdrawn | Files Closed for Incompleteness | Loan Purchased By Institution | Preapproval Request not Accepted |
|---------------------------|---------------|------------------|-----------------------------|-------------|----------------|---------------------------------|-------------------------------|----------------------------------|
| | Number | Number | Number | Number | Number | Number | Number | Number |
| American Indian | | | | | | | | |
| Conventional | 28 | 9 | 2 | 4 | 10 | 2 | 0 | 1 |
| FHA, VA, FSA or RHS loans | 48 | 21 | 2 | 6 | 6 | 0 | 13 | 0 |
| Asian | | | | | | | | |
| Conventional | 232 | 116 | 9 | 36 | 22 | 23 | 26 | 0 |
| FHA, VA, FSA or RHS loans | 107 | 42 | 3 | 18 | 14 | 6 | 24 | |
| African American | | | | | | | | |
| Conventional | 141 | 65 | 10 | 40 | 14 | 2 | 10 | 0 |
| FHA, VA, FSA or RHS loans | 385 | 175 | 12 | 60 | 23 | 8 | 107 | 0 |
| Pacific Islander | | | | | | | | |
| Conventional | 15 | 6 | 1 | 4 | 2 | 0 | 2 | 0 |
| FHA, VA, FSA or RHS loans | 26 | 9 | 3 | 4 | 2 | 0 | 8 | 0 |
| White | | | | | | | | |
| Conventional | 1948 | 994 | 115 | 411 | 170 | 73 | 185 | 0 |
| FHA, VA, FSA or RHS loans | 2976 | 1403 | 105 | 334 | 231 | 52 | 850 | 1 |
| Hispanic or Latino | 1914 | | | | | | | |
| Conventional | 530 | 239 | 32 | 128 | 53 | 17 | 60 | 1 |
| FHA, VA, FSA or RHS loans | 1384 | 637 | 47 | 181 | 91 | 17 | 410 | 1 |
| Totals | | | | | | | | |
| Conventional | 2894 | 1429 | 169 | 623 | 271 | 117 | 283 | 2 |
| FHA, VA, FSA or RHS loans | 4926 | 2287 | 172 | 603 | 367 | 83 | 1412 | 2 |

Source: Federal Financial Institutions Examination Council (FFIEC)

Apps: Applications; FHA: Federal Housing Administration; FSA: Farm Service Agency; RHS: Rural Housing Services; VA: Veterans Administration

Note: Not all applications have race/ethnicity available. The ethnicity Hispanic/Latino overlaps with other groups.

Note: Data based on census tract data that follows City boundaries as close as possible, but there may be census tract data that falls outside of official City boundaries and vice versa.

**Table 3-2
Loan Application Number by Race and Ethnicity
in the Lancaster Area By Thousands of Dollars (2010)**

| | Apps Received | Loans Originated | Apps Approved, not accepted | Apps Denied | Apps Withdrawn | Files Closed for Incompleteness | Loan Purchased By Institution | Preapproval Request not Accepted |
|---------------------------|---------------|------------------|-----------------------------|---------------|----------------|---------------------------------|-------------------------------|----------------------------------|
| | 000s | 000s | 000s | 000s | 000s | 000s | 000s | 000s |
| American Indian | | | | | | | | |
| Conventional | 3617 | 1226 | 310 | 108 | 1565 | 296 | 0 | 112 |
| FHA, VA, FSA or RHS loans | 7622 | 3174 | 344 | 1099 | 1094 | 0 | 1911 | 0 |
| Asian | | | | | | | | |
| Conventional | 39647 | 19138 | 1397 | 6591 | 3914 | 3539 | 5068 | 0 |
| FHA, VA, FSA or RHS loans | 19210 | 7643 | 782 | 2909 | 2216 | 1297 | 4363 | 0 |
| African American | | | | | | | | |
| Conventional | 18773 | 8701 | 1240 | 4152 | 2707 | 240 | 1733 | 0 |
| FHA, VA, FSA or RHS loans | 71426 | 30995 | 2262 | 11663 | 5329 | 1815 | 19362 | 0 |
| Pacific Islander | | | | | | | | |
| Conventional | 1493 | 842 | 99 | 250 | 110 | 0 | 192 | 0 |
| FHA, VA, FSA or RHS loans | 4747 | 1689 | 482 | 851 | 290 | 0 | 1435 | 0 |
| White | | | | | | | | |
| Conventional | 280687 | 141438 | 15535 | 54918 | 26021 | 12959 | 29816 | 0 |
| FHA, VA, FSA or RHS loans | 514589 | 243861 | 16673 | 56594 | 39599 | 9463 | 148314 | 85 |
| Hispanic or Latino | | | | | | | | |
| Conventional | 65038 | 28500 | 3135 | 14844 | 7082 | 1723 | 9642 | 112 |
| FHA, VA, FSA or RHS loans | 212742 | 97028 | 6811 | 28100 | 14109 | 2239 | 64370 | 85 |
| Totals | | | | | | | | |
| Conventional | 409255 | 199845 | 21716 | 80863 | 41399 | 18757 | 46451 | 224 |
| FHA, VA, FSA or RHS loans | 830336 | 384390 | 27354 | 101216 | 62637 | 14814 | 239755 | 170 |

Source: Federal Financial Institutions Examination Council (FFIEC)

Apps: Applications; FHA: Federal Housing Administration; FSA: Farm Service Agency; RHS: Rural Housing Services; VA: Veterans Administration

Note: Not all applications have race/ethnicity available. The ethnicity Hispanic/Latino overlaps with other groups.

Note: Data based on census tract data that follows City boundaries as close as possible, but there may be census tract data that falls outside of official City boundaries and vice versa.

An analysis of differences in loan approval rates by race/ethnicity and income separately does not always reveal important differences among groups. For this reason, an analysis of lending patterns for race/ethnicity and income together helps reveal differences among applicants of different races/ethnicities of the same income levels. Although this analysis provides a more in-depth look at lending patterns, it still cannot provide a reason for any discrepancy. Aside from income, many other factors can contribute to the availability of financing, including credit history, the availability and amount of a down payment and knowledge of the home-buying process, among others. The FFIEC data does not provide insight into these and many other factors. However, the City should continue to monitor the approval rates among ethnic groups and continue to take appropriate

actions to remove barriers to financing, including credit counseling, down payment assistance and homebuyer education programs.

According to Table 3-3, when compared to their percentage of total population, there is no significant underrepresentation among Hispanics, Asians or American Indians in the homeownership market within the City of Lancaster. Whites, however, are significantly overrepresented by more than 13 (13.4) percentage points. Conversely, African Americans are underrepresented in the homeownership market with a difference of nearly 14 (13.8) percentage points less than their total population, the highest differential among all race/ethnic groups.

**Table 3-3
Loan Applications versus Population
by Race and Ethnicity in Lancaster (2010)**

| Race and Ethnicity | % of Total Applications | % of Total Population |
|--------------------|-------------------------|-----------------------|
| American Indian | 1.0% | 1.0% |
| Asian | 4.3% | 4.3% |
| African American | 6.7% | 20.5% |
| Pacific Islander | 0.5% | 0.2% |
| White | 63.0% | 49.6% |
| Hispanic or Latino | 24.5% | 24.1% |

Source: Federal Financial Institutions Examination Council (FFIEC); US Census Bureau, 2010
 Note: May not add to 100% because of rounding.

Conventional versus Government-Backed Home Loans

During the housing boom experienced in the early 2000s, low-income households had a much better chance of getting a conventional loan than a government-assisted loan. The lending market offered subprime loan options such as zero percent down, interest-only and adjustable rate mortgages. As a result, government-backed loans, with comparably more stringent requirements and higher fees, became a less attractive option for many households.

However, as adjustable-rate mortgages began to reset at higher interest rates (causing higher monthly payments), mortgage delinquencies soared and many households faced foreclosure. In response, the federal government in September 2007 created a government-insured foreclosure avoidance initiative, FHA Secure, to assist tens of thousands of borrowers nationwide in refinancing their subprime home loans.

According to the 2010 FFIEC data, 63 percent of all applications that year within Lancaster were for government-backed loans. Of these loan applications, 46.4 percent loans were originated, which is slightly less than the loan origination rate of conventional loans at 49.4 percent. Out of total loan

applications received, 21.5 percent of conventional loan applications were denied while only 12.2 percent of government-backed loans were denied.

As government-backed loans are again being publicized and subprime loans are less of an option to borrowers, the increased use of government-backed loan applications is likely. However, expanded marketing to assist potential homeowners in understanding the requirements and benefits of these loans could be necessary.

Subprime Lending

According to the Federal Reserve, prime mortgages are offered to persons with excellent credit and employment history and income adequate to support the loan amount. Subprime loans are loans to borrowers who have less-than-perfect credit history, poor employment history or other factors such as limited income. By providing loans to those who do not meet the credit standards for borrowers in the prime market, subprime lending can and does serve a critical role in increasing levels of homeownership. Households that are interested in buying a home but have blemishes in their credit record, insufficient credit history or nontraditional sources of income might otherwise be unable to purchase a home. The subprime loan market offered these borrowers opportunities to obtain loans that they would be unable to realize in the prime loan market.

Subprime lenders generally have interest rates that are higher than those in the prime market and often lack the regulatory oversight required for prime lenders because they are not owned by regulated financial institutions. In the past decade, however, many large and well-known banks became involved in the subprime market either through acquisitions of other firms or by initiating loans that were subprime directly.

Most subprime loans provide families with payments for the first couple of years at a low “teaser” rate. After that, the loans reset every six months or year to a higher, fully indexed rate, which can cost borrowers hundreds of extra dollars each month. This extra expense has increased the housing cost burden of many families and ultimately resulted in foreclosed homes for many.

Although subprime lending cannot in and of itself be equated with predatory lending, studies have shown a high incidence of predatory lending in the subprime market. Unlike in the prime lending market, overly high approval rates in the subprime market are a potential cause for concern when the target clients are considered high risk. Many large banks have also been involved in the subprime market but are not identified as subprime lenders exclusively. The FFIEC data does not provide information on which loans were subprime loans. As such, analysis on this topic is difficult.

Predatory Lending

With an active housing market, potential predatory lending practices by financial institutions could arise. Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. The predatory practices typically include high fees,

hidden costs, unnecessary insurance and larger repayments due in later years. One of the most common predatory lending practices is placing borrowers into higher interest rate loans than called for by their credit status. Although the borrowers may be eligible for a loan in the “prime” market, they are directed into more expensive and higher fee loans in the “subprime” market. In other cases, fraudulent appraisal data is used to mislead homebuyers into purchasing overvalued homes, or fraudulent or misrepresented financial data is used to encourage homebuyers into assuming a larger loan than can be afforded. Both cases almost inevitably result in foreclosure.

Nationally, predatory lending is a growing fair housing issue. Predatory as well as discriminatory lending is addressed under the Fair Housing Act of 1968, which requires equal treatment in the terms and conditions of housing opportunities and credit regardless of race, religion, color, national origin, family status or disability. This applies to loan originators as well as the secondary market.

Data available to investigate the presence of predatory lending are extremely limited. At present, the FFIEC data are the most comprehensive available for evaluating lending practices. However, as discussed before, the FFIEC data lack the financial details of the loan terms to conclude any kind of predatory lending. Efforts at the national level are pushing for increased reporting requirements in order to curb predatory lending.

To curb the future negative impact of predatory lending, the governor of California in June 2009 signed into law Assembly Bill 260, reforming mortgage lending and specifically banning predatory lending practices. The legislation created a fiduciary duty standard for mortgage brokers, eliminated compensation incentives that encourage the steering of borrowers into risky loans and established regulations on prepayment penalties.

Foreclosures

Foreclosure occurs when homeowners fall behind in one or more or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current or if the homeowner sells their home and pays the mortgage off. However, if regular payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess the home. When this happens, the homeowner must move out of the property. If the home is worth less than the total amount owned on the mortgage loan, a deficiency judgment could be pursued. If that happens, the homeowner would lose their home and also would owe the home lender an additional amount.

In the late-2000s the number of foreclosed homes in California hit an all-time high. The problem was so severe in its consequences that numerous factors have been attributed for the high incidence of foreclosure, including but not limited to abnormally high housing prices in the early part of the decade, the origination of sub-prime loans to unqualified buyers, the economic recession and job losses. This confluence of negative economic incidents has left most housing markets in the United States in severe decline with historically high rates of foreclosure. Property values declined significantly-in some cases to pre-2000 levels.

The high incidence of foreclosure and the housing crisis in general represented a system-wide collapse of the housing market that resulted in numerous national, state and local efforts to reform virtually every aspect of housing acquisition and finance. Due to the widespread and complex nature of the foreclosure crises, it is not possible to point to particular lenders or lending practice within the City that may have contributed to incidences of foreclosure or reveal patterns of discrimination against protected classes.

Agency Coordination

Many agencies are involved in overseeing the real estate industry and real estate agents. A portion of this oversight involves ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the real estate market, and some of their policies, practices, and programs are described below.

National Association of Realtors

The National Association of Realtors (NAR) has developed a Fair Housing Program to provide resources and guidance to Realtors in ensuring equal professional services for all people. The term *Realtor* identifies a licensed professional in real estate who is a member of the NAR. However, not all licensed real estate brokers and salespersons are members of the NAR.

Article 10 of the NAR Code of Ethics provides that “Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin.” A Realtor pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations on Realtors and is a firm statement of support for equal opportunity in housing. A Realtor who suspects discrimination is instructed to call the local Board of Realtors. Local Boards of Realtors will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase or rental of housing. Local Boards of Realtors have a responsibility to enforce the Code of Ethics through professional standards, procedures and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

In addition, Standard of Practice Article 10-1 states that “REALTORS® shall not volunteer information regarding the racial, religious, or ethnic composition of any neighborhood and shall not engage in any activity which may result in panic selling. REALTORS® shall not print, display, or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin.”

In accordance with the Code of Ethics, each Realtor signs the below pledge, developed in 1996 as a result of the HUD/NAR agreement.

I agree to:

- Provide equal professional service without regard to race, color, religion, sex, handicap, familial status, or national origin of any prospective client, customer, or of the residents of any community.
- Keep informed about fair housing law and practices, improving my clients' and customers' opportunities and my business.
- Develop advertising that indicates that everyone is welcome and no one is excluded, expanding my client's and customer's opportunities to see, buy, or lease property.
- Inform my clients and customers about their rights and responsibilities under the Fair Housing Laws by providing brochures and other information.
- Document my efforts to provide professional service, which will assist me in becoming a more responsive and successful Realtor.
- Refuse to tolerate non-compliance.
- Learn about those who are different from me, and celebrate those differences.
- Take a positive approach to fair housing practices and aspire to follow the spirit as well as the letter of the law.
- Develop and implement fair housing practices for my firm to carry out the spirit of this declaration.

California Association of Realtors

The California Association of Realtors (CAR) is a trade association of Realtors statewide. CAR has recently created the position of Equal Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and meetings typically include sessions on fair housing issues. They also maintain fair housing and ethics information on their website.

Realtor Associations Serving Lancaster

Realtor Associations are generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development and other daily work necessities. The frequency and availability of courses varies among these associations, and local association membership is generally determined by the location of the broker for which an agent works.

Complaints involving agents or brokers may be filed with these associations. Monitoring of services by these associations is difficult as statistics on the education/services the agencies provide or statistical information pertaining to the members is rarely available. The Greater Antelope Valley Association of REALTORS services the City of Lancaster. Contact information is as follows:

Greater Antelope Valley Association of REALTORS
1112 West Ave M-4
Palmdale, CA 93551
Phone: (661) 726-9175/Fax: (661) 726-9199

California Department of Real Estate

The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. As noted earlier, not all licensed brokers and salespersons are members of the National or California Association of Realtors.

The DRE has adopted education requirements that include courses in ethics and fair housing. To renew a real estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of the four mandated areas: agency, ethics, trust fund and fair housing. The fair housing course contains information that will enable an agent to identify and avoid discriminatory practices when providing real estate services to clients.

On or after January 1, 1996, a real estate salesperson renewing his/her license for the first time must complete separate 3-hour courses in agency, ethics, trust fund handling and fair housing to qualify for renewal. All licensees, with the exception of those renewing for the first time, are required to complete a full 45 hours of continuing education for each license renewal.

For the initial renewal on or after January 1, 1996, the law requires, as part of the 45 hours of continuing education, completion of four mandatory 3-hour courses in agency, ethics, trust fund handling and fair housing. These licensees will also be required to complete a minimum of 18 additional hours of courses related to consumer protection. The remaining hours required to fulfill the 45 hours of continuing education may be related to either customer service or consumer protection, at the option of the licensee.

The DRE requires all licensees to provide proof of continuing education courses with the following exceptions:

- An applicant provides proof that he/she is 70 years of age or older.
- An applicant provides proof that he/she has been licensed for 30 consecutive years.

Rental Housing

Similar to the homeownership market, a major challenge to ensuring fair housing in the rental market is the complexity of the process. There are several stages in the process of renting a home or an apartment: 1) the advertising and outreach stage, 2) pre-application inquiries and responses, 3) the criteria for acceptance, 4) the lease and 5) administration of the lease. This section discusses these phases of the rental process. Although a potential homebuyer may face discriminatory practices primarily during the process of purchasing a home, a renter may confront housing discrimination not only during the process of renting but throughout the tenancy.

The Apartment Rental Process

Although the process of renting an apartment may be less expensive and burdensome up-front than the home-buying process, it may still be just as time-consuming and potential renters may still face discrimination during various stages of the rental process.

Advertising

Like finding a home to purchase, the main sources of information are the classified advertisements in local newspapers, word of mouth, signs, apartment guides, the Internet and apartment brokers. The same types of discriminatory language previously described under the Homeownership Process may be used by landlords or apartment managers to exclude “undesirable elements.”

A particularly difficult situation to address is the development of small apartment complexes during the housing boom. These new complexes are sometimes owned and operated by property owners who are new to the rental housing industry. Compliance with fair housing laws is difficult to monitor among the large number of small property owners. Outreach to this group is also difficult because many of these owners do not belong to the Apartment Owners or Apartment Managers associations and are not active in participating in events/trainings offered by these associations. Advertising by small property owners may not always comply with the fair housing laws. For example, rental ads in local Spanish-language newspapers do not always appear in the English-language newspapers, as required by law.

Viewing the Unit

Viewing the unit is the most obvious place where potential renters could encounter discrimination because landlords or managers might discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or might violate any of the rules. For example, there have been cases where a manager tries to deter a family by indicating strict occupancy standards or frowning on the presence of young children accompanying a viewer. Furthermore, discrimination against families with children and people with disabilities is even more prevalent than racial discrimination.

Credit/Income Check

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history as an excuse when trying to exclude certain groups. Recent legislation provides for applicants to receive a copy of the report used to evaluate applications. In addition, applicants may request a copy of their credit report (for a fee) to verify that the information used to approve/deny their application is accurate.

The Lease

Most apartments are rented under either a lease agreement or a month-to-month rental agreement. A lease is favorable from a tenant's point of view for two reasons: The tenant is assured the right to live there for a specific period of time, and the tenant has an established rent during that period. Most other provisions of a lease protect the landlord. Information written in a lease or a rental agreement includes the rental rate, the required deposit, length of occupancy, the apartment rules and termination requirements.

In a tight housing market, when a landlord can "financially afford" to choose tenants, the tendency is to offer shorter lease terms. In this case, a landlord might simply ask the "not-so-desirable" tenant to leave with a 60-day Notice to Vacate. Short-term leases also allow the landlord to raise rent more frequently.

Typically, the lease or rental agreement is a standard form completed for all units within the same building. However, the enforcement of the rules contained in the lease or the agreement might not be standard for all tenants. A landlord might act in a discriminatory way and choose strict enforcement of the rules for certain tenants based on arbitrary factors, such as race, presence of children or disability. Since the recent escalation of housing prices throughout California, complaints regarding tenant harassment through strict enforcement of lease agreements as a means of evicting tenants have increased.

Security Deposit

A security deposit is typically required to rent a housing unit. To deter "less-than-desirable" tenants, a landlord might ask for a security deposit higher than usual. Tenants could also face differential treatment when vacating the units. The landlord might choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear. A landlord might require that persons with disabilities with service animals pay an additional pet rent, a monthly surcharge for pets or a deposit, which is also a discriminatory act.

During the Tenancy

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex or disability. Usually, these types of discrimination appear in differential enforcement of rules, overly strict rules for children, excessive occupancy standards and refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction, notices, illegal entry, rent increases or harassment. These actions might be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

Apartment Association

The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. The CAA was incorporated in 1941 to serve rental property owners and managers throughout California. The CAA represents rental housing owners and professionals who manage more than 1.5 million rental units. Under this umbrella agency, various apartment associations cover specific geographic areas.

The CAA has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared toward improving the approach, attitude and professional skills of onsite property managers and other interested individuals. The CCRM program consists of 31.5 hours of training that includes training on fair housing and ethics issues.

The CAA supports the intent of all local, state and federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation or national origin. Members of the CAA agree to abide by the following provisions of their Code for Equal Housing Opportunity:

- We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;
- We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our residents' tenancy;
- We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and
- We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.

The CAA, Los Angeles Division serves Lancaster's communities. This local chapter of the CAA provides members with information and training on such topics as ethics, credit checks, addressing code enforcement violations, property management and pre-inspections.

Section 4

PUBLIC POLICIES AND PRACTICES

Land Use Policy

Public policies established at the state, regional and local levels can affect housing development and therefore could have an impact on the range of housing choices available to residents. This section discusses the various public policies that might influence fair housing choice in the City of Lancaster.

General Plan

Land use policies are fundamental to ensuring housing opportunities. The Lancaster General Plan and the Zoning Ordinance regulate the amount, location, type and density of housing in the City of Lancaster. Land use policies that do not promote a variety of housing options can impede housing choice.

Development standards include zoning ordinances, subdivision ordinances, and building code requirements. The most far-reaching constraints are those contained in a city's zoning ordinance, which is the most traditional tool used by a local jurisdiction to regulate the use of private land. Zoning regulates the use; density; floor area; setbacks; parking; and placement and mix of residential, commercial, and industrial projects to reflect the community's development goals and objectives. A summary of the development standards for the zones within each residential land use designation is given in Table G-1.

Zoning Ordinance

The purpose of the Zoning Ordinance is to promote the public health, safety, and general welfare and to preserve and enhance the quality of life within the City by establishing regulations to ensure that an appropriate mix of land uses is developed in an orderly manner. To achieve this purpose, the City desires to achieve a pattern and distribution of land uses which generally meets the following objectives:

- To implement goals, objectives and policies of the General Plan;
- To retain and enhance established residential neighborhoods, commercial and industrial districts, public facilities, recreation, open space and other amenities;
- To allow for the infill and redevelopment of areas of similar scale and character;
- To accommodate expansion of development into vacant and under-utilized lands, while considering environmental and infrastructural constraints;
- To provide a diversity of areas throughout the community characterized by differing land use activity, scale and intensity;
- To maintain and enhance significant environmental and visual resources;

- To provide opportunities for economic development, including business creation and expansion in a variety of manufacturing, service and marketing industries; and
- To establish Lancaster as a distinctive community with a high quality of life and a visually pleasing, secure environment for the City’s residences and businesses.

Please see Table 4-1 Residential Development Standards.

| Table 4-1 Residential Development Standards (2013) | | | | | | |
|---|--------------------------|--------------|--|--|---|--------------|
| Land Use Category and Zone Classifications | Density (units per acre) | Lot Coverage | Minimum Lot Area | Setbacks (ft.) | Parking | Height (ft.) |
| <u>Rural Residential (RR):</u> RR-2.5, RR-1, SRR | 0.4 – 2.0 | 30 – 40% | 20,000 sq. ft. to 2.5 acres | Front: 30-40 Rear: 20-30 Interior: 10-20 Street side: 20-40 | 2 garage parking spaces | 35-40 |
| <u>Urban Residential (UR):</u> R-15,000, R-10,000, R-7,000 | 2.1 – 6.5 | 40 – 50% | 3,500 sq. ft. to 15,000 sq. ft. | Front: 10-20 Rear: 12-20 Interior: 0-5 Street side: 10-15 | | 35 |
| <u>Multiple Family Residential, Medium and High Density (MR1 and MR2):</u> MDR and HDR | 6.6 – 15.0 | 50% | 6,000 sq. ft. | Front: 0-32 Rear: 15 Interior: 10-15 Street side: 15-20 | <u>1 or 2 units per lot:</u> 2 garage spaces per unit. <u>3+ units per lot:</u> 1BR-1.5 covered spaces/unit; 2 BR-1.5 covered + 0.5 uncovered space/unit. 0.25 guest space/unit. | 35-72 |
| <u>Mobile Home Park (MHP):</u> MHP | 4.6 – 6.0 | N/A | 10 acres for park. Individual spaces: 4,000-5,000 sq. ft. | Front: 20 Rear: 20 Interior: 10 Street side: 20 | 2 covered spaces and 0.25 guest space per unit | 35 |

Source: City of Lancaster Planning Department (Lancaster Municipal Code Title 17, Chapter 8)

Housing Element

The Housing Element is one of seven mandated elements of Lancaster’s General Plan. Enacted in 1969, and revised in 2008 by Senate Bill Number 2, housing element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of their community.

According to California state law, the housing element of any community’s general plan is required to be reviewed by the state’s Housing and Community Development (HCD) to assure compliance with housing laws. An important criterion of HCD approval of any housing element includes a determination that the local jurisdiction’s policies do not unduly constrain the maintenance, improvement and development of a variety of housing choices for all income levels.

The current Lancaster Housing Element identifies strategies and programs that focus on:

1. Promoting sufficient housing to meet the diverse housing needs of all economic segments of the present and future City of Lancaster;
2. Preserving existing housing stock within areas for which a desirable living environment can be provided; to promote conversion of such residential areas for which a desirable living environment cannot be sustained; and
3. Providing adequate shelter opportunities and assistance programs for those families and individuals who are either homeless or are at risk of becoming homeless.

To implement these policies, the Housing Element contains different housing programs designed to support and implement the City's housing goals. Where relevant to this Analysis of Impediments Report, housing programs which affect fair housing are described.

These goals accommodate the City's designated Regional Housing Needs Assessment (RHNA) allocation. The RHNA is not a mandate to construct the full number of housing units assigned to the jurisdiction. However, the City is obligated to make a "good faith effort" to accommodate the RHNA housing needs, and that the zoning code is permissive with respect to allowing construction of a variety of housing types to meet the special needs of the population.

The RHNA establishes two important parameters for future planning: the "short-term housing construction need" during the planning period which consists of the level of construction necessary to meet the housing needs of the projected population growth for the jurisdiction and takes into account adjustments to meet desired vacancy rates and anticipated housing demolitions; and the "fair share distribution of housing needs among income groups," which is the future housing need for the planning period distributed among the four income categories of very-low, low, moderate and above-moderate income.

SCAG prepared a RHNA in 2012 for cities in its six-county region. The model provides a 7 year projection of housing needs and a breakdown of those needs by income category. State law requires SCAG to follow a set of guidelines in preparing its regional housing need determination. Guidelines come from two primary sources: (1) HCD, who sets a housing need planning target for the region, and (2) State law, which provides guidelines on how to allocate the region's housing need among jurisdictions.

SCAG is required to take into account planning considerations when housing needs are allocated among jurisdictions. State law does not specifically define each "planning consideration" but allows SCAG to determine how to address each issue in the regional housing plan. The RHNA plan should promote the following objectives: (1) increase the housing supply and the mix of housing types, tenure and affordability in all cities and counties within the region in an equitable manner; (2) promote infill development and socioeconomic equity, the protection of environmental and

agricultural resources, and the encouragement of efficient development patterns; and (3) promote an improved intraregional relationship between jobs and housing.

Lancaster’s projected regional housing need for the period of 2014-2021 is for 2,510 units. Of this amount, 627 units are to be allocated for very low income units (25.0 percent), 384 for low income units (15.3 percent), 413 for moderate income units (16.5 percent), and 1,086 units allocated for above moderate income categories (43.3 percent).

Table 4-2

City of Lancaster Snapshot of 2014-2021 RHNA Allocations by Income Category

| Projection Period January 1, 2014 - September 30, 2021 | | Very Low Income | | Low Income | | Affordable Allocation (Combined Low + Very Low Income) | | Moderate Income | | Above Moderate Income | |
|--|-------|-----------------|-----------------|------------|-----------------|--|-----------------|-----------------|-----------------|-----------------------|-----------------|
| | | Units | % of Total RHNA | Units | % of Total RHNA | Units | % of Total RHNA | Units | % of Total RHNA | Units | % of Total RHNA |
| Lancaster City | 2,510 | 627 | 25.0% | 384 | 15.3% | 1,011 | 40.3% | 413 | 16.5% | 1,086 | 43.3% |

Source: Southern California Association of Governments (SCAG), SCAG 5th Cycle Regional Housing Needs Assessment Final Allocation Plan 2014-2021.

The Housing Element also describes various housing programs intended to facilitate meeting the objectives described above. Where relevant to this Analysis of Impediments, housing programs that affect Fair Housing are described in this report.

Housing Opportunities

Housing Element law requires that cities facilitate and encourage the provision of a range in types and prices of housing for all economic and special needs groups. Local government policies that limit or exclude housing for persons with disabilities, lower income people, people who are homeless, families with children, or other groups may violate the Fair Housing Act.

Single Family and Multi-Family Residential Housing

The City has updated the zoning ordinance to allow for the administrative review and approval of multi-family development. Proposed multi-family developments are processed by planning staff and do not require a conditional use permit or public hearing before the Planning Commission. This removes the uncertainty of the potential of reduction in housing units during the public hearing process, and will assist the City and State in reaching housing production and affordability objectives. City staff will still ensure that proposed developments meet all standards and

regulations of the City's zoning code, design guidelines, and conformance with any other applicable city or community plans. The City of Lancaster is in compliance with HCD requirements pertaining to the zoning of multifamily developments.

Second (or Accessory) Dwelling Units

Although the City had a previous ordinance that permitted secondary dwelling units, the City further revised it to provide greater flexibility. In 2013, the City revised its Residential zoning ordinance to allow secondary dwelling units (or also called accessory dwelling units) on all single-family lots 7,000 square feet or greater. The building square footage of the accessory dwelling unit is limited to 10 percent of the lot size, up to a maximum of 1,500 square feet. The accessory dwelling unit would still need to meet all applicable lot coverage and setback requirements. The new ordinance made utility metering and addressing requirements optional, which provides a property owner cost savings when constructing accessory dwelling units. Plan review of accessory dwelling units is done with a Director's Review. This is a simple administrative review that is typically completed within one to two weeks. The accessory dwelling ordinance requires the property owner to live in the primary or secondary dwelling unit. Therefore, the City is in compliance with AB1866.

Mixed Uses

As a result of the 2009 General Plan update, the City has approximately 1,480 acres of Mixed Use designated land, all of which allow for residential uses, either in conjunction with another office or commercial use, or stand-alone. There are three Mixed Use zones with the Mixed Use designation: MU-N (Mixed Use-Neighborhood), MU-C (Mixed Use-Commercial), and MU-E (Mixed Use-Employment). All three of these zones allow for multi-family uses. Multi-family projects with fifteen or fewer housing units are permitted uses, while projects with sixteen or more units require a conditional use permit. The development regulations in Mixed Use zones vary depending on the type of building that is proposed. Since the Mixed Use zones were recently adopted, the City does not have enough information to determine whether the development standards for the new zones act as constraints against development. The City has not yet received an application for new development in any of the City's new Mixed Use zones; however, the City has processed mixed use developments in the City's Commercial zone and within Downtown Lancaster. Arbor Grove is one example of a mixed-use development in Lancaster located in a Commercial zone. Development standards were not a constraint in the unit capacity for this project. Arbor Grove was able to develop at 28 units per acre (150 units on 5.3 acres), not counting the commercial portion. This is near maximum density (30) for its corresponding land use designation.

Density Bonus

As required by State law, the City's zoning code contains a density bonus provision. The City's 2013 zoning ordinance was updated to comply with the latest State density bonus requirements. This provision allows residential projects an increased density of a specified percentage over the maximum authorized density of the zone, plus other incentives, when the developer or property

owner agrees to set aside a prescribed percentage of units within the project for lower-income households. Despite the afforded option, few developers have taken advantage of the City's density bonus provisions. Multi-family projects can achieve the maximum number of units allowed in the density range for the particular zone "by right," and without a conditional use permit. The processes do not present a major burden to achieving increased unit capacity.

Infill Incentives

The 2013 Residential zoning ordinance includes an infill provision that allows developers to build up to eight (8) housing units per acre in the single-family R-7000 zone (implementing Policy 18.2.1 and Specific Action 18.2.1(c) of General Plan 2030), which yield up to twice the number of housing units than typically allowed. To qualify for infill, the project site must be located in the urbanized area of Lancaster, or be located adjacent to commercially zoned land, or be surrounded by existing development on all sides, or combines 4 or more adjoining parcels. The infill qualifying criteria is drafted to strategically address the many parcels in the urbanized areas of Lancaster that continue to sit vacant and are bypassed for development, as a result of land fragmentation, as well as the abundance of available land on the fringes of Lancaster. City staff believes that the development of infill properties in Lancaster is critically important for the fiscal sustainability of the City, since infill development takes advantage of existing infrastructure, whereas development on the fringe results in the extension of City resources and services, as well as infrastructure that the City will need to maintain indefinitely.

Single Room Occupancy (SRO) Units

A single room occupancy (SRO) is a multi-tenant building that provides permanent residency to one or two people in individual rooms, or to the single room itself, with tenants typically sharing kitchen facilities. The 2013 Residential zoning ordinance update added SROs as an allowed use in the City's multi-family zones, as a way to provide a form of affordable private housing for lower-income households, seniors, and persons with disabilities. Standards for SROs include: minimum 200 sq. ft. area; individual bathrooms; individual cooking facilities or community kitchen; and community garbage disposal. A property owner seeking a permit to construct an SRO, including the conversion of an existing building (e.g. hotel) would submit a Director's Review application.

Manufactured Homes and Mobile Homes

The Zoning Ordinance permits manufactured homes and mobile homes in all of the single family residential zones without any planning application required. When building plans are submitted, the plans are routed to the Planning Department for review against applicable zoning standards. The manufactured homes are subject to the same property development standards as a single family detached unit. The City requires that the dwelling have non-reflective exterior material on the roof and siding and that the foundation system comply with the Health and Safety Code. Also, in the commercial and industrial zones, if there is an existing residential use, such a dwelling may continue to be used as a permitted use.

Mobilehome Parks

State law requires that jurisdictions accommodate a mobilehome park within their community; however, a city, county, or a city and county may require a use permit. A mobilehome park refers to a mobilehome development built according to the requirements of the Health and Safety Code, and intended for use and sale as a mobilehome condominium, cooperative park, or mobilehomehome parks in the MHP Zone, subject to a Conditional Use Permit.

Transitional and Supportive Housing

One objective of SB 2 is to allow supportive housing, including housing for persons with disabilities, as residential uses subject only to those restrictions that apply to other residential uses of the same type in the same zone. The 2013 update of the City's Residential zones revised and added various terms and definitions that would allow transitional and supportive housing (group homes) in residential zones with no planning and zoning review, as any other residential use in the same zone.

The City's definition of "family," previously restricted the number of persons served in a supportive housing unit by including the licensee, members of the licensee's family, and facility employees. As a result, the number of supportive housing and disabled clients allowed to live in a supportive housing facility prior to 2013 was reduced to five or fewer persons. The usage of the term "family" in Title 17 also conflicted with the City's group home provision in Title 5, which does allow for unlicensed group homes of seven persons or more to be located in single-family, urban residential neighborhoods, given the finding that the unlicensed group facility has at least one bedroom for each two guests (Section 5.44.090). In an effort to mitigate this conflict and constraint, the City revised the zoning code's definition of "family" to be consistent with the provisions of the City's group home ordinance, and to comply with California Health and Safety Code and the Community Care Facilities Act.

Another prior constraint against supportive housing and housing for the disabled is the prohibition against group homes serving more than 6 persons in the City's single-family residential zones. The City has mitigated this by allowing group living facilities with seven or more residents to function as a family for the purposes of siting in low density residential zones, in conformance with federal and state fair housing laws. For proposed residential care facilities in multi-family zones, the City has removed the Director's Review requirement and instead, and is permitting them using the same procedures that would apply for any other proposed multi-family development. As discussed in the chapter on governmental constraints, the City has removed the conditional use permit requirement for all developments located in multi-family zoned land. This also extends to development proposals for residential care facilities and transitional housing, pursuant to SB 2.

In addition to the modification of the definition of "family," the City has adopted generalized definitions for transitional and supportive housing, matching those stated in State Health and Safety Code. The zoning code was amended to list transitional and supportive housing as permitted uses in

residential zones. The use of broadened definitions would better align local regulations with State mandates and fair housing laws.

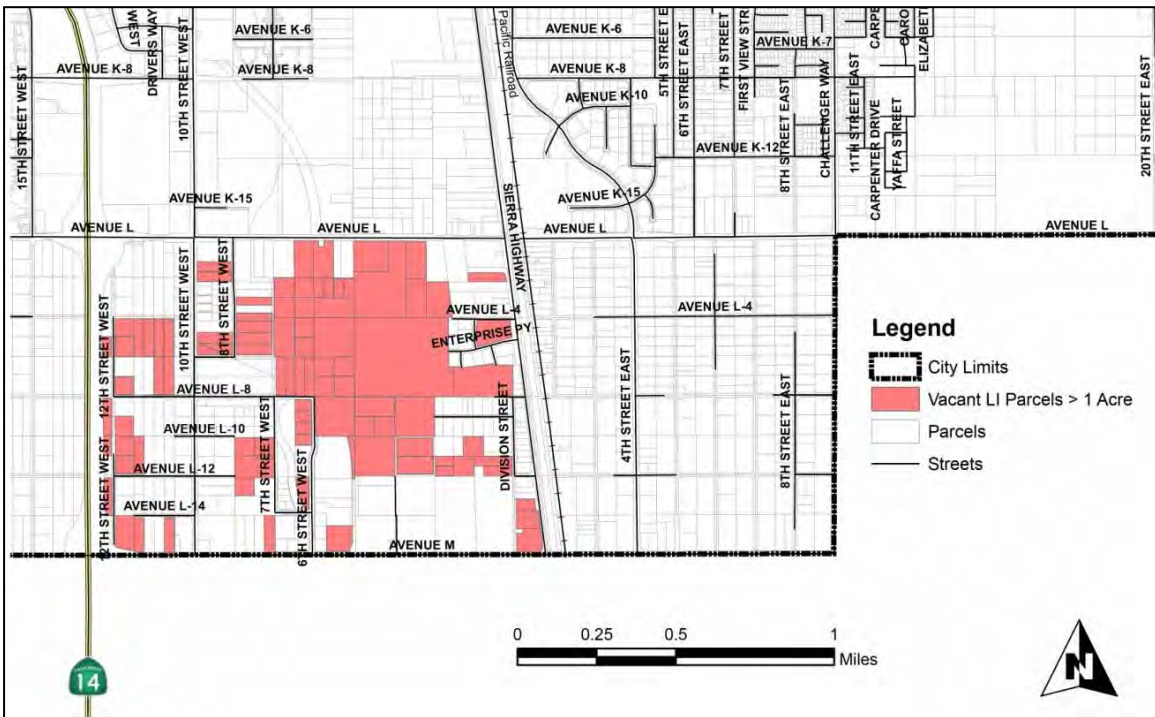
Emergency Shelters

In accordance with SB 2, the City amended the zoning code to allow emergency/homeless shelters in the Light Industrial zone without a conditional use permit. SB 2 also requires jurisdictions to identify zones where emergency shelters will be allowed without requiring a conditional use permit. As required by State Law, the City has amended the zoning ordinance to allow, by administrative review, the construction of emergency shelters within a specific land use designation. The City selected the Light Industrial land use designation to allow this use “by right,” with approval of a Director’s Review application.

The Director’s Review application does not require a public hearing, and is an efficient method of review. The time period for this review vary, depending on whether there is an existing structure or not. For a request with an existing building, the Director’s Review process may require a few days up to a few weeks. The City would analyze the submitted request with a description of the operation, and determines whether there are any CEQA impacts, as the City would do for any other use in the same zone. The City also consults other departments and agencies to determine if they have comments and conditions for the proposed use, such as building and safety requirements, as applicable to any other use in the same zone. Requests involving new construction are subject to site plan review, which takes approximately two to six months to review, depending on the level of environmental review required. The City’s Director’s Review process is the simplest form of administrative review, with no discretionary action on the part of appointed or elected officials.

Table 4-3 shows one sample area, bounded by Ave L and M, 12th Street West and Sierra Highway, where vacant, larger light industrial parcels exist. The graphic below shows 93 light industrial parcels greater than one acre, all of which are able to accommodate construction of an emergency shelter. A minimum one acre parcel would accommodate an operational emergency shelter facility, given a 0.5 floor area ratio and 15 to 25-ft. front and side yard setbacks, and 10-ft. interior and rear yard setbacks. By comparison, the existing Lancaster Community Shelter, which provides 105 beds, is 7,700 square feet could easily be accommodated on a one acre site.

**Table 4-3
Identified Vacant LI Parcels Greater Than 1 Acre**



Source: City of Lancaster Planning Department

The following definitions in the code have been revised or added in 2013 for added clarification and compliance with fair housing laws:

“Family” means an individual or 2 more persons living in a single dwelling unit. “Family” also mean the persons living together a residential facility, including transitional and supportive housing.

“Transitional housing,” as defined in Health and Safety Code 50675.2(h), means buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.

“Supportive housing,” as defined in Health and Safety Code 50675.14(b), means housing with no limit on length of stay, that is occupied by the target population as defined in subdivision (d) of Section 53260, and that is linked to on- or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

“Target population” means adults with low-income having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals

eligible for services provided under the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people.

“Family” means an individual or 2 or more persons living in a single dwelling unit. “Family” also means the persons living together in a licensed “residential facility” as defined in Section 1502(a)(1) of the Health and Safety Code, which serves 6 or fewer persons, including the licensee, the members of the licensee’s family, and persons employed as facility staff.

Fair Housing Impediment Review

This Analysis of Impediments to Fair Housing Choice includes the review of the General Plan and the Zoning Code in order to identify regulations, practices and procedures that may act as barriers to the development, siting and use of housing for individuals with disabilities. In addition to the review of these City documents, City Planning and Building Department staff, the Architectural Commission and Planning Commission have had input.

Table 4-4

Regulatory Compliance To Fair Housing Choice For Lancaster

| Impediment Description | Jurisdiction Practice | Comment | Compliance Yes or No |
|---|---|--|----------------------|
| Definition of “Family” | No Definition of “Family” is contained in the Zone Code. | City uses “Family” definition set forth in State Codes. | Yes |
| Definition of “Disability” | No definition of “Disability” is contained in the Zone Code. | City uses “Disability” definition set forth in State Codes. | Yes |
| Restrict number of unrelated persons residing together if they are disabled | City complies with State law regarding number of unrelated persons residing on-site regardless of disabilities. | City does not distinguish between able or disabled when addressing the number of unrelated persons residing on-site. | Yes |
| Allow ADA Modifications in municipal-supplied or managed housing | City does not own or manage public housing. City encourages ADA access. | City Housing Authority complies with State law. City encourages ADA access modifications. | Yes |
| Variances & Exceptions to zoning and land-use rules | City requires a public hearing for all zoning variances as required by State law. | City complies with State law regarding the granting of variances and exceptions to zoning and land-use rules. | Yes |
| Residential | City provides for | The MX Zone includes | Yes |

| | | | |
|--|---|--|-----|
| Mixed Land Use Standards | commercial/residential mixed land use in the MX Overlay Zone. | permitted uses, uses subject to Director's review and uses subject to a CUP for Site Plan Review. The MX Zone permits a residential density of 10 DE/ac. | |
| Zoning Exclusion regarding Discrimination | City does not exclude or discriminate housing types based on race, color, sex, religion, age, disability, marital status, creed or national origin. | All City zoning and land use regulations and policies comply with Federal and State law regarding the prohibition of discrimination. | Yes |
| Senior Housing Restrictions & Federal Law | City permits multi-family senior housing in accordance with zoning standards. | Developers often request variances regarding the reduction of unit size and required off-street parking. | Yes |
| Zoning for ADA accessibility | City's Building Code provides for ADA access. | City's zoning code defers to the Building Code regarding ADA access. | Yes |
| Occupancy Standards and Limits | City zoning code does not limit occupancy. The State Building and Housing Codes establish criteria to define overcrowding. | City codes comply with State law. | Yes |
| Zoning for Fair Housing | City's Housing Element promotes Fair Housing, Zoning Code does not conflict with that policy. | City's General Plan promotes and requires compliance with all Fair Housing laws and policies. | Yes |
| Handicap Parking for Multi-Family Development | City's Building Codes require 1 handicap parking space for each 25 requires parking spaces. | City codes comply with State and Federal requirements. | Yes |
| Is a CUP required for Senior Housing? | City does not distinguish between senior citizen housing and other single-family or multi-family housing. | Developers often request modification of housing standards for senior citizen housing such as smaller swelling sizes and reduced off-street parking. | Yes |
| Does City distinguish between handicapped housing and other types of single-family or multi-family | City does not require a CUP for Handicapped Housing. | City complies with State and Federal law regarding ADA designed housing. | Yes |

| | | | |
|---|---|---|-----|
| housing? | | | |
| How are “Special Group Housing” defined in the zoning code? | City defines “Special Group Housing” as set forth in State law. | City complies with State and Federal law regarding “Special Group Housing”. | Yes |
| Does the City’s Building and planning codes make specific reference to accessibility requirements set forth in the 1988 Fair Housing Act? | City adopted California State Building & Housing Codes. | Building Department reviews all plans for compliance with adopted codes. Monitoring is the responsibility of the building department. | Yes |

Development Policy

Development Standards

The Zoning Ordinance provides design and development standards regarding where housing can be located. The Zoning Ordinance establishes the minimum residential development standards to ensure the construction of quality housing, to preserve and protect neighborhoods.

Local Government Development Fees

Development fees and taxes charged by local governments also contribute to the cost of housing. The City assesses various development fees to cover the costs of permit processing.

State law requires that locally imposed fees not exceed the estimated reasonable costs of providing the service. The fees and exactions required of a development to pay for the public facilities associated with the residential development pose a potential constraint to housing production.

Table 4-5 shows the typical fees for the development of a single-family house and a multi-family complex. The fees are broken down into: city fees, school fees, county fees, water agency fees, and state fees. The City only has the ability to control the amount of city fees a developer has to pay. For a single-family house, a builder would pay an approximate total of \$50,722 in fees, with \$12,904 as City fees, going towards the processing of the permit, and impact fees for traffic, drainage, and parks. For a 16-unit multi-family complex, the total fee per unit is approximately \$24,942, with \$12,002 in City fees. The listed City fees are a slight increase from 2007, when the per-unit fee for a single-family house and a multi-family unit was \$12,394 and \$11,122, respectively; however, given the 25 percent building stimulus discount (as described in next paragraph), these fees are actually considerably less than the fees for 2007.

As a result of the housing downturn, the City of Lancaster approved a Building Stimulus Program in February of 2010, which allows residential tract developers to receive a 25 percent development impact fee incentive per dwelling. This calculates to approximately \$2,853 per dwelling unit. This incentive program has been extended through 2013, and has resulted in additional construction activity, since homebuilders in the area, such as KB Home, have expressed that the fee incentives allow them to continue building during a time when profit margins are very slim.

Land costs vary, depending on when and how much the builder paid for the land; however, they are estimated at approximately \$40,000 to \$60,000 for an improved lot with utilities available. Construction costs are estimated to be about \$100 per square foot. Given a 2,000 square foot single-family home, total land and construction costs may total \$250,000. The City fees of \$12,904 (or \$10,051 with builder incentive) are approximately 5 percent compared to the costs a builder pays for land, labor and materials. Total fees, including City, County, State, and water fees represent about 20 percent of such costs.

The City's fees are not a constraint to development because they are in line with, or less than the fees of nearby jurisdictions. The City of Palmdale's draft Housing Element reports an approximate fee of \$55,162 for a 2,200 sq. ft. single-family home, with \$26,993 going towards City fees, including plan check, traffic, drainage, and parks impact fees. Likewise, for a multi-family unit, Palmdale reports an approximate overall fee of \$31,188 per multi-family unit, with \$16,400 in City fees.

Table 4-5
Development Impact Fee Schedule for the City of Lancaster

| Approximate Fees for Single-family and Multi-family Dwelling | | |
|--|---|--|
| | Single-family Dwelling (2,000 square feet) | Multi-family Complex (16, 2-bd units, 800 s.f.) |
| City fees | | |
| Building permit | \$1,290 | \$14,218 |
| Traffic signalization | \$1,356 | \$20,292 |
| Traffic impact | \$1,745 | \$27,920 |
| Drainage impact | \$4,659 | \$74,544 |
| Park development | \$2,534 | \$40,544 |
| Dwelling unit (parks) | \$1,000 | \$12,000 |
| Public facilities | \$119 | \$1,903 |
| Planning building plan review | \$165 | \$562 |
| General Plan maintenance | \$36 | \$60 |
| City fees - sub-total | \$12,904 | \$192,043 (\$12,002 per unit) |
| School fees | | |
| AV High School District (\$1.56/sf.) | \$3,120 | \$18,720 |
| Westside School District (\$2.83/sf.) | \$5,660 | \$36,224 |
| School fees - sub-total | \$8,780 | \$54,944 |
| Los Angeles County fees | | |
| LA County Waterworks | \$16,000 | \$54,344 |
| LA County Fire Protection | \$1,791 | \$14,008 |
| LA County Sanitation | \$5,190 | \$59,424 |
| County fees - sub-total | \$22,981 | \$127,776 |
| Antelope Valley East Kern Water Agency | | |
| Water Supply Capacity Charge | \$6,028 | \$24,112 |
| State fees | | |
| Strong motion | \$20 | \$142 |
| Green building | \$9 | \$57 |
| State fees - sub-total | \$29 | \$199 |
| Total fees | \$50,722 | \$399,074 (\$24,942 per unit) |

Source: City of Lancaster

State law also requires that impact fees must have a substantial nexus to the development and that the dedication of land or fees be proportional to its impact. Like all cities, Lancaster abides by state law with respect to fees and exactions. The City charges a limited number of impact fees to ensure that services and infrastructure are in place to serve the planned developments. Although impact fees and requirements for offsite improvements add to the cost of housing, these fees and requirements are necessary to maintain the quality of life within a community.

Building Codes

The City of Lancaster has adopted the 2010 edition of the California Building Code, based upon the 2006 International Building Code with local governments. California cities are required to adopt the California Building Standards Code (Title 24 of the California Code of Regulations). The Code is a set of uniform health and safety codes covering building, electrical, mechanical, plumbing, fire safety,

and other issues. Uniform codes are considered the minimum acceptable standards for health and safety.

Building codes regulate new construction and substantial rehabilitation. They are designed to ensure that adequate standards are met to protect against fire, collapse, unsanitary conditions, and safety hazards. The City follows the same building code standards as does Los Angeles County. These standards are set by the California Building Code. Building costs in Lancaster do not appear to be unduly increased through local building codes. However, state regulations with respect to energy conservation, though perhaps cost effective in the long run, may add to initial construction costs.

State law allows cities to add local, more restrictive, amendments to the California Building Code, provided such amendments are reasonably necessary to address local climatic, geological, or topographic conditions. The City has adopted local amendments to address fire hazards, seismic conditions, wind conditions and minimal construction techniques for heavy rains and floods caused by special environmental conditions. None of these amendments directly or indirectly limits the type of housing opportunities available to disabled people nor limits access to housing. All local amendments are intended to strengthen and enhance building and safety standards to provide safer housing opportunities and disabled access to housing in excess of California's current requirements.

Accessibility Standards

Lancaster also enforces the requirements of the 2010 California Building Codes and the applicable amendments of the City of Lancaster set forth in Ordinance No. 890. The City's Building and Safety Department requires plans with fully dimensioned details indicating compliance with disabled access requirements, including:

- Disabled unit(s) and disabled adaptable unit(s)
- Disabled parking spaces
- Paths of travel from disabled parking spaces to building entrance
- Building entrance and paths of travel within the building
- Disabled access to facilities within the building, including restrooms, telephones, drinking fountains, and counters

For the purpose of considering appeals to the standards of Title 24, Part 2 of the California Code of Regulations regarding accommodations for the physically handicapped, the City established the Physically Disabled Access Appeals Board, which consists of the members of the City Council. The Board considers appeals filed relating to requirements for physically disabled access and authorize reasonable alternatives to physically disabled access requirements imposed by Title 24 of the California Code of Regulations. The City has yet to receive any appeals relating to disabled access requirements.

Requests for Reasonable Accommodation

In October 2011, the City adopted Ordinance No. 971, approving the Reasonable Accommodation Ordinance, now included in Section 17.08.500 of the Lancaster Municipal Code. The reasonable accommodation procedure provides a process to request reasonable accommodation for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act in the application of zoning laws and other land use regulations, policies and procedures. With this procedure, individuals with disabilities will have a process to make requests for reasonable accommodation in regard to relief from the various land use and zoning regulations and procedures, separate from a variance or conditional use permit. The Planning Director, or the Planning Director's designee, makes a written determination within 45 days and either grants, grants with modifications, or denies a request for reasonable accommodation based on specific findings consistent with the Fair Housing Act.

The findings include the following:

- The housing accommodation will be used by an individual disabled under the Fair Housing Act.
- The request for reasonable accommodation is necessary to make specific housing available to an individual with a disability under the Fair Housing Act.
- The requested reasonable accommodation would not impose an undue financial burden or administrative burden on the City.
- The requested reasonable accommodation would not require a fundamental alteration in the nature of a City program or law, including but not limited to land use and zoning.
- The requested reasonable accommodation would not result in negative and detrimental impact on surrounding uses.

Processing and Permit Procedures

Development permit procedures are designed to ensure that residential development proceeds in an orderly manner so as to ensure the public's health, safety, comfort, convenience, and general welfare. Although permit processing procedures are a necessary step, unduly burdensome procedures can subject developers to considerable uncertainty, lengthy delays, and public hearings that cumulatively make a project financially infeasible.

State law requires communities to work toward improving the efficiency of building permit and review processes by providing one-stop processing, thereby eliminating duplication of effort. The Permit Streamlining Act helped reduced governmental delays by limiting processing time in most cases to one year and requiring agencies to specify the information needed to complete an acceptable application.⁹

Before development can occur, it is necessary that certain permits, inspections, and approvals be obtained. These procedures, although necessary to ensure the development is safe and in

compliance with local regulations and building code requirements, can sometimes lead to delays in projects and subsequently increase costs. Moreover, excessive processing time may act as a constraint on the production of affordable housing, because it increases carrying costs to the developer for land, financing, etc. As a result, the City has attempted to reduce processing time to the minimum necessary for adequate review and control of development in accordance with the previously discussed development standards.

Planning review

Table 4-6 outlines the permit approval process by housing type. The review and approval process for residential projects depends on the type, scale and complexity of the project.

A custom single-family house requires no discretionary planning review and is approved “over the counter” as long as the structure meets the standards of the zone it is located in. The applicant for the house would then obtain all necessary building permits for construction.

Approval for an accessory dwelling unit, or for a small multi-family structure, such as a duplex or triplex, can be obtained through the Director’s Review process. Although named “Director’s Review,” this is an application that is typically reviewed by a staff planner, who would review the request and plan against the City’s zoning regulations. Given the minimal CEQA requirements for small structures, especially for an infill location, these uses can typically be approved within a week’s time frame, with standard conditions as listed in the City’s zoning code and regulations. All design considerations would be reviewed at a staff level.

A single-family subdivision would go through a tentative tract map process, which requires a public hearing before the City’s Planning Commission. This process may be as quick as 3 months, or up to 18 months, if an EIR is required. After an application and map submittal has been deemed complete, the City will send notices to other departments and outside agencies to solicit comments and conditions. Soon after, city staff will host a development review meeting between the applicant, City staff and/or any other members of affected agencies. Typically, an applicant would go through at least one round of review and correction, which may prolong the review process, as the applicant makes revisions. Once all the corrections have been addressed, city staff would prepare a report with a recommendation and conditions for the Planning Commission’s consideration to adopt. After tentative map approval, the applicant can submit for final map review and approval by the City’s Engineering Department.

A multi-family development with four or more housing units would be required to go through a Site Plan Review process. Although still an administrative review, this process is more intensive than a Director’s Review, given the greater complexity and potential impact to adjacent properties. With a Site Plan Review, the City notices other departments and outside agencies to solicit comments and conditions. The City then hosts a development review committee meeting to have the applicant and his/her engineer meet with City staff and other department and agency members. One or more rounds of review and corrections may be warranted. After all comments and corrections have been

addressed, city staff would approve the project, subject to conditions. This process can take 2 to 4 months, depending on the level of environmental review. The majority of site plan reviews submitted in the past for multi-family development have been processed with a negative declaration, which did not prolong the review process. All design considerations are reviewed at a staff level.

Owner-occupied multi-family developments (condominiums) would also go through the same Site Plan Review process required for apartments; however, the applicant would also have to submit a Tentative Parcel Map for the subdivision of air-space required for condominiums. The Tentative Parcel Map can be submitted concurrently with the Site Plan Review so that it does not prolong the review and approval process longer than necessary. Although the Site Plan Review is processed and approved by city staff, the Tentative Parcel Map would be subject to a public hearing before the Planning Commission. The Planning Commission would only be able to review and approve the air-space subdivision, and not the multi-family structure itself. The Site Plan Review and Tentative Parcel Map required for condominiums would take 3 to 6 months for review and approval.

**Table 4-6
Planning Approval Procedure and Time Frame by Housing Type**

| Housing Type | Planning Application Procedure | Time Frame |
|----------------------------|----------------------------------|--------------------|
| Custom single-family house | No application required | “over-the-counter” |
| Accessory dwelling unit | Director’s review | Within 1 week |
| Single-family subdivision | Tentative tract map (no EIR) | 3 to 6 months |
| | Tentative tract map (with EIR) | 9 to 18 months |
| Multi-family: 2 to 3 units | Director’s review | Within 2 weeks |
| Multi-family: 4+ units | Site plan review | 2 to 4 months |
| Condominiums | Site plan review with parcel map | 3 to 6 months |

Source: City of Lancaster Planning Department

The City’s processing times for planning development applications are not a constraint because these are time frames are in line with the processing times of other jurisdictions. The City of Palmdale has a 45 to 60-day schedule for getting a development application through the Planning Commission or site plan review hearing, provided the application is complete when it is submitted. It is important to note that Palmdale does not deem an application complete until agency notices have been distributed. With Lancaster, the agency notice distribution and 30-day response period is included in the application processing time frame.

Since the last Housing Element, the City has revised its residential zoning ordinance to allow the administrative processing of multi-family development proposals, as opposed to a conditional use permit. This provides greater certainty to multi-family builders because a public hearing is not required.

Assessment

HCD reviews development processing procedures to ensure that such procedures facilitate and encourage the construction of housing for all income levels. HCD has taken the position that the requirement of obtaining a conditional use permit on multiple-family housing projects subjects the project to NIMBYism that leads to rejection of a project that otherwise complies with City regulations.

State law prohibits a local agency from disapproving a low income housing development, or imposing conditions that make the development infeasible, unless one of six conditions exists. Three conditions are of most import: 1) the project would have an unavoidable impact on health and safety which cannot be mitigated; 2) the neighborhood already has a disproportionately high number of low income families; or 3) the project is inconsistent with the general plan and the housing element is in compliance with state law.¹⁰

Community Representation

The City values citizen input on how well city government serves its residents. The City Council relies on its Planning Commission, advisory commissions, and boards to provide advice and recommendations in areas of City services. Lancaster makes an effort to ensure that advisory boards and commissions reflect the diversity of the City's residents. Boards, commissions, and advisory committees that have responsibility for land use, building, and other policies that could affect fair housing choice include the Planning Commission.

Public Housing Authority (PHA) Tenant Selection Procedures

There are no public housing sites owned by the City of Lancaster located within the City of Lancaster; however, the Housing Authority of the County of Los Angeles (HACOLA) does own and operate one public housing multifamily housing project in the City of Lancaster and nearby Quartz Hill in the County of Los Angeles. The City reviewed HACOLA's tenant selection procedures for the units available in Quartz Hill. This review did not reveal any impediments to fair housing choice. Based on information provided by HACOLA, no complaints were received from prospective tenants alleging discrimination or unfair practices in the Housing Authority's selection of tenants to occupy public housing projects.

Residential Anti-Displacement Policy

It is the policy of the City of Lancaster to comply with the requirements of Section 104(d) of the Housing and Community Development Act of 1974 with respect to the prevention and minimization of residential displacement as a result of the expenditure of HUD assistance. The City's Consolidated Plan, Chapter III, provides the City of Lancaster Residential Anti-Displacement Policy.

Housing-Employment-Transportation

The City of Lancaster has numerous plans that impact housing opportunity, provision of public services, and access to public transit within the community. These plans include the City's General Plan, Housing Element, Consolidated Plan and Lancaster Housing Authority Implementation Plan.

This section first provides details on how the City of Lancaster and other agencies further fair housing for City residents through housing programs, employment, and services. The section concludes with an analysis of transit policies and services to determine if there are impediments to fair housing that are apparent as a result of the locations and concentrations of housing and employment centers as related to public transportation routes in the City.

Housing Programs

The 2013-2021 Housing Element sets forth various housing goals for the community, accompanied by many implementing policies and programs. The following briefly describes rental assistance, homeownership assistance, housing rehabilitation programs, and neighborhood revitalization efforts currently underway in Lancaster.

Rental Assistance

The Housing Authority of the County of Los Angeles (HACOLA) is a federally-funded agency that administers housing assistance programs for qualified very low income families, disabled people, and seniors. Section 8, a rent subsidy program, offers very low income households the opportunity to obtain affordable, privately-owned rental housing on the open rental market. Section 8 tenants pay a minimum of 30 percent of their income for rent and the Housing Authority pays the difference to the negotiated payment standard established by HUD. As of March 2015, 1,642 households in Lancaster were utilizing Section 8 vouchers according to HACoLA, including 25 Veterans Affairs Supportive Housing (VASH) vouchers.

Housing programs Included in the 2013-2021 Housing Element

The 2014-2021 Housing Element sets forth various housing goals for the community, accompanied by many implementing policies and programs. The following briefly describes rental assistance, homeownership assistance, housing rehabilitation programs and neighborhood revitalization efforts currently underway in Lancaster.

Goals, Objectives, Policies and Action Programs

This section represent the goals, objectives, policies and action programs that the City will pursue over the course of the current housing element planning period (January 1, 2014 to September 30, 2021).

Appropriateness of Goals, Objectives and Policies

Lancaster will provide adequate sites to meet its Regional Housing Needs Assessment allocation. Given its geography, Lancaster has the land area to accommodate future housing need; however, housing specific to very low and low-income households will require programs, specific actions, and funding that will assist in the development of housing for these households. In previous Housing Element cycles, Lancaster has amended zoning regulations and processing procedures to obtain the funding necessary to facilitate development of affordable housing. The programs and specific actions that have been effective are carried over into the next planning period. Some of the program actions identify specific planning areas most likely to develop as affordable housing. The actions reflect the City's best estimate as to when these housing units will be built, and at what level of affordability.

Specific action time frames

Each specific action is assigned a priority which defines a general period during which the City shall initiate an action. They are defined as follows:

| | |
|----------------|---|
| Priority One | Initiate upon update of Housing Element |
| Priority Two | Initiate within 6 to 12 months following Housing Element update |
| Priority Three | Initiate within 1 to 3 years following Housing Element update |
| Priority Four | Initiate within 5+ years following Housing Element update |
| Ongoing | For programs already in existence |
| Implemented | For completed programs |

Although the Housing Element is a separate document, it is a chapter of the General Plan. As such, the goals for the Housing Element are numbered 6 through 8, in continuation from other chapters in the General Plan.

“Goal 6

To promote sufficient housing to meet the diverse housing needs of all economic segments of the present and future City of Lancaster.

Provision of adequate sites for housing

The State Legislature has declared that local governments “have a responsibility... to make adequate provision for the housing needs of all economic segments of the community.” Unfortunately, the housing market is generally not able to produce housing which is affordable to very low, low, and even moderate-income households, without some form of government assistance.

In addition, certain communities have become impacted with more than their fair share of housing for very low, low, and moderate-income households, while other communities provide housing exclusively for upper income residents. As a result, State law requires that individual communities accommodate their “fair share” of households of all economic groups. Within the Southern California region, the

Southern California Association of Governments (SCAG) is responsible for preparing a Regional Housing Needs Assessment to identify the fair share of regional growth which individual communities must strive to achieve over the next five years.

The following outlines Lancaster's proposed program to provide for adequate housing through 2014 to accommodate its fair share of regional housing needs and to ensure that adequate housing opportunities are available to all economic segments of the community.

Objective 6.1 Provide for adequate sites that will enable the production of 2,510 housing units through September 2021 to meet the demands of present and future residents, including an adequate number and range of new dwelling types which are affordable to extremely low, very low, low, moderate and above moderate-income households.

Policy 6.1.1: Ensure that a mix of housing types are provided, including single- and multi-family housing within a variety of price ranges which will provide a range of housing options for those wishing to reside within the City of Lancaster, and which will enable the City to achieve Objective 6.1.

Specific Actions:

6.1.1(a) In order to maintain current information concerning housing production, compile a quarterly Development Summary Report, identifying the location, size and type of residential development proposals submitted to the City, as well as their status. It is intended that this summary report will track projects from submittal through recordation of subdivision maps through building permits and issuance of occupancy permits through project completion.

6.1.1(b) Establish a monitoring program which identifies the type and cost of housing being produced within Lancaster, as well as the availability of vacant land which can be used in the short-term (next five years) to accommodate a variety of housing types. This monitoring program is ongoing, but will result in a report to be prepared immediately after each calendar year. In addition, as part of the City's General Plan Annual Review, prepare a status report which evaluates program and production goals outlined in this plan and revise as necessary to meet the needs for housing that is affordable to very low, low, and moderate-income households.

6.1.1(c) If multi-year construction trends, as evidenced by the quarterly Development Summary Report and other available information, indicate that housing unit development will fall short of the City's needs as established in Objective 6.1, consider revisions to, or adoption of, housing incentive programs such as waiver and/or deferral of processing and development impact fees, and relaxation of standard development requirements to encourage construction of those categories where it appears that actual construction will not meet identified needs. The analysis and consideration

for modification will be performed on an annual basis during the preparation of City department's fiscal budget.

6.1.1(d) Assist local nonprofit agencies to actively seek the acquisition of state and federal funding sources by providing letters of support, technical guidance, and other regulatory and procedural assistance as needed to facilitate the development of affordable housing for low to extremely low-income households. The submittal of funding applications would occur during their specified time frames. Other assistance provided to nonprofits would include development incentives, such as a streamlined application review process and other mechanisms specific to the development to ensure the production of successful housing projects.

Policy 6.1.2: Promote infill housing development within areas presently approved for urban density residential development, as well as areas which have been committed to urban development.

Specific Actions:

6.1.2(a) Continue to enhance development opportunities for the construction of affordable housing through shared appreciation covenants, conditions and restrictions, the provision of technical assistance, and use of real property acquisition powers of the Lancaster Housing Authority which action results in the consolidation of small, infill parcels and the development of affordable housing.

6.1.2(b) Encourage the utilization of Zoning Ordinance provisions pertaining to the development of mixed use projects such as: related office uses in conjunction with housing for the aged, infirm, or convalescent, or limited residential occupancies above neighborhood-type commercial uses. Where developers propose commercial projects or reuses of buildings, particularly in the downtown area, staff will inform them of the provision in the Zoning Ordinance that would allow them to incorporate residential units as part of the project. In addition, the staff will encourage these uses by providing flexibility in building and site design.

Policy 6.1.3: Promote efforts to slow the rising costs of new and existing housing to the extent that government actions can reasonably do so while protecting the public health, safety, and welfare.

Specific Actions:

6.1.3(a) Provide timely review of discretionary and non-discretionary residential development requests, with fees sufficiently only to cover the actual costs (direct and overhead) incurred by the City. In order to do so, continue to exercise existing procedures and

consider adopting new measures to expedite case processing. These techniques include:

- Computerize case records to allow for automated case tracking;
- Schedule case processing timetables to provide reasonable expectations in processing applications based upon available resources;
- Hold public and agency review of EIR's concurrently so that processing times can be reduced; and
- Continue to require complete information as part of application filing to avoid later delays.

6.1.3(b) Periodically, evaluate land development processing procedures to ensure that project review is accomplished in the minimum time necessary to implement the General Plan and ensure protection of public health, safety, and welfare.

6.1.3(c) As part of the regular proceedings of the Development Review Committee (DRC), make residential developers aware of City zoning ordinance provisions that provide up to a 35 percent density bonus, or equivalent financial incentive, to residential developers who agree to make a corresponding percentage of the units within the project affordable to households, per State density bonus law. The City's zoning ordinance will be revised to reflect the latest changes in density bonus law.

Policy 6.1.4: Promote the use of available housing assistance programs and resources.

Specific Actions:

6.1.4(a) Leverage direct funding resources of the City and Lancaster and Lancaster Housing Authority with State and Federal funding sources to address the housing objectives contained in Table H-1 "Quantified Objectives" of the Housing Element in order to facilitate the provision of single and multiple family dwelling units available to very low, low, and moderate-income households.

6.1.4(b) Encourage private sector development of affordable housing by subsidizing development impact fees in exchange for long term affordable restrictions.

6.1.4(c) Identify and acquire distressed residential projects (e.g. foreclosures, bankruptcies) and prepare them for sale or rent at affordable housing costs. This is an ongoing effort by the Housing and Neighborhood Revitalization Division.

6.1.4(d) Continue to allow the Los Angeles County Housing Authority to administer the Section 8 Voucher Program and public housing programs within the City.

Policy 6.1.5: Facilitate housing for extremely low, very low, low, and moderate income-households to be distributed at locations throughout the urban portions of the City.

Specific Actions:

6.1.5(a) Periodically review the General Plan and zoning map to ensure that locations for affordable housing are encouraged in areas throughout the City, including locations within reasonable proximity to public facilities, transportation, schools, parks, and other daily services.

6.1.5(b) Implement the following strategies to provide housing opportunities specifically for extremely low-income households:

- Assist developers in seeking specialized funding sources for extremely low-income housing units
- Identify and recruit developers (for-profit and non-profit) for the development of extremely low-income housing units
- Re-evaluate the city's development review process for higher density, mixed use, second dwelling unit, and other supportive housing to ensure development feasibility
- Encourage other alternative housing options, including SRO (single room occupancy) housing units to meet the needs of varying living situations

Policy 6.1.6: Facilitate the construction of affordable housing developments for very low, low, and moderate income households.

Specific Actions:

6.1.6(a) Complete construction and sale of single-family residences to provide affordable housing to meet the needs of moderate-income households and enhance stability of neighborhoods through the pride of home ownership. The Lancaster Housing Authority will assist the developer to construct 100 single-family residences located north of Avenue I and east of Division Street (Sky View). Twenty percent of the units (20 units) will be deed restricted to moderate-income households, restricting resale of the homes to households whose income does not exceed 120% of the Los Angeles County median. Complete construction and sale of homes by 2021.

6.1.6(b) Complete construction and sale of single-family residences to provide affordable housing to meet the needs of moderate-income households and enhance stability of neighborhoods through the pride of home ownership. The Lancaster Housing Authority will assist the developer to construct 100 single-family residences located north of Avenue H-8 and east of Division Street (Whit Carter). Thirteen percent of the units (13

units) will be deed restricted to moderate-income households, restricting resale of the homes to households whose income does not exceed 120% of the Los Angeles County median. Complete construction and sale of homes by 2021.

- 6.1.6(c) Complete construction and sale of single-family residences to provide affordable housing to meet the needs of moderate-income households and enhance stability of neighborhoods through the pride of home ownership. The Lancaster Housing Authority will assist the developer to construct 40 single-family residences located in the Northeast Gateway Corridor (Old Fairgrounds housing project). Twenty percent of the units (8 units) will be deed restricted to moderate-income households, restricting resale of the homes to households whose income does not exceed 120% of the Los Angeles County median. Complete construction and sale of homes by 2021.
- 6.1.6(d) Complete construction and sale of single-family and multi-family residences to provide affordable housing to meet the needs of moderate-income households and enhance stability of neighborhoods through the pride of home ownership. The Lancaster Housing Authority will assist the developer to construct 77 single-family residences and 200 townhomes located in the Lowtree Neighborhood Project. Twenty percent of the units (56 units) will be deed restricted to moderate-income households, restricting resale of the homes to households whose income does not exceed 120% of the Los Angeles County median. Complete construction and sale of homes by 2021.
- 6.1.6(e) Complete construction and sale of residences to provide affordable housing to meet the needs of moderate-income households and enhance stability of neighborhoods through the pride of home ownership. The Lancaster Housing Authority will assist the developer to construct 100 condominiums located on Avenue I in the North Downtown Transit Village project area. One-hundred (100) units will be deed restricted to moderate-income households, restricting resale of the homes to households whose income does not exceed 120% of the Los Angeles County median. Complete construction and sale of homes by 2021.

For General Plan action programs that address the build-out of underutilized parcels and infill development within the urban core, please refer to the Lancaster General Plan Policy Document.

Policy 6.1.7: Ensure adequate water and sewer capacity to meet Lancaster's housing need.

Specific Actions:

- 6.1.7(a) On an annual basis, meet and work with all water districts, pertinent agencies and community groups to ensure adequate water capacity to meet Lancaster's housing need, utilizing a variety of strategies, including increased water conservation, the use of recycled water, and banking of increased supplies when available.

6.1.7(b) On an annual basis, meet and work with the Los Angeles County Sanitation District and other pertinent agencies to ensure adequate sewer capacity to meet Lancaster’s housing need, including the coordination of timely expansion upgrades to the Lancaster Water Reclamation Plant.

Policy 6.1.8: Encourage affordable mixed use and multi-residential housing developments on mixed use zoned sites.

Specific Actions:

6.1.8(a) Encourage housing development in the mixed-use zones by: providing assistance with site identification and entitlement processing; offering fee waivers and deferrals for affordable housing projects; modifying development standards such as setbacks and parking; and providing financial support where available for multi-family and mixed use affordable projects.

6.1.8(b) On an annual basis, the City will organize special marketing events geared towards the development community and post the sites inventory on the City’s webpage.

6.1.8(c) To assist the development of housing for lower income households on larger sites, the City will facilitate land divisions, lot line adjustments, mixed use planned developments, and specific plans, to create parcel sizes that facilitate multifamily developments affordable to lower income households, in light of state, federal and local financing programs (i.e., 2 to 10 acre units) through ministerial review of lot line adjustments, and streamlining and expediting the approval process for land division for projects that include affordable housing units.

Goal 7

To preserve existing housing stock within areas for which a desirable living environment can be provided; to promote conversion of such residential areas for which a desirable living environment cannot be sustained.

Subsidized housing

As a means of ensuring that an adequate amount of housing is available to meet the needs of all economic segments of the community, attention must be paid to ensure that existing housing which is affordable to low and moderate income groups stays affordable. Within Lancaster, as in any community, there is the chance that the availability of dwelling units which are affordable to low and moderate income households may decrease over time. This loss of affordable housing could occur as the result of termination of existing rental subsidy contracts.

Objective 7.1 Retain at no less than present levels the number of subsidized housing units of all types, and expand affordable housing opportunities for very low, low, and moderate-income households.

Policy 7.1.1: Regulate the conversion of existing rental apartment housing and mobile home parks to condominium or cooperative housing in order to prevent a decline in the supply of rental housing. Place particular emphasis on minimizing hardships created by the displacement of very low, low, and moderate-income households.

Specific Actions:

7.1.1(a) Apply the provisions of the City's subdivision ordinance relating to limitations on the conversion of rental apartments to condominiums or cooperatives when the multi-family vacancy rate falls below four percent.

7.1.1(b) Periodically monitor existing programs designed to preserve assisted housing developments for low income households as required by Government Code Section 65583(d) to determine if additional actions are required to protect these developments.

7.1.1(c) To preserve subsidized multifamily apartment units at risk of losing affordability restrictions, continue to apply the preservation strategies presented the section, "Preservation of Affordable Housing Units At-Risk" of the Housing Element.

Policy 7.1.2: Regulate the conversion of existing mobile home parks to non-residential uses in order to maintain a valuable source of affordable housing.

Specific Actions:

7.1.2(a) In order to preserve an affordable senior housing option and to protect the public health, safety and welfare and pursuant to the provisions of Section 65858 of the California Government Code, enact an urgency moratorium on the conversion of any mobile home park currently in existence in the City of Lancaster from a park where at least eighty percent (80%) of the full-time residents are individuals aged fifty-five (55) years and older (a "seniors only" mobile home park) to a mobile home park accepting all ages of residents.

Housing rehabilitation

Housing condition problems within the City of Lancaster are of great concern. The ability for households of all economic groups to find clean decent, sound shelter is a fundamental right. In addition, one of the first indications of a community's desirability as a place in which to live and do business is reflected in the quality of its housing stock. The existence of deteriorated housing in any

portion of Lancaster negatively affects the desirability of the entire community, and could negatively affect the decision making process of businesses and industrial firms which might consider Lancaster as a location, particularly where such housing is in close proximity to commercial and industrial areas.

Objective 7.2 Improve and preserve the existing supply of low and moderate income housing.

Policy 7.2.1: Rehabilitate owner and/or renter-occupied residences for extremely low to moderate-income households, the elderly, and physically disabled.

Specific Actions:

- 7.2.1(a) Continue the Home Ownership Mortgage Loan Program. This program will provide affordable housing to meet the needs of very low and low-income households, increase the mobile home owner base, and revitalize mobile home parks. Priority is to provide new or substantially rehabilitated housing and to provide financial assistance for purchase of affordable housing. The program will preserve 20 very low-income and 12 low income mobile residential homes by 2021.
- 7.2.1(b) Continue the Homeowner (and Senior Homeowner) Home Improvement Program designed to assist very low to above moderate income homeowners as well as senior citizen homeowners, by providing loans to rehabilitate distressed properties. The programs will provide assistance to 140 very low, 80 low, 40 moderate and 20 above moderate-income households. Assistance will be provided by 2021.
- 7.2.1(c) Continue the Rental Housing Rehabilitation Loan Program designed to provide a low interest loan for the rehabilitation of existing rental units. This program will provide financial assistance to 20 very low and 20 low-income households. Assistance will be provided by 2021.
- 7.2.1(d) Continue the Mobile Home Grant Program designed to assist very low and low-income mobile homeowners by providing grants to rehabilitate distressed mobile homes. This program will provide financial assistance to 100 very low and 80 low-income households. Assistance will be provided by 2021.
- 7.2.1(e) Implement the Foreclosure Preservation Homeownership Program designed to preserve sustainable homeownership in the city through reclaiming foreclosed homes as neighborhood assets. This program will preserve 10 very low, 10 low, and 9 moderate-income residential homes by 2021.

Maintenance of existing sound housing

The large majority of housing within the City of Lancaster is currently sound. Because of the community's rapid growth in recent years, a large portion of the City's housing stock will grow old at the same time. If the City is to avoid significant problems in the future, the establishment of programs

now to prevent future physical deterioration of the housing stock is critical. In addition, as a method of preventing deterioration of residential neighborhoods, it is important to ensure that an adequate level of public improvements and neighborhood facilities are provided throughout the city.

Objective 7.3 Prevent the physical deterioration of existing sound housing stock within the city of Lancaster.

Policy 7.3.1: Encourage continued maintenance of currently sound housing through local information and assistance programs.

Specific Actions:

7.3.1(a) Continue to perform pre-occupancy inspection programs in which a City building inspector inspects housing to ensure compliance with local, state, and federal regulations related to public health, safety, and welfare, including applicable housing codes.

7.3.1(b) Conduct concentrated code enforcement programs within the City when the need and community support warrant such activity. It is intended that this program would be applied to areas which are still basically sound, but which are just beginning to show signs of decline. This program would be coordinated with existing rehabilitation programs to provide loans and subsidies for required repairs.

7.3.1(c) Perform departmental review and approval of state-unlicensed group home facilities for disabled persons within the community to ensure compliance with regulations related to public health, safety, and welfare.

7.3.1(d) Respond to complaints or reports of substandard and unsanitary residential rental properties deemed unfit and/or unsafe for human occupancy, and limit the negative impacts to the physical, social, and economic stability of existing residential facilities, neighborhoods and the community as a whole.

Policy 7.3.2: Improve the livability of existing residential neighborhoods and prevent their deterioration by ensuring that an adequate level of public improvements and neighborhood facilities are available.

Specific Actions:

7.3.2(a) Facilitate the street maintenance, street widening, and provision of curb, gutter, sidewalk, and other improvements as appropriate to urban and rural environments in neighborhoods requiring revitalization.

Works Department budget

- 7.3.2(b) Provide for the acquisition of property in targeted neighborhood-revitalization areas where blighted conditions exist. Long-range revitalization efforts include acquisition, demolition, infrastructure repair, re-parcelization, and construction of single-family dwellings and neighborhood facilities.

Goal 8

To promote provision of adequate housing opportunities for those desiring to live in Lancaster, regardless of age, race, ethnic background, color, national origin, religion, familial status, marital status, disability, sex, sexual orientation, ancestry, source of income and any other protected class under state and federal law.

Housing for special needs groups

Previous objectives have dealt with general housing issues affecting a wide range of groups within the City. In addition to previously expressed housing needs, there exist within the City certain groups which have specialized housing needs. These groups include the elderly, handicapped, homeless, and military personnel. Each of these groups has different housing needs which are addressed below.

Objective 8.1 Promote provision of housing for the elderly, handicapped, homeless, and other special needs groups.

Policy 8.1.1: Promote the development and rehabilitation of housing specifically designed for the elderly providing a variety of living environments.

Specific Actions:

8.1.1(a) Administer the provisions of the zoning ordinance that allow the development of senior citizen residential projects, as a conditional use, within areas designated for single family, multiple family or commercial uses. The senior developments would be located as a transitional use between districts of varying intensity.

8.1.1(b) According to the provisions of the zoning ordinance, allow for the reduction in required parking for senior citizen projects as necessary to encourage affordable housing for senior citizens.

8.1.1(d) Administer the provisions of the zoning ordinance that allow for the establishment of second units on single family residential lots as a means of providing additional elderly housing opportunities. Inform the public of the provision for second units for the elderly through publication and public presentation.

8.1.1(e) Utilize the following criteria to evaluate proposed senior residential projects:

- Projects should be within walking distance of transit services, major transportation routes, and shopping and medical facilities.
- Land uses in senior projects should be limited to residential uses, extended care facilities and ancillary commercial uses.
- Projects shall include provisions limiting the purchase or lease of the property to persons over 55 unless a different age is required by state law.

Policy 8.1.2: Provide adequate shelter opportunities and assistance programs for those families and individuals who are either homeless or are at risk of becoming homeless.

Specific Actions:

- 8.1.2(a) Continue support for Lancaster Community Homeless Shelter. Provide funding on an ongoing basis to a non-profit entity for the management of this facility.
- 8.1.2(b) Continue to seek opportunities for providing emergency shelter for the homeless. Encourage participation of non-profit organizations.

Emergency Shelter Program

- 8.1.2(c) Coordinate with other jurisdictions in the Antelope Valley in order to address the regional perspective of homelessness.
- 8.1.2(d) Continue support in the operations of Homeless Solutions Access Center as a first point of contact for the homeless and persons at risk of becoming homeless.
- 8.1.2(e) Periodically conduct a survey to identify vacant buildings within the City which could be reused for housing for very low-, low- and moderate-income households or as shelter/service facilities for the homeless. If conversion opportunities are feasible, prepare implementation strategies.

Policy 8.1.3: Promote the development and rehabilitation of housing specifically designed for the disabled.

Specific Actions:

- 8.1.3(a) Continue the Homeowner Disabled Accessibility Program and the Senior Homeowner Disabled Accessibility Program designed to assist very low to moderate-income disabled homeowners as well as disabled senior citizen homeowners, by providing loans to retrofit principal residences to be physically accessible. The programs will provide assistance to 84 very low, 36 low and 24 moderate-income households. Assistance will be provided by 2021.

Policy 8.1.4: Ensure coordination between the City of Lancaster, Air Force Plant 42 and Edwards Air Force Base in regard to the provision of sufficient housing in the City to help meet the needs of military personnel for off-base housing.

Specific Action:

8.1.4(a) Establish regular lines of communication and a monitoring program to gauge the extent of off-base military housing requirements.

Prevention of housing discrimination

Housing discrimination, defined as prejudicial treatment applied categorically and not on the merit of the individual, is illegal for reasons of race, religion, national origin, ancestry, color, sex, or marital status. Housing discrimination is also socially repugnant, but still occurs. The City of Lancaster will remain vigilant to ensure that housing discrimination does not become a problem. Because state and federal law prohibit housing discrimination, the City's role in enforcing fair housing practices is generally limited to information, advocacy, coordination, and referral.

Objective 8.2 Prevent housing discrimination in accordance with national and state fair housing law.

Policy 8.2.1: Prohibit discrimination in housing based on race, ethnicity, national origin, age, religion, sex, and family status (children).

Specific Actions:

8.2.1(a) Continue to work with the Housing Rights Center to actively support and promote a Fair Housing Program that encompasses investigations of discrimination complaints, research of housing related discrimination issues and public education and information.

8.2.1(b) Increase public awareness of Lancaster's Fair Housing Program and other City and Agency assisted housing programs through period print, radio, television, web-based media and other venues through the provisions of the City's Communications Master Plan.

8.2.1(c) Identify, promote and foster community-based organizations focused on delivering supportive services that meet the specific needs of people who are in need of Continuum of Care programs ranging from domestic violence to homelessness."

Public Services and Facilities

A variety of public services and facilities are available to Lancaster residents. Some of the key facilities and services are identified in Table 4-7

**Table 4-7
Public Services and Facilities**

| Public Facility | Location |
|--|---|
| Lancaster City Hall | 44933 Fern Ave. Lancaster, Ca. 93534 |
| Lancaster City Maintenance Yard | 615 West Ave. H Lancaster, Ca. 93535 |
| MOAH Lancaster Museum of Art & History | 665 West Lancaster Blvd. Lancaster, Ca. 93534 |
| Lancaster City Performing Arts Center | 750 West Lancaster Blvd. Lancaster, Ca. 93534 |
| Cedar Center for the Arts | 44851 Cedar Ave. Lancaster Blvd. Lancaster, Ca. 93534 |
| Lancaster Community Shelter | 44611 Yucca Ave. Lancaster, Ca. 93534 |
| Lancaster Station Metro Link | 512 W Lancaster Blvd. Lancaster, Ca. 93534 |
| Lancaster City National Soccer Center | 43000 30 th St East Lancaster, Ca. 93536 |
| Lancaster Municipal Stadium (JetHawks) | 45116 Valley Central Way Lancaster, Ca. 93534 |
| Western Hotel | 557 West Lancaster Blvd. Lancaster, Ca. 93534 |
| American Heroes Park | 701 W Kettering Ave. Lancaster, Ca. 93534 |
| Lancaster City Park/Big 8 Softball Complex | 43063 10 th St. West Lancaster, Ca. 93534 |
| Prime Desert Woodlands Preserve | 43201 35 th St West Lancaster, Ca. 93536 |
| Deputy Pierre Baine Park/Eastside Pool | 45045 N 5 th St. East Lancaster, Ca 93534 |
| El Dorado Park | 44501 N 5 th St. East Lancaster, Ca. 93535 |
| Jane Reynolds Park/Webber Pool | 716 Oldfield Lancaster, Ca. 93534 |
| Skytower Park | 43434 North Vinyard Lancaster, Ca. 93536 |

Transportation

The Antelope Valley Transit Authority (AVTA) offers both a fixed-route service and a demand-response service known as Dial-a-Ride for local area residents. The AVTA local bus service takes children to school, employees to work, and residents to local stores and malls. The AVTA also provides Dial-a-Ride which is a curb to curb van service primarily for disabled persons.

The city's public transit is managed by the Antelope Valley Transit Authority (AVTA) which is a Joint Powers Authority formed under an agreement among the County of Los Angeles and the cities of Lancaster and Palmdale to provide transit services to the Antelope Valley.

Rail service is also available from the Antelope Valley to Santa Clarita, the San Fernando Valley and L.A. basin cities from Monday through Saturday by Metrolink, a commuter rail system.

Lancaster Fixed Route Services

The AVTA has 40 local transit coaches. Transit vehicles seat 38 to 40 passengers and have 2 wheelchair positions. They are ramp-equipped and the front steps can be lowered for passengers

who have difficulty boarding. Operating hours are from 6:00am to 11:00pm Monday through Friday and 7:00am to 7:00pm on Saturday and Sunday. AVTA provides supplemental routes that operate during peak times. Transfer Centers are located at Lancaster City Park and at the Palmdale Transportation Center. Table 4-8 shows the current local transit fare structure used by the system.

Table 4-8

Lancaster Local Transit Fare Structure

| | | Full Fare |
|---------------------|---------|------------------|
| One-Way Trip | Cash | 1.50 |
| | on TAP* | 1.25 |
| 4-Hour Pass | | 2 |
| Day Pass | | 3.75 |
| Weekly Pass | | 15 |
| 31 Day Pass | | 50.00 |

Source: http://www.avta.com/transit/transit_fares.htm

* The TAP card is a reusable fare payment card that can be reloaded again and again with bus/rail passes or stored value to provide AVTA passengers with seamless travel throughout Los Angeles County.

No-Cost fares are available to the following:

- Children 44 inches and under in height ride free on regular transit only. (Limit four (4) free children per fare paying adult. Each additional child will pay 25 cents.)
- Seniors over the age of 65
- Disabled Passengers
- Medicare card holders
- Active Military
- Veterans

**Table 4-9
AVTA Fare Structure**

| | Full Fare | Senior/Disabled/Medicare |
|---|---------------|--------------------------|
| Route 785 | | |
| EZ Transit Pass (zone 10) | \$304.00 | \$130.00 |
| Monthly Pass | \$266.00 | \$133.00 |
| 10-Ride Pass | \$76.00 | \$38.00 |
| One-Way Trip | | |
| | on TAP \$7.60 | \$3.80 |
| | Cash \$14.00 | \$7.00 |
| Route 786 | | |
| EZ Transit Pass (zone 11) | \$326.00 | \$139.50 |
| Monthly Pass | \$310.00 | \$155.00 |
| 10-Ride Pass | \$88.50 | \$44.00 |
| One-Way Trip | | |
| | on TAP \$8.85 | \$4.40 |
| | Cash \$16.00 | \$8.00 |
| Route 787 | | |
| EZ Transit Pass (zone 9) | \$282.00 | \$120.50 |
| Monthly Pass | \$249.00 | \$124.50 |
| 10-Ride Pass | \$71.00 | \$35.50 |
| One-Way Trip | | |
| | on TAP \$7.10 | \$3.55 |
| | Cash \$14.00 | \$7.00 |
| *EZ transit pass allows you to use more than one transit system without having to purchase additional tickets or transfers. | | |
| **The TAP card is a reusable fare payment card that can be reloaded again and again with bus/rail passes or stored value to provide AVTA passengers with seamless travel throughout Los Angeles County. | | |
| Source: http://www.avta.com/commuter/commuter_fares.htm | | |

Dial-A-Ride

Dial-A-Ride (DAR) is a special transportation service designed to provide curb-to-curb van service to seniors over the age of 65 and disabled residents of the Antelope Valley. The DAR service uses air-conditioned, lift-equipped vans.

The U.S. Department of Transportation has implemented the Americans with Disabilities Act of 1990 (ADA). The ADA requires public entities that operate a fixed-route system for the general public to provide a complementary paratransit service to persons unable to use the regular fixed-route service. There are three qualifying categories set forth in the ADA. Only those individuals

who qualify under at least one category will be certified to ride Dial-A-Ride. The categories are as follows:

- Any individual with a disability who is unable to board or ride a bus on the fixed-route system that is accessible and usable by other individuals with a disability.
- Any individual with a disability who needs the assistance of a wheelchair lift or other boarding assistance and the fixed route he/she wants to travel is not wheelchair accessible.
- Any individual with a disability who has a condition that prevents him/her from walking or traveling to and from a bus stop on the fixed route system.

Table 4-10 shows the fare structure used by the DAR system.

**Table 4-10
Dial-A-Ride Fare Structure**

| Zone | Fares |
|--|----------------|
| Urban Zone | \$3.00 One way |
| *Group Rate | \$1.25 One way |
| Rural Zone 1 | \$3.50 One way |
| *Group Rate | \$1.75 One way |
| Rural Zone 2 | \$6.00 One way |
| *Group Rate | \$3.00 One way |
| *Group Rate applies to 3 or more DAR qualified passengers traveling from one origin to one destination. The fare is per person. Source: http://www.avta.com/dar/dar_fares.htm | |

Commuter Bus Service

AVTA provides commuter bus service to Downtown Los Angeles (Route 785), Century City/West L.A. (Route 786), and the San Fernando Valley (Route 787). These routes operate during the work week only and depart from Lancaster City Park and Palmdale Transportation Center.

Public Transit and Employment Nexus in Lancaster

As previously stated, access to employment via public transportation can reduce welfare usage rates and increase housing mobility, which enables residents to locate housing outside of traditionally low- and moderate-income neighborhoods. The lack of a relationship between public transit, employment opportunities and affordable housing could impede fair housing choice because persons who depend on public transit will have limited choices regarding places to live.

According to AVTA Comprehensive Long-Range Transit Plan (August 2010), jobs are forecast to increase at half the rate of population. Since the Antelope Valley already has an employment

deficit, many of the new workers will have to travel outside of the Antelope Valley for work. These workers will have to – by necessity – travel longer distances to work, potentially increasing the demand for express transit services.

Antelope Valley will continue to have more workers than jobs in all income categories. A further consideration is whether there will be a match in the kinds of new households and jobs added. If Antelope Valley adds low-paying jobs, but builds high-end housing, then even more longer-distance commuting will ensue. In percentage terms, Antelope Valley is projected to add more of the higher income households and higher income jobs. Nonetheless, there are projected to be sizeable disparities in households and jobs for all income levels. This indicates that even lower income workers will be forced to travel long distances.

Costs associated with lower and medium income workers traveling long distances could be an impediment to fair housing choice. While monthly passes for local transit could be up to \$55, a monthly commuter pass could cost a resident up to \$352, more than 10 times the local transit cost. Results show these inter-jurisdictional commutes impose disproportionately high time and cost burdens on low-income households, particularly single female-headed households. The city should explore sources of funding for income-based assistance for low-wage commuters.

Section 5

Fair Housing Practices

This section provides an overview of the institutional structure of the housing industry with regard to fair housing practices. In addition, this section discusses the fair housing services available to residents, as well as the nature and extent of fair housing complaints received by the fair housing provider. Typically, fair housing services encompass the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing information. Tenant/landlord counseling services are usually offered by fair housing service providers but are not considered fair housing services.

The City of Lancaster contracts with the Housing Rights Center (HRC), a nonprofit organization dedicated to affirmatively furthering fair housing choice through the provision of education and direct client services. To promote awareness of fair housing laws, HRC implements targeted homebuyers and tenants as well as housing providers such as sellers, owners, realtors, brokers, landlords and property management firms. Using available data to analyze current discrimination trends, HRC disseminates brochures that promote awareness of specific fair housing issues in an effort to ensure that all persons have the opportunity to secure safe and decent housing that they desire and can afford, without regard to their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by laws. Direct client services range from providing advice concerning general housing issues to performing investigations and advising residents of their rights and remedies under the law in cases where evidence sustains the allegations of discrimination.

Using available data to analyze current discrimination trends HRC, disseminates brochures that promote awareness of specific fair issues in an effort to ensure that all persons have the opportunity to secure safe and decent housing that they desire and can afford, without regard to their race, color, religion, gender sexual orientation, national origin, family status, marital status, disability, ancestry, age, source of income or other characteristics protected by laws. Direct client services range from providing advice concerning general housing issues to performing investigations and advising residence of their rights and remedies under the law in cases where evidence sustains the allegations of discrimination.

The Comprehensive Fair Housing Services Include:

Fair Housing Education: HRC has established an effective and comprehensive outreach and public education program designed to raise awareness of the fair housing laws that protect individuals, often in traditionally underserved communities, against housing discrimination.

The Outreach Department develops and distributes educational literature and resources that describe ways to prevent housing injustices and the applicable laws that protect against

discrimination. The materials are made available free to the public in various languages including English, Spanish, Korean, Mandarin, Armenian, Cantonese and Russian.

Housing Discrimination Complaint Investigation: HRC investigates allegations of housing discrimination under the fair housing laws. The investigations Department conducts fact finding investigations and proposes potential solutions for victims of housing discrimination. Case resolution can include mediation, conciliation, a referral to state and federal administrative agencies, or referral to HRC's Litigation Department.

Tenant and Landlord Counseling: HRC provides free telephone and in-person counseling to both tenants and landlords regarding their rights and responsibilities under California law and local city ordinances. Housing Counselors are trained in landlord/tenant law. Counselors are also trained to ask basic questions that are likely to reveal potential discrimination without prompting the caller to prematurely identify discrimination as the cause.

As the largest community-based fair housing agency in the United States, HRC has pioneered many investigative and reporting procedures, and is often called on by the media to provide expert knowledge on fair housing issues.

Fair Housing Education

HRC provides a comprehensive, extensive and viable education and outreach program and services. The purpose of this program is to educate tenants, landlords, owners, realtors and property management companies on fair housing laws; to promote media and consumer interest and to secure grass root's involvement within the community. HRC conducts outreach and education activities that are vital to improve compliance with the law as follows:

Conduct Training Workshops for consumers: The general types of activities conducted for consumers include a comprehensive fair housing presentation, a discussion about common forms of housing discrimination, and a question and answer session. During these workshops, HRC also distributes literature that consumers can refer to when specific issues arise.

Conduct Training Workshops for Housing Providers: The general types of activities conducted for housing providers include monthly Fair Housing Certification Training seminars for housing industry professionals at their main office located in Los Angeles. These seminars are tailored to provide detailed analysis of fair housing laws and interpretation, with specific information on discrimination against families with children, people with disabilities, sexual harassment, hate crimes, and advertising.

Increase Public Awareness: The general types of activities conducted to increase public awareness includes developing and distributing hundreds of pieces of multilingual literature in the City, aimed at a variety of audiences, describing how housing injustices arise, the laws that protect against

housing discrimination, and ways to prevent housing inequality. Materials are distributed during neighborhood visits and via mailings through the City, can also be found in a variety of languages.

The education and outreach activities provided by HRC over the last four (4) years are shown in Tables 5-1 and 5-2

Table 5-1

Education and Outreach Provided by HRC in Lancaster

| Location and Activity | 2009-2010 | 2010-11 | 2011-2012 | 2012-2013 | 2013-2014 | Total |
|-------------------------|-----------|---------|-----------|-----------|-----------|--------|
| Agency Contacts | 722 | 605 | 495 | 459 | 457 | 2,738 |
| Literature Distribution | 2,500 | 1,700 | 4,700 | 3,390 | 2,830 | 15,120 |
| Walk-in Clinics | 12 | 12 | 12 | 12 | 12 | 60 |

Table 5-2

Education and Outreach Provided by HRC – All Service Areas

| Location and Activity | 2009-2010 | 2010-2011 | 2011-2012 | 2012-2013 | 2013-2014 | Total |
|-----------------------|-----------|-----------|-----------|-----------|-----------|---------|
| Media | | | | | | |
| Advertisements | 17 | 12 | 15 | 25 | 27 | 96 |
| Newsletter | 3 | 1 | 1 | 3 | 2 | 10 |
| Press Releases | 52 | 70 | 54 | 34 | 36 | 246 |
| PSAs | 130 | 185 | 118 | 64 | 112 | 609 |
| Website Hits | 55,002 | 66,218 | 276,822 | 160,415 | 112,026 | 670,483 |
| Other | 13 | 12 | 12 | 12 | 9 | 58 |
| Staff Training | 1 | 1 | 4 | 1 | 5 | 12 |
| Tester Training | | | | | | |
| New Testers | 72 | 70 | 93 | 41 | 31 | 307 |
| New Training Sessions | 6 | 8 | 8 | 5 | 5 | 32 |
| Refresher Sessions | 1 | 1 | 1 | 1 | 1 | 5 |
| Special Events | | | | | | |
| Annual Summit | 1 | 1 | 1 | 1 | 1 | 5 |
| Conference | 1 | 1 | 1 | 0 | 0 | 3 |

Source: HRC. 2014

Fair Housing Discrimination Complaints

Housing Discrimination Intake and Investigation

HRC is a complaint driven agency that investigates fair housing complaints based on fair housing violations in the City of Lancaster. Fair housing complaints are received through education and outreach, internet referrals, and advertisements activities that take place in the City of Lancaster.

HRC investigates State and Federal protected categories which include race, color, national origin, religion, sex, age, familial status, disability, marital status, sexual orientation, ancestry, age, source of income and arbitrary characteristic. The State of California has identified marital status, sexual orientation, ancestry, age, source of income and arbitrary characteristics as additional protected classes.

Once a Fair Housing Complaint is received, HRC educates the complainant of their rights and responsibilities. The complainants are advised of possible further investigation depending on the complaint.

HRC uses government regulated testing methodologies to enforce, support, and conduct fair housing investigations. Based on the details provided by the complainant HRC will either investigate the complaint or, advise the complainants of their other options, which include: conciliation, referral to the State Department of Fair Employment and Housing (DFEH) or to HUD for further investigation and enforcement.

HRC handled a total of 64 discrimination complaints over a five year period from July 1, 2009 to June 30, 2014. Table 5-3 shows the discrimination complaints in Lancaster by complaint basis. Note that each of the 64 discrimination complaints may have had more than one attributable basis of discrimination.

**Table 5-3
Fair Housing Discrimination Complaints by Basis**

| Basis* | 2009-2010 | 2010-2011 | 2011-2012 | 2012-2013 | 2013-2014 | Total |
|---------------------|------------------|------------------|------------------|------------------|------------------|--------------|
| Age | 0 | 2 | 2 | 1 | 0 | 5 |
| Ancestry | 0 | 0 | 0 | 0 | 0 | 0 |
| Arbitrary | 0 | 0 | 0 | 0 | 0 | 0 |
| Color | 0 | 0 | 0 | 0 | 0 | 0 |
| Familial Status | 2 | 4 | 4 | 2 | 0 | 12 |
| Gender | 1 | 0 | 1 | 3 | 0 | 5 |
| Marital Status | 0 | 0 | 0 | 0 | 0 | 0 |
| Mental Disability | 7 | 15 | 6 | 2 | 3 | 33 |
| National Origin | 1 | 3 | 0 | 1 | 0 | 5 |
| Physical Disability | 27 | 28 | 34 | 13 | 14 | 116 |
| Race | 11 | 3 | 11 | 9 | 0 | 34 |
| Religion | 0 | 1 | 1 | 0 | 1 | 3 |
| Sexual Orientation | 0 | 0 | 1 | 1 | 1 | 3 |
| Source Income | 0 | 0 | 0 | 0 | 1 | 1 |
| General Information | 6 | 6 | 1 | 4 | 2 | 19 |
| Total: | 55 | 62 | 61 | 36 | 22 | 236 |

Physical disability, race, and mental disability were the most frequently cited reasons why complainants felt discriminated against.

Table 5-4 shows the findings and disposition of the 64 unduplicated discrimination complaints received by HRC in the last five (5) years. Allegations of discrimination based on physical or mental disability remained the most frequently reported to the HRC from July 1, 2009 to June 30, 2014 (116 physical disability complaints and 33 mental disability complaints). The majority of discrimination allegations were sustained as a result of the investigation conducted by HRC.

Data supplied by HRC in Table 5-4 indicates that the number of fair housing discrimination complaints in Lancaster replicates a bell curve, starting with 11 complaints by June 30, 2010, slowly increasing to 19 complaints by June 30, 2012, and decreasing substantially to 7 complaints ending June 30, 2014.

Table 5-4

Fair Housing Discrimination Complaints: Findings and Disposition

| Findings | 2009-2010 | 2010-2011 | 2011-2012 | 2012-2013 | 2013-2014 | Total |
|--------------------------------|------------------|------------------|------------------|------------------|------------------|--------------|
| Sustains Allegation | 6 | 12 | 12 | 4 | 4 | 38 |
| Inconclusive Evidence | 1 | 0 | 4 | 2 | 1 | 8 |
| Pending | 4 | 3 | 3 | 6 | 2 | 18 |
| Total | 11 | 15 | 19 | 12 | 7 | 64 |
| Dispositions | 2009-2010 | 2010-2011 | 2011-2012 | 2012-2013 | 2013-2014 | Total |
| Successful Conciliation | 3 | 5 | 3 | 3 | 2 | 16 |
| Client Withdrew | 2 | 0 | 0 | 0 | 1 | 3 |
| No Enforcement Action Possible | 1 | 6 | 5 | 2 | 1 | 15 |
| Pending | 4 | 2 | 11 | 7 | 3 | 27 |
| Referred to Litigation Dept | 1 | 0 | 0 | 0 | 0 | 1 |
| Referred to DFEH | 0 | 2 | 0 | 0 | 0 | 2 |
| Total | 11 | 15 | 19 | 12 | 7 | 64 |

National Fair Housing Enforcement

Under the Fair Housing Act, HUD has the authority to investigate, attempt to conciliate, and if necessary, adjudicate complaints of discrimination involving, among other things, home sales, rentals, advertising, mortgage lending and insurance, property insurance, and land use, but must refer these complaints to the U.S. Department of Justice for enforcement.

HUD shares its authority to investigate housing discrimination complaints with state and local government agencies that participate in the Fair Housing Assistance Program (FHAP). To participate in the FHAP, a jurisdiction must demonstrate that it enforces a fair housing law that provides rights, remedies, procedures, and opportunities for judicial review that are substantially equivalent to those provided to the federal Fair Housing Act. As of September 30, 2013, there are 90 FHAP agencies across the country; however, the only FHAP agency in California is the State Department of Fair Employment and Housing (DFEH). In other states, county governments, municipal governments and community based organizations are approved as FHAP agencies. HUD pays FHAP agencies for each complaint they investigate, based on the timeliness and quality of the investigation. In addition, HUD provides funding to FHAP agencies for capacity-building, training, and information systems.

A person who believes that he or she has experienced, or is about to experience, housing discrimination may file a complaint or may have a complaint filed on his or her behalf by someone else, such as a parent, child, spouse, or guardian, HUD and FHAP agencies accept complaints in person, by telephone through the mail, and through their websites. If HUD receives a housing discrimination complaint where the alleged discriminatory act occurred within the jurisdiction of one of its FHAP agencies, HUD is required under the Fair Housing Act to refer the complaint to that agency.

If HUD determines there is reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, it issues a charge of discrimination. The parties may choose to pursue the matter in an administrative proceeding or in federal district court.

If a FHAP agency finds reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, the agency or attorneys for the state or locality litigate that complaint in an administrative proceeding or in civil court.

HUD annually compiles data on housing discrimination complaints filed with HUD or FHAP agencies and issues an Annual Reports on Fair Housing to Congress. The most recent Annual Report on Fair Housing was issued by HUD Secretary Julian Castro on November 7, 2014 covering the period of October 1, 2011 to September 30, 2013. The Annual Report on Fair Housing indicates that the overall number of housing discrimination complaints filed with HUD and FHAP declined each fiscal year from 2010-2013. Table 5-5 provides information on the complaints received by HUD and FHAP during this period for the top eight bases of discrimination.

**Table 5-5
HUD and FHAP Discrimination Complaints, 2010-2013**

| Basis of Discrimination | 2010 | | 2011 | | 2012 | | 2013 | |
|--------------------------------------|---------------|-----|--------------|-----|--------------|-----|--------------|-----|
| | No. | % | No. | % | No. | % | No. | % |
| Disability | 4,389 | 48% | 4,498 | 48% | 4,379 | 50% | 4,429 | 53% |
| Race | 3,483 | 34% | 3,025 | 32% | 2,597 | 29% | 2,337 | 28% |
| Familial Status | 1,560 | 15% | 1,425 | 15% | 1,301 | 15% | 1,149 | 14% |
| National Origin | 1,177 | 12% | 1,195 | 13% | 1,114 | 13% | 1,040 | 12% |
| National Origin – Hispanic or Latino | 722 | 7% | 759 | 8% | 691 | 8% | 629 | 8% |
| Sex | 1,139 | 11% | 1,033 | 11% | 1,067 | 12% | 985 | 12% |
| Retaliation | 707 | 7% | 856 | 9% | 970 | 11% | 928 | 11% |
| Religion | 287 | 3% | 262 | 3% | 229 | 3% | 220 | 3% |
| Color | 219 | 2% | 185 | 2% | 155 | 2% | 170 | 2% |
| Total: | 10,155 | | 9,354 | | 8,818 | | 8,368 | |

Nationally, the top eight most frequently cited bases of discrimination have not changed in the last four years. Similar to data reported to FHAP for the City of Lancaster, disability continues to be the most common basis of complaints filed with HUD and FHAP agencies, increasing in proportion relative to the overall number of complaints each year. According to HUD, this large number of complaints is due, in part, to the additional protections afforded persons with disabilities under the Fair Housing Act, (i.e., reasonable accommodation, reasonable modification, and accessible design and construction).

All complaints to HUD and FHAP agencies must specify the section of the Fair Housing Act that was allegedly violated or would have been violated. HUD and FHAP agencies record these discriminatory practices in categories known as “issues”. Table 5-6 shows the number of complaints filed with HUD and FHAP agencies from 2010-2013, broken down by issue. If a single complaint alleged multiple issues, it was counted under each issue alleged.

Nationwide, the share of complaints filed under each basis has remained relatively stable during the period represented in the report. However, the overall number of discrimination complaints decreased slightly in the prior five (5) years. Race continues to be the second most common basis of complaints filed with HUD and FHAP agencies. Familial status, the third most common basis of housing complaints, but has recently decreased since as well. Discrimination based on familial status covers acts of discrimination against parents or guardians of a child under the age of 18, the parent’s or guardian’s designee, and person who are pregnant or in the process of obtaining legal custody of a child under the age of 18.

The Department of Fair Employment and Housing (DFEH) is the State agency responsible for investigating housing discrimination complaints. The Department of Fair Employment and Housing’s mission is to protect Californians from employment, housing and public accommodation discrimination, and hate violence. During the prior four (4) years, DFEH has not received any cases from the City of Lancaster.

In May 2003, DFEH announced a program for mediating housing discrimination complaints in partnership with state fair housing enforcement agencies. The program provides tenants, landlords, property owners and manager through mediation in a free and timely manner. Mediation takes place within the first 30 days of filing of the complaints, often avoiding the financial and emotional costs resulting from a full DFEH investigation and potential litigation.

Table 5-6
Issues in HUD and FHAP Complaints, 2010-2013

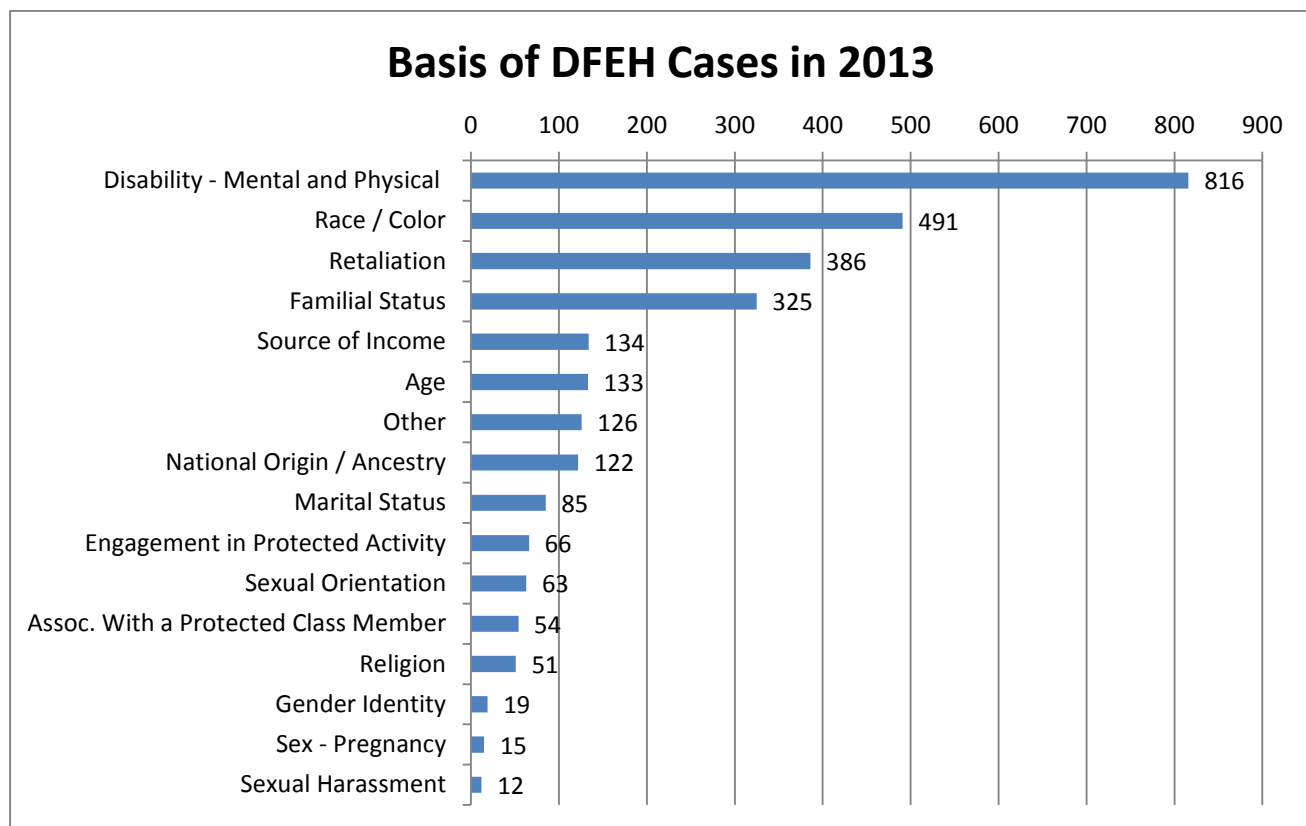
| Complaint Issue | 2010 | | 2011 | | 2012 | | 2013 | |
|--|---------------|-------|---------------|-------|---------------|-------|---------------|-------|
| | No. | % | No. | % | No. | % | No. | % |
| Discriminatory Terms, Conditions, Privileges, Services, & Facilities in the Rental or Sale of Property | 5,959 | 59% | 5,674 | 61% | 5,516 | 63% | 5,713 | 68% |
| Failure to Make a Reasonable Accommodation | 2,556 | 25% | 2,408 | 26% | 2,487 | 28% | 2,543 | 30% |
| Refusal to Rent | 2,405 | 24% | 2,239 | 24% | 2,317 | 26% | 2,273 | 27% |
| Coercion or Intimidation, Threats, Interference, and Retaliation | 1,478 | 15% | 1,650 | 18% | 1,913 | 22% | 1,884 | 23% |
| Discriminatory Notices, Statements or Advertisements | 937 | 9% | 784 | 8% | 936 | 11% | 986 | 12% |
| Discriminatory Financing | 511 | 5% | 442 | 5% | 383 | 4% | 433 | 5% |
| False Denial or Representation of Availability | 256 | 3% | 250 | 3% | 237 | 3% | 246 | 3% |
| Failure to Permit A Reasonable Accommodation | 203 | 2% | 207 | 2% | 204 | 2% | 194 | 2% |
| Refusal to Sell | 205 | 2% | 142 | 2% | 190 | 2% | 170 | 2% |
| Non-Compliance with Design and Construction Requirements | 169 | 2% | 90 | 1% | 106 | 1% | 114 | 1% |
| Steering | 84 | 1% | 62 | 1% | 81 | 1% | 80 | 1% |
| Refusal to Provide Insurance | 2 | <0.5% | 0 | 0% | 4 | <0.5% | 6 | <0.5% |
| Redlining | 6 | <0.5% | 2 | <0.5% | 11 | <0.5% | 5 | <0.5% |
| Number of Complaints Filed | 10,155 | | 13,950 | | 14,385 | | 14,647 | |

State of California Fair Housing Enforcement

The State Department of Fair Employment and Housing (DFEH) is the state agency responsible for investigating housing discrimination complaints. As discussed in the previous section, DFEH is the only HUD approved FHAP agency in the State of California. DFEH’s mission is to protect California residents from employment, housing and public accommodation discrimination and Hate violence. In 2013, FHF referred only one Palmdale resident to DFEH to pursue enforcement action. Table 5-7 provides the basis data from the most recent report available showing the 2,898 different bases of discrimination associated with 1,250 cases referred to DFEH from across the state in calendar year 2013.

Table 5-7

State Department of Fair Employment and Housing Cases



Hate Crimes

Hate crimes are violent acts against people, property, or organizations because of the group to which they belong or identify with. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate or act violently toward a person who has exercised their right to free housing choice. Some examples include threats made in person, writing or by telephone, vandalism of the home or property, or unsuccessful attempts at any of these. The FBI classifies hate crimes into one of five (5)

primary bias motivation categories, including: race, religion, sexual orientation, ethnicity or disability. Housing discrimination complaints regarding coercion or intimidation, threats, interference, and retaliation filed with HUD and FHAP agencies, has remained steady at 13-15 percent for the last five fiscal years, suggesting that discrimination most closely associated with hate crimes may be on the rise in housing discrimination.

In Lancaster, there were a total of 27 hate crimes reported to the FBI during 2010-2013 shown in Table 5-8. The most prevalent hate crime bias motivation reported was race (52.0 percent of all cases). The relatively low occurrence of hate crimes within the community indicates that hate-motivation does not appear to coincide with the incidence of housing discrimination in Lancaster and does not indicate an impediment to fair housing choice.

Table 5-8
Hate Crime Incidents Reported to the FBI in Lancaster 2010-2013

| Calendar Year | Race | Religion | Sexual Orientation | Ethnicity | Disability | Total |
|----------------------|-------------|-----------------|---------------------------|------------------|-------------------|--------------|
| 2010 | 3 | 0 | 5 | 0 | 0 | 8 |
| 2011 | 4 | 2 | 0 | 1 | 0 | 7 |
| 2012 | 3 | 1 | 0 | 1 | 0 | 5 |
| 2013 | 4 | 0 | 1 | 2 | 0 | 7 |
| Total: | 14 | 3 | 6 | 4 | 0 | 27 |

Fair Housing Legal Status

From July 1, 2009 to June 30, 2014, no cases were filed in a court of competent jurisdiction by the HRC to enforce fair housing laws. HRC was successful in conciliation or otherwise addressing the fair housing cases that were investigated on behalf of the City of Lancaster during this time period; therefore, there is not litigation to report.

Section 6

Fair Housing Analysis

Previous chapters of this Analysis of Impediments study examined changes in Lancaster during the last five (5) years, analyzed public policies for impediments to fair housing, and documented fair housing opportunity in Lancaster. Building upon the previous analysis, this chapter recommends actions to improve housing opportunity in Lancaster. Table 6-1 at the end of this chapter summarizes the impediments and recommendations to address these impediments to fair housing choice with an implementation schedule.

Existing Impediments to Fair Housing Choice

HUD requires the City to analyze past performance with respect to the resolution of impediments to fair housing choice that were identified in prior Analyses of Impediments. The 1996 Analysis of Impediments and the Update to the 1996 Analysis of Impediments to Fair Housing completed April 2002 identified three (3) impediments to fair housing choice, of which all three (3) were resolved.

The earlier sections of this Analysis of Impediments identified common problems and potential barriers to fair housing in the City of Lancaster. This section builds on the previous analysis, summarizes conclusions and outlines the City's commitment to actions for addressing the impediments to fair housing.

New Impediments to Fair Housing Choice

The 2015 Analysis of Impediments revealed new impediments to fair housing choice.

- 1. 2015 Impediment No. 1: Discrimination against Persons with Disabilities.** Housing Rights Center Fair Housing Discrimination Complaint data indicates that a majority of discrimination complaints from 2006-2009 were based on physical or mental disability. The high number of disability-related complaints in Lancaster was consistent with data from other cities at that time and revealed a lack of understanding of and sensitivity to the fair housing rights of the disabled.

Physical and mental disability fair housing discrimination complaints continue to be the most common basis for fair housing discrimination complaints in Lancaster. For the last five fiscal years the highest number of fair housing discrimination complaints in Lancaster has been physical and mental disabilities. There were a total of 236 complaints within the last five fiscal years, and 149 (63 percent) were related to physical and mental disabilities complaints.

Recommendation: To address the lack of understanding and sensitivity to the fair housing needs of physically and mentally disabled people, it is recommended that the City provide additional workshops geared toward disabled housing issues including reasonable accommodation and emphasizing that landlords may not refuse to rent on the basis of disability

or any arbitrary factor. These workshops should be designed to specifically address this population's particular housing needs and rights. Additionally, it is recommended that the City provide additional discrimination testing to be conducted by HRC on the topic of disabilities.

- 2. 2015 Impediment No 2: Lack of Awareness of Fair Housing Laws.** A general lack of knowledge of fair housing rights and responsibilities continues to exist. Increased fair housing complaint intake by Housing Rights Center and interaction with housing providers and housing seekers during workshops demonstrates a lack of understanding of both Federal and State fair housing laws.

Recommendation: Coordinate with Housing Rights Center to enhance its outreach efforts to real estate professionals with fair housing questions or concerns in Lancaster and the region, It is recommended that the City continue existing efforts to provide for expanded participation in fair housing education workshops for prospective homebuyers, renters, and providers of housing such as multifamily management companies, independent landlords and real estate agents or brokers to facilitate awareness of fair housing laws and the rights and responsibilities of tenants and landlords under California law.

- 3. 2015 Impediment No. 3: Race/Ethnic Relations.** Race/Ethnic relations may contribute to bias or stereotypes that have an impact on Fair Housing Choice. Fair housing complaint data from 2006-2009 indicates that race/ethnicity was the second-leading cause of housing discrimination in the City.

Recommendation: In partnership with community nonprofits, fair housing organizations, other government agencies and special districts, continue to provide public information programs disseminating information on fair housing laws, inclusion and diversity.

Fair Housing Plan

This Analysis of Impediments identifies common problems and barriers to fair housing in Lancaster. This section builds upon the previous analysis, outlines conclusions, and provides recommendations for the City to address impediments to the fair housing identified earlier. These recommendations will serve as the basis for the City to develop an action plan to eliminate identified impediments. The recommendations listed in Table 6-1 on the following page are designated for action by the City, and other service agencies that assist Lancaster residents.

Table 6-1
Fair Housing Plan

| Impediments to Fair Housing Choice | Recommendations | Lead Agency | Timeframe |
|---|---|--|--------------------------|
| 1. Discrimination against Persons With Disabilities | <p>To address the lack of understanding and sensitivity of the fair housing needs of physically and mentally disabled people, it is recommended that the City provide additional fair housing workshops geared toward disabled housing issues including reasonable accommodation and emphasizing that landlords may not refuse to rent on the basis of disability of any arbitrary factor.</p> <p>These workshops should be designed to specifically address this population’s particular housing needs and rights. Additionally, it is recommended that the City provide additional discrimination testing to be conducted by the City’s contracted fair housing service provider for disability complaints.</p> | Contracted Fair Housing Service Provider | Ongoing to June 30, 2020 |
| 2. Lack of Awareness of Fair Housing Laws | <p>It is recommended that the City’s contracted fair housing service provider continue to provide fair housing technical assistance to real estate professionals with fair housing questions or concerns in Lancaster and the region.</p> <p>It is recommended that the City continue existing efforts to provide for expanded participation in fair housing education workshops for prospective homebuyers, renters, and providers of housing such as multifamily management companies, independent landlords and real estate agents or brokers to facilitate awareness of fair housing laws and the rights and responsibilities of tenants and landlords under California law.</p> | Contracted Fair Housing Service Provider | Ongoing to June 30, 2020 |
| 3. Race/Ethnic Relations | <p>In partnership with community nonprofits, fair housing organizations, other government agencies and special districts, continue to provide public information programs disseminating information on fair housing laws, inclusion and diversity.</p> <p>It is recommended that the fair housing service provider continue to conduct fair housing workshops for residents, apartment owners, and property managers.</p> | Contracted Fair Housing Service Provider | Ongoing to June 30, 2020 |

Signature Page

I, Mark V. Bozigian, City Manager of the City of Lancaster, hereby certify that this Analysis of Impediments to Fair Housing Choice represents the City’s conclusion about impediments to fair housing choice, as well as actions necessary to address any identified impediments.

_____, hereby certify that this Analysis of Impediments to Fair Housing Choice for the City of Lancaster represents the City’s conclusions about impediments to fair housing choice, as well as actions necessary to address any identified impediments.

Mark V. Bozigian
City Manager

Date: _____