# City of Lancaster, California

# 2022 Analysis of Impediments to Fair Housing Choice



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# **Summary Organization**

**Section 1: Introduction** defines *fair housing* and explains the purpose of this report.

**Section 2: Jurisdictional Background Data** 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.

- 1. Demographic Data
- 2. Income Data
- 3. Employment Data
- 4. Housing Profile
- 5. Other Relevant Data

**Section 3: Private Practices** analyze 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: Conclusions, Impediments and Actions** provide conclusions and recommendations about fair housing issues in Lancaster.

# **Summary Fair Housing Regulatory 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 below describes Lancaster's regulatory compliance to fair housing choice.

# **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 re: the granting of variances and exceptions to zoning and land- use rules.	Yes
Residential Mixed Land Use Standards	City provides for commercial/residential mixed land use in the MX Overlay Zone.	The MX Zone includes 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.	Yes
Zoning Exclusion re: Discrimination	City does not exclude nor 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- or multifamily housing.	Developers often request modification of housing standards for senior citizen housing such as smaller swelling sizes and reduced offstreet parking.	Yes
Does City distinguish between handicapped housing and other types of single- or multi-family housing?	City does not require a CUP for Handicapped Housing.	City complies with State and Federal law regarding ADA designed housing.	Yes
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 Dept. reviews all plans for compliance with adopted codes. Monitoring is the responsibility of the building dept.	Yes

# Section 1 Introduction

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.

#### 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 (cognitive or physical). In addition, the Amendments Act provides for "reasonable accommodations," allowing structural modifications for people with disabilities, if requested, and sometimes at their own expense, for multifamily dwellings to accommodate people with physical disabilities.

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.<sup>1</sup>

#### 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 race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor that restricts 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 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.

<sup>&</sup>lt;sup>1</sup>Fair Housing Hotline Project, Legal Services of Northern California. March 2004. "Fair Housing in California: Families with Children: A Manual for Housing Providers, Tenants and Advocates."

#### **Purpose of Report**

This Analysis of Impediments to Fair Housing Choice (AI) 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.

#### Participants, Methodology, and Funding

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 federal Community Development Block Grant (CDBG) funds. Some of the City non-profits, interest groups, and City population were interviewed and surveyed for this report.

The following data sources were used directly or indirectly to complete this AI:

- City of Lancaster General Plan
- Housing Element (2021-2029)
- Local Housing Data SCAG
- U.S. Census Bureau
- U.S. Census Bureau American Community Survey (ACS)
- HUD Comprehensive Housing Affordability Strategy (CHAS)
- City of Lancaster 2021-2025 Consolidated Plan
- Los Angeles County Development Authority (LACDA)
- Housing Rights Center (HRC), 2019-2021
- California Department of Finance
- Community Development Commission of the County of Los Angeles
- Federal Financial Institutions Examination Council (FFIEC)

This AI 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 a community advisory committee, a resident survey, service provider interviews, and City Council and Planning Commission public hearings.

#### **Community Advisory Meetings**

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

■ [March 17th and 22<sup>nd</sup>, 2022 at 5:30PM and 12:00PM] — Virtually

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 very low-, low- and moderate-income residents and residents with special needs were addressed, individual invitation letters were distributed via mail and e-mail, if available, to agencies and organizations that serve the above-mentioned communities. Agencies and organizations that were invited and contributed directly to this report included the following:

- City of Lancaster Department of Housing & Neighborhood Revitalization
- Los Angeles County Development Authority (LACDA)
- Housing Rights Center (HRC)

Meeting times and dates were placed on the City of Lancaster website (cityoflancasterca.org) in Lancaster's newspaper, *The Antelope Valley Times*, and posted conspicuously at City Hall and the Lancaster branch of the County Public Library. 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.

#### **Resident Survey**

To supplement the citizen advisory meetings, a survey was made available to Lancaster residents at City Hall and the Lancaster Public Library. The survey was also available online at the City's website. Spanish versions of the survey were provided to include and reflect the diversity of Lancaster's residents. During the survey period, completed surveys were submitted by 78 Lancaster residents.

#### Service Provider Interviews

In addition, interviews were conducted with the Housing Rights Center (HRC), the Los Angeles County Development Authority (LACDA) 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. The HRC is active in the city, holding workshops and trainings each year related to fair housing.

#### **Public Review**

During a 30-day public review period, the draft AI document was made available at the following locations:

- Lancaster City Hall, 44933 Fern Ave
- City of Lancaster website, www.cityoflancasterca.org

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

#### **Fair Housing Actions**

Continue to work with and refer fair housing complaints to the Housing Rights Center, whose services include counseling and mediation between tenants and landlords, fair housing trainings, workshops, and outreach. Facilitate public education and outreach by creating informational, multilingual informational material on fair housing that will be made available at public counters, libraries, post office, other community locations, and on the City's website.

# Section 2

#### **JURISDICTIONAL BACKGROUND DATA**

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.<sup>2</sup>

Lancaster, with a population of over 160,000 residents and located at an elevation of 2350 feet above sea level, has grown into a bustling urban destination. Downtown Lancaster has also experienced a great deal of change in recent years. The Lancaster Redevelopment Agency has worked to attract 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, California State University (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 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, the Eddy Award for Most Business-Friendly City from the Los Angeles County Economic Development Corporation in 2007, and Top 100 Best Places to Live in 2019 from Livability.com. 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 De sedimentation and Habitat Preservation.

#### **Demographic Data**

The primary sources or the demographic data used to prepare the AI were the U.S. Census Bureau's American Community Survey, the California Department of Finance, the Southern California Association of Governments (SCAG) local housing data, and Local Housing Element.

Table 2-1 shows population trends and growth rates for Lancaster from 2010 and 2020 and projected through 2045. Between 2010 and 2020, the population of Lancaster grew approximately 3 percent, from 156,633 to 161,699 residents, a rate slightly lower than Los Angeles County as a whole (4 percent). This was reported by the California Department of Finance for the City of Lancaster Housing Element (2021-2029), one of the Statemandated elements of the Lancaster General Plan, which presents the goals, objectives, policies, and action programs the City intends to implement to facilitate provision of housing for existing and future residents. SCAG growth forecast predicts a steady increase in population through 2045. From 2020 to 2045, SCAG estimates that the Lancaster's population will grow by nearly 32 percent, while countywide population is expected to increase by 14.8 percent.

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<sup>&</sup>lt;sup>2</sup> http://www.cityoflancasterca.org

Table 2-1
Population Growth and Projected Growth for Lancaster and Los Angeles County

Demograp	hics	2010	2020	2045	% Change 2010-2020	% Change 2020-2045
Lancaster		156,633	161,699	213,300	3.2%	31.9%
Los	Angeles	9,758,256	10,172,951	11,677,000	4.1%	14.8%
County						

Sources: City of Lancaster Housing Element 2021-2029, with data taken from CA DOF E-5 Population and Housing Estimates and SCAG Growth Forecasts

Table 2-2 provides a perspective of the City's population by age distribution between 2015 and 2019. Population age distribution serves as an important indicator of housing needs because needs and preferences change as individuals or households grow older. Young families tend to focus more on cost and the ability to become first-time homebuyers. In 2015, residents between 25 and 44 years old represented the largest age group (29.4 percent) and maintained that status, though slightly reduced, in 2019 (28.8 percent). In both years, residents within the age groups zero to 14 and 45 to 64 years old represented nearly a quarter of the population each. Lancaster's seniors (65 and above) maintained its makeup of more than 6 percent of the population. This younger demographic is also reflected in the median age; Lancaster's median age is 30.9 years in 2015 and increased to 33.5 years in 2019. The large population of children and young adults means that demand will likely continue to grow for larger family-sized units.

Table 2-2
Age Distribution Profile of Lancaster

	2015 161,223		2019 157,60	
Age	Number	Percent	Number	Percent
0-14	37,835	23.5%	36,744	23.3%
15-24	24,143	15.07%	21,936	13.9%
25-44	47,240	29.4%	45,354	28.8%
45-64	37,239	23.1%	36,249	22.9%
65+	10,033	6.2%	10,662	6.8%
Median Age	30.9	N/A	33.5	N/A

Source: American Community Survey 1-Year Estimate, 2015 and 2019

Table A: Race and Ethnicity

Demographic Profile		2010	2018		
Race/Ethnicity	Count	Percentage	Count	Percentage	
White (non-Hispanic)	55,236	35%	49,669	31%	
Hispanic	55,592	35%	63,403	40%	
Black	34,618	22%	33,958	21%	
Asian/Pacific Islander	7,684	5%	7,121	4%	
Other	674	0%	5,511	3%	

Sources: US Census Bureau 2010 Census, American Community Survey 2014-2018 5-year estimates Note: Other includes American Indian and Alaska Native alone, and two or more races

#### Income Data

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. Although economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity and other factors often create misconceptions and biases that raise fair housing issues.

The city's income distribution is indexed to the Area Median Income (AMI), the midpoint of that of the region as determined by HUD, to provide a comparison of changes in Lancaster over time.

To analyze income distribution, households are placed into different income groups. HUD defines four categories of income households 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 81 percent to 120 percent of the AMI

Table 2-3 shows the distribution of household incomes for Lancaster and Los Angeles County based on HUD Comprehensive Affordable Housing Strategy (CHAS) data by the Census for 2014-1018. Close to 26 percent of households in Lancaster had income at or below 30 percent of the AMI (\$25,050 for a household of four in 2018), whereas just over 18 percent of households in Los Angeles County earned the same. On the high end of the income spectrum, 29.7 percent of Lancaster households earned more than 100% of the median income (\$69,300) compared to 41.1 percent in the county.

Table 2-3
Household Income Distribution

HUD Area Median Income (AMI) - \$69,300										
Households	0-	30%	≥30-	50%	≥50-8	0%	≥80-1	.00%	≥	100%
	#	%	#	%	#	%	#	%	#	%
Lancaster 47,650	12,295	25.8 %	6,630	13.9%	9,335	19. 6%	5,250	11.0%	14135	29.7%
Los Angeles County 3,306,110	600,34 0	18.2 %	460,44 5	13.9%	570,615	17. 2%	316,295	9.6%	1,358,415	41.1%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

Many cities use federal and/or state financial assistance to increase the supply of affordable housing for low-income families. Although assistance is offered and available, the amount is a mere fraction of what is truly needed to accommodate housing for extremely low-, very low- and low-income households.

State Housing Element Law requires that cities and counties address housing for all segments of the population including those that have lower income. In table 2-4, SCAG details the new construction needs by income category. In the assessment, Lancaster's projected construction need was for 12,799. Of this amount, the majority of units

(5,501/43 percent) provided housing for above moderate-income households, with the least number of units needed (1,989/15.5 percent) for low-income households.

Table 2-4
Housing Needs for Income Groups

New Units	Extremely Low/ Very Low	Low	Moderate	Above Moderate	Total
Number	3144	1,989	2,165	5,501	12,799
Percent	24.6%	15.5%	16.9%	43.0%	100.0%

Sources: City of Lancaster Housing Element 2021-2029 & Regional Housing Needs Plan adopted by SCAG

The terms *extremely low, 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 B: Household Characteristics by Tenure

Household	Owner Households		Renter Hou	seholds	All Households	
Characteristic	Count	Percentage	Count	Percentage	Count	Percentage
Number of Households <sup>1</sup>	25,462	53.4%	22,188	46.6%	47,650	100%
Median HouseholdIncome <sup>1</sup>	\$73,168		\$34,135		\$52,504	

#### **Employment Data**

Table 2-5 shows the employment and unemployment rates along with industry employment by major classification for Lancaster from the American Community Survey data from 2015 and 2019.

In 2015, Lancaster had 56,402 workers living within its borders and working across 13 major industrial centers, and in 2019, the number increased to 59,532 workers. In 2015, most Lancaster residents worked in educational services, health care and social assistance (28 percent) and retail trade (14 percent), both of which decreased slightly in 2019 (to 27 and 10 percent, respectively). Conversely, the largest growth came from the manufacturing sector – including warehouse workers, assemblers, woodworkers, quality control inspectors and more – with an increase of 5 percent (2,853) from 2015 to 2019 employees.

These trends are important to understand, as certain industries are generally associated with lower median earnings. In Lancaster, educational services, health care and social assistance workers have a median income of \$36,775, and those in retail trade have a median income of \$26,458, both below the City median of \$37,428.

Table 2-5
Employment by Industry in Lancaster

Employment by Industry	201	L5	2019	
Total Number of Civilian Employed Population 16 Years and Over	56,4	102	59,532	2
Educational services, and health care and social assistance	15,896	28%	16,241	27%
Retail trade	8,099	14%	6, 090	10%
Manufacturing	4,640	8%	7,503	13%
Professional, scientific, and management, and administrative and waste mgmt. services	4,411	8%	4,397	7%
Construction	3,617	6%	4,187	7%
Arts, entertainment, and recreation, and accommodation and food services	3,827	5%	3,853	7%
Finance and insurance, and real estate and rental and leasing	2,538	5%	3,625	6%
Other services, except public administration	3,266	6%	2,279	4%
Transportation and warehousing, and utilities	3,392	6%	5,053	9%
Public Administration	4,248	8%	3,944	7%
Wholesale Trade	1,074	2%	1,141	1%
Information	1,253	2%	815	1%
Agriculture, forestry, fishing and hunting, and mining	141	1%	404	1%

Sources: American Community Survey 2015 and 2019 1-Year estimates

Table C: 10 Principal Employers, 2019

Employer	Number of Employees	Percentage	
Edwards AFB	11,149	13.3%	
China Lake NWC	9,906	11.8%	
County of Los Angeles	4,211	5%	
Northrop Grumman	4,200	5%	
Lockheed Martin	3,700	4.4%	
Antelope Valley Union High School District	2,500	3%	
Antelope Valley Hospital Medical Center	2,425	3%	
Lancaster School District	2,200	2.6%	
General Atomics	2,000	2.4%	
Robertson's Ready Mix	2,000	2.4%	

Source: City of Lancaster Comprehensive Annual Financial Report, June 30, 2019

#### **Housing Profile**

Lancaster's housing stock consists of varied housing types. Table 2-6 shows the type and number of units in the city.

Lancaster was developed as a community of single-family dwelling units and has primarily remained as such. In 2019, single-family detached units comprised 69.5 percent of the housing stock, followed by multi-family structures of 5-19 units at 10.3 percent, making up nearly 80 percent of the total housing stock during that time.

Table 2-6
Composition of Housing Stock in Lancaster

Property Type	Number	Percent
1-unit, detached structure	36,665	69.5%
1-unit, attached structure	528	1.0%
2-4 units	2,849	5.4%
5-19 units	5,434	10.3%
20 or more units	3,429	6.5%
Mobile home, boat, RV, van, etc.	3,746	7.1%
Total Housing Units (Occupied and Unoccupied)	52,755	100%

Source: American Community Survey 1-Year Estimates, 2019

Notes: Totals may not add up due to rounding. Multi-family structures could also be owner-occupied units such as triplexes, duplexes and condominiums.

### **Housing Conditions**

The condition of housing stock can be an indicator of potential rehabilitation needs. Based upon observations and experiences of community development and planning staff, the City estimates that in

2025, fewer than 50 housing units are in severe need of replacement or substantial rehabilitation due to housing conditions. The good condition of most housing in Lancaster is primarily due to the City's relatively young housing stock. According to the American Community Survey, 68 percent of Lancaster's housing stock was built 1980 or later, and 33 percent was built 1990 or later. Since the age of housing in Lancaster is fairly new the housing conditions of these units is generally good. Less than 1 percent of Lancaster's housing stock is in need of rehabilitation or replacement, due to inadequate kitchen and/or plumbing facilities. A higher percentage of renter-occupied housing units lack kitchen and/or plumbing facilities (1.6 percent) than owner-occupied housing units (0.3 percent). Substandard housing that is dilapidated beyond repair is usually demolished. There is not a significant number of substandard units within the city.

The City of Lancaster Department of Housing & Neighborhood Revitalization provides a range of services, housing programs and projects designed to assist in the maintenance and improvement of the quality of life in Lancaster's neighborhoods. The goal is to make every neighborhood a desirable place to live, work and play by encouraging development and redevelopment through strategic investment of public resources intended to make every neighborhood "livable" through Code Enforcement Compliance, Housing Revitalization and Neighborhood Community Building.

The Department services are delivered through the Code Enforcement Division, Housing Division, Neighborhood Community Building Division, and the Mobile home Park Inspection Program to address concerns within the more established areas of Lancaster by reversing the pattern of deterioration and recapturing the sense of place that once existed.

The City conducts proactive and regular surveys of both multi-family and single-family properties to ensure there are no code violations. This survey helps indicate the approximate percentage of housing structures classified as needing some form of repair. Based upon observations and experiences of community development and planning staff, the City estimated fewer than 50 housing units in severe need of replacement or substantial rehabilitation due to housing conditions in 2025.

The good condition of most housing in Lancaster is primarily due to the City's relatively young housing stock. The condition of a city's housing stock is not in itself an impediment to fair housing. However, for many low-income families, substandard housing is the only housing available at an affordable price. One indicator of substandard housing is the age of a city's housing stock.

As Table 2-7 shows, according to the 2019 American Community Survey, close to 66 percent of Lancaster's housing stock was built 1980 or later, and more than 36 percent was built 1990 or later. Although not definitive without a housing condition survey, having newer housing stock tends to indicate less substandard housing within a jurisdiction.

Table 2-7
Age of Housing Stock by Tenure

Date Built	Number	Percent
2014 or later	475	0.9%
2010 to 2013	422	0.8%
2000 to 2009	7,122	13.5%
1990 to 1999	11,184	21.2%
1980 to 1989	15,563	29.5%
1970 to 1979	7,386	14.0%
1960 to 1969	352	6.7%
1950 to 1959	6,225	11.8%
1940 to 1949	633	1.2%
1939 or earlier	211	0.4%
Total	52,755	100%

Source: American Community Survey 1-Year Estimates, 2019

Note: Totals may not add up due to rounding

Table 2-8 displays the number and age of housing stock since 1950 based on owner- and renter-occupancy. The data reveals the majority of the stock for both dramatically increased between 1980 and 1999, with rental units built at a more than 20 percent higher rate. Beginning in 2000, the build-rate for owner-occupied units (6,720) was more than double that of rentals (2,433).

Table 2-8
Age of Housing Stock by Owner- and Renter-Occupancy

Date Built	Owner-Occupied		Renter-Occupied		
	Number	Percent	Number	Percent	
2000 or later	6,720	25%	2,433	12%	
1980 to 1999	12,349	46%	11,285	54%	
1950 to 1979	7,055	26%	6,570	32%	
Before 1950	535	2%	480	2%	
Total	26,659	100%	20,768	100%	

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2011-2015

Note: Totals may not add up due to rounding

Table 2-9 is a reflection of data taken from Comprehensive Housing Affordability Strategy (CHAS), HUD's tabulations of the Census's American Community Survey regarding housing problems comparing owner- and renter-occupied units. This Strategy defines four housing problems including incomplete kitchen facilities, incomplete plumbing facilities, more than one person occupying a room, and residents with a cost burden of greater than 30 percent.

Owner-occupants accounted for a total of 25,460 units and renters occupied 22,190 units. Data for renters shows the highest number of households with at least one designated housing problem is in the lowest-income category of residents (0-30% of the AMI) at 5,580 and decreases consistently and dramatically as incomes rise, with the number of households with income at or above 100% of the AMI showing 155 with a housing problem. Regarding households with no designated housing problems, owner-occupants show an increase in zero designated housing

problems as their incomes rise, while renters have a higher number of zero designated housing problems including cost burdens, which decreases as their incomes rise. One could conclude from this data that higher income residents – regardless of their status as an owner or renter – experience less of these housing problems than their lower-income neighbors.

Table 2-9
Housing Problems in Lancaster by Household Income and Occupancy

		HUD Area Median Income (AMI)								
# Housing Problems	0-30%		≥30-50% ≥50-80%		≥80-100%		≥100%			
	Number of Units Based on Occupancy (O = Owner, R = Rental)									
	0	R	0	R	0	R	0	R	0	R
At least 1/4	2,180	5,580	2,005	2,795	2,620	2,230	1,005	585	910	155
0/4 or cost burden N/A, no other problems	930	3,600	1,090	745	2,275	2,210	2,230	1,435	10,215	2,855

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2011-2015

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%

See tables below for a breakdown based on designated housing problems – incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room and cost burden greater than 30 percent. Since the age of housing in Lancaster is fairly new, the conditions of these units is generally good. As shown in Table 2-10, less than 2 percent of Lancaster's housing stock is in need of rehabilitation or replacement due to inadequate kitchen and/or plumbing facilities. Substandard housing that is dilapidated beyond repair is usually demolished. There is not a significant number of substandard units within the city.

Table 2-10
Substandard Housing – Lacking Complete Plumbing and Kitchen Facilities

Lacking Complete Facilities	Number Percent	
Plumbing	226 .5%	
Kitchen	621 1.3%	

Source: American Community Survey 1-Year Estimates, 2019

## **Housing Occupancy**

The 2019 Census reported 49,220 occupied units in Lancaster, with 53.3 percent occupied by owners and 46.7 percent occupied by renters. Accordingly, 71.8 percent of total housing units in Lancaster contained three or more bedrooms. This could likely be the result of a combination of factors, including higher rates of homeownership, a larger number of family households, a higher percentage of newer units and market demand for larger units.

#### Overcrowding

In response to a mismatch between household income and housing costs in a community, some households may not be able to buy or rent housing that provides a reasonable level of privacy and space. According to both California and federal standards,

a housing unit is considered overcrowded if it is occupied by more than one person per room (excluding kitchens, bathrooms, and halls). In Lancaster, 4.2

percent of housing units are overcrowded. Overcrowding is more prevalent in rental households than owner households. Lancaster experiences less overcrowding than Los Angeles County at large, where 11 percent of households are overcrowded.

HUD defines *overcrowded* housing conditions as a household with more than one person per room, and *severely overcrowded* conditions as one with more than 1.5 people per room. In Lancaster, as shown in Table 2-11, the 2019 Census found that 1,445 households encountered some degree of overcrowding.

Of these, approximately 1,245 households lived in overcrowded conditions (1.01 to 1.50 occupants per room) and 220 lived in severely overcrowded conditions (1.51 or more occupants per room). However, on a percentage basis, Lancaster's overcrowding is relatively minor, accounting for *only* 2.9 percent of the total 49,220 households.

Table 2-11
Overcrowding Based on Units

Number of Occupants Per Room	Number	Percent
1.00 or less	47,755	97.0%
1.01 to 1.50	1,245	2.5%
1.51 or more	220	.4%
Total Occupied Housing Units	49,220	100%

Source: American Community Survey 1-Year Estimates, 2019

Note: Totals may not add up due to rounding

The rise in multigenerational households to help cope with increasing expenses and loss of income associated with today's economy could explain overcrowding. A 2018 report by the Pew Research Center stated that one in five Americans live in multigenerational households despite the rise improvements in the economy since the Great Recession of 2007-2009<sup>3</sup>. These are made up of households that include two or more adult generations or including grandparents and grandchildren younger than 25. Since 2000, there were 35.4 million intergenerational households in the nation which almost doubled in 2016 to 64 million.

#### **Housing Cost**

The cost of housing in a community is directly correlated to the number of housing problems and affordability issues. High housing costs can price low-income families out of the market, cause extremecost burdens, or force households into overcrowded or substandard conditions. The Lancaster medianhome price in September 2020, based information provided by CoreLogic, was \$368,000, which is 18.7 percent higher than the median price in September 2019. As of January 2021, data reported by the Greater Antelope Valley Association of Realtors reported a median sales price of \$380,000, with 52 homes (37 percent) selling at a cost between \$300,000 and \$400,000. Many homes also sold at lower cost; 26homes sold during January 2021 at prices between \$200,000 and \$299,999, and an additional four homes sold even lower. The median home price in Los Angeles County in September 2020 was \$710,000, nearly double the median price Lancaster at the same time.

According to the 2018 Census, 46.5 percent of Lancaster households live in rental housing. Census data shows that the average rent in Lancaster is \$1,162 per month with most (39.6 percent) paying between

<sup>&</sup>lt;sup>3</sup> Pew Research Center analysis of 1950-2000 decennial censuses and 2006-2016 American Community Survey (IPUMS)

\$1,000 and \$1,499 in rent. The real estate website Zumper.com reports a median rent of \$1,395 for one- bedroom units, \$1,495 for two-bedroom units, and \$1,900 for three-bedroom units in Lancaster as of December 2020. As of July 2021, limited rentals were available, based on a search of the real estate website Zillow.com. Six apartments and townhomes were listed for rent in Lancaster and 13 single- family houses were listed for rent. One-bedroom units ranged from \$1,375 to \$1,728; two-bedroom apartments ranged from \$1,375 to \$1,750. Houses ranged from \$1,950 to \$3,200 with a median rent of \$2,437. Table below shows that the HUD-determined fair market rents for Los Angeles fall within the range of the rents within Lancaster. The rental rates in Lancaster generally are less than the HUD determined fair market rents, indicating that certain

Table D: Fair Market Rents in Los Angeles County

parts of Los Angeles County are potentially more expensive than local rents.

Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2020 FMR	\$1,279	\$1,517	\$1,956	\$2,614	\$2,857

Sources: FY2020 Fair Market Rents. U.S. Department of Housing and Urban Development (HUD)

#### **Housing Affordability**

According to the federal government, rental housing is considered "affordable" if the residents pay no more than 30 percent of their income toward their rent and utilities costs. According to mortgage lenders, a home is affordable if the mortgage payment - also including utilities, association fees, insurance and real estate taxes - is not more than 35 percent of the borrower's income. Therefore, what is affordable is based on household income.

When a household spends more than 30 percent of its income on housing costs, it has less disposable income for other necessities such as health care, child-care, and food. In the event of unexpected circumstances such as loss of employment or health problems, lower-income households with a housing cost burden are more likely to become homeless or double up with other households.

As seen in Table 2-12, owner-occupants are more than twice as stable (67.1 percent) than renter-occupants (32.9 percent) as it pertains to paying less than or equal to 30 percent of their income toward their mortgage and related expenses. While the number of households paying between 30 and 50 percent of their income on such expenses are fairly comparable between the two, renter-occupants are more heavily burdened than owner-occupants, paying more than 50% of their income toward such expenses at a rate of 65.8 percent as compared to 34.2 percent. Lastly, renters with a Housing Choice Voucher are not immune to being cost-burdened, as payment standards lower than market rates may be further tax their income by requiring the recipient to fill the gap between the subsidy and the rent amount.

Table 2-12
Household Cost Burden Based on Occupancy

Cost Burden (% of Income)	Owner-0	Owner-Occupied		Renter-Occupied		
	Number	Percent	Number	Percent		
≤30%	16805	67.1%	8,245	32.9%	25,050	
>30 to ≤50%	5,245	51.5%	4,935	48.5%	10,180	
>50%	2,930	34.2%	5,625	65.8%	8,555	
Cost Burden not available	475	12.3%	3,380	87.7%	3,855	
Total	25,460	N/A	22,190	N/A	47,650	

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2011-2015

#### **Household Size**

From Table 2-13, we find there are more owner-occupied households (53.3 percent) than renter-occupied (46.7 percent), though not a relatively high gap. Household size is also fairly equal between both types of residents.

Table 2-13
Household Occupancy – Owner and Renter

	Number	Percent
Renter-Occupied	22,986	46.7%
Average household size (people)	3.05	N/A
Owner-Occupied	26,234	53.3%
Average household size (people)	3.06	N/A
Total Occupied Housing Units	49,220	100%

Source: American Community Survey 1-Year Estimates, 2019

Note: Totals may not add up due to rounding.

Table 2-14 shows the distribution of number of bedrooms in Lancaster's occupied housing units. Fairly consistent with the average household size of three for renter- and owner-occupied households is the largest percentage of three bedrooms units, which could serve a single-parent household with two children or a double-parent household with one child and an extra bedroom for an office or guests.

Household characteristics also influence housing preferences and needs. For example, single-person households and/or older adults and those who live on a fixed income 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 2-14 Bedroom Size

	Number	Percent
No Bedroom	791	1.5%
1 Bedroom	2,691	5.1%
2 Bedrooms	11,342	21.5%
3 Bedrooms	20,891	39.6%
4 Bedrooms	13,400	25.4%
5 or more Bedrooms	3,587	6.8%
Total Housing Units (Occupied and Unoccupied)	52,755	100%

Source: American Community Survey 1-Year Estimates, 2019

Notes: Totals may not add up due to rounding

Household growth is influenced by marriages, the dissolution of marriages and the number of children entering adulthood. Household growth is also affected by future residents moving to Lancaster to either find employment or housing. Finally, because households must occupy a housing unit, the rate of new housing construction also influences whether a new household will be established or whether households will consolidate.

#### **Future Housing Needs**

Article 10.6 of the Government Code Section 65580-65590 requires all California localities to adopt a Housing Element as part of their general plan. SCAG is responsible for providing Lancaster with an adopted Regional Housing Needs Assessment for incorporation into the City's Housing Element. The Housing Element, which is part of the City's General Plan, serves as a planning document for public officials and community residents and incorporates existing and projected housing needs assessments, site inventory and analysis, an analysis on constraints to housing development, housing programs to be implemented and quantified objectives to be met during the planning period.

#### **Special Needs**

Disabled residents face housing access and safety challenges. Disabled people, in many cases, are of limited incomes and often receive Social Security income only. As such, most of their monthly income is often devoted to housing costs. In addition, disabled persons may face difficulty finding accessible housing (housing that is made accessible to people with disabilities through the positioning of appliances and fixtures, the heights of installations and cabinets, layout of unit to facilitate wheelchair movement, etc.) because of the limited number of such units.

There are 8,092 residents with a disability in Lancaster, representing five percent of residents. Disabilities are more commonly found in the elderly population. The most commonly occurring disability amongst seniors 65 and older is an ambulatory disability, experienced by 20 percent of Lancaster's seniors. Understanding the employment status of people with disabilities may also be an important component in evaluating specialized housing needs. In Lancaster, 21 percent of the population with a disability is employed, compared to 53 percent of the non-disabled population, as estimated by the US Census Bureau, American Community Survey 2014-2018 5-year estimates.

The State Department of Developmental Services (DDS) provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers.

The North Los Angeles Regional Center serves residents in Lancaster. The center is a private, non-profit community agency that contracts with local service providers to offer a wide range of services to individuals with developmental disabilities and their families. Some of the services and support that regional centers provide include: information and referral; assessment and diagnosis; counseling; individualized planning and service coordination; resource development; advocacy; family support; and

placement of out-of-home care. In Lancaster, 1,117 persons are reported as consumers of the services provided at the local Regional Center. This includes 344 persons 18 years and older and 773 persons under 18 years old receiving services from DDS. The majority of individuals with developmental disabilities live in home settings, often with service and care from a family member and/or health provider. Licensed residential care facilities are also located in Lancaster.

Individuals with disabilities often have some form of special housing need. Depending on the type of disability, the need may include proximity to transit facilities, retail and commercial services, workplace, parking, handicap ramps, curb cuts, connecting walkways, lowered sinks, restroom grab bars, wider doorways and the like.

Disabilities are divided into two categories, physical and developmental, although people may experience both:

- Some physical disabilities include loss or impairment of limbs, disabling disease or condition (such as high blood pressure), or impairment of speech, hearing or sight, and people who have developmental disabilities. The most common special housing needs of people with disabilities are affordability and access. Individuals with disabilities may require housing with special counter heights, railings, ramps and maneuvering areas. California Title 24, Disabled Access Code, regulates the accessibility and adaptability of all new multi-residential, commercial and industrial buildings to people with disabilities.<sup>4</sup>
- People with developmental disabilities exhibit intellectual disabilities, cerebral palsy, epilepsy, autism or other conditions similar to people with intellectual disabilities. The North Los Angeles County Regional Center (NLACRC) is a private, non-profit corporation which provides diagnostic evaluations, client program management life-long planning and other services for people with developmental disabilities and their families.

#### **Lancaster Disability Medical/Health Resources**

For people with difficulty with accessing medical resources, or cannot afford insurance, low-cost clinics can be quite helpful. The following list consists of low-cost clinics that serve the people living in the Lancaster area:

- Antelope Valley Community Clinic 45074 N. 10th St. West, Suite 109, Lancaster, CA 93534; 661-942-2391. There is also the Care-A-Van Mobile Clinic, which is a part of the Antelope Valley Community Clinic, to help those without health care.
- High Desert Medical Group 43779 N. 15th St. West, Lancaster, CA 93534; 661-945-5984
- Tarzana Treatment Center Antelope Valley Family Medical Clinic, 907 W. Lancaster Blvd., Lancaster, CA 93534; 661 726-2630

Residents with disabilities face housing access and safety challenges. In many cases, these populations have limited incomes and often receive Social Security income only. As such, most of their monthly income is often devoted to housing costs. In addition, people with disabilities may face difficulty finding accessible housing (made accessible to people with disabilities through the positioning of appliances and fixtures, the heights of installations and cabinets, layout of unit to facilitate wheelchair movement, etc.) because of the limited number of such units.

The State Department of Developmental Services (DDS) provides community-based services to people with developmental disabilities and their families through a statewide system of 21 regional centers. The North Los

<sup>&</sup>lt;sup>4</sup> City of Lancaster General Plan Housing Element (2021-2029)

Angeles Regional Center serves residents in Lancaster. The center is a private, non-profit community agency that contracts with local service providers to offer a wide range of services to individuals with developmental disabilities and their families. Some of the services and support provided by regional centers include information and referral; assessment and diagnosis; counseling; individualized planning and service coordination; resource development; advocacy; family support; and placement of out-of-home care. As of February 2021, 28,274 Lancaster residents are reported as consumers of the services provided at the local Regional Center. This includes 27,074 active consumers and 1,200 active applicants in intake. The majority of individuals with developmental disabilities live in home settings, often with service and care from a family member and/or health provider. Licensed residential care facilities are also located in Lancaster.

As shows in Table 2-15, there are 8,092 residents with a disability in Lancaster, representing five percent of residents. Disabilities are more commonly found in the elderly population. The most commonly occurring disability amongst seniors 65 and older is an ambulatory disability, experienced by 20 percent of Lancaster's seniors. Understanding the employment status of people with disabilities may also be an important component in evaluating specialized housing needs. In Lancaster, 21 percent of the population with a disability is employed, compared to 53 percent of the non-disabled population.

Table 2-15
Special Needs Groups

	Number	Percent
Special Needs Category		
People with Disabilities <sup>1</sup>	8,092	5% of population
People with Developmental Disabilities <sup>2</sup>	1,117	0.7% of residents
Total People with Disabilities	15,616	9.7% of residents
Elderly (65+ years) <sup>1</sup>	8,658 households	18.2% of households
Large Households (5+ members) <sup>1</sup>	8,836 households	18.5% of households
Farmworkers <sup>1</sup>	323 persons	0.5% of labor force
Female-Headed Households <sup>1</sup>	9,075 households	19% of households
People Experiencing Homelessness <sup>3</sup>	1,076	N/A

Sources: 1) US Census Bureau, American Community Survey 2014-2018 5-year estimates, 2) California Department of Developmental Services, 2020; DDS consumer count by CA ZIP Codes 93534, 93535, 93536, 3) 2019 Greater Los Angeles Homeless Count Report

Table 2-16 shows information from the 2019 American Community Survey regarding the number of individuals with disabilities in Lancaster by age group. There are 12,614 residents reported to have a disability in Lancaster, representing 39.5 percent of total civilian non-institutionalized residents. Out of 45,061 individuals under the age of 18, approximately 3.2 percent were reported to have some form of disability. A larger percentage at 6.5 percent for those individuals aged between 18-64 years old. The age group with the highest percentage of individuals with disabilities were older adults over age 65. Out of 16,756 older adults approximately, 4,928 or 29.4 percent were reported to have some form of disability.

Table 2-16
People with Disabilities in Lancaster

	Number	Percent
Total Civilian Non-Institutionalized Population	151,849	N/A
Under 18 years	45,061	N/A
With a disability	1,455	3.2%
18 to 64 years	90,032	N/A
With a disability	6,231	6.9%
65 years and over	16,756	N/A
With a disability	4,928	29.4%
Total Number of Population with Disability	12,614	39.5%

Source: American Community Survey 1-Year Estimates, 2019

Although the Census data provides categories of disabilities, it does not indicate the extent or duration of the disability. However, the statistics are a good indicator of the housing needs for those with disabilities.

HUD refers to people with special needs as individuals with a disabling condition, primarily the existence of an intellectual or physical challenge that require some form of special housing accommodations to live an independent lifestyle. Elderly and frail people also fall into this category, as well as those with severe intellectual, developmental, and physical disabilities; people with drug or alcohol addictions; people with HIV/AIDS; and individuals experiencing homelessness. Many cities also include large families and farmworker housing in the special needs category.

Also falling into special needs housing category is *supportive housing*, which refers to housing units and group quarters that provide a supportive environment and consist of some form of a planned social support component. This enables individuals to stabilize and become more self-sufficient with the intent to transition into traditional housing.

## **Gender and Family Status**

Table 2-17 shows single-parent households with children. Single-parent families, particularly female-headed families with children, often require special consideration and assistance because of their greater need for affordable housing and accessible day care, healthcare and other supportive services. Because of their relatively lower income and higher living expenses, female-headed families have comparatively limited opportunities than other types of households for finding affordable and decent housing. These families may also be discriminated against in the rental housing market because some landlords are concerned about the ability of these households to make regular rent payments. Consequently, landlords may require more stringent credit checks or higher security deposits for women, which would be a violation of fair housing laws.

The 2018 American Community Survey reported 6,306 single-parent households with children under age 18 in Lancaster, representing 13.6 percent of all households. Of these single-parent households, 4,884 were female-headed households, representing 10.5 percent of all households. The percentage of female-headed households in Lancaster was almost two times higher than in either the county or the state.

In Lancaster 75.4 percent of households are family households. This is 9.2 percent higher than Los Angeles County and 7.1 percent higher than California. Of these family households, 18.6 percent are female-headed households with no husband present, and 10.5 percent of these female-headed households have children under the age of 18. Of particular notice is that 44.9 percent of households have at least one person living there under the age of 18.

These household and age characteristics of a community indicate current needs and future trends for housing. Because different age groups have different housing needs, housing demand correlates to the age of residents. For example, young adult households may choose to occupy apartments, condominiums and small single-family homes because of affordability, location and no or few children. Middle-aged adults may prefer larger homes in which to raise families, whereas seniors may prefer smaller units that have lower costs and are more proximate to services. Age and fair housing intersect when managers or property owners make housing decisions based on the age of residents. For example, managers and property owners may prefer to rent to mature residents, limit the number of children in their complex or discourage older residents due to their disabilities. Although a housing provider may establish reasonable occupancy limits and set reasonable rules about the behavior of tenants, those rules cannot single out children for restrictions that do not apply also to adults.

Table 2-17
Estimated Household Status

	Lanc	aster	Los Ang	geles County		California
	Number	Percent	Number	Percent	Num ber	Percent
Total Family HH (families)	34,939	75.4%	2,193,34	66.2%	8,934 ,261	68.3%
Non-Family HH	11,370	24.6%	1,120,55 9	33.8%	4,137 ,501	31.7%
Total HH	46,309	100.0%	3,313,90 8	100.0%	13,07 2,122	100.0%
Family HH Characteristics						
Married-couple family	23,514	50.8%	1,475,43 0	44.5%	6,458 ,423	49.4%
With own children under 18 years	11,714	25.3%	615,655	18.6%	2,719 ,648	20.8%
Male householder, no wife present, family	2,825	6.1%	228,053	6.9%	791,1 14	6.1%
With own children under 18 years	1,422	3.1%	84,553	2.6%	325,2 99	2.5%
Female householder, no husband present, family	8,600	18.6%	489,866	14.8%	1,685 ,084	12.9%
With own children under 18 years	4,884	10.5%	207,795	6.3%	779,3 32	6.0%
Other Household Characteristics						
Householder living alone	9,750	21.1%	861,334	26.0%	3,133 ,413	24.0%
HH with one or more people under 18 years	20,771	44.9%	1,069,76 2	32.3%	4,366 ,906	33.4%
HH with one or more people 65 years and over	10,965	23.7%	951,114	28.7%	3,907 ,006	29.9%

Source: American Community Survey 1-Year Estimates, 2018

#### Race and Ethnicity

Table 2-18 provides a breakdown of the 2015 and 2019 racial and ethnicity distribution of the city. Non-Hispanic (57.8 percent) and White (63.5 percent) residents make up the majority of the population, followed by Black or African American (27.2 percent), and *some other race* (6.2 percent). It is important to note that the *Some Other Race* category is increasingly being used by people in self-identifying their race. The Atlantic (8.27.2016) reported some reasons people identify this way are to avoid of specifying a race, and others use it to reflect their Hispanic allegiance through race as opposed to ethnicity.

From 2015 to 2019, there was significant change in the racial and ethnic characteristics of the city. Most notable was the increase all races other than White despite a 2.2 percent decrease in total population. Black/African American residents increased by 7 percent, Asians increased by 0.8 percent, American Indian/Alaska Native increased by 0.7 percent, and Native Hawaiian/Other Pacific Islander increased .1 percent. Similarly, the Hispanic or Latino population increased 6.6%, placing it higher than Non-Hispanic/-Latino populations by 15.6 percent. This data reflects a significant close in gap between White residents, leading other races in numbers, and increases the lead of Hispanic/Latino residents.

Table 2-18
Race and Ethnicity of Lancaster Residents

Demographic Profile	20	15	20	2019		
	161	,113	157,604			
Race (alone)	Number	Percent	Number	Percent		
American Indian and Alaska Native	536	0.3%	1,523	1.0%		
Asian	7,274	4.5%	8,334	5.3%		
Black or African American	32,622	20.2%	42,837	27.2%		
Native Hawaiian and Other Pacific Islander	0	0.0%	193	0.1%		
White	104,759	65.0%	100,119	63.5%		
Some other race	8,969	5.6%	9,715	6.2%		
Two or More Races	6,953	4.3%	6,023	3.8%		
Ethnicity						
Hispanic or Latino	57,423	35.6%	66,476	42.2%		
Non-Hispanic (white alone)	103,690	64.4%	91,128	57.8%		

Sources: American Community Survey 1-Year Estimates, 2015 and 2019

#### **English Language Ability**

As shown in Table 2-19, 106,508 households (71.9 percent) speak English only, with the balance of 4,545 (28.1 percent) speaking at least one other language including Spanish, Indo-European, Asian and Pacific Islander and other languages. Spanish is the primary second language in Lancaster, spoken by 23.2 percent (34,338) of the Spanish-speaking population, and 33.7 percent (11,560) who speak English less than well. It is interesting to note that while only 2.1 percent (3,061) of the population speaks Asian at home, 38.5 percent (1,177) of them speak English less than very well.

Additionally, approximately 27,690 (18.7 percent) of Lancaster residents that speak a language other than English said that they speak English less than very well. This is important to note as foreign-born residents may have difficulty accessing housing due to language barriers or an apartment owner's reluctance to rent housing to an immigrant. In addition, a fair housing concern could arise if a foreign-born resident owns an apartment building and advertises only in his or her native language, thus restricting access only to persons speaking that language.

Table 2-19
English Language Ability of Lancaster Resident Households

Language Spoken at Home	N	lumber	Percent
English only	1	106,508	71.9%
Language other than English		41,545	28.1%
Total Number of Speakers	1	48,053	
Total Who Speak English less than "very		13,845	33.3% of total who speak other than English
well"			
Spanish		34,338	23.2%
Speak English less than "very well"		11,560	33.7% of total who speak Spanish language
Other Indo-European languages		2,705	1.8%
Speak English less than "very well"		735	27.2% of total who speak Indo-European languages
Asian and Pacific Islander languages	3,061	2.1%	
Speak English less than "very well"	1,177	38.5%	of total who speak Asian and Pacific Islander languages
Other languages	1,441	1.0%	
Speak English less than "very well"	373	25.9% (	of total who speak other languages

Source: American Community Survey, 1-Year Estimates 2019

#### **Public Assisted Housing**

The availability and location of public-assisted housing may be a fair housing concern. If such housing is concentrated in one area of a community, a household seeking affordable housing is limited to choices within that particular area. Public/assisted housing and housing assistance must be accessible to qualified households regardless of race/ethnicity, disability or other special characteristics.

#### **Section 8 Housing Programs**

The Los Angeles County Development Authority (LACDA) administers the Section 8 Housing Choice Voucher (HCV) program. The LACDA's service area is the unincorporated areas of Los Angeles County and 62 incorporated cities, including Lancaster.

The HCV program is the federal government's major program for assisting very low-income families, elderly adults, and people with disabilities to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. The maximum housing assistance is generally the lesser of the payment standard minus 30% of the family's monthly adjusted income or the gross rent for the unit minus 30% of monthly adjusted income.

A family that is issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. This unit may include the family's present residence. Rental

units must meet minimum standards of health and safety, as determined by the Public Housing Agency (PHA). A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program.

Eligibility for a housing voucher is determined by the LACDA based on the total annual gross income and family size and is limited to US citizens and specified categories of non-citizens who have eligible immigration status. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live. By law, a PHA must provide 75 percent of its voucher to applicants whose incomes do not exceed 30 percent of the area median income (AMI).

Table 2-20 shows Area Median Income Limits based on household size for the Metropolitan Statistical Area (MSA) of Los Angeles-Long Beach-Glendale area, which includes the city of Lancaster.

Table 2-20
Section 8 Income Limits for Los Angeles-Long Beach-Glendale, CA HUD Metro FMR Area
Based on Area Median Income for Number of Household Members

Area Median Income			Nun	nber of Hou	sehold Men	nbers		
(AMI)	1	2	3	4	5	6	7	8
30%	\$21,950	\$25,050	\$28,200	\$31,300	\$33,850	\$36,350	\$39,010	\$43,430
50%	\$36,550	\$41,800	\$47,000	\$52,200	\$56,400	\$60,600	\$64,750	\$68,950
80%	\$58,450	\$66,800	\$75,150	\$83,500	\$90,200	\$96,900	\$103,55	\$110,25
							0	0

Source: U.S. Housing and Urban Development (HUD) Income Limits 2019

Table 2-21 shows the percentage of vouchers contracted by the City of Lancaster versus total vouchers contracted by the Los Angeles County Development Authority (LACDA) per previous fiscal years (FY). In FY 2018-2019, approximately 26 percent (394) of new admissions were contracted within Lancaster out of the total (1,544) vouchers contracted by LACDA. In FY 2019-2020, the number was approximately 35 percent (500 out of 1,427). In total numbers, LACDA have leased 2,971 vouchers, with 894 of them for Lancaster (approximately 30 percent).

Based on ethnicity and race,

Table 2-21
Housing Choice Vouchers - New Admissions
Data for 2018-2019 and 2019-2020

	FY 2018-2019		FY 2019	9-2020
	L.A. County	Lancaster	L.A. County	Lancaster
FY 2018-2019				
Total New Admissions	1544	394/26%	1427	500/35%
8: 11 1	764	475/220/	720	2.47/220/
Disabled	764	176/23%		247/33%
Elderly	378	69/18%	323	83/26%
Elderly and Disabled	242	43/18%	214	57/27%
Ethnicity				
Hispanic or Latino	474	86/18%	438	84/19%
Non-Hispanic	1070	308/29%	989	416/42%
Race				
American Indian/Alaskan Native	30	9/30%	22	6/27%
Asian	25	1/4%	21	1/5%
Black/African American	794	243/31%	762	296/39%
Native Hawaiian or Other Pacific Islander	9	3/33%	17	2/12%
White	686	138/20%	605	195/32%

Source: Los Angeles County Development Authority (LACDA)

Considering that Lancaster residents, according to 2020 Census data, only represent 1.6 percent of the population (161,699 out of an LA County population of 10,172,951), there seems to be an over representation of Section 8 participants when compared to the rest of the LA County.

#### **Affordable Housing Need**

Housing Element law requires a quantification of each jurisdiction's share of the regional housing need as established in the RHNA (Regional Housing Needs Allocation)-Plan prepared by the jurisdiction's council of governments. The California Department of Housing and Community Development (HCD), in conjunction with the SCAG, determine a projected housing need for the region covered by SCAG. The share known as the RHNA, is 1,341,827 new housing units for the 2021-2029 planning period throughout the SCAG region. SCAG has, in turn, allocated this share among its constituent jurisdictions, distributing to each its own RHNA divided along income levels. The City of Lancaster has a RHNA of 9,023 housing units to accommodate in the housing element period.

Table 2-22 shows the number of housing units for affordable for households with varying income. As shown, allocations for households with above-moderate income (47 percent) are almost double of those for households with very low income (25 percent). Comparing this to Table 2-3, Household Income Distribution, the percentage of households with income at or below 50 percent of the AMI (identified as "very low income" in the table below) equals 39.7 percent, as compared with 29.7 percent of households with income above 100 percent of the AMI. For the unit allocation to be fairer based on Lancaster's residents' income, the number of units allocated to very low-income residents should be increased by a minimum of 15 percent.

Table 2-22
Unit Allocation Based on Income Distribution

Income Group	Percent of County AMI	Number of Units	Percent of Total Allocation
		Allocated	
Very Low*	0-50%	2224	25%
Low	>50-80%	1,194	13%
Moderate	>80-120%	1,328	15%
Above Moderate	120%+	4,277	47%
Total	N/A	9,023	100%

Note: \*Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation. Therefore, the City's very low-income RHNA of 2,224 units can be split into 1,112 extremely low-income and 1,112 very low-income units.

#### **Affordable Housing Projects**

In its Housing Element (2021-2029), Lancaster states its goals, objectives and actions that will be taken to accommodate the City's share of regional housing need for each income level, including but not limited to, areas promoting a variety of housing types to meet existing and future needs of residents; assisting in the development of adequate housing and provide resources to meet the needs of low- and moderate-income and special needs households; preserving existing housing stock; addressing governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for people with disabilities; and promoting and affirmatively further fair housing opportunities and promote housing throughout the community for all.

Apartment projects can receive housing assistance from a variety of sources to ensure that rent is affordable for lower-income households. In exchange for public assistance, owners are typically required to reserve a portion or all of the units as affordable housing for lower-income households. The length-of-use restrictions are dependent on the funding program. These funds are typically used in concert with Low Income Housing Tax Credits (LIHTC) to reduce the debt associated with the project, thereby maximizing affordability. Currently, Lancaster is partnering with nonprofits for several LIHTC projects located in the city.

The LIHTC creates an incentive for private investment in low-income housing development by giving federal tax credits to investors. Private investors, such as banks and corporations, buy the tax credits from the affordable housing developer. The owner/developer uses the proceeds from the sale of the tax credits, known as "equity," to construct or rehabilitate housing. Investors receive a federal tax credit over a 10-year term.

The Lancaster Housing Element (2021-2029) states that the City has been assigned a Regional Housing Needs Assessment (RHNA) of 2,224 extremely low/very low-income units, 1,194 low-income units, 1,328 moderate-income units, and 4,277 above moderate-income units for the 2021-2029 RHNA planning period. A significant portion of this target will be achieved with credits for approved and proposed projects. With the existing available vacant land in residential and mixed-use zones, as well as projections about accessory dwelling units (ADUs), properties in Lancaster can adequately accommodate the remaining RHNA under existing General Plan land use policy and Zoning Ordinance standards. The City will maintain an inventory of available sites for residential development and provide the list to prospective residential developers upon request. The City will continue to track new housing projects and progress toward meeting the RHNA and will post the sites inventory on the City's webpage.

The City is not responsible for the actual construction of these units. It can, however, create a regulatory environment that enable the private market to build these units. This includes the adoption and implementation of General Plan policies, zoning, and development standards, and/or incentives to encourage the construction of various types of units

Table E Affordable Housing At-Risk of Conversion

Name	Address	Afford- able Units	Total Units	Funding Source	Affordability Expiration
Montecito Apartments	835 W Ave L	39	192	MRB	2022
Silver Winds	45180 Fern Ave	25	124	MRB	2026
The Willows	1650 W. Ave. K-8	47	232	MRB	2026
West Park Villas	1800 W Ave J-12	55	272	MRB	2026
High Valley Apartments	2325 West Avenue J 8	92	140	LRA/MRB/S ec8/Sec 221(d)(4)	2028
Sierra Retirement Village	43321 Sierra Hwy	96	97	LIHTC	2029
Sunset Ridge	43244 16th St. West	160	800	MRB	2029
Cordova Park	43530 Gadsden Ave	84	208	MRB	2031
Sienna Heights	43519 Kirkland Ave	63	314	MRB	2031
Total:		661			

Source: City of Lancaster, 2021

Table-F Assisted Housing (Not At-Risk of Converting in Next 10 Years)

Name	Address	Afford -able Units	Total Units	Funding Source	Affordability Expiration
Village Pointe	1037 East Avenue K	155	160	HUD	2034
Lancaster HomesApartments	711 W. Jackman St	120	120	HUD	2034
Aurora Village	43862 15th Street West	129	132	LIHTC	2052
Village Pointe Apartments	43732 Challenger Way	199	200	LIHTC	2055
Village at Beechwood	44063 Beech Avenue	99	100	LIHTC; CalHFA	2057
Aurora Village II	43945 12th Street West	138	140	LIHTC	2060
Arbor Grove	855 W. Jackman Street	150	150	LIHTC	2060

Table-F Assisted Housing (Not At-Risk of Converting in Next 10 Years)

Name	Address	Afford -able Units	Total Units	Funding Source	Affordability Expiration
Arbor Court I	44958 10th Street West	83	84	LIHTC	2061
Laurel Crest Apartments	45114 Beech Avenue	71	72	LIHTC	2061
Poppyfield Estates	530 W. Jackman Ave.	99	100	LIHTC	2062
Essex Apartments	44916 N. 10th Street West	149	150	LIHTC; HUD	2062
Arbor Lofts fka The Commons of Lancaster	665 West Lancaster Blvd.	20	21	LIHTC	2063
Arbor on Date	44927 Date Avenue	39	40	LIHTC	2064
Sagebrush II	707 Milling Street	39	40	LIHTC	2065
Sagebrush I	44826 Fig Avenue	20	21	LIHTC	2065
Cedar Ridge Apartments	2105 East Avenue J8	109	109	LIHTC	2067
Sierra Villa East	621 East Avenue I	90	91	LIHTC; HUD	2068
Fernwood SeniorApartments	45151 Fern Avenue	75	76	LIHTC; HUD	2068
College Park Apartments	43331 30th Street West	60	61	LIHTC; HUD	2068
Avenida Crossing Apartments	2317 West Avenue J 8	76	77	LIHTC	2069
Copper Square Apartments	45431 30th Street West	201	204	LIHTC	2070
Antelope Valley Veteransand Families	44000 Sahuayo Street	74	75	LIHTC	2070
Antelope Valley Apartments	43460 32nd Street West	119	121	LIHTC; HUD	2070
Kensington Campus	45260 32nd Street West	50	50	LIHTC	2072
Kensington II	Avenue I	50	51	LIHTC	2072
Kensington Homes	45244 32nd St W	50	51	LIHTC	2073
Total:		2,464	-		

Source: City of Lancaster, 2021

#### **Rental Assistance**

State, local, or other funding sources can be used to provide rental subsidies to maintain the affordability of at-risk projects. These subsidies can be structured to mirror the Housing Choice Voucher/Section 8 program, whereby the subsidy covers the cost of the unit above what is determined to be affordable for the tenant's household income (including a utility allowance) up to the fair market value of the apartment. Unit sizes for the at-risk properties range from studios to four-bedroom units and are distributed among very low- and low-income categories. The total annual subsidy to maintain the 661 at-risk units is estimated at about \$5.7 million<sup>2</sup>.

#### **Public Transit**

Public transit information is important to the analysis of impediments to fair housing, as access is of paramount importance to households affected by low incomes and rising housing prices. Public transit should link lower-income people, who are often transit-dependent, to major employers where job opportunities exist. 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 people who depend on public transit will have limited choices regarding places to live. In addition, elderly people and those with disabilities often rely on public transit to visit doctors, go shopping or attend activities at community facilities. Public transit that provides a link between job opportunities, public services and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services and jobs.

Lancaster's public transit is made up of two systems: 1) The Antelope Valley Transit Authority (AVTA), which offers a fixed-route commuter bus service and Dial-a-Ride, a curb-to-curb demand-response service primarily for people with disabilities, and 2) Metrolink commuter rail system, available from the Antelope Valley to Santa Clarita, the San Fernando Valley and Los Angeles basin cities.

While there isn't much data available regarding existing transit needs for Lancaster residents, these systems are widespread and accessible between Lancaster and many communities within the Los Angeles area. In addition, a fairly recent California transportation plan, Toward an Active California, though focused on State Bicycle and Pedestrian Plan emphasizes the promotion of social equity as one of their vision's three strategies. This is obtained through community support, by strengthening engagement with disadvantaged communities by proactively seeking input on needs and providing technical guidance, and equity lens, from which all strategies are implemented, and access to funding, providing disadvantaged communities with the opportunity to participate in active transportation funding programs.<sup>5</sup>

#### **Lancaster Fixed Route Services**

The AVTA has 58 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 8:00am to 6:00pm Monday through Friday, closed on Saturday and Sunday. AVTA provides supplemental routes that operate during peak times. Transfer Centers are located at Sgt. Steve Owen Memorial Park and at the Palmdale Transportation Center.<sup>6</sup>

Table 2-24 shows the current local transit fare structure used by the system. The reduce fare, for passengers ages 62 and over and/or who have a disability are charged half the price of the full fare. No-cost fares are available to the following: Children 44 inches and under in height on regular transit with a limit of four free children per fare paying adult (each additional child will pay 25 cents); active military and veterans.

<sup>&</sup>lt;sup>5</sup> Toward an Active California: State Bicycle + Pedestrian Plan, Caltran, State of California, May 2017

<sup>&</sup>lt;sup>6</sup> https://www.avta.com/transit/transit schedules.htm

## Table 2-24 Lancaster Local Transit Fare Structure

	Full Fare	Reduced Fare for Seniors and People with Disabilities
One-Way Trip (cash)	\$1.50	\$.75
4-Hour Pass	\$2.00	\$1.00
Day Pass	\$5.00	\$2.50
Weekly Pass	\$15.00	\$7.50
31 Day Pass	\$50.00	\$25.00

Source: https://www.avta.com/local-transit-fares-passes.php, 2021

Note: Seniors ages 62 and older and/or passengers with disabilities qualify for a reduced fare

#### 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 62 and residents of the Antelope Valley with a disability. The DAR service uses air-conditioned, lift-equipped vans.<sup>7</sup>

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 people 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 are 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 2-25 shows the fare structure based on zones used by the DAR system.

Table 2-25
Dial-A-Ride Fare Structure

Source:	Zone	e Fares
	Urban Zone	e \$3.00 One way
	*Group Rate	e 1.25 One way
	Rural Zone 2	1 \$3.50 One way
	*Group Rate	e \$1.75 One way
	Rural Zone 2	2 \$6.00 One way
	*Group Rate	e \$3.00 One way

https://www.avta.com/dialaride-fares-reservations.php, 2021

\*Group Rate applies to 3 or more DAR qualified passengers traveling from one origin to one destination. The fare is per person.

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<sup>&</sup>lt;sup>7</sup> https://www.avta.com/dar/dar service.htm

## **Commuter Bus Service**

Table 2-26 shows the commuter bus service provided by AVTA 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 Sgt. Steve Owen Memorial Park and Palmdale Transportation Center.<sup>8</sup>

Table 2-26
AVTA Commuter Bus Service Fare Structure

Source:

	Full Fare	Senior/Disabled/Medicare Recipient
Route 785		
EZ Transit Pass	\$330.00 (Zone 10)	\$165.50 (Zone 13)
Monthly Pass	\$296.00	\$148.00
10-Ride Pass	\$85.00	\$42.50
One-Way Trip	\$9.25	\$4.50
Route 786		
EZ Transit Pass (zone	\$352.00 (Zone 11)	\$175.00 (Zone 14)
11)		
Monthly Pass	\$344.00	\$172.00
10-Ride Pass	\$99.00	\$49.50
One-Way Trip	\$10.75	\$5.25
Route 787		
EZ Transit Pass (zone 9)	\$308.00 (Zone 9)	\$156.00 (Zone 12)
Monthly Pass	\$280.00	\$140.00
10-Ride Pass	\$80.00	\$40.00
One-Way Trip	\$8.75	\$4.25

https://www.avta.com, 2021

Source: https://www.avta.com/commuter/commuter\_fares.htm

#### **Commuter Rail Service**

Table 2-26 shows the commuter rail service, Antelope Valley Route, provided by Metrolink, which runs daily (except for the Riverside station) between Lancaster and Union Station in Downtown Los Angeles. This commuter service shows a direct link to downtown Los Angeles and ten areas in between, providing ample transportation throughout the city, and discounted for populations in need.

<sup>\*</sup>EZ transit pass allows you to use more than one transit system without having to purchase additional tickets or transfers.

<sup>\*\*</sup>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 our passengers with seamless travel throughout Los Angeles County.

<sup>8</sup> https://www.cityoflancasterca.org/Index.aspx?page=235

Table 2-26
Metrolink Antelope Valley Route between Lancaster and Union Station, Los Angeles

	Full Fare	Seniors, People with Disabilities, Medicare Recipients	Active Military
One-Way Trip (cash)	\$11.50	\$5.75	\$10.25
Weekend Day Pass	\$10.00	\$10.00	\$10.00
Round Trip	\$23.00	\$11.50	\$20.50
7-Day Pass	\$80.50	\$60.50	N/A
5-Day Flex Pass (mobile app only)	\$103.50	\$51.75	\$93.25
Monthly Pass	\$241.50	\$181.25	N/A

https://metrolinktrains.com/ticketsOverview/ticket-info/price-finder/, 2021

Note: Seniors are defined as aged 62 and over. There are also student discounts which are not included in the chart above.

# Section 3 PRIVATE PRACTICES

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. Lending policies and requirements related to credit history, current credit rating, employment history and the general character of applicants permit lenders to use a great deal of discretion and in the process deny loans even though the prospective borrower would have been an acceptable risk. This section reviews the lending practices of financial institutions and the access to home loans for ethnic minorities of all income groups.

#### **Background**

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. During the recent rise of the subprime loan market, discriminatory lending practices became more subtle. 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. The pattern and trend of subprime rate lending led to high-cost (subprime) loans and foreclosures concentrated in low-income minority neighborhoods. 10

## **Legislative Protection**

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.

<sup>&</sup>lt;sup>9</sup>TD Bank Corp. (2007, April 30). *A Primer on the U.S. Sub-Prime Market*. The subprime mortgage market ballooned in 2005 and 2006 to 20 percent–25 percent of all new mortgages, capturing more than twice the market share seen over the prior 10 years.

<sup>&</sup>lt;sup>10</sup>Joint Center for Housing Studies of Harvard University. (2009). The State of the Nation's Housing 2009.

## **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 FFIEC data for 2020, approximately 1,883 households (for a total of \$611,455,000) applied for conventional first loans in the city of Lancaster based on census tracts numbers<sup>11</sup>.

That said, for this purpose to focus on identifying any disparities in race and ethnicity, those categories have been cut down. Therefore 1) race data is only taken for *American Indians/Alaskan Natives, Asians, Blacks/African Americans, Native Hawaiians/Other Pacific Islanders,* and *Whites* and do not include 2 or more minority races, free form text only, joint and race not available, and 2) ethnicity only includes *Hispanic or Latino* or *Not Hispanic or Latino*, and does not include free form text, joint or ethnicity not available. In addition, loans reviewed for this report only include 1<sup>st</sup> liens (not subordinate). The 2020 data used for conventional loans, simplified per above, will reflect a total of 1,081 household applications received for a total loan amount of \$323,365,000.

Among applications received that year (simplified as above), the number of loans originated was 647 (59.9 percent), and the number of applications denied was 142 (13.1 percent). Conventional loan applications were primarily used to purchase single-family site-built homes of 1-4 units (926, 85.7 percent), with the balance of 154 (14.2 percent) single-family manufactured home of 1-4 units and 1 (.09 percent) multi-family unit.

When broken down by race, Whites (of either ethnicity) participated at the highest level, submitting 890 (82.3 percent) conventional loan applications amounting to \$267,190,000 (82.6 percent), and Native Hawaiian/Pacific Islanders (of any ethnicity) were the lowest participants in the conventional loan market, only submitting 4 (.37 percent) applications, for a total of \$1,160,000 (.36 percent). When categorized by ethnicity, the number of people identified as Hispanic/Latino (for any of the 5 races) submitted a higher level of applications than those who identified as Non-Hispanic/-Latino, totaling 452 (41.8 percent) applications and amounting to \$120,980,000 (37.4 percent).

Whites (of either ethnicity) also had the highest conventional loan origination rate of 50.5 percent followed by Blacks/African Americans at 4.8 percent, with the lowest loan origination rate for Native Hawaiians/Other Pacific Islanders at .28 percent. Data on ethnicity (for any race) showed 36.4 percent for Non-Hispanics/-Latinos, as compared to 23.5 percent for Hispanics/Latinos.

<sup>11</sup> Federal Financial Institutions Examination Council (FFIEC). 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.

## **Government-Backed Loans**

According to the FFIEC data for 2019, approximately 1,896 households (for a total of \$668,160,000) applied for government-backed first loans (FHA, VA, or FSA/RHS loans) in the city of Lancaster based on census tracts numbers.<sup>12</sup>

Similar to data-tracking for conventional loans for this report, race and ethnicity categories have been cut down. Therefore 1) race data is taken for *American Indians/Alaskan Natives*, *Asians*, *Blacks/African Americans*, *Native Hawaiians/Other Pacific Islanders*, and *Whites* and do not include 2 or more minority races, free form text only, joint and race not available, and 2) ethnicity only includes *Hispanic or Latino* or *Not Hispanic or Latino*, and does not include *free form text*, *joint* or *ethnicity not available*. In addition, loans reviewed for this report only include 1<sup>st</sup> liens (not subordinate). The 2020 data used to track government-backed loans, simplified per above, will reflect a total of **1,075** household applications received for a total loan amount of **\$380,775,000**.

When broken down by race, Whites (of either ethnicity), similar to conventional loans, had the highest participation levels, submitting 849 (79.0 percent) government-backed loan applications, amounting to \$293,955,000 (77.2 percent), and Native Hawaiians/Pacific Islanders (of either ethnicity) were the lowest participants in government-backed loans, only submitting 3 (.3 percent) applications, for a total amounting to \$1,145,000. When categorized by ethnicity (for any of the 5 races), the number of people identified as Hispanic/Latino submitted a higher level of applications than those who identified as Non-Hispanic/-Latino, totaling 560 (52.1 percent) applications and amounting to \$184,780,000 (48.5 percent).

Whites (of either ethnicity) also had the highest government-backed loan origination rate of 51.6 percent followed by Blacks/African Americans at 10.4 percent, with the lowest loan origination rate for Native Hawaiians/Other Pacific Islanders with zero loans originated. Data on ethnicity (for any race) showed identical rates for Hispanics/Latinos and Non-Hispanics/Latinos at 32.7 percent.

Table 3-1
Loan Applications by Race and Ethnicity
by Number in the Lancaster Area

Race or Ethnicity Loan Type (1st)	App Rec'd	Loans Originated	App Appr Not Accepted	App Denied	App Withdrawn	Files Closed Incomplete	Loan Purch by Inst	Pre-Appr Not Accepted
American Indian/Alaska Native	18	13/72%	1/6%	0/0%	4/22%	0/0%	0/0%	0/0%
Conventional	7	6	0	0	1	0	0	0
FHA/VA/FSA/RHS	11	7	1	0	3	0	0	0
Asian	115	68/59%	0/0%	15/13%	25/22%	3/3%	4/3%	0/0%
Conventional	75	40	0	12	20	2	1	0
FHA/VA/FSA/RHS	40	28	0	3	5	1	3	0
Black/African American	288	164/57%	5/2%	43/15%	38/13%	13/5%	23/8%	2/1%
Conventional	105	52	1	20	15	9	6	2
FHA/VA/FSA/RHS	183	112	4	23	23	4	17	0
Native Hawaiian/Pacific Islander	7	3/43%	1/14%	0/0%	3/43%	0/0%	0/0%	0/0%
Conventional	4	3	1	0	0	0	0	0
FHA/VA/FSA/RHS	3	0	0	0	3	0	0	0
White	1,739	1,101/63%	55/3%	174/10%	200/12%	74/4%	131/8%	3/0%
Conventional	890	546	38	110	94	59	40	3
FHA/VA/FSA/RHS	849	555	17	64	106	15	91	0

<sup>&</sup>lt;sup>12</sup> Federal Financial Institutions Examination Council (FFIEC). Note that these percentages are based on the number of applications received, and not based on the number of thousands of dollars for loan applications.

Totals - Race	2,167	1,349/62%	62/3%	232/11%	270/12%	90/4%	158/7%	5/0%
Conventional	1,081	647	40	142	130	70	47	5
FHA/VA/FSA/RHS	1,086	702	22	90	140	20	111	0
Hispanic/Latino	1,012	605/60%	36/4%	113/11%	120/12%	45/4%	90/9%	2/0%
Conventional	452	254	20	69	47	35	25	2
FHA/VA/FSA/RHS	560	351	16	44	73	10	65	0
Not Hispanic/Latino	1,155	744/64%	26/2%	119/10%	150/13%	45/4%	68/6%	3/0%
Conventional	629	393	20	73	83	35	22	3
FHA/VA/FSA/RHS	526	351	6	46	67	10	46	0
Totals - Ethnicity	2,167	1,349/62%	62/3%	232/11%	270/12%	90/4%	158/7%	5/0%
Conventional	1,081	647	40	142	130	70	47	5
FHA/VA/FSA/RHS	1,086	702	22	90	140	20	111	0

Source: FFIEC Home Mortgage Data Act Report, 2020

Notes: Race totals do not include 2 or more minority races, free form text only, joint and race not available. Ethnicity only includes Hispanic or Latino or Not Hispanic or Latino, and does not include free form text only, joint or ethnicity not available. Loans are 1<sup>st</sup> lien (not subordinate) only. Totals are made up of all inclusions and exclusions stated above.

Table 3-2
Loan Applications by Race and Ethnicity
by Thousands of Dollars (000s) in the Lancaster Area

Race or Ethnicity	App Rec'd	Loans	App Appr	App	Арр	Files Closed	Loan Purch	Pre-Appr
Loan Type (1 <sup>st</sup> )		Originated	Not Accepted	Denied	Withdrawn	Incomplete	by Inst	Not Accepted
Amer Indian/Alaska Native	\$5,170	\$3,495	\$275	\$0	\$1,400	\$0	\$0	\$0
Conventional	\$2,025	\$1,580	\$0	\$0	\$445	\$0	\$0	\$0
FHA/VA/FSA/RHS	\$3,145	\$1,915	\$275	\$0	\$955	\$0	\$0	\$0
Asian	\$39,215	\$24,270	\$0	\$4,435	\$8,395	\$755	\$1,360	\$0
Conventional	\$23,825	\$13,470	0	\$3,520	\$6,070	\$470	\$295	\$0
FHA/VA/FSA/RHS	\$15,390	\$10,800	\$0	\$915	\$2,325	\$285	\$1,065	\$0
Black/African American	\$96,300	\$57,510	\$1,825	\$13,855	\$12,980	\$2,535	\$6,785	\$810
Conventional	\$29,165	\$15,720	\$385	\$4,450	\$4,515	\$1,425	\$17,300	\$810
FHA/VA/FSA/RHS	\$63,135	\$41,790	\$1,440	\$9,275	\$8,465	\$1,110	\$5,055	\$0
Native Hawaiian/Pac Islander	\$2,305	\$885	\$275	\$0	\$1,145	\$0	\$0	\$0
Conventional	\$1,160	\$885	\$275	\$0	\$0	\$0	\$0	\$0
FHA/VA/FSA/RHS	\$1,145	\$0	\$0	\$0	\$1,145	\$0	\$0	\$0
White	\$561,145	\$376,365	\$14,035	\$46,900	\$69,730	\$12,430	\$40,535	\$835
Conventional	\$267,190	\$181,550	\$8,390	\$24,040	\$32,960	\$7,185	\$12,230	\$835
FHA/VA/FSA/RHS	\$293,955	\$194,815	\$5,645	\$22,860	\$36,770	\$5,245	\$28,305	\$0
Totals - Race	\$704,135	\$462,525	\$16,410	\$65,190	\$93,650	\$15,720	\$48,680	\$1,645
Conventional	\$323,365	\$213,205	\$9,050	\$32,140	\$43,990	\$9,080	\$14,255	\$1,645
FHA/VA/FSA/RHS	\$380,770	\$249,320	\$7,360	\$33,050	\$49,660	\$6,640	\$34,425	\$0
Hispanic/Latino	\$305,760	\$194,265	\$8,650	\$28,265	\$39,790	\$6,845	\$27,040	\$590
Conventional	\$120,980	\$78,100	\$3,480	\$12,365	\$15,815	\$3,695	\$6,935	\$590
FHA/VA/FSA/RHS	\$184,780	\$116,165	\$5,170	\$15,900	\$23,975	\$3,150	\$20,105	\$0
Not Hispanic/Latino	\$398,375	\$268,260	\$7,760	\$36,925	\$53,860	\$8,875	\$21,640	\$1,055
Conventional	\$202,385	\$135,105	\$5,570	\$19,775	\$28,175	\$5,385	\$7,320	\$1,055
FHA/VA/FSA/RHS	\$195,990	\$133,155	\$2,190	\$17,150	\$25,685	\$3,490	\$14,320	\$0
Totals - Ethnicity	\$704,135	\$462,550	\$16,410	\$65,190	\$92,650	\$15,695	\$48,680	\$1,645
Conventional	\$323,365	\$213,230	\$9,050	\$32,140	\$43,990	\$9,055	\$14,255	\$1,645
FHA/VA/FSA/RHS	\$380,770	\$249,320	\$7,360	\$33,050	\$49,660	\$6,640	\$34,425	\$0

Source: FFIEC Home Mortgage Data Act Report, 2020

Notes: Race totals do not include 2 or more minority races, free form text only, joint and race not available. Ethnicity only includes Hispanic or Latino or Not Hispanic or Latino, and does not include free form text only, joint or ethnicity not available. Loans are 1<sup>st</sup> lien (not subordinate) only. Totals are made up of all inclusions and exclusions stated above.

While this data indicates no large disparity between races and ethnicities in the number and amounts of first loan applications originated and accepted, Whites are significantly overrepresented by more than 80 percent of the total loans received and 81.6 percent of the total applications originated. 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.

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, although there is significant overrepresentation of White loan applicants in the market as compared with the other races.

Table 3-3
Loan Applications versus Population
by Race and Ethnicity in Lancaster

Race and Ethnicity	Percentage of Total Applications	Percentage of Total Population
American Indian or Alaska Native	.76%	1.0%
Asian	4.8%	5.3%
Black or African American	14.4%	27.2%
Native Hawaiian or Pacific Islander	0.3%	0.1%
White	79.8%	63.5%
Hispanic or Latino	45.1%	42.2%

Source: Federal Financial Institutions Examination Council (FFIEC) HMDA and American Community Survey 1-Year Estimates, 2019

Note: Totals may not add up due to 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 government-assisted loan than a conventional loan. The lending market offered subprime loan options such as zero percent down, interest-only and adjustable loans. As a result, government-backed loans became a less attractive option for many households. With the recent difficulties in the subprime housing market, however, this option is no longer available, and many households are facing 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 2019 FFIEC data, 63.2 percent of all applications that year within Lancaster were for government-backed loans, as compared with 38.8 percent of conventional loans. Of these loan applications, 52 percent of government-backed loans were originated, which is slightly higher than the loan origination rate of conventional loans at 48 percent. Of loans denied, 61.2 percent were conventional loans as compared with 38.8 percent of those back by the government.

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 people 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 credit sources might otherwise be unable to purchase a home. The subprime loan market offers 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. <sup>14</sup> 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. However, the high approval rate of any lending institution in Lancaster could indicate a concern related to an overly aggressive lending practice.

## **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.

In recent years, predatory lending has also penetrated the home improvement financing market. Seniors and ethnic minority homeowners are the usual targets. In general, home improvement financing is more difficult to obtain than

<sup>&</sup>lt;sup>13</sup>Christie, L. (2007, March 22). Subprime risk: Most vulnerable markets: 2.2 million homeowners are endangered by the subprime crisis. Which markets may be hardest hit? *CNN Money*.

<sup>&</sup>lt;sup>14</sup>California Reinvestment Committee. (2001, November). Stolen Wealth: Inequities in California's Subprime Mortgage Market.

home purchase financing. Many homeowners have a debt-to-income ratio that is too high to qualify for home improvement loans in the prime market and become targets of predatory lending in the subprime market. Seniors

are often swindled into installing unnecessary devices or making unnecessary improvements that are bundled with unreasonable financing terms.

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. The Equal Credit Opportunity Act of 1972 requires equal treatment in loan terms and availability of credit for all of the above categories, as well as age, sex and marital status. Lenders that engage in predatory lending would violate these acts if they were to target ethnic minority or elderly households to buy higher-priced and unequal loan products, treat loans for protected classes differently than those of comparably creditworthy White applicants, or have policies or practices that have a disproportionate effect on the protected classes.

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.

Predatory lending and unsound investment practices, which are central to the current home foreclosure crisis, have resulted in a credit crunch that has spread well beyond the housing market and is now affecting the cost of credit for local government borrowing, as well as local property tax revenues. 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.<sup>15</sup>

## **Other Factors**

The availability and cost of housing is strongly influenced by market factors, over which local government has little or no control. State law requires that the housing element contain a general assessment of these constraints, which can serve as the basis for actions that local governments might take to offset their effects. The primary non-governmental constraints to the development of new housing are land costs, construction costs, and environmental constraints.

## **Land Availability and Cost**

Costs associated with the acquisition and improvement of land include the market price of raw land, the costs of holding land throughout the development process, and the necessary improvements to the land prior to construction. Land holding costs are determined by interest rates on acquisition and development loans during development. Interest rates are not under the control of local jurisdictions;

therefore, the greatest inroad that can be made on holding costs would be through shorter processing times for development permits.

Land costs and the cost of holding land throughout the development process can account for as much as half of the final sales prices of new homes in small developments or in areas where land is scarce.

However, Lancaster has a large supply of vacant land, which lowers the overall cost of land in comparison to other denser areas in Los Angeles County. Average land costs in undeveloped single- family residential neighborhoods of Lancaster are about \$18,600 per acre. Among the variables affecting the cost of land are the size of lots, location and amenities, the availability and proximity of public services, and the financing arrangement between the buyer and seller.

The City cannot control the market price of land, which may be affected by speculation, demand, and supply. The price of land can also escalate through land fragmentation, which is a problem in some areasof Lancaster, and can result in a significant constraint on housing production. Land fragmentation, which was originally allowed by inadequate regulation of land subdivisions in the past, often resulted in parcels that are uneconomical or difficult to develop because of size, inadequate access, or scattered ownership.

In Lancaster, the problem is most acute on the east and west side of the City, where fragmented areas adjacent to existing development hamper logical urban expansion. Often, these areas are "skipped over" in favor of land further away from the urban core, encouraging "leap-frog" development and urban sprawl. The result is that developers incur greater costs from infrastructure extensions, the City incurs greater costs for providing services and these costs are passed on to the potential buyers in the form of higher housing prices. While lower land costs on the urban fringe may initially offset some of the increased development costs, land fragmentation and sprawling land use patterns will ultimately result in higher housing prices and higher costs to the community who must serve these developments.

In Lancaster, much of the existing available land has not been subdivided yet into legal lots. Generally, the subdivision application process is completed by a different entity than that which completes the building application and construction process. Throughout the region, local builders report a shortage of available legal lots upon which to build. As such, additional entitlement work by private industry is necessary to prepare the land for development.

#### **Cost of Construction**

Construction cost is determined primarily by the cost of labor and materials—these are the most significant cost components of developing residential units, and they have grown dramatically in recent years. The relative importance of each is a function of the complexity of the construction job and the desired quality of the finished product. The price paid for material and labor at any one time will reflect short-term considerations of supply and demand. Future costs are difficult to predict given the cyclical fluctuations in demand and supply that in large part are created by fluctuations in the state and national

A review of vacant residential land sales on Zillow.com on February 23, 2021 provided 1,098 vacant lots for salewithin the City. Land costs were estimated from a quarter (275 listings) of this sample and may not be representative of general land costs in the City

economies. Such policies unilaterally impact construction in a region and therefore do not deter housing construction in any specific community.

According to data from the California Construction Cost Index, hard construction costs in California grew by 44 percent between 2014 and 2018, or an additional \$80 per square foot. <sup>2</sup> Construction costs are estimated to account for upwards of 60 percent of the production cost of a new home, especially for multi-unit residential buildings which often require the use of more expensive materials, like steel, and need additional amenities such as parking structures. <sup>3</sup> Variations in the quality of materials, type of amenities, labor costs and the quality of building materials could result in higher or lower construction costs for a new home. Pre-fabricated factory built housing, with variation on the quality of materials andamenities may also affect the final construction cost per square foot of a housing project.

An indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data is national and does not consider regional differences, nor does the data include the price of the land upon which the buildings are built. The 2020 national averages for costs per square foot of apartment units and single-family homes are as follows:

- Type I or II, Multi-Family: \$129.23 to \$167.27 per sq. ft.
- Type V (Wood Frame), Multi-Family: \$112.76 to \$147.50 per sq. ft.
- Type V (Wood Frame), One- and Two-Family Dwelling: \$122.46 to \$141.72 per sq. ft.

The City's ability to mitigate high construction costs is limited without direct subsidies. Another factorrelated to construction cost is development density. With an increase in the number of units built in aproject, overall costs generally decrease as builders can benefit from the economies of scale.

## **Availability of Financing**

The availability of capital to finance new residential development is a significant factor that can impact both the cost and supply of housing. Two types of capital are involved in the housing market: 1) capital used by developers for initial site preparation and construction and 2) capital for financing the purchase of units by homeowners and investors. Interest rates substantially impact home construction, purchase, and improvement costs. A fluctuation in rates of just a few percentage points can make a dramatic difference in the annual income needed to qualify for a loan. In general, financing for new residential development is available at reasonable rates. However, economic fluctuations due to COVID-19 have caused caution among lenders and may have lasting effects through this Housing Element planning period. And while interest rates are low, lenders are considering applicants much more closely than in the past, leading to credit tightening despite affordable interest rates.

#### Section 4

## **PUBLIC POLICIES AND PRACTICES**

Although local governments have little influence on such market factors as interest rates and availability of funding for development, their policies and regulations can affect both the amount of residential development that occurs and the affordability of housing. Since governmental actions can constrain development and affordability of housing, State law requires the Housing Element to "address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing."

Governmental constraints are policies, development regulations, standards, requirements, or other actions imposed by various levels of government upon land and housing ownership and development. Land use controls, building codes, processing procedures and development fees are all factors that may hamper the maintenance, improvement and/or development of housing in Lancaster. State and federal regulations such as those related to environmental protection, building codes, and other topics have significant and often adverse impacts on housing costs and availability. While constraints exist at all levels of government, this section emphasizes policies and regulations that can be mitigated by the City.

## **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 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 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 4-1.

## **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.

Table 4-1 gives an overview of Lancaster's Residential Development Standards for single-family homes on rural lots.

Table 4-1
Single-Family House on Rural Residential Lot Development Standards

Development Standard	RR-2.5	RR-1	SRR	
Site Specifications				
Min. Lot Size (square feet)	100,000	40,000	20,000	
Minimum width (feet)	165	110	85	
Minimum depth (feet)	250	130	120	
Building Placement				
Front yard (feet)	40	30	30	
Garage Location (feet)	All garages shall be located at or behind the wa			
	plane where th	ne front entrance is	located.	
Rear (feet)	30	25	20	
Interior side yard (feet)	20	15	10	
Interior side yard: total sum of two yards (feet)	40	30	25	
Street side yard (feet)	40	30	20	
Building Size and Massing				
Height Limit (feet)	40	40	35	
Lot Coverage	30%	40%	40%	
Parking	2 spaces with	in an enclosed gar	age per Section	
	17.08.100			

Source: 2021-2029 Lancaster Housing Element

Table G: Multi-Family Development Standards

Development Standard	MDR/HDR 2-15 units	MDR/HDR Large Building <sup>2</sup>
Site Specifications		
Min. Lot Size (sf)	6,000	6,000
Minimum width (ft.)	60	60
Min. width – corner lot (ft.)	80	75
Minimum depth (ft.)	100	100

#### **Building Placement**

Building Placement		
Fronting local, collector, or other residential street with on- street parking (feet). Transitional infill guidelines apply (Sec 17.08.070.D)	0-12	0-12
Fronting local, collector, or other residential street with on- street parking and adjacent to single-family uses along the same street (feet).	8-20	8-20
Fronting arterial street with no on-street parking (feet)	20-32	20-32
Rear yard (ft)	15	15
Interior side yard (ft)	10	15
Street side yard (ft)	15	20
Building Size and Massing	•	
Lot Coverage	50%	50%
Building height within 100 ft of SFR zone (ft)	35	35
Height Limit (ft)	55	72
Parking	•	
Location of on-site parking	Behind the front façade of the residential building	40 ft. from front property line
Number of parking spaces	Per Section 17.08.100	Per Section 17.08.100
Open Space and Landscaping	•	
Open Space/recreation area	Min. 8% of lot area, min. 20' width and depth	Min. 8% of lot area, min. 50' width and depth
Landscaping	Min. 15% of lot area	Min. 15% of lot area
Solar Provision		

## **Housing Element**

The Housing Element is one of seven mandated foundations 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) office 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 people within 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 residents within 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 experiencing homelessness 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 2021 for cities in its six-county region. The model provides a seven-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, which 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.

Housing Element law requires a quantification of each jurisdiction's share of the regional housing need as established in the RHNA-Plan prepared by the jurisdiction's council of governments. The California Department of Housing and Community Development (HCD), in conjunction with the SCAG, determine a projected housing need for the region covered by SCAG. This share, known as the Regional Housing Needs Allocation (RHNA), is 1,341,827

new housing units for the 2021-2029 planning period throughout the SCAG region. SCAG has, in turn, allocated this share among its constituent jurisdictions, distributing to each its own RHNA divided along income levels. The income distribution for Lancaster is as shown in Table 4-2.

Lancaster's projected regional housing need for the period of 2021-2029 is for 9,023 units. Of this amount, 2,224 units are to be allocated for units serving households with very low income (25.0 percent), 1,194 units serving households with low income (13 percent), 1,328 units serving households with moderate income (15 percent), and 4,277 units allocated to serve households with above-moderate income (47 percent).

Table 4-2
City of Lancaster Snapshot of RHNA Allocations by Income Category 2021-2029

Income Group	% of County AMI	Number of Units Allocated	Percent of Total Allocation
Very Low <sup>1</sup>	0-50%	2,224	25%
Low	>50-80%	1,194	13%
Moderate	>80-120%	1,328	15%
Above Moderate	120%+	4,277	47%
Total		9,023	100%

Source: City of Lancaster Housing Element 2021-2029

Note: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation Therefore, the City's very low-income RHNA of 2,224 units can be split into 1,112 extremely low-income and 1,112 very low-income units.

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 people with disabilities, people who have lower income, people who are experiencing homelessness, 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**

Secondary or accessory dwelling units (ADUs) can be an important source of affordable housing since they are smaller than primary units and do not have direct land acquisition costs. ADU development expands housing opportunities for very low-, low-, and moderate-income households by increasing the number of rental units available within existing neighborhoods. Lancaster complies with Government Code Section 65852.2; as such, ADUs are permitted by right in the single-family residential zones R-7000, R-10,000, R15,000, SRR, RR-1, RR-2.5 and are subject to all development standards of the underlying zoning district with a few minor exceptions.

Although the City had a previous ordinance that permitted secondary dwelling units, it 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**

The City has four mixed use zones all of which allow for residential uses, either in conjunction with another office or commercial use, or stand-alone. These zones are: MU-N (Mixed Use-Neighborhood), MU-C (Mixed Use-Commercial), MU-E (Mixed Use-Employment), and MU-TOD (Mixed Use-Transit Oriented Development). The MU-TOD zone is addressed by the Lancaster T.O.D. Zones Master Plan which was adopted in 2015 and follow its own set of standards and guidelines. MU-N, MU-C, and MU-E 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 following applies for theratio of uses:

- 1- When a development is located on a project site that is located within 660 feet of an intersection of two major arterial streets, a minimum of 25 percent of the development shall benon-residential uses, as measured by ground floor area.
- 2- When a development is located on a project site that is located within 660 feet of an intersection of two secondary arterial streets, or an intersection of a major arterial with a secondary arterial, a minimum of 10 percent of the development shall be non-residential uses, as measured by ground floor area.

The development regulations in Mixed Use zones vary depending on the type of building that is proposed. Since the mixed use zones were adopted over a decade ago, the City has seen many inquiries, but limited development in these zones. Oftentimes, the complex requirements for a commercial component based on the project's location in proximity to major arterial streets deter residential developers who inquire. There are programs included in the Housing Plan to analyze and amend the Mixed Use zones to better encourage development within these areas.

## **Downtown Specific Plan**

The Downtown Specific Plan includes form-based development standards in conjunction with simplified use regulations for 140 acres in the downtown area, located within the City's urban core. The regulating form-based code focuses attention on the form, placement, and appropriate use of buildings. The code encourages better site and building design through bulk and mass regulations that are more defined, promoting an attractive and pedestrian-oriented environment. Under the Downtown Specific Plan, multi-family residential uses are allowed "by right," without a conditional use permit and detached single-family homes are only permitted in the Neighborhood Office District. The unit capacity is not determined by density, but rather, the defined building envelope, as well as the building types that are permitted.

The Downtown Specific Plan gives developers a much greater capability to develop high density residential projects in the heart of the city's core, as a result of the reduction in parking requirements, ability to build up to five stories in height, and generous bulk and mass regulations. Efforts to clarify development regulations through form-based codes should provide developers increased certainty in estimating development costs, and consequently, an increased willingness to proceed on projects located in the City.

#### **Lancaster TOD Zones**

The Lancaster Transit Oriented Development (TOD) Zones, located east of Division Street between Avenue J and Avenue I, immediately surround the Downtown Specific Plan area to the south and east. The TOD Zones form-based code is intended to restore, intensify, and reanimate the area surrounding the City's historic downtown. Represented as MUTOD on the zoning map, the zoning is further divided into sub-zones: Station Area Zone, Corridor Commercial Zone, Employment Commercial Zone, Workshop District Zone, Neighborhood Medium Zone, and Neighborhood Low Zone. Under the TOD Zones, a majority of residential uses are allowed "by right," without a conditional use permit, and mixed-use is allowed by right in nearly all zones (with the exception of the lower density Neighborhood Moderate Zone where a conditional use permit is required and Neighborhood Low Zone where is it not permitted). For all TOD Zones, the unit capacity is not determined by density, but rather, the defined building envelope, as well as the building types that are permitted, providing flexibility to developers insite design.

The Metrolink Station sits at the eastern edge of the Downtown Lancaster Specific Plan area and is a key component in design considerations for the TOD Zones, with more intensive development focused within the Station Area. Residential uses are encouraged in all zones, with the exception of the Employment Commercial Zone and the Workshop District Zone. The Metrolink Station is located on the eastern boundary of the Downtown Specific Plan area, abutting the TOD zones. This area supports higher density development, including urban apartment buildings and mixed-use projects up to five stories (65 feet). Corridor Commercial allows for housing up to three stories and 48 feet in height.

Neighborhood Medium Zone allows multifamily in a variety of building formats up to three stories/45feet in height, and Neighborhood Low Zone allows smaller scale housing (including single family, duplexes, triplexes, and quadplexes), up to two stories/24 feet in height.

\*\*\* DETAIL INSERTS\*\*\*

DOWNTOWN Specific Plan Districts

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Table- H: Downtown Specific Plan and MU-TOD Zones

#### **Lancaster Health District Master Plan**

In 2021, the City of Lancaster adopted the Lancaster Health District Master Plan. Building on a core campus of existing medical service providers including Antelope Valley Hospital, Kaiser Permanente, City of Hope, High Desert Medical Group, and many other medical offices, drug stores and supporting businesses along Avenue J, the Health District will attract, organize, and support a broad range of health and wellness businesses, in a walkable and mixed-use environment. Of the 272.4 acres within the Plan Area, over 110 are vacant or undeveloped. Much of the land near the hospital is owned by the Antelope Valley Health District (AVHD). Large parcels of vacant land both north and south of Avenue J-8 are owned by private parties who share the vision for the Health District and look forward to developing their land with housing, medical offices, hotels and other uses that will support the viability and growth of the District.

The Health District Master Plan replaces existing zoning with a new Mixed Use – Health District zone. Within the new zone are three new sub-districts/zones: District Core, District General, and District Edge. Residential uses are allowed by right in all zones, with a maximum height of six stories/75 feet in District Core, four stories/50 feet in District General, and three stories/30 feet in the District Edge zone. For all Health District Zones, residential unit capacity is not determined by density, but rather, the defined building envelope, as well as the building types that are permitted, providing flexibility to developers insite design.

## **Multifamily Rental Housing**

Multi-family developments are permitted by-right in the MDR and HDR zones. Duplexes and triplex are permitted in MDR and HDR zones with a director's review to ensure the site plan conforms with development standards. These zones are meant for developments with higher densities of 4 or more dwelling units. In the mixed-use zones (MU-N, MU-C, MU-E), developments with 15 or fewer units are permitted by-right, but developments with 16 or more units are conditionally allowed. High-density residential land uses are also permitted by-right in all zones that permit residential uses in the Downtown Specific Plan and in Lancaster's TOD Zones. In 2021, the City adopted a new Mixed Use zone (MU-H) as part of the Health District Master Plan. Multi-family residential uses are allowed by right in all zones within the Health District Master Plan.

In 2013, the City updated the zoning ordinance to allow for the administrative review and approval of multi-family development. Proposed multi-family developments of more than four units in the MDR and HDR are processed by

planning staff and would not require a conditional use permit and public hearing before the Planning Commission. This removes the uncertainty of the potential of reduction in housing units during the public hearing process, and assists the City and State in reaching housing production and affordability objectives. City staff would 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. Conditional use permits are only required in the MU-N, MU-C, and MU-E zones for projects with 16 or more units. In order to ensure compliance with the Housing Accountability Act, Program is included in the Housing Plan to amend the Zoning Ordinance to add reference to the Housing Accountability Act requirements, indicating that multi-family housing (and mixed use containing at least two-thirds residential) cannot be denied nor density reduced and that the City will adopt objective design standards to provide clarity in project review.

## **Processing and Permit Procedures**

Processing and permit procedures may pose a considerable constraint to the production and improvement of housing. Statewide, common constraints include lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval. These constraints increase the final cost of housing, uncertainty in the development of the project, and overall financial risk assumed by the developer. The City of Lancaster's development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Processing times vary with the complexity of the project. Table-I outlines the typical timelines for various residential projects in the city of Lancaster.

Table-I: Planning Approval Procedure and Time Frame by Housing Type

Planning Application Procedure	Time Frame	
Director's review (site plan)	"over-the-counter" to 1 month	
Director's review	"over-the-counter" to 1 month	
Tentative tract map (no EIR)	approximately 6 months	
Tentative tract map (with EIR)	9 to 12 months	
Director's review	4 to 6 weeks	
Site plan review	2 to 6 months	
Site plan review with parcel map	3 to 6 months	
	Director's review (site plan)  Director's review  Tentative tract map (no EIR)  Tentative tract map (with EIR)  Director's review  Site plan review	

## **Density Bonus**

As required by State law, the City's zoning code contains a density bonus provision. This ordinance, adopted by the City in 2013 as part of its comprehensive update to the Zoning Code, 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 specific zone "by right," and without a conditional use permit. The processes do not present a major burden to achieving increased unit capacity. Density Bonuses are an important tool for the City.

While consistent with Government Code 65915 at the time of adoption, the State Legislature has passed numerous changes to the density bonus requirements. Lancaster's Housing Plan includes actions to ensure the City's density bonus ordinance is consistent with the most current State laws.

#### **Infill Incentives**

The 2013 Residential Zoning Ordinance includes an infill provision that allows developers to build up to eight housing units per acre in the single-family R-7000 zone, 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, be located adjacent to commercially zoned land, be surrounded by existing development on all sides, or combine four 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. This incentive is intended to reduce the cost and increase the supply of residential development.

## 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 people 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.

#### **Mobile Home Communities**

State law requires that mobile and manufactured homes be considered a single-family dwelling and permitted in all zones that allow single-family housing. Manufactured housing can be subject to design review. Mobile home/factory-built dwellings are permitted by right in all of the single-family residential zones with approval of a Director's Review. When building plans are submitted, the plans are routed to the City's Community Development Division 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 has non-reflective exterior material on the roof and siding and that the foundation system complies with the Health and Safety Code. Also, in the commercial and industrial zones, if there is an existing residential use, this dwelling may continue to be used as a permitted use.

## **Transitional and Supportive Housing**

State law (SB 2) requires cities to allow transitional and supportive housing as a residential use and allowed by right in all zones that allow similar residential uses. In Lancaster, transitional and supportive housing are considered single-family or multi-family uses and are permitted in all residential zones and thus held to the same development standards as 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.

Effective January 1, 2019, AB 2162 (Supportive Housing Streamlining Act) requires supportive housing to be considered a use by right in zones where multi-family and mixed uses are permitted, including nonresidential zones permitting multi-family uses if the proposed housing development meets specified criteria. The law prohibits the local government from imposing any minimum parking requirement for units occupied by supportive housing residents if the development is located within one-half mile of a public transit stop. AB 2162 also requires local entities to streamline the approval of housing projects containing a minimum amount of supportive housing by providing a ministerial approval process, removing the requirement for a California Environmental Quality Act (CEQA) analysis, and removing the requirement for a Conditional Use Permit (CUP) or other similar discretionary entitlements. Program H-4.7 is included in the Housing Element to ensure AB 2162 compliance.

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 clients with disabilities 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 people with disabilities is the prohibition against group homes serving more than six people 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, 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, 12<sup>th</sup> 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 may 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.

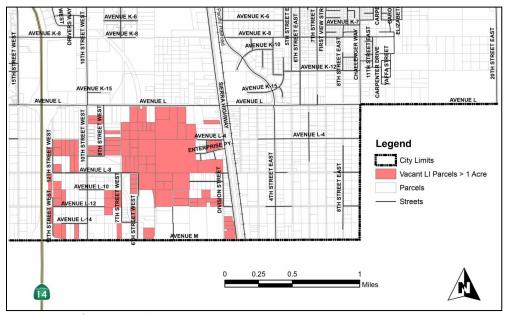


Table 4-3
Identified Vacant LI Parcels Greater Than 1 Acre

Source: City of Lancaster Planning Department

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

- "Family" means an individual or two or more persons living in a single dwelling unit. "Family" also
  mean the persons living together a residential facility, including transitional and supportive housing,
  which serves six or fewer persons, including the licensee, the members of the licensee's family, and
  persons employed as facility staff.
- "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.

## **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 the following categories: 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
Building and Development Impact Fees for Lancaster

	2018		2021		
	SFR	MFR	SFR	MFR	
New Construction Permit (Plan check and inspection)	\$5,778 (2,000 sf)	\$14,637 (10,000 sf)	\$3,376	\$12,336	
Traffic Signal (per unit)	\$1,124		Central: \$212 Outer: \$1,180.20	Central: \$142 Outer: \$1,180.20	
Traffic (per unit)	\$1,790	\$1,592	\$1,879.89	\$1,671.97	
Los Angeles County Traffic (all projects within the areas bounded by Avenue J-8, 40 <sup>th</sup> St W, Ave L-8 and 100 <sup>th</sup> St W)	\$1,578 per PM		\$1,578 per PM	\$1,578 per PM	
Planned Local Drainage Facilities (per unit)	\$4,780	\$2,390	\$2,952.66	\$2,952.66	
Urban Structure Program:					
Park Development (per unit)	\$2,534		\$2660.70	\$2660.70	
Administrative Offices (per unit)	\$61		\$64.24	\$64.24	
Corporate Yard (per unit)	\$57		\$60.65	\$60.65	
Dwelling Unit (Park in Lieu; per unit)					
1 Bedroom or Studio	\$500		\$500	\$500	
2 Bedroom or Mobile Home	\$750		\$750	\$750	
3 Bedroom or More	\$1,000		\$1,000	\$1,000	
Biological Impact (per gross acre)	\$77	0	\$770	\$770	
Open Space Fee (per unit)	\$0		\$315	\$214	

Source: City of Lancaster, 2018. Effective 2018.

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.

## **Central Core Impact Fee Reductions**

To promote increased development and density in the City's Core, projects will receive a fee reduction based on the amount of lot coverage that a developer builds for a given project, relative to the average lot coverage for that land use, and the maximum lot coverage allowable. High density residential projects can achieve up to a 50 percent fee reduction and mixed-use residential projects are eligible for up to a 100 percent fee reduction. The Central Core includes the areas bounded by Avenue I, 20th Street East, Avenue L and 30th Street West.

## Pre-designated Project Areas (No Impact Fees)

Within pre-designated project areas (Medical Main Street, Parkway Village, Front Row Center, the BLVD) and senior housing developed anywhere within City limits, no impact fees are charged.

**AVENUE I** 3 S JACKMAN ST ≥ ST LANCASTER BLVD 10TH **NEWGROVE ST AVENUE J** 12TH ST \ 3 20TH ST \ **Project Areas** Legend Front Row Center Medical Main Street Parkway Village **AVENUE K** The BLVD Other Project Areas including COMMERCE COMMERCE housing development for senior SIERRA HWY citizens and handicapped persons\*, **AVENUE K8** which are not depicted on this map. AVENUE L \*Multiple family housing development maintained for the occupancy of the elderly in which not more than 10% of the occupants are under 62 years of age, or for handicapped persons whose disabilities seriously restrict operation of a motor vehicle.

Table-J: Predesignated Project Areas (No Impact Fees)

## **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 people 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 its 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 with a disability under the Fair Housing
- 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, 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	Director's review (site plan)	"over-the-counter" to 1 month	
Accessory dwelling unit	Director's review	"over-the-counter" to 1 month	
Single-family subdivision	Tentative tract map no EIR/with EIR	Approx. 6 months/9 to 12 months	
Multi-family: 2 to 3 units	Director's review	4 to 6 weeks	
Multi-family: 4+ units	Site plan review	2 to 6 months	
Condominiums	Site plan review with parcel map	3 to 6 months	

Source: Housing Element 2021-2029

The City's processing times for planning development applications are not a constraint because these 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 are 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 importance: 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 compliant with state law.10

## **Community Representation**

The City values citizen input on how well municipal 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**

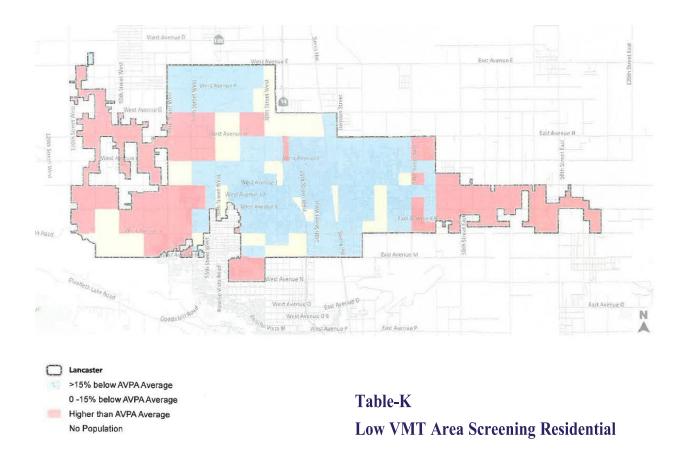
There are no public housing sites owned by the City of Lancaster located within Lancaster; however, LA CDA own and operate one public housing multifamily housing project in Lancaster and nearby Quartz Hill in the County of Los Angeles. The City reviewed LA CDA tenant selection procedures for the units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

## Transportation

SB 743 requires new metrics for identifying and mitigating transportation impacts within CEQA. In July 2020, the City of Lancaster adopted standards and thresholds for analyzing projects with respect to vehicle miles traveled (VMT). A series of screening criteria was adopted and if a project meets one of these criteria, a VMT analysis is not required and it is assumed that no impacts would occur. Included in these criteria are: 1) project size - generates fewer than 110 trips per day; 2) project located in a low VMT area (15 percent below baseline for the Antelope Valley Planning Area (AVPA) at large); 3) transit proximity; and 4) affordable housing. Areas indicated in blue in Table-K are identified as low VMT areas, where VMT analysis is not required, streamlining the development review process significantly.



## **Housing Programs**

The 2021-2029 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.

## **Rent Subsidy**

The LA CDA 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 LA CDA, including 25 Veterans Affairs Supportive Housing (VASH) vouchers.

## Housing Programs Included in the 2021-2029 Housing Element

The 2021-2029 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 represents the goals, objectives, policies and action programs that the City will pursue over the course of the current housing element planning period (January 1, 2021 to September 30, 2029).

Table-L1

Goal H-1.	To promote a variety of housing types to meet the existing and future needs of
	Lancaster residents
Policy H-1.1	Provide for adequate sites that will enable the production of 9,023 housing units through October 2029 to meet the demands of present and future residents, including an adequate number and range of new dwelling types affordable to extremely low-, very low-, low-, moderate-, and above moderate- income households.
Policy H-1.2	Encourage a mix of housing types are provided, including single- and multi-family housing within a variety of price ranges to provide a range of housing options for Lancaster residents.
Policy H-1.3	Promote infill housing development within areas presently approved for urban density residential development, as well as areas which have been committed to urban development.
Policy H-1.4	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.
Policy H-1.5	Ensure adequate water and sewer capacity to meet Lancaster's housing need.
Policy H-1.6	Encourage affordable mixed-use and multi-family residential housing developments on mixed-use zoned sites.
Policy H-1.7	Ensure coordination between the City of Lancaster, Air Force Plant 42, and Edwards Air Force Base regarding the provision of sufficient housing in the City to help meet the needs of military personnel for off-base housing.
Policy H-1.8	As the local population grows, proactively plan for needs including hospitals, employment, infrastructure, and transportation.

## Table-L2

Goal H-2.	To assist in the development of adequate housing and provide resources to meet the needs of low- and moderate-income and special needs households
Policy H-2.1	Promote the use of available housing assistance programs and resources.

Policy H-2.2	Facilitate housing for extremely low-, very low-, low-, and moderate-income households to be distributed at locations throughout the urban portions of the city.
Policy H-2.3	Facilitate the construction of affordable housing developments for very low-, low-, and moderate-income households.
Policy H-2.4	Promote the development and rehabilitation of housing specifically designed for the elderly, providing a variety of living environments.
Policy H-2.5	Provide adequate shelter opportunities and assistance programs for those families and individuals who are either homeless or are at risk of becoming homeless.
Policy H-2.6	Promote the development and rehabilitation of housing specifically designed for the disabled.

## **Summary of Quantified Objectives**

Table-M summarizes the City's quantified objectives for the 2021-2029 planning period by income group. While all programs list specific action to be undertaken, only key programs include quantified objectives. The objectives are aggregated from the programs that indicate quantified objectives and are grouped under three categories as indicated in State Housing Element law.

- The Construction Objective represents the City's 2021-2029 RHNA.
- The Rehabilitation Objective represents objectives for residential rental inspections.
- The Conservation/Preservation objective refers to the preservation of 661 units of affordable housing identified in the affordable housing at-risk analysis in Chapter 3: Community Profile and Needs Assessment.

Table- M: Quantified Objectives

	Income Levels				
Objectives	Extremely/ Very Low- Income (0- 50% AMI)	Low-Income (50-80% AMI)	Moderate- Income (80-120% AMI)	Above Moderate- Income (120%+ AMI)	Total
Construction Objective *	2,224	1,194	1,328	4,277	9,023
Rehabilitation Objective	8,000			8,000	
Conservation/Preservation Objective	661			1	661

<sup>\*</sup>Note: The City of Lancaster is not responsible for the actual construction of these units. The City is, however, responsible for creating a regulatory environment in which the private market could build these units. This includes the creation,

adoption, and implementation of General Plan policies, zoning standards, and/or incentives to encourage the construction of various types of units.

### **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.

- 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.

- 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.

- 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.
- 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.

- 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.

- 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.

- 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.
- 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.

- 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.

- 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.

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.

- 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 homeowner 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 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 than 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.

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-parcellation, 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.

- 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.

- 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 <sup>th</sup> 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 <sup>th</sup> St. West Lancaster, Ca. 93534
Prime Desert Woodlands Preserve	43201 35 <sup>th</sup> St West Lancaster, Ca. 93536
Deputy Pierre Baine Park/Eastside Pool	45045 N 5 <sup>th</sup> St. East Lancaster, Ca 93534
El Dorado Park	44501 N 5 <sup>th</sup> 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 people with disabilities.

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.

#### 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.

#### **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.

## Section 5

### FAIR HOUSING PRACTICES

The City of Lancaster 2022 Analysis of Impediments to Fair Housing Choice (AI) serves as the fair housingplanning document for the city. It provides an overview of the laws, regulations, conditions, and other possible obstacles that could affect an individual's or household's access to housing in Lancaster.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor. The AI examines local housing conditions, economics, policies, and practices in order to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The AI assembles fair housing information, identifies existing impediments that limit housing choice, and proposes actions to mitigate those impediments.

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. HRC promotes awareness of fair housing laws by targeting educational materials towards homebuyers, tenants, and housing providers such as sellers, owners, realtors, brokers, landlords, and property management firms. 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. HRC offers the following comprehensive fair housing services:

- Fair Housing Education
- Housing Discrimination Complaint Investigation
- Tenant and Landlord Counseling

The agency's education and outreach program include workshops for consumers and housing providers to ensure there is compliance with fair housing laws. These workshops cover topics such as forms of housing discrimination, Fair Housing Certification Training Seminars for housing industry professionals, information on the latest fair housing laws, and more. HRC also works on increasing public awareness on fair housing issues by distributing hundreds of pieces of multilingual literature throughout the city, aimed at a variety of audiences. HRC investigates allegations of discrimination based on a person's status as a member of one of the State or Federal protected categories.

#### **Segregation and Opportunity Patterns and Trends**

Segregation data for the City of Lancaster compares favorably to the region in terms of absolute values, meaning that the City is more integrated than the region overall with respect to each of the four groups compared (White, Black, Hispanic, Asian). According to HUD, "The dissimilarity index (or the index of dissimilarity) is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods within the same city. The dissimilarity index varies between 0 and 100 and measures the percentage of one group that would have to move across neighborhoods to be distributed the same way as the second group. A dissimilarity index of 0 indicates conditions of total integration under which both groups are distributed in the same proportions across all neighborhoods. A dissimilarity index of 100 indicates conditions of total segregation such that the members of one group are located in completely different neighborhoods than the second group. Neither extreme value is generally

seen in most cities and metropolitan areas. Rather the value typically lies somewhere in- between 0 and 100. Index values between 0.0 and 30.0 indicate low segregation, values between 31.0 and 60.0 indicate moderate segregation, and values between 61.0 and 100.0 indicate a high level of segregation. In Lancaster, HUD dissimilarity data shows that since 1990, segregation between several ethnic groups seen has been increasing, as shown in Table-N. The dissimilarity index has doubled between Hispanic and White residents since 1990. Segregation is also the highest among the Black population. However, the degree of segregation in the City is almost half of the level of segregation seen at the regional level for all racial/ethnic groups.

Table-N: Dissimilarity Index for the City of Lancaster and Los AngelesMetropolitan Region

		City of Lancaster						
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	Current			
Non-White/White	10.95	18.69	21.98	23.79	56.94			
Black/White	17.85	22.68	25.24	30.16	68.85			
Hispanic/White	10.99	25.24	23.53	25.11	63.49			
Asian or Pacific Islander/White	13.95	25.53	15.01	21.31	49.78			

In terms of employment and housing opportunities, Lancaster has high rates of unemployment, but market rate housing remains more affordable than Los Angeles County. According to data from the 2018 American Community Survey, the median household income for Lancaster was \$52,504, which is lower than the Los Angeles County median household income of \$64,251. It is also estimated that 23.8 percent of Lancaster households live in poverty. In Lancaster, certain populations are much more likely to be living in poverty. For example, 39 percent of Black residents and 38 percent of Native American residents are living in poverty. These disparities in poverty among different populations could also be attributed to the segregation patterns seen across the city. Additionally, Lancaster struggles from a jobs- housing imbalance, where 36 percent of employed residents commute more than 30 minutes to get to work. The main industries employing residents are educational services, health care and social assistance, and retail. The median income for educational services and health care and social assistance workers is \$36,775; retail trade workers medina income is \$26,458.

However, the median home price in Lancaster (\$368,000) is less than half of the median home prices of the County (\$710,000), which make home ownership more attainable for lower wage earners. Rental housing in Lancaster is also more affordable than many other areas of the county. Census data shows that the average rent in Lancaster is \$1,162 per month with most (39.6 percent) paying between \$1,000 and \$1,499 in rent. HUD-determined fair market rents for Los Angeles County range from \$1,279 for a studio apartment to \$2,857 for a four-bedroom unit. The rental rates in Lancaster generally are less than the HUD determined fair market rents.

## Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents with these residents living in poverty. Formally, an area is designated an R/ECAP if two conditions exist: (1) the non-white population, whether Hispanic or non- Hispanic, must account for at least 50 percent of the Census tract population; and (2) the poverty rate in that Census tract must exceed a certain threshold. Regarding the poverty threshold, neighborhoods of "extreme poverty" are census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. Since these extreme poverty neighborhoods are unlikely to have racial or ethnic concentrations as high as 50 percent, the threshold is set at 20 percent.

In Lancaster, HUD R/ECAP data shows one census tract (9006.07) classified as a R/ECAP, which is located near the downtown area (see Table-O). CalEnviroScreen data also indicates that this census tract scores in the 97<sup>th</sup> percentile in terms of poverty but is not considered an Environmental Justice Community as it does not score in 75<sup>th</sup> percentile for pollution burden characteristics.

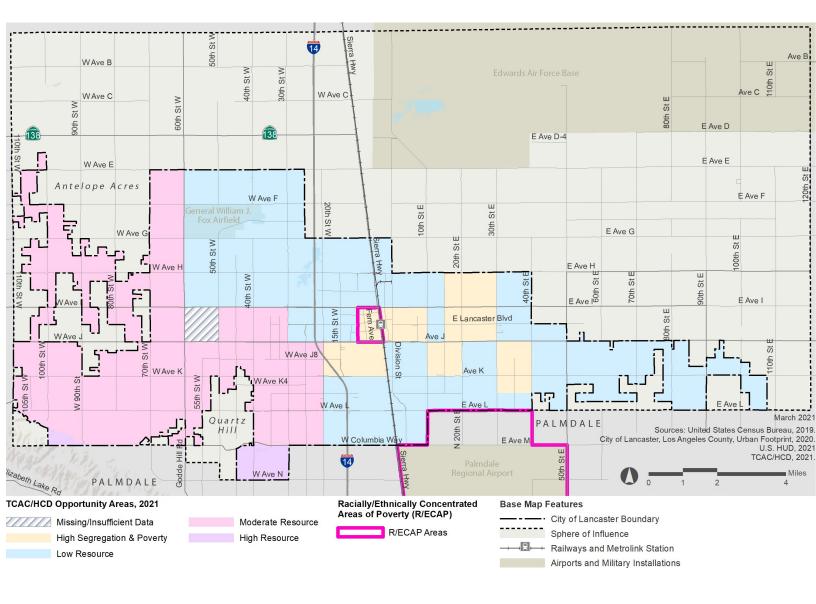


Table-O: R/ECAP and TCAC/HCD Opportunity Areas in Lancaster

#### The Comprehensive Fair Housing Services Include

<u>Fair Housing Education</u>: 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.

<u>Housing Discrimination Complaint Investigation</u>: 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.

<u>Tenant and Landlord Counseling</u>: 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:

<u>Conduct Training Workshops for consumers</u>: 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.

<u>Conduct Training Workshops for Housing Providers</u>: 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.

<u>Increase Public Awareness</u>: 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.

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		ייים וויפנו אפווע	VICES 2019-202	<u>-</u>		
	1st Qtr July - Sept	2nd Qtr Oct- Dec	3rd Qtr Jan - March	4th Qtr April-June	Total	& %
General						
Discrimination	11	4	4	10	29	10%
General Housing	76	56	56	80	268	90%
Total	87	60	60	90	297	100%
Discrimination						
Cases	3		1		4	14%
Inquiries	8	4	3	10	25	86%
Total	11	4	4	10	29	100%
Demographic  Am Ind or Alsk	1	1			2	1%
Am Ind or Alsk Am Ind/Alsk and Blk	2	1			2	1%
Asian	3		2	1	6	2%
Asian and Wht	3			1	1	0%
Blk/Afr Am	20	20	10	20	70	24%
Blk/Afr Am and Wht	1	20	10	20	1	0%
Other	47	36	44	61	188	63%
White	13	3	4	7	27	9%
Total	87	60	60	90	297	100%
	1					1
Mexican/Chicano	17	4	6	9	36	12%
Not Hispanic/Latino	61	49	46	76	232	78%
Other Hispanic/Latino	9	7	8	5	29	10%
Total	87	60	60	90	297	100%
Income						
Extremely Low	68	54	47	83	252	85%
Low	9	2	7	2	20	7%
Moderate	1	1	3		5	2%
Very Low	9	3	3	5	20	7%
Total	87	60	60	90	297	100%
Special groups	10	10	10	0.1	F.0	410
Disabled Female Headed	18	10 5	10	21	59	41%
Gov't Subsidized	6	1	4	5	25	17%
Senior Subsidized	15	11	3	16	16 45	11% 31%
						100%
Total	46	27	19	53	145	100%

The black population, Latino (not Hispanic), and Other have greater discriminatory complains. The Extremely low-income population and disabled population also have high number of complaints.

2019-2020	1st Qtr July-	2nd Qtr Oct-	3rd Qtr Jan -	4th Qtr April -	Tot FY	al
Type of Call	Sept	Dec	March	Jun	19/20	)
In-Place Tenant	71	53	50	78	252	85%
Landlord	5	2	4	6	17	6%
Manager	3	1	4	0	1	0%
Other	4	2	2		8	3%
Realtor	7	1		1	2	1%
Rental Homeseeker	7	1	4	5	17	6%
Total	87	60	60	90	297	100%
<u>Discrimination inqu</u>	iry					
Gender	1	1			2	7%
Mental Disability	2		1	1	4	14%
Physical Disability	8	3	3	8	22	76%
Race				1	1	3%
Total	11	4	4	10	29	100%
Case Opened Counseled Pending Referred Total	3 6 1 1	3 1 4	3	9 1	2 2 2 2 29	14% 72% 7% 7% 100%
Discrimination case  Gender  Mental Disability	<u>s</u> 1	1		_	1 2	25%
Physical Disability	1				1	
Total	3		1		4	1009
Inconclusive Evidence	2	1		_	2	50%
Sustains Allegation	1		1		2	50%
Total	3		1		4	100%
- <del></del>	I	1	<u>.</u>	1		.007
Client Withdrew	2				2	50%
Client Withdrew	2		1		2	50% 50%

### Landlord / Tenant Services 2019-2020

	1st Qtr July - Sept	2nd Qtr Oct- Dec	3rd Qtr Jan - March	4th Qtr April - Jun	To: FY 19/2	
Eviction	8	4	8	3	23	9%
Harassment	5	1	4	8	18	7%
Illegal Entry		1			1	0%
General Information	4	5	3	12	24	9%
Late Fees	1	1			2	1%
Lease Terms	3	2	4		9	3%
Lockout		1	2		3	1%
Notices	17	7	3	9	36	13%
Other Issue	2		6	8	16	6%
Refusal to Rent			1		1	0%
Rent Increase	9	11	4	11	35	13%
Repairs	5	3	3	5	16	6%
Section 8 Information	1	1	2	2	6	2%
Security Deposit	5	6	1	5	17	6%
Seeking Housing	5	5	8	12	30	11%
Substandard Conditions	11	8	5	4	28	10%
Utilities			2	1	3	1%
Total	76	56	56	80	268	100

Attorney	3	1	7		11	4%
public Safety	1			1	2	1%
Code Enforcement	2		4	3	9	3%
Consumer Affairs	1			1	2	1%
Health Department	2	1	1	2	6	2%
Housing Authority	1	1	1	1	4	1%
Legal Aid	10	6	7	6	29	11%
Mediation	2	2	7	6	17	6%
Other FHC Group			1		1	0%
Other Action			3	1	4	1%
Project Place	5	4	7	12	28	10%
Rent Control or Stabilization			2		2	1%
Resolved	48	38	14	46	146	54%
Small Claims Court	1	3	2	2	8	3%
Total	76	56	56	81	269	100%

The legal aid and mediation were used the most to resolve landlord / tenant problems. The City should invest more in this kind of methods.

## **SERVICES 2020-2021**

		1st Qtr	2nd Qtr	3rd Qtr Jan	4th Qtr	Total	
		July - Sept	Oct - Dec	- March	April - Jun	FY 20/2	1
				1			
eneral							
Discrimination	n	13	9	16	23	61	19%
General Hous	sina	63	63	60	70	256	81%
Total	<u> </u>	76	72	76	93	317	100%
				<u> </u>		•	
iscriminatio	n						
Cases		2	1		2	5	8%
Inquiries		11	8	16	21	56	92%
Total		13	9	16	23	61	100%
			·		·		
	Race						
	Am Ind or Alsk	1			1	2	1%
	Am Ind/Alsk and Blk				1	1	0%
	Blk/Afr Am	24	17	24	13	78	25%
	Blk/Afr Am and Wht				1	1	0%
	Other	38	46	46	67	197	62%
	Pacific Islander				1	1	0%
	White	13	9	6	9	37	12%
	Total	76	72	76	93	317	100%
Ethn	nicity						1
Cuban		1				1	0%
Mayican/Chic	cano		9	11	14		
WEXICALI/CITIC	// _4!	69				38	-
Not Hispanic/	Latino	09	51	60	63	243	12% 77%
		2	51 12	60 5	63 15		12%
Not Hispanic/ Other Hispan Puerto Rican	ic/Latino	2	12	5	15 1	243 34 1	12% 77% 11% 0%
Mexican/Chic		4		9	9 11		
/Latino ic/Latir					15	243 34	
lispanic/ r Hispan to Rican	ic/Latino	2	12	5	15 1	243 34 1	129 779 119
Not Hispanic/ Other Hispan Puerto Rican Total Inco	ic/Latino me	76	12 <b>72</b>	7 <b>6</b>	15 1 93	243 34 1 317	129 779 119 0% 1009
Not Hispanic/ Other Hispan Puerto Rican Fotal Inco	ic/Latino me	76 69	72 72	76 62	15 1 93	243 34 1 317	12% 77% 11% 0% 100%
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lov	ic/Latino me	76	12 <b>72</b>	5 76 62 3	15 1 93 80 4	243 34 1 317 273	12% 77% 11% 0% 100°
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lov Low Moderate	ic/Latino me	76 69 4	12 72 62 6	62 3 1	15 1 93 80 4 2	243 34 1 317 273 17 3	12% 77% 11% 0% 1009 86% 5% 1%
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lov Low Moderate Very Low	ic/Latino me	69 4	12 72 62 6	5 76 62 3 1	15 1 93 80 4 2 7	243 34 1 317 273 17 3 24	12% 77% 11% 0% 100% 86% 5% 1% 88%
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lov Low Moderate Very Low	ic/Latino me	76 69 4	12 72 62 6	62 3 1	15 1 93 80 4 2	243 34 1 317 273 17 3	12% 77% 11% 0% 100% 86% 5% 1% 88%
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lov Low Moderate Very Low Total	me w	69 4	12 72 62 6	5 76 62 3 1	15 1 93 80 4 2 7	243 34 1 317 273 17 3 24	12% 77% 11% 0% 100% 86% 5% 1% 88%
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lov Low Moderate Very Low Total  Spec	ic/Latino me	69 4 3 76	62 6 6 4 72	62 3 1 10 76	15 1 93 80 4 2 7 93	243 34 1 317 273 17 3 24 317	12% 77% 11% 0% 1009 86% 5% 1% 8% 1009
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lot Low Moderate Very Low Total  Spec Disabled	me w cial group	2 76 69 4 3 76	12 72 62 6 4 72	5 76 62 3 1 10 76	15 1 93 80 4 2 7 93	243 34 1 317 273 17 3 24 317	12% 77% 11% 0% 100% 86% 5% 1% 88% 100%
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lov Low Moderate Very Low Total	me w cial group	69 4 3 76	62 6 6 4 72	62 3 1 10 76	15 1 93 80 4 2 7 93	243 34 1 317 273 17 3 24 317	12% 77% 11% 0% 100% 86% 5% 1% 88%
Not Hispanic/ Other Hispan Puerto Rican Total  Inco Extremely Lov Low Moderate Very Low Total  Spec	me w	69 4 3 76	62 6 6 4 72	62 3 1 10 76	15 1 93 80 4 2 7 93	243 34 1 317 273 17 3 24 317	

In 2020-2021 the black population, Latino (not Hispanic), and Other have greater discriminatory complains. The Extremely low-income population and disabled population also have high number of complaints. This shows no change in year to year in this type of data.

#### 2020-2021 Services

	1st Qtr July -	2nd Qtr Oct -	3rd Qtr Jan -	4th Qtr April -	Tot FY	al
	Sept	Dec	March	Jun	20/21	
Total	43	25	31	42	141	100%

Type of Call

Total	76	72	76	93	317	100%
Rental Homeseeker	7	4	7	10	28	9%
Realtor	1		1		2	1%
Other			2		2	1%
Manager	1				1	0%
Landlord	8	5	1	5	19	6%
In-Place Tenant	59	63	65	78	265	84%
1,65 01 0011						

# **Discrimination inquiry**

Protected groups

Total	13	9	16	23	61	100%
Source of Income	1	1		2	4	7%
Race	1			1	2	3%
Physical Disability	10	5	9	10	34	56%
Mental Disability	1	3	6	9	19	31%
Familial Status				1	1	2%
Discrim. General Information			1		1	2%

Case Opened	2	1		2	5	8%
Counseled	9	8	13	18	48	77%
Pending	2		2	2	6	10%
Referred	1		1	1	3	5%
Total	14	9	16	23	62	100%

## **Discrimination Cases**

Total	2	1		2	5	100%
Successful Conciliation	1	1		1	3	60%
Pending				1	1	20%
No Enforcement Action Possible	1				1	20%
		1	1		'	
Total	2	1		2	5	100%
Sustains Allegation	2	1		2	5	100%
Total	2	1		2	5	100%
Race	1				1	20%
Physical Disability	1	1		1	3	60%
Mental Disability				1	1	20%
Protected Class						

1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Total
July -	Oct -	Jan -	April -	FY
Sept	Dec	March	Jun	20/21

## TENANT/LANDLORD SERVICES

Total	63	63	60	70	256	100%
Utilities		1		2	3	1%
Substandard Conditions	4	5	8	7	24	9%
Seeking Housing	14	6	8	7	35	14%
Security Deposit	3	3	1	5	12	5%
Secion 8 Information	1	2	1	1	5	2%
Repairs	8	1	3	8	20	8%
Rent Increase	8	8	8	8	32	13%
Parking				1	1	0%
Other Issue	4	4	7	3	18	7%
Notices	9	14	10	12	45	18%
Lockout		1		1	2	1%
Lease Terms	2	1	1	2	6	2%
Late Fees	1				1	0%
L/T General Information	5	8	9	5	27	11%
Illegal Entry				1	1	0%
Harassment	2	6	2	3	13	5%
Eviction	2	3	2	4	11	4%

Total	63	62	60	70	255	100%
Small Claims Court	2	3		2	7	3%
Resolved	25	27	35	40	127	50%
Project Place	14	6	7	7	34	13%
Other GH Action	1	1	1	1	4	2%
Mediation	6	4	1	1	12	5%
Legal Aid	7	12	13	9	41	16%
Housing Authority		1			1	0%
Health Department	4		2	2	8	3%
Consumer Affairs		1			1	0%
Code Enforcement		1	1	3	5	2%
Building and Safety	1			3	4	2%
Attorney	3	6		2	11	4%

In 2020-2021 the legal aid and mediation were used the most to resolve landlord / tenant problems. The City should invest more in this kind of methods. The types of services have not changed from year to year.

#### **Fair Housing Discrimination Complaints**

HRC is a complaint driven agency that investigates fair housing complaints based on fair housing violations in Lancaster. Fair housing complaints are received through education and outreach, internet referrals, and advertisements activities that take place in 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 the following: conciliation, referral to the State Department of Fair Employment and Housing (DFEH) or to HUD for further investigation and enforcement.

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

#### **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.

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". Nationwide, the share of complaints filed under each basis has remained relatively stable during the period represented in the report. Race continues to be the second most common basis of complaints field with HUD and FHAP agencies. Familial status, the third most common basis of housing complaints.

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.

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 cots resulting from a full DFEH investigation and potential litigation.

#### **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.

#### **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.

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.

## **Existing Impediments to Fair Housing Choice**

	Los Angeles-Long Beach-Anaheim Region				
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	Current
Non-White/White	10.95	18.69	21.98	23.79	56.94
Black/White	17.85	22.68	25.24	30.16	68.85
Hispanic/White	10.99	25.24	23.53	25.11	63.49
Asian or Pacific Islander/White	13.95	25.53	15.01	21.31	49.78

A dissimilarity index of 100 indicates conditions of total segregation such that the members of one group are located in completely different neighborhoods than the second group. Neither extreme value is generally seen in most cities and metropolitan areas. Rather the value typically lies somewhere in- between 0 and 100. Index values between 0.0 and 30.0 indicate low segregation, values between 31.0 and 60.0 indicate moderate segregation, and values between 61.0 and 100.0 indicate a high level of segregation. In Lancaster, HUD dissimilarity data shows that since 1990, segregation between several ethnic groups seen has been increasing, as shown in Table-N. The dissimilarity index has doubled between Hispanic and White residents since 1990. Segregation is also the highest among the Black population. However, the degree of segregation in the City is almost half of the level of segregation seen at the regional level for all racial/ethnic groups.

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

The 2022 Analysis of Impediments do not reveal any new systematic impediments to fair housing choice. The City will continue to actively work to affirmatively further fair housing choice for all residents. The City should invest more in mediation and legal-aid for resolving landlord / tenant problems.

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#### **Fair Housing Plan**

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.

#### **Discrimination against Persons with Disabilities**

Housing Rights Center Fair Housing Discrimination Complaint data indicates that physical and mental disability fair housing discrimination complaints continue to be the most common basis for fair housing discrimination complaints in Lancaster.

**Recommendation:** To address the lack of understanding and sensitivity to the fair housing needs ofphysically 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.

### 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.

#### 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 2006-2021 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. Increase funding for legal aid and mediation efforts.

#### Consistency with Affirmatively Furthering Fair Housing (AFFH)

State law requires that for housing elements due on or after January 1, 2021, sites must be identified throughout the community in a manner that affirmatively furthers fair housing opportunities

(Government Code Section 65583(c)(10)). Affirmatively Furthering Fair Housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity. For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income need are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty.

HCD and the California Tax Credit Allocation Committee (TCAC) coordinated efforts to produce opportunity maps that evaluate specific economic, environmental, and educational characteristics that have been shown by research to support positive economic, educational, and health outcomes for low-income families. Shown on Table-P, TCAC opportunity areas in Lancaster range from low resources in the northern and southern areas of the city with moderate resources in the western portions.

The sites inventory for the 2021-2029 planning period consists of approved capacity in tentative tracts, approved and proposed multi-family projects, and vacant land. The lower-income RHNA is addressed with sites designated for future multi-family residential development based on density and market ratehousing costs for those units. Those sites have capacity for 1,699 lower-income units, with 100 percent on vacant sites (zoned for high density residential or mixed use). Table-P shows that capacity for multi-family residential development and proposed projects are evenly distributed among the low and moderate resources areas (very little area within Lancaster is identified as high resource) and that no concentration of lower-income sites exists.

Table-P: TCAC/HCD Opportunity Areas

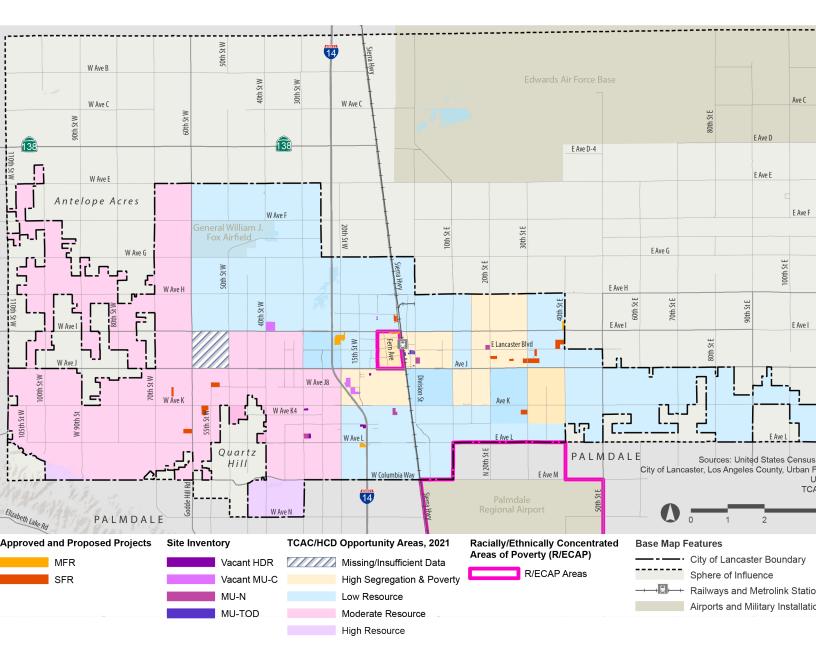


Table-Q1 RHNA Allocation 2021-2029

Income Group	Total Housing Units	Percentage of Units
Extremely-/Very Low-Income (0-50% AMI)*	2,224	25%
Low-Income (51-80% AMI)	1,194	13%
Moderate-Income (80-120% AMI)	1,328	15%
Above Moderate-Income (121+% AMI)	4,277	47%
Total	9,023	100%

### **Progress towards RHNA**

Since the RHNA uses June 30, 2021 as the baseline for growth projections for the Housing Element planning period of 2021 to 2029, jurisdictions may count toward the RHNA housing units approved, developed, or under construction that are anticipated to be completed after July 1, 2021. As of April 2021, 8,814 housing units are under construction or approved in Lancaster (Table-Q2). These units have the following income distribution: 258 very low-income units, 1,030 low-income units, 3,905 moderate-income units, and 3,621 above moderate-income units.

APPROVED PROJECTS. Table-Q2: Credits toward the RHNA

Approved Residential Tracts (Partial					
Construction)	-	-	249	250	499
Approved Residential Tracts (No					
Building Permits Yet)	-	-	65	66	131
Approved TTM	-	-	2,292	2,292	4,584
ADUs on Approved Tracts	82	153	7	103	345
Approved Multi-Family Projects	176	583	166	-	925
subtotal	258	736	2,779	2,711	6,484
PROPOSED PROJECTS					
TTM in Review	-	-	829	829	1,658
Multi-Family Projects in Review	-	294	297	81	672
subtotal	-	294	1,126	910	2,330
Total	258	1,030	3,905	3,621	8,814

### **Approved Multi-family Residential Projects**

Six multi-family projects totaling 925 units have been approved recently in Lancaster, five of which will provide deed-restricted affordable housing.

Table R: Approved Multi-Family Residential Projects

Project	Zone	Ex./Very Low (0-50% AMI)	Low (50-80% AMI)	Moderate (80-120% AMI)	Above Moderate (120%+ AMI)	Total
TTM 74312 62nd Street West, 75th Street West, Avenue K-8, Avenue L	SP 15-02	,	162	163	-	325
CUP 18-26 Penny Lane Near the NWC of Sahuayo Street and Avenue K-4	SP 80-02	8	70	2	-	80

Proje ct	Zone	Ex./Ver y Low (0- 50% AMI)	Low (50-80% AMI)	Moderate (80-120% AMI)	Abov e Moder ate (120 %+ AMI)	Total
CUP 21-03						
Southwest corner of Sierra Hwy and Ave I	Commercial	-	114		-	114
SPR 19-07						
1752 East Avenue J-43148- 041-001	HDR	27	237	-	-	264
SPR 20-02 Northwest corner of 27th Street West and Avenue K- 12	HDR	71	-	1	-	72
CUP 07-13						
Essex Towers						
44948 10th Street West3133-002-026	Commercial	70	-	-	-	70
	Total:	176	583	166	0	925

# **Remaining RHNA**

Approved residential development projects credited toward the 2021-2029 RHNA can accommodate 8,814 units (see Table-S) and address the low-, moderate, and above moderate-income RHNA for 2021-2029.

Table S: Remaining RHNA (After Potential Projects)

	-		
		Units Under Construction,	
Income Category	RHNA	Approved, and Proposed	Remaining RHNA

Extremely- and Very-Low	2,224	258	1,966
Low	1,194	1,030	164
Moderate	1,328	3,905	(2,577)
Above Moderate	4,277	3,621	656
Total	9,023	8,814	2,130

The City has a surplus of 2,577 units in the moderate-income category and a remaining RHNA of 1,966very low-income units and 164 low-income units to be addressed through site identification.

Table S2: Sites Inventory Summary

	Ex./Very Low (0- 50% AMI)	Low (50- 80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	Total
RHNA					
2021-2029 RHNA	2,224	1,194	1,328	4,277	9,023
APPROVED PROJECTS					
Approved Residential Tracts (Partial Construction)	-	-	249	250	499
Approved Residential Tracts (No Building Permits Yet)	-	-	65	66	131
Approved TTM	-	-	2,292	2,292	4,584
Approved Multi-Family Projects	82	153	7	103	345
ADUs on Approved Tracts	176	583	166	-	925
subtotal	258	736	2,779	2,711	6,484
PROPOSED PROJECTS					
TTM in Review	-	-	829	829	1,658
Multi-Family Projects in Review	-	294	297	81	672
subtotal	-	294	1,126	910	2,330
PROJECTED ADUS					
Estimated ADU Production***	210	400	19	267	896
subtotal	210	400	19	267	896
Vacant Land					
Vacant HDR Sites*	457	-	-	-	457
Vacant MU-C Sites*	1,242	-	-	-	1,242
Vacant MU-N*	371	-	-	-	371
Vacant MU-TOD*	225	-	-	-	225
subtotal	2,295	-	-	-	2,295
TOTAL PROJECTS/SITES					
Total	2,763	1,430	3,924	3,888	12,005

REMAINING RHNA					
(+shortfall/-surplus)	+ 539	+ 236	+ 2,596	- 389	+ 2,982

<sup>\*</sup>Affordability based on allowed density

#### **Future Plans**

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.

The City continues to work with the Housing Rights
Center to affirmatively further fair housing in Lancaster.
To solicit public feedback on fair housing choice in the
City and in consideration of possible impediments,
information was gathered from many different sources
to draft the 2022 Analysis of Impediments to Fair
Housing Choice, 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. *Continued Appropriateness:* The City continues to provide funding to the Housing Rights Center to promote fair housing in Lancaster. This program is continued in the updated Housing Element, in a consolidated Fair Housing program.

Increase public awareness of Lancaster's Fair Housing Program and other Cityand 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.

The City 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. 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 lases. 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.

Continued Appropriateness: The City continues to provide funding to the Housing Rights Center to promote fair

housing in Lancaster. This program is continued in the
updated Housing Element, in a consolidated Fair Housing
program.

, Mark V. Bozigian, City Manager of the City of Lancaster, hereby certify that this Analysis of mpediments to Fair Housing Choice represents the City's conclusion about impediments to fair nousing 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.
Date:
Date: Mark V. Bozigian
City Manager

# Appendix

All HRC reports:

Follow the link: Lancaster Reports

