



# Analysis of Impediments to Fair Housing Choice

---

Adopted May 6, 2015



This page intentionally left blank.



# CITY OF PALMDALE

---

## **ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

**JAMES C. LEDFORD, JR.**  
Mayor

**MIKE DISPENZA**  
Mayor Pro Tem

**STEVEN D. HOFBAUER**  
Council Member

**FRED THOMPSON**  
Council Member

**ROXANA MARTINEZ**  
Council Member

**DAVID CHILDS**  
City Manager

**MICHAEL P. MILLER**  
Director Department of Neighborhood Services

**SOPHIA REYES**  
Housing Coordinator

This page intentionally left blank.

## Table of Contents

<b>I. Executive Summary .....</b>	<b>I-1</b>
A. Background.....	I-1
B. Methodology and Citizen Participation .....	I-2
C. Status of Prior Impediments and Recommendations.....	I-4
D. New Impediment to Fair Housing Choice and Recommendation .....	I-6
<b>II. Community Characteristics.....</b>	<b>II-1</b>
A. Historical Profile .....	II-1
B. Demographic Profile .....	II-3
C. Income Profile .....	II-14
D. Employment Profile .....	II-18
E. Housing Profile.....	II-19
F. Special Housing Needs Profile .....	II-29
<b>III. Analysis of Private Sector Impediments .....</b>	<b>III-1</b>
A. Owner-Occupied Housing.....	III-1
B. Rental Housing.....	III-14
<b>IV. Analysis of Public Policy Impediments.....</b>	<b>IV-1</b>
A. Land Use Policy .....	IV-1
B. Development Policy .....	IV-13
C. Housing-Employment-Transportation Linkage .....	IV-19
<b>V. Analysis of Current Fair Housing Activity .....</b>	<b>V-1</b>
A. Fair Housing Education .....	V-2
B. Fair Housing Enforcement.....	V-3
C. Community Perspectives on Fair Housing Discrimination .....	V-6
D. National Fair Housing Enforcement .....	V-8
E. State of California Fair Housing Enforcement.....	V-12
F. Hate Crimes.....	V-13
G. Fair Housing Legal Status .....	V-13
<b>VI. Fair Housing Plan .....</b>	<b>VI-1</b>
A. Existing Impediments to Fair Housing Choice .....	VI-1
B. New Impediments.....	VI-3
C. Fair Housing Plan .....	VI-3
<b>Appendix</b>	
A. Signature Page	

This page intentionally left blank.

### A. Background

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, ancestry, national origin, religion, age, sex, disability, marital status, familial status, or any other arbitrary factor. The Analysis of Impediments to Fair Housing Choice (A.I.) provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual or household's access to housing.

Equal access to housing for all is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. Recognizing this fundamental right, the federal and State of California governments have both established fair housing as a right protected by law.

#### *Fair Housing Laws*

The Civil Rights Act of 1968 and Fair Housing Amendments Act of 1988<sup>1</sup> are the primary federal laws that prohibit discrimination in the sale, rental, lease, or negotiation for property based on race, color, religion, age, sex, or national origin. Whereas the Civil Rights Act contained provisions protecting people from housing discrimination, amendments enacted in 1988 extended protection to families with children and people with disabilities. The Fair Housing Act also sets accessibility standards for new multi-family units and requires "reasonable accommodations" for people with disabilities.

The State of California has enacted a number of statutes that mirror and, in certain cases, extend fair housing protections in federal law. The Unruh Civil Rights Act of 1959<sup>2</sup> and subsequent court decisions require equal access to the accommodations, advantages, facilities, privileges or services of all business establishments regardless of protected status. The courts have interpreted this Act to prohibit any arbitrary discrimination based in any class distinction, regardless of whether or not that basis is enumerated in the Act.

The Fair Employment and Housing Act of 1963<sup>3</sup> is the primary state law that prohibits discrimination in the sale, rental, lease negotiation, or financing of housing based on race, color, religion, age, sex, marital status, national origin, and ancestry. The California Fair Housing Act of 1992 brought state laws into conformity with the Federal Fair Housing Act of 1988 and added protections for people with a "mental and physical disability" and "familial status." The Act also requires that housing providers allow disabled persons to modify their premises to meet their needs.

The Ralph Civil Rights Act of 1976 provides that all persons have the right to be free from any violence, or intimidation by threat of violence, committed against their persons or property because of their race, color, religion, age, ancestry, national origin, political affiliation, sexual orientation, sex, age, disability, or position in a labor dispute. The Act prohibits violence or threat of the same in rental housing situations. The Banes Civil Rights Act also forbids interference by force or threat with an individual's constitutional or statutory rights in places of worship, housing, and private property.

---

<sup>1</sup> 43 U.S. Code §§ 3601 et. seq.

<sup>2</sup> California Civil Code, §§ 51 and 52

<sup>3</sup> California Government Code §§ 12900-12906

### *Defining Fair Housing and Impediments*

In light of fair housing legislation passed at the federal and state levels as well as consultation with the U.S. Department of Housing and Urban Development (HUD) and professionals providing fair housing services, the following definition of fair housing is used for this report:

*Fair housing is a condition in which individuals of similar income levels in the same housing market having a like range of housing choice available to them regardless of race, color, ancestry, national origin, religion, age, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.*

Within the legal framework of federal and state laws and based on the guidance provided by the U.S. Department of Housing and Urban Development (HUD) Fair Housing Planning Guide, impediments to fair housing choice can be defined as:

*Any actions, omissions, or decisions taken because of age, race, color, ancestry, national origin, religion, age, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or*

*Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, religion, age, sex, disability, 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 or mitigate impediments to fair housing choice. Furthermore, eligibility for certain federal funds requires the 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; and
- Conduct an analysis of impediments to fair housing.

The City of Palmdale is dedicated to providing fair housing opportunities to all residents, and ensuring compliance with all applicable laws.

### **B. Methodology and Citizen Participation**

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

#### *Methodology*

HUD requires jurisdictions that receive federal funding for community development activities to assess the status of fair housing in their community. As a recipient of Community Development Block Grant (CDBG) funds, Palmdale should update its Analysis of Impediments to Fair Housing (last updated in 2005) and report the findings and progress in the Consolidated and Performance Evaluation Report (CAPER) submitted to HUD.

The purpose of this report is to identify impediments to fair and equal housing opportunities in Palmdale. This Analysis of Impediments to Fair Housing (A.I.) provides an overview of the laws, regulations, conditions or other possible obstacles that may affect access to housing and other services in Palmdale. The scope, analysis, and format used in this A.I. report adhere to recommendations of the *Fair Housing Planning Guide* published by HUD.

The A.I. contains these six (6) chapters:

1. *Executive Summary*. This chapter provides background on "fair housing," methodology, citizen participation, and a summary of the findings and recommendations identified within the report.
2. *Community Characteristics*. This chapter provides a brief history of the City, a demographic profile, income profile, employment profile, housing profile, special needs housing profile and key maps to provide the baseline information necessary to form a complete understanding of the City. This chapter provides a broad overview and understanding of the community so that housing needs are clearly defined.
3. *Analysis of Private Sector Impediments*. This chapter provides an overview of the private owner-occupied housing market and the renter-occupied housing market. It examines the private-sector impediments to fair housing.
4. *Analysis of Public Policy Impediments*. This chapter identifies analyzes a range of public activities that may impede fair housing choice, including governmental land use, development regulations, and community development activities. Potential impediments to fair housing choice are discussed.
5. *Analysis of Current Fair Housing Activity*. This chapter includes the current fair housing education, enforcement and legal status of any pending cases currently underway in the City.
6. *Fair Housing Plan*. This chapter provides a summary of major issues and recommendations to further fair housing. This chapter also reports on progress made in implementing the prior A.I. These actions are specific, with implementing timeframes.

### *Citizen Participation*

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

To solicit public feedback on fair housing choice in the City of Palmdale, three Community Meetings were held on June 30, 2014, July 15, 2014 and July 17, 2014 and the City also provided residents with the opportunity to complete the Consolidated Plan Needs Assessment Survey that included questions pertaining to fair housing choice.

A Public Hearing was held before the City Council on March 4, 2015 to provide background on the scope of the study and solicit input on the most pressing issues affecting housing opportunities in Palmdale. No public comments were received.

Subsequently, the Draft A.I. was made available for a 30-day public review and comment period. The City Council convened a Public Hearing to solicit feedback from the public and then formally adopted the A.I. during the City Council Meeting held on May 6, 2015. No written or oral comments were received during the public comment period or the Public Hearing.

**C. Status of Prior Impediments and Recommendations**

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

**1. 2010 Impediment No. 1: Discrimination against Persons with Disabilities.** Housing Rights Center (HRC) Fair Housing Discrimination Complaint data indicates that a majority of discrimination complaints from 2006-2009 were based on physical or mental disability. The high number of disability-related complaints in Palmdale was consistent with data from other cities at that time and revealed a lack of understanding and sensitivity of the fair housing rights of the disabled.

**2015 Status: Unresolved.** Physical and mental disability fair housing discrimination complaints continue to be the most common basis for fair housing discrimination complaints in Palmdale. **Table I-1** displays the top six (6) highest number of fair housing discrimination complaints in the City for the last five fiscal years. There were a total of 145 complaints within the last five fiscal years, and 92 (63.4 percent) are related to physical and mental disabilities complaints.

**Table I-1  
Fair Housing Discrimination Complaints by Basis**

Basis	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Physical Disability	14	17	10	14	17	72
Familial Status	0	3	3	1	20	27
Mental Disability	4	3	3	4	6	20
Race	4	3	2	5	5	19
Gender	0	2	0	0	1	3
National Origin	0	0	0	0	3	3

Source: HRC, 2015.

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

**2. 2010 Impediment No. 2: Lending Patterns.** Overall, the analysis of lending patterns revealed that loan approval rates are higher for Whites and Hispanics across all income levels than for African Americans and Asians in the City of Palmdale.

**2015 Status: Resolved.** In the 2010 A.I, Home Mortgage Disclosure Act (HMDA) data from 2009 was analyzed. When compared to the 2012 HMDA data in **Table I-2** below, there was an overall increase in the approval of home purchase and

home refinance loans amongst all races and ethnic groups. The most significant improvement is shown in **Table I-3** where the disparity between the highest approved group and the lowest approved group from 2009 to 2012 diminished from over 22 percent to 5.6 percent.

**Table I-2**

Race/Ethnicity	2009 Home Purchase Loan Approval Rate	2012 Home Purchase Loan Approval Rate
White	73.4%	87.8%
Hispanic	69.3%	86.0%
Asian	67.9%	84.1%
African American	65.5%	85.4%

Source: HMDA Database, 2009 and 2012.

**Table I-3**

Race/Ethnicity	2009 Home Refinance Loan Approval Rate	2012 Home Refinance Loan Approval Rate
White	47.4%	80.9%
Hispanic	36.2%	78.3%
Asian	36.6%	75.4%
African American	25.1%	75.3%

Source: HMDA Database, 2009 and 2012.

- 2010 Impediment No. 3: 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 HRC and interaction with housing providers and housing seekers during workshops demonstrates a lack of understanding of both Federal and State fair housing laws.

**2015 Status: Ongoing.**

HRC continues to receive a pattern of the same types of fair housing discrimination complaints and general inquiries each year. According to the 2010 A.I., the City of Palmdale averaged 40 discrimination complaints per year from July 1, 2006 to June 30, 2009. Data supplied by HRC in 2015 indicates that the number of fair housing discrimination complaints in Palmdale decreased substantially for the fiscal years ending June 30, 2010, June 30, 2011 and June 20, 2012. However, the number of complaints began to increase again from less than 10 per year to 28 in the fiscal year ended June 30, 2014.

**Recommendation:** Coordinate with HRC to enhance its outreach efforts to real estate professionals with fair housing questions or concerns in Palmdale 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.

- 4. 2010 Impediment No. 4: Race/Ethnic Relations.** Race/ethnic relations may contribute to bias or stereotypes that have an impact on Fair Housing Choice. Fair housing complaint data from 2006-2009 indicates that race/ethnicity was the second-leading cause of housing discrimination in the City. Further, 33 hate crimes were reported to the Federal Bureau of Investigation (FBI) from 2006-2008—most on the basis of race/ethnicity.

**2015 Status: Ongoing.**

**Table 1-4** illustrates the number of hate crime incidents reported to the FBI in Palmdale from 2008-2012. Hate crime incidents related to race and ethnicity continues to be a challenge.

**Table I-4  
Hate Crime Incidents Reported to the FBI in Palmdale 2008 – 2012**

Calendar Year	Race	Religion	Sexual Orientation	Ethnicity	Disability	Total
2012	10	1	3	3	0	17
2011	9	0	2	1	0	12
2010	4	1	0	1	0	6
2009	6	1	1	1	1	10
2008	7	1	4	2	0	14
<b>Total:</b>	<b>36</b>	<b>4</b>	<b>10</b>	<b>8</b>	<b>1</b>	<b>59</b>

Source: FBI Hate Crime Incidents by State and Agency, 2008-2012.

[http://www.fbi.gov/about-us/investigate/civilrights/hate\\_crimes](http://www.fbi.gov/about-us/investigate/civilrights/hate_crimes)

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

**D. New Impediment to Fair Housing Choice and Recommendation**

The 2015 A.I. did not reveal any new impediments to fair housing choice. The City actively works to affirmatively further fair housing choice for all residents.

### A. Historical Profile

Palmdale has its roots in two small, early communities: Harold (Alpine Station) and Palmenthal. Harold was a natural location for a community because it was at the crossroads of the two major routes on the Valley floor: the Southern Pacific Railroad tracks and Fort Tejon Road (now Barrel Springs Road). At that time there were only four roads in the Valley: Soledad, Mojave, San Francisquito Canyon, and Fort Tejon Roads. Fort Tejon was a military road, and was used by stage coaches going from Los Angeles to northern points. It followed the foothills of the San Gabriel's because water was more readily available there than on the Valley floor. Harold had its own well and natural spring.

The community of Harold had three names (Harold, Alpine Station and Trejo Post Office) and five buildings in the early 1890s. It was mainly populated by railroad employees and Chinese laborers of the railroad. Harold was located at what is now the intersection of Barrel Springs Road and Sierra Highway.

In the late 1890s, Harold was reduced to a few residents when the railroad decided to build a larger station for its booster engines. Booster engines were needed to get the train over the San Gabriel Mountains, and they needed to be started on flat land. Harold was not flat, and so the new station was built a short distance north of Harold, at what is now central Palmdale.

As the story goes, Palmenthal came to be in 1886, when between 50 & 60 families of Swiss and German descent, predominantly from Nebraska and Illinois, were moving westward to California. They had been told that when they saw Palm trees, they would be very close to the Pacific Ocean. As they came to the Antelope Valley and saw our Joshua trees, they mistook them for Palm trees. The families settled here and called their new town Palmenthal.

The original settlement of Palmenthal was located about 3 miles southeast of the present Civic Center, at R-8 and 27th Street East. It was a thriving community by all accounts, and consisted of a livery stable, blacksmith shop, shoe shop, church, many fine houses, a school, and a general store. Palmenthal became the official name of the town when a post office was established in the general store owned by John Munz, on June 17, 1888.

The 1890s were a decade of boom and bust. Lured by the promise of cheap land and good living, Palmenthal's settlers came west to grow grain and fruit. Those early years were wet ones, and the land seekers were successful. But during the coming dry years, agriculture failed. The early settlers were ignorant of farming in an arid climate, and many also found themselves victims of promoter's scams when they couldn't get clear titles to their land. In these early years, many homesteads were abandoned.

By 1899, because of the drought and their land deed problems, all but one family had moved away. Their deserted homes were eventually carried off piece by piece for the wood and other building needs. Some of the buildings were moved to the new Palmdale to serve as places of business by those settlers who chose to move closer to the railroad station. Other old Palmenthal settlers moved to Leona Valley and other local areas where water was more plentiful.

The post office was discontinued in Palmenthal and moved to the new town site around the railroad station. Most of the new town was located about 8th Street East between Q-7 and Palmdale Boulevard. In 1899, the community, now relocated in the heart of present-day Palmdale, changed its name to Palmdale.

So this is how Palmdale came to be: Palmenthal and Harold both came to be abandoned and both settlements relocated to the center of the new City of Palmdale, by the new Southern Pacific railroad station. This site was also closer to the stage coach line that ran from San Francisco to New Orleans.

Although the settlers learned of irrigation and other dry farming methods, water was to remain a problem. With the completion of the Los Angeles Aqueduct in 1914, and the availability of electricity, irrigation allowed agriculture to take hold and become the primary means of livelihood in the area.

Palmdale's population began to steadily increase. Irrigated lands in the Valley increased from 5,000 acres in 1910, to 11,900 in 1919. Alfalfa, pears and apples became staple crops in the area.

The main road through town was called Mint Canyon. Paving was completed in 1921, and its name was changed to Sierra Highway, the Valley's first viable and convenient link to Los Angeles. This highway improvement facilitated a more consistent access to Los Angeles based markets by Valley agricultural producers.

Agriculture remained the primary industry of the Antelope Valley until the beginning of World War II. After World War II, Palmdale grew as a center for aerospace and defense industries with the establishment of Edwards Air Force Base in Kern County and U.S. Air Force Plant 42 in Palmdale.

The U.S. Air Force Plant 42 has become noted as the home of the B-1 and B-2 bombers and the Space Shuttle. Palmdale has often been referred to as the Aerospace Capitol of the United States, with Rockwell, Northrop, Lockheed and McDonnell Douglas maintaining production facilities at Plant 42. The Federal Aviation Administration's Air Route Traffic Control Center, which handles air traffic for the Western Region of the United States, is also located in Palmdale. With the development of the Palmdale Regional Airport, the possibility of a bullet train linking Palmdale to Los Angeles International Airport, and the relocation of Lockheed's secret research facilities to Palmdale, Palmdale's future in aerospace seems assured.

When Palmdale incorporated in 1962, it had a land area of 2.1 square miles. By 1965, there were 22.4 square miles within the city limits, and by 1983, Palmdale had grown to 45 square miles and had 130 additional square miles in its planning area.

Growth over the last 30 years has been substantial. From 1980 to 1990, Palmdale was the fastest growing city in the state, climbing 573 percent from a population of 12,227 in 1980 to 68,842 in 1990. From 1990 to 2000, the population surpassed 100,000 residents, growing by 69 percent. As of 2011, there are 149,001 residents (American Community Survey, 2007-2011). While a significant portion of Palmdale's land is vacant, providing space for continued growth and development in the future, population growth rates continue to decline over time as the City continues to mature.

The record-breaking population growth is not so much related to industrial growth as it is to the availability of affordable housing. Palmdale has become a 'bedroom' community, with an increasing number of residents commuting to the Los Angeles area to work.

Although the aerospace industry remains the area's largest source of employment, Palmdale continues to attract retail and industrial jobs into the area. The opening of the Antelope Valley Mall in September of 1990 heralded dynamic growth in retail sector employment.

**B. Demographic Profile**

*Population Trends*

During the 1990s, the population of Palmdale, Santa Clarita and Lancaster outpaced population growth countywide. From 2000-2011, Palmdale's population growth continued to increase by 27.7 percent (**Table II-1**). During this period, Palmdale's rate of population growth was much higher than Los Angeles County and outpaced neighboring Santa Clarita and Los Angeles City. Lancaster's population growth rate was similar to Palmdale.

**Table II-1  
Population Growth Trends, 1990-2011**

Community	1990	2000	2011	Percent Change	
				90-00	00-11
Lancaster	97,291	118,718	152,678	+22.0%	+28.6%
<b>Palmdale</b>	<b>68,842</b>	<b>116,670</b>	<b>149,001</b>	<b>+69.5%</b>	<b>+27.7%</b>
Santa Clarita	110,642	151,088	173,993	+36.6%	+15.2%
Los Angeles City	3,694,820	3,485,398	3,782,544	-5.7%	+8.5%
Los Angeles County	8,863,164	9,519,338	9,787,747	+7.4%	+2.8%

Source: U.S. Census, 2000 and ACS, 2007-2011.

*Age and Sex Characteristics*

The age distribution of Palmdale residents has been fairly consistent between 2000 and 2011, other than the high percentage increase in the older population between the ages 55 and 64. According to the 2011 ACS, Palmdale is a younger city with a median age of 28.9 years, That is 5.7 years less than the median age of Los Angeles County (34.6). However, the largest age population group remained is the young adults ages 15 to 24 (**Table II-2**).

The age distribution of Palmdale residents remained stable between 1990 and 2000 despite a 69 percent increase in the City's population over the ten year period. Adults age 25-54 remained the largest portion (43 percent) of the City population in 2000, while seniors ages 55 and above comprised 11.0 percent of the population. The fastest growing age groups were children age 17 and under and adults 55-64 (**Table II-2**).

**Table II-2  
Age and Sex Characteristics and Trends**

Age Group	2000		2011		Percent Change in Persons
	Persons	Percent of Total	Persons	Percent of Total	
< 5	10,808	9.3	11,937	8.0%	+10.4%
5-14	26,757	23.0	28,827	19.4%	+7.7%
15-24	16,718	14.3	26,724	17.9%	+59.9%
25-34	14,864	12.7	18,188	12.2%	+22.4%
35-44	21,452	18.4	20,611	13.8%	-3.9%
45-54	13,229	11.3	20,633	13.8%	+56.0%
55-64	6,322	5.4	12,591	8.5%	+99.2%
65+	6,520	5.6	9,490	6.4%	+45.6%
<b>Total:</b>	<b>116,670</b>	<b>100.0%</b>	<b>149,001</b>	<b>100.0%</b>	<b>+27.7%</b>
<b>Male</b>	57,338	49.1%	72,233	48.5%	+26.0%
<b>Female</b>	59,332	50.9%	76,768	51.5%	+29.4%

Source: U.S. Census 2000 and ACS, 2007-2011.

*Race and Ethnicity*

From 2000 to 2011, Census respondents identifying themselves as “White” decreased 0.6 percent while “Hispanic” in terms of ethnicity increased 81.5 percent. All other races increased, led by the Some Other Race, Asian/Pacific Islander, and Black/African American categories (**Table II-3**). According to the 2007-2011 ACS, people of Hispanic or Latino origin are the largest ethnic group within the City, comprising 53.6 percent of the population.

**Table II-3  
Race and Ethnicity Trends**

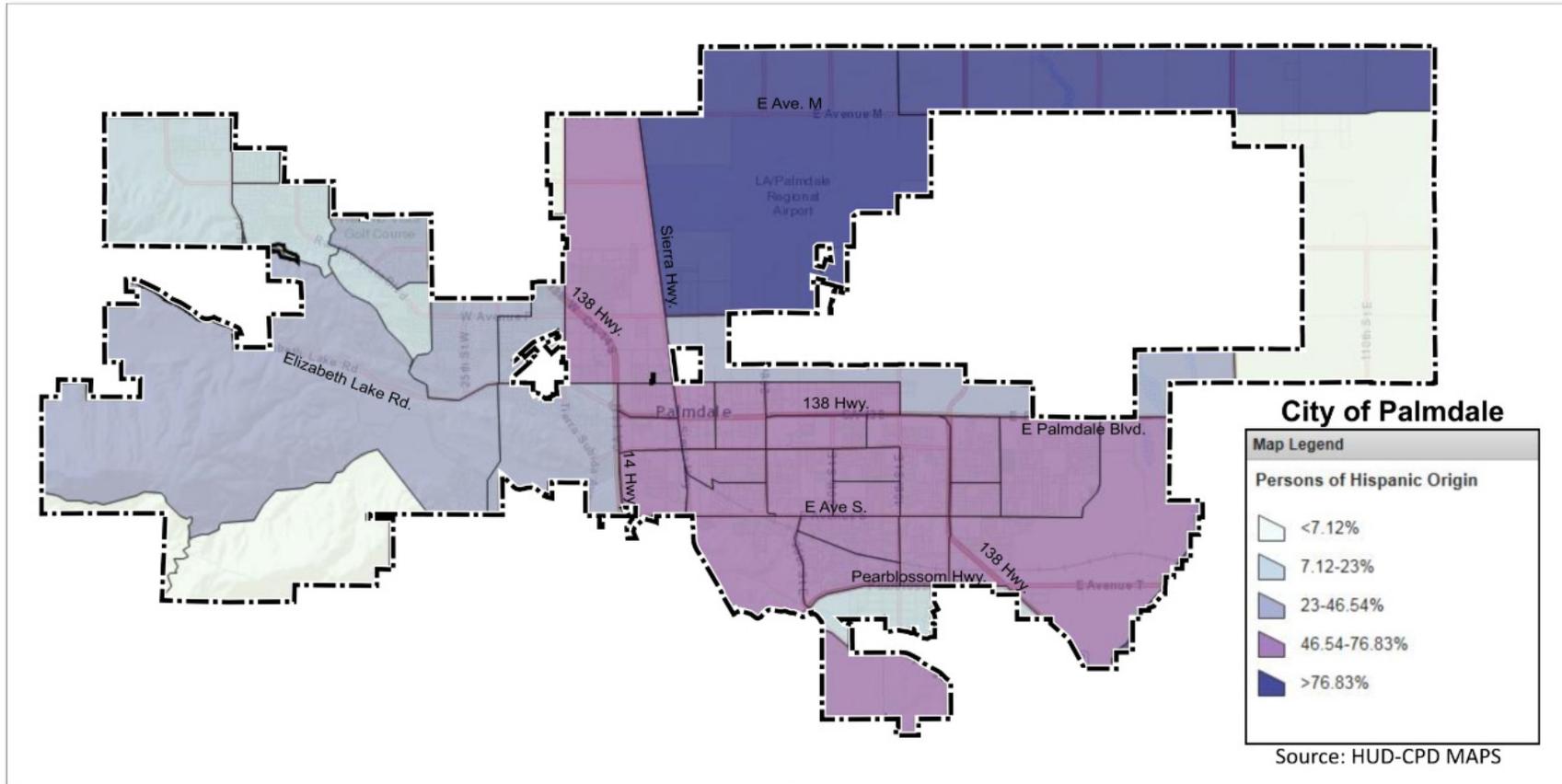
Race	2000 Census		2011 Census		2000-2011 Change	
	#	%	#	%	#	%
White	63,905	54.8%	63,505	42.6%	-400	-0.6%
Black/African American	16,913	14.5%	21,403	14.4%	+4,490	+26.5%
Native American	1,198	1.0%	1,060	0.7%	-138	-11.5%
Asian/Pacific Islander	4,692	4.0%	6,682	4.5%	+1,990	+42.4%
Some other race	23,858	20.4%	50,252	33.7%	+26,394	+110.6%
Two or more race	6,104	5.2%	6,099	4.1%	-5	-0.1%
<b>Total</b>	<b>116,670</b>	<b>100.0%</b>	<b>149,001</b>	<b>100.0%</b>	<b>32,331</b>	<b>27.7%</b>
Ethnicity	2000 Census		2011 Census		2000-2011 Change	
	#	%	#	%	#	%
Hispanic or Latino	43,991	37.7%	79,861	53.6%	+35,870	+81.5%
Not Hispanic or Latino	72,679	62.3%	69,140	46.4%	-3,539	-4.9%

Source: U.S. Census 2000 and ACS, 2007-2011.

### *Racial Integration*

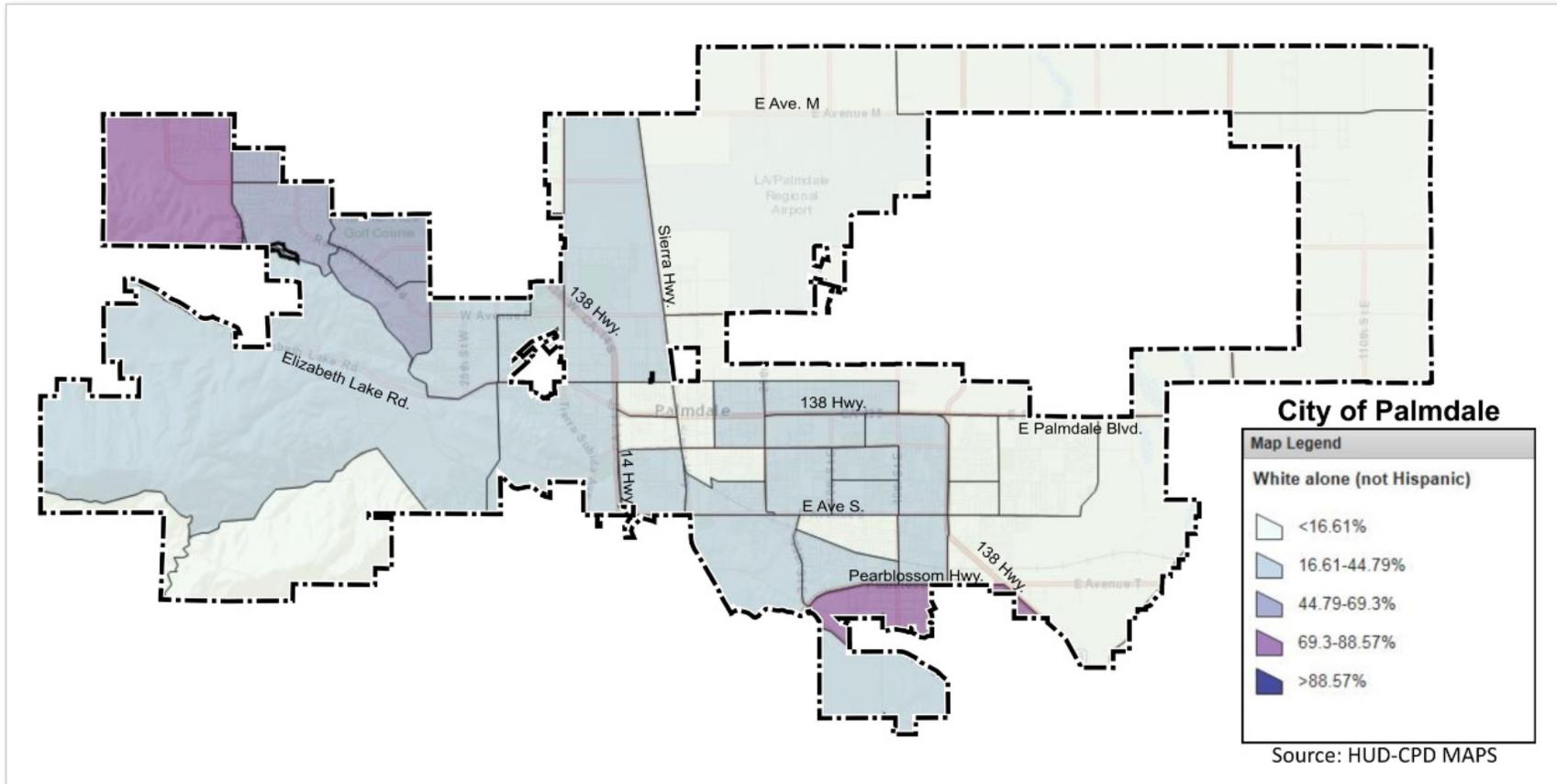
According to the 2007-2011 ACS, the three identified largest racial makeup of the City was White persons (42.6 percent), Some Other Race (33.7 percent) and Black/African Americans (14.4 percent). In addition, a large number of people identify themselves as being of Hispanic or Latino ethnicity (53.6 percent). Based on this information, it would appear that the community is fully racially integrated. **Maps II-1** through **II-8** on the following pages illustrate that Palmdale is a multi-cultural community with people of different race or ethnicity living together throughout the City.

Map II-1  
Hispanic or Latino



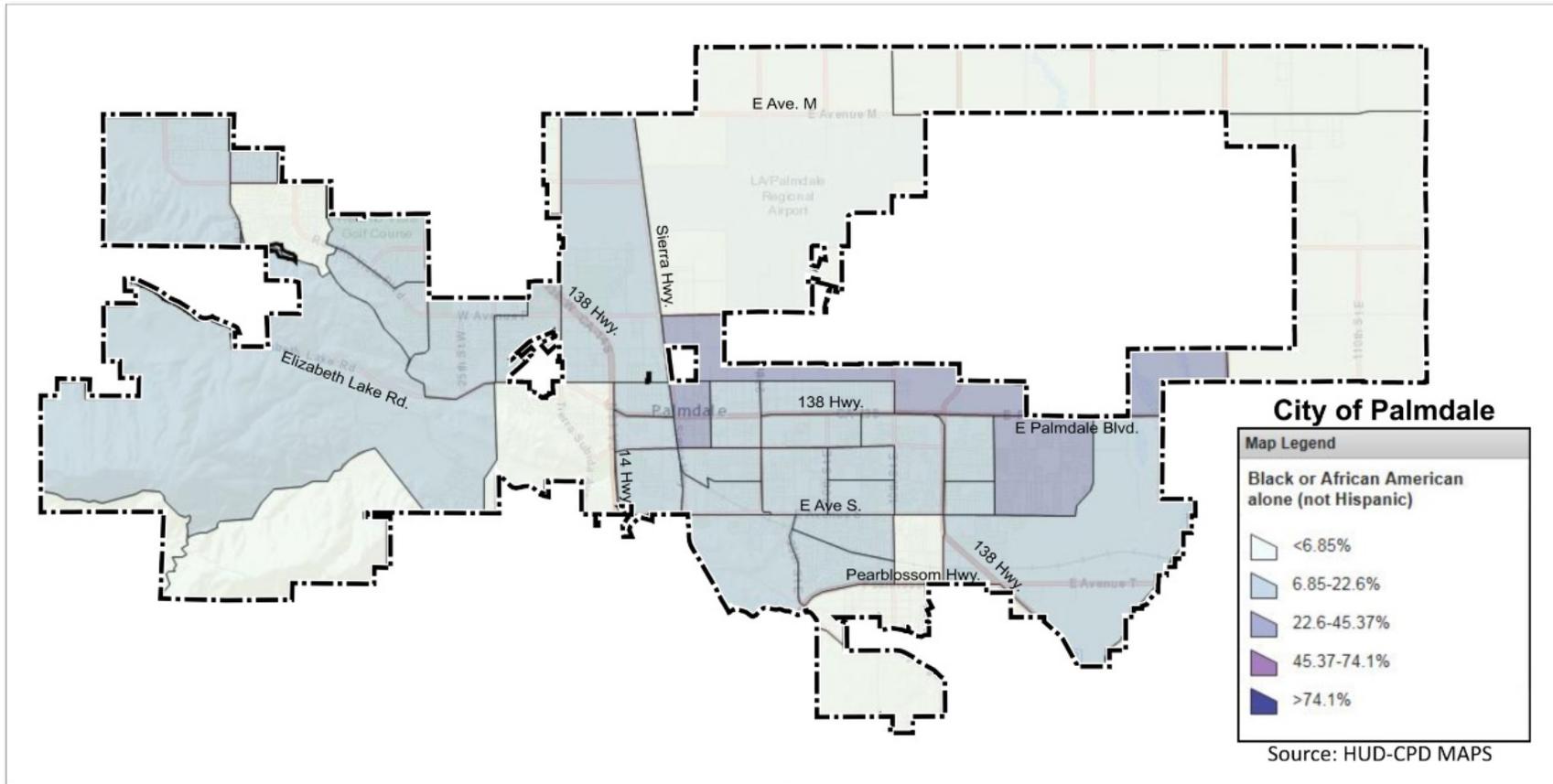
Source: ACS, 2007-2011.

Map II-2  
White



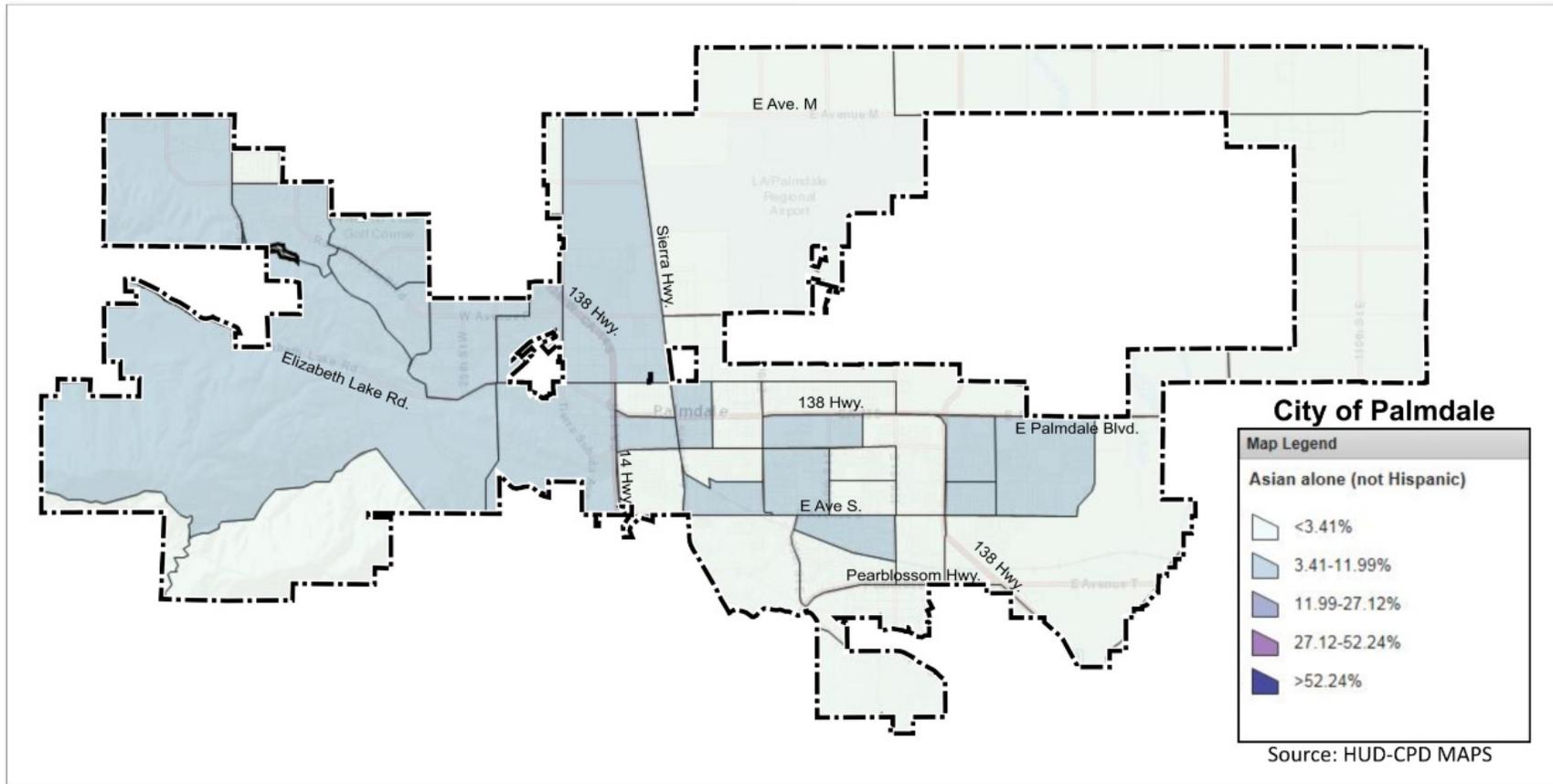
Source: ACS, 2007-2011.

Map II-3  
Black / African American



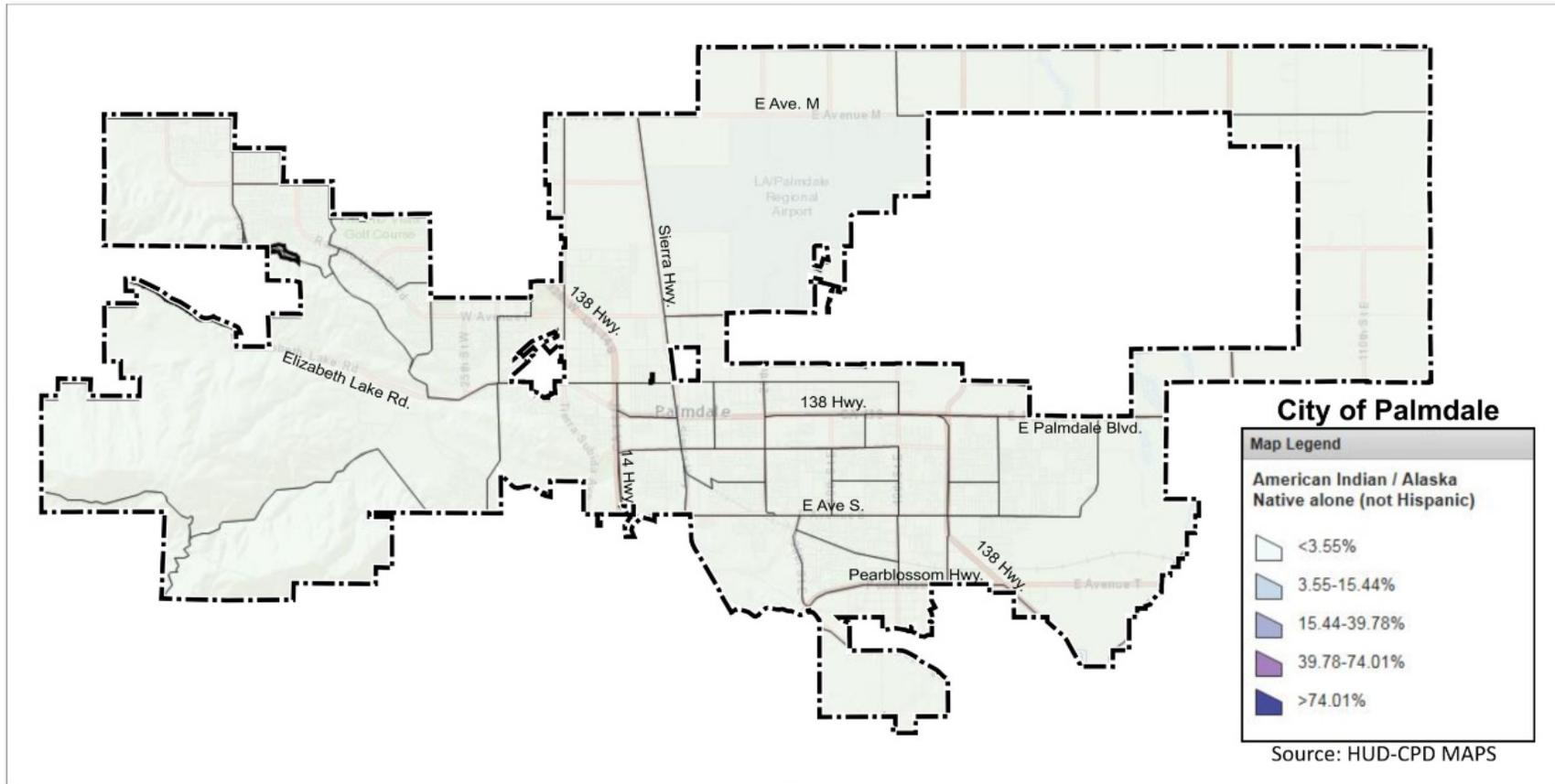
Source: ACS, 2007-2011.

Map II-4  
Asian



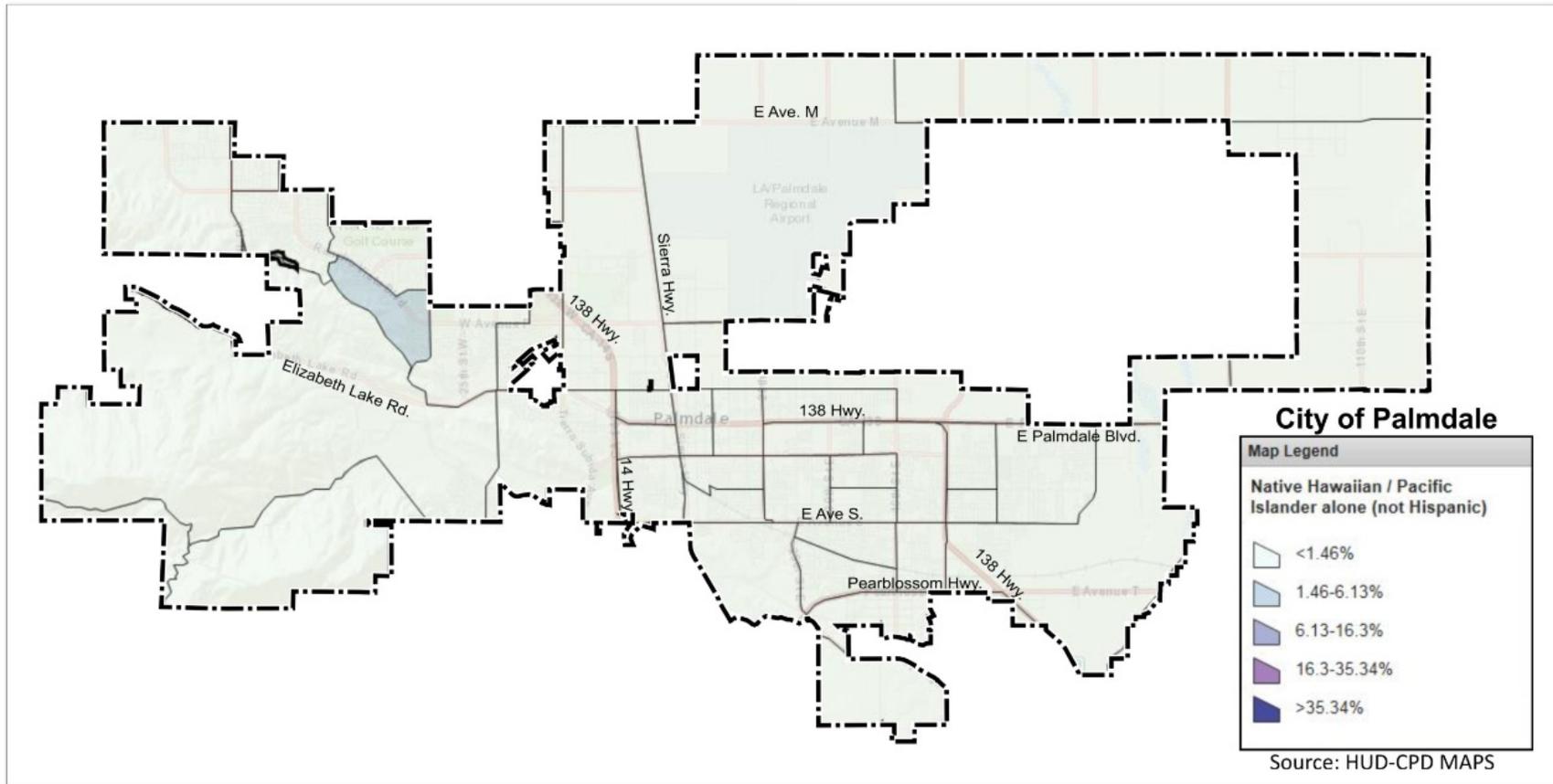
Source: ACS, 2007-2011.

Map II-5  
American Indian / Alaska Native



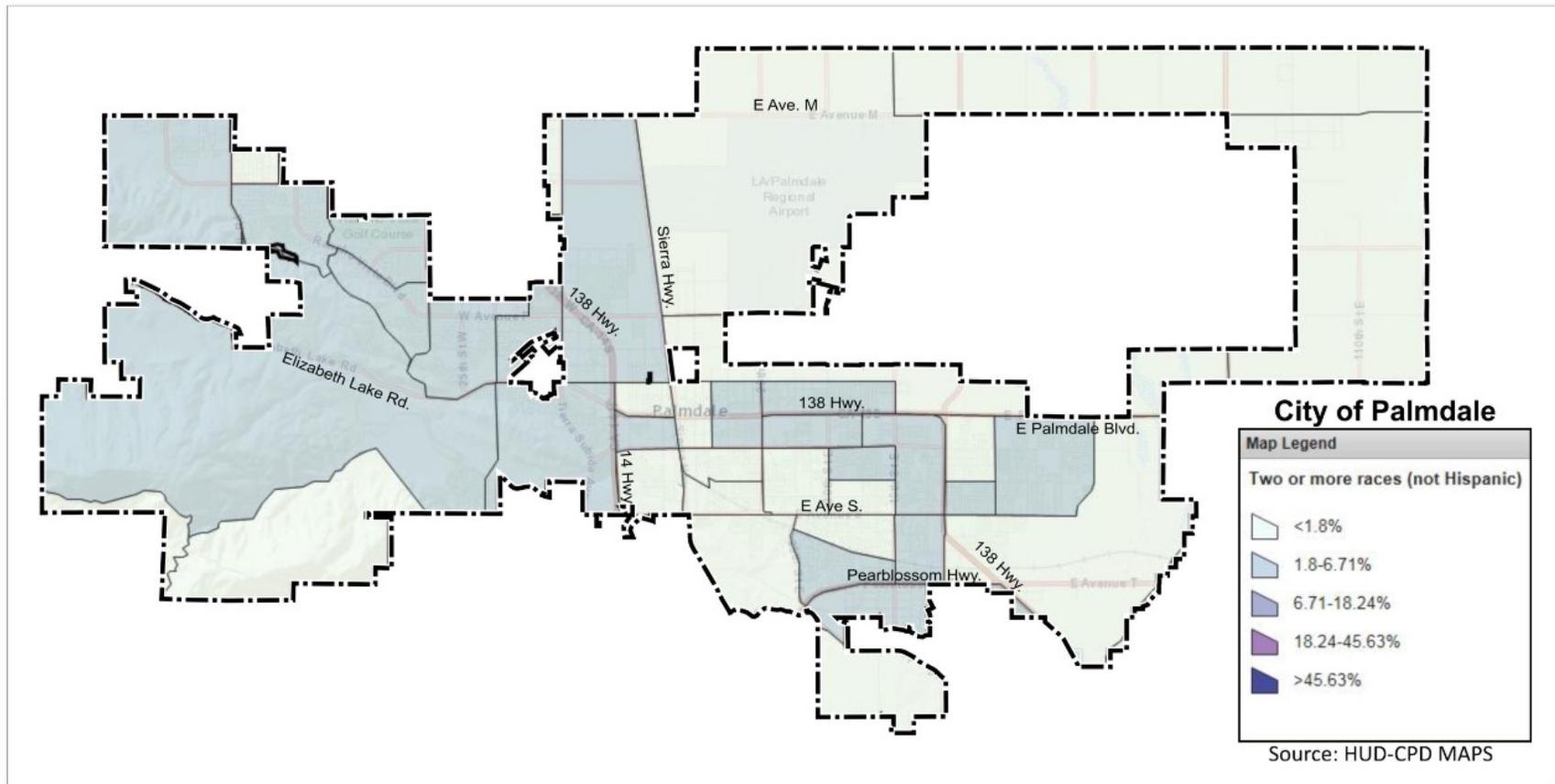
Source: ACS, 2007-2011.

Map II-6  
Native Hawaiian / Pacific Islander



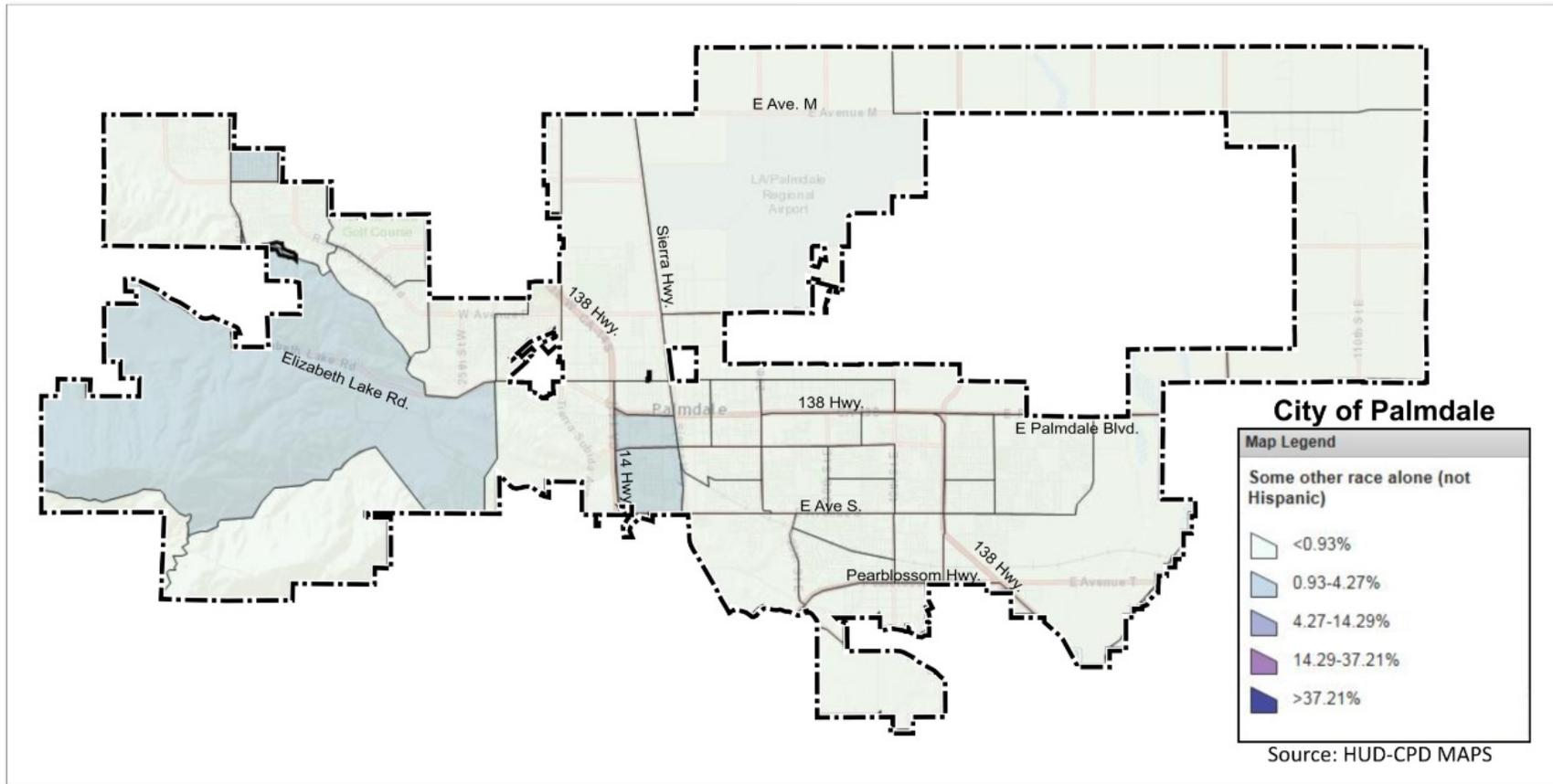
Source: ACS, 2007-2011.

Map II-7  
Two or More Races



Source: ACS, 2007-2011.

Map II-8  
Some Other Race



Source: ACS, 2007-2011.

Household Profile

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

**Table II-4** compares various household trends in Palmdale. Eighty-two percent (82 percent) of the City's households were family households at the time of the 2000 Census. Perhaps the most significant change since 2000 was the percent change in the number Other Families (25.8 percent change). Second, Palmdale also experienced a substantial increase in the number of households that are married without children (31.3 percent change), representing 22.7 percent of the City's population. Together, those households that are Married without Children and Other Family comprise 48.5 percent of the City population. Non-family households include single persons and unrelated individuals sharing housing accommodations.

Household size identifies sources of population growth and/or overcrowding in individual housing units. A city's average household size will increase over time with an increase in larger families or may decline where the population is aging. In 2000, the average household size in Palmdale was 3.4, and it increased to 3.7 in 2011. This increase is attributable to the increase in the proportion of family households versus non-family households, which essentially remained the same over the five (5) year period covered by the ACS estimate. The data in **Table II-4** shows that the City's average household size and number of family and non-family households.

**Table II-4**  
**Household Characteristics and Trends**

Household Type	2000		2011		Percent Change
	Number	Percent	Number	Percent	
<b>Family Households</b>					
- Married With Children	13,492	38.8%	13,774	34.0%	+2.1%
- Married Without Children	7,008	20.7%	9,202	22.7%	+31.3%
- Other Families	7,605	22.5%	10,442	25.8%	+37.3%
<b>Non-Family Households</b>					
- Single Persons	4,762	13.9%	5,263	13.0%	+10.5%
- Non-families	1,418	4.1%	1,784	4.5%	+25.8%
<b>Total</b>	<b>34,285</b>	<b>100.0%</b>	<b>40,465</b>	<b>100.0%</b>	<b>+18.0%</b>
<b>Average Household Size</b>	<b>3.4</b>		<b>3.7</b>		<b>+8.8%</b>

Source: U.S. Census, 2000 & ACS, 2007-2011.

**C. Income Profile**

In evaluating household income, households are oftentimes grouped into different income groups in relation to the County Median Family Income (MFI) and adjusted for household size. This provides a useful comparison of changes in the City's household income distribution over time. The five (5) income categories include:

- Extremely Low Income (0-30 percent of County MFI)

- Low Income (31-50 percent of County MFI)
- Moderate Income (51-80 percent of County MFI)
- Middle/Upper Income (>81 percent of County MFI)
- Upper Income (greater than 120 percent of County MFI)

The data in **Table II-5** indicates more households are earning higher income.

**Table II-5  
Number of Households by Income Level**

Household Income Level		2000	2011	Percent Change
Extremely Low	Less than \$10,000	3,023	2,194	-27.4%
	\$10,000 to \$14,999	1,947	1,933	-0.7%
	\$15,000 to \$24,999	3,627	3,908	+7.7%
Low	\$25,000 to \$34,999	3,890	3,803	-2.2%
	\$35,000 to \$49,999	5,739	6,075	+5.9%
Moderate	\$50,000 to \$74,999	7,796	8,386	+7.6%
Middle	\$75,000 to \$99,999	4,422	5,532	+25.1%
Upper	\$100,000 to \$149,999	3,036	5,581	+83.8%
	\$150,000 to \$199,999	514	1,876	+265.0%
	\$200,000 or more	291	1,177	+304.5%
<b>Total:</b>		<b>34,285</b>	<b>40,465</b>	18.0%

Source: U.S. Census, 2000 and ACS, 2007-11.

Table II-6 summarizes the household income characteristics of Palmdale residents.

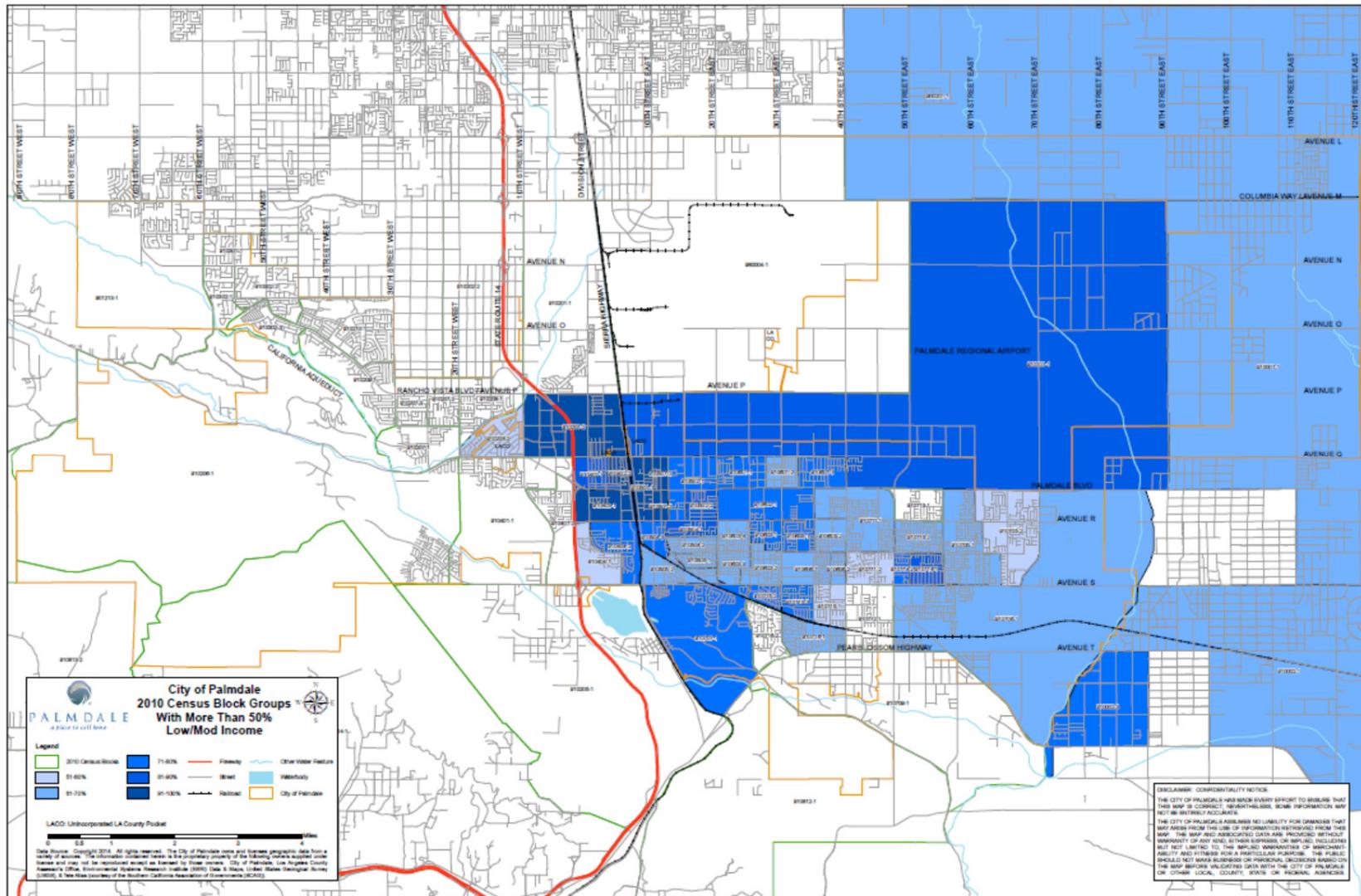
**Table II-6  
Household Income Characteristics**

Household Type	Percent of Households by Income level			
	Total Low/Mod (0-80% MFI)	Extremely Low (0-30% MFI)	Low (31-50% MFI)	Moderate (51-80% MFI)
Elderly	5,505	1,750	1,915	1,840
Small Families	11,025	3,570	3,145	4,310
Large Families	6,370	1,500	2,200	2,670
All Others	7,340	2,630	2,400	2,310

Source: Comprehensive Housing Affordability Strategy (CHAS), 2007-2011.

**Map II-9** illustrates areas within Palmdale that are considered to be low-moderate income neighborhoods. The definition of an area of concentration for low and moderate-income households is governed by federal regulations for the Community Development Block Grant Program. Low and moderate-income area is defined as a block group or census tract with 51 percent or more residents earning income less than 80 percent of the County median family income. The southern portion of Palmdale is largely a low-moderate income area.

Map II-9  
Low- and Moderate Income Areas



Source: City of Palmdale, 2014.

**D. Employment Profile**

Local economic characteristics, although not directly related to fair housing, influence local housing needs. Economic characteristics include the types of jobs available within Palmdale, the way residents access jobs (e.g., auto, transit, etc.), occupations held by residents, and their household income. This section thus explores economic trends and characteristics in Palmdale as a means to identifying and understanding local housing needs.

*Major Employers*

Palmdale has a diversified mix of retail, defense, service, education medical employers. Of Palmdale's top 10 employers in 2014, three (3) are major aerospace/military agencies. Many retailers and service providers have located in Palmdale to serve the rapidly expanding population throughout the Antelope Valley, inclusive of the Cities of Palmdale, Lancaster and Santa Clarita as well as unincorporated areas. **Table II-7** lists the major employers in Palmdale.

**Table II-7  
Major Employers in Palmdale**

Name of Business or Institution	Number of Employees	% of Total City Employment	Type of Business
Edwards Air Force Base	10,808	7.1%	Aerospace/Military
China Lake NWC	9,172	6.0%	Aerospace/Military
County of Los Angeles	3,953	2.6%	Government
Lockheed Martin	3,000	2.0%	Aerospace/Military
Palmdale School District	2,682	1.8%	Education
A.V. Hospital	2,619	1.7%	Medical/Hospital
Northrop-Grumman	2,573	1.7%	Aerospace
A.V. Union HS District	2,037	1.3%	Education
Wal-Mart (5)	1,922	1.3%	Retail
CA State Prison-Tehachapi	1,915	1.3%	Corrections
<b>Total City Employment</b>	<b>40,681</b>	<b>26.8%</b>	

Source: Palmdale Comprehensive Annual Financial Report, Year ended June 30, 2014.

*Jobs Held by Residents*

According to the 2009-2011 ACS, 51 percent of residents over the age of 16 were in the labor force. **Table II-8** shows the occupation of residents, number of residents in each category and percentage employed by each occupation. Of particular note is the high proportion of managerial/professional and sales/office occupations held by Palmdale residents.

**Table II-8  
Occupation Characteristics**

Occupations of Residents	Number of Residents	% Employed by Occupation
Management, business, science, and arts	14,450	26.4%
Service	11,200	20.3%
Sales and office	14,317	26.0%
Natural resources, construction, and maintenance	6,407	11.6%
Production, transportation, and material moving	8,664	15.7%

Source: ACS, 2009-2011.

According to the 2009-2011 ACS, the majority of employed Palmdale residents (74.2 percent) drive alone to work. 17.1 percent of all residents carpooled to work and only 3.2 percent used public transportation.

**E. Housing Profile**

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

*Available Housing Units*

Reflecting the population growth between 2000 and 2011, Palmdale's housing inventory expanded 21.4 percent, substantially more than the 5.1 percent increase County wide. The nearby City of Lancaster experienced a similar increase in housing units while other surrounding Cities and the County as a whole expanded their housing availability.

As discussed later, the predominant housing type in Palmdale remained single-family detached homes accounting for 79.7 percent of the City's housing stock in 2011. **Table II-9** shows housing growth trends in Palmdale as compared to nearby jurisdictions and the County as a whole.

**Table II-9  
Housing Growth Trends, 2000-2011 (Housing Units)**

Community	2000	2011	Percent Change
Santa Clarita	52,341	60,326	+15.3%
<b>Palmdale</b>	<b>36,984</b>	<b>44,881</b>	<b>+21.4%</b>
Lancaster	41,637	51,260	+23.1%
Los Angeles City	1,332,801	1,412,641	+6.0%
Los Angeles County	3,270,906	3,437,584	+5.1%

Source: U.S. Census, 2000 and ACS, 2007-2011.

*Housing Characteristics*

According to the 2007-11 ACS, Palmdale has 40,465 occupied housing units. Of these units, 67.8 percent are owner-occupied and 32.2 percent are renter occupied. **Table II-10**

describes the City's housing inventory in 2011.

Vacancy rates are an indicator of housing needs. While vacancies help moderate housing costs, excess vacancies depress rents and home values. Generally, an "optimal" vacancy rate is 1.5 percent to 2.0 percent in the for-sale market and 5.0% to 6.0% for the rental market. In 2011, the City's homeowner vacancy rate was 3.4 percent, and the rental vacancy rate was 8.0 percent. As the housing market continues to recover from the recent economic recession, Palmdale's vacancy rates are expected to improve due to the relative affordability of housing in the Los Angeles County.

**Table II-10  
Housing Supply: Units in Structure by Tenure**

Number of Units in Structure	Total Units		Owner			Renter		
	#	%	#	Share of Category	% of Total	#	Share of Category	% of Total
1, detached or attached	33,128	81.9%	25,898	94.4%	78.2%	7,230	55.5%	21.8%
2 to 9 units	2,523	6.2%	70	0.3%	2.8%	2,453	18.8%	97.2%
10 or more units	3,051	7.5%	19	0.1%	0.6%	3,032	23.3%	99.4%
Mobile home and all other types of units	1,763	4.4%	1,459	5.3%	82.8%	304	2.3%	17.2%
<b>Total:</b>	<b>40,465</b>	<b>100.0%</b>	<b>27,446</b>	<b>67.8%</b>		<b>13,019</b>	<b>32.2%</b>	

Source: ACS, 2007-2011.

*Housing Conditions*

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

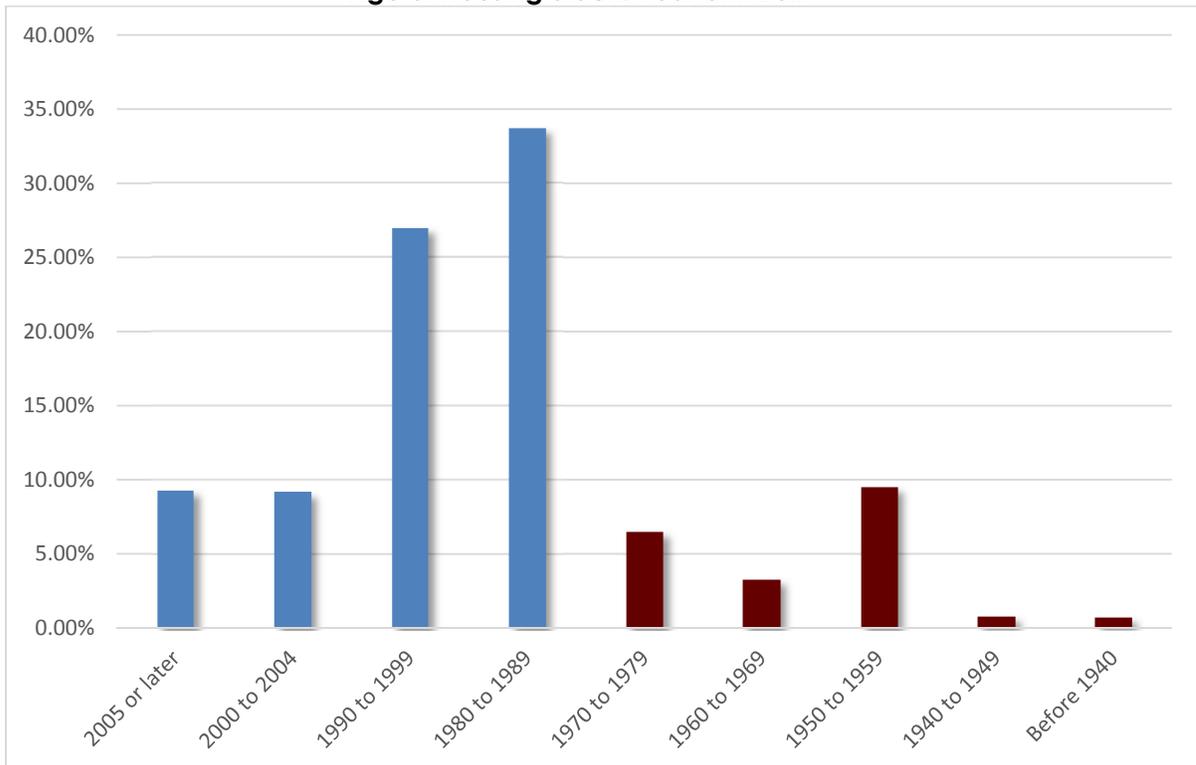
**Table II-11** indicates the number of homes built in Palmdale by decade. As of 2011, 48.2 percent of the housing was at least 30 years old. A general rule of thumb in the housing industry is homes older than 30 years begin to require major investments to maintain quality. Improvements needed include siding, painting, and roofing among others. After 50 years, homes typically need new plumbing electrical systems, mechanical systems, lead-removal, and other major repairs.

**Table II-11  
Age of Housing Stock: Year Unit Built by Tenure**

Year Structure Built	Total Units		Owner			Renter		
	#	%	#	Share of Category	Share of Owner	#	Share of Category	Share of Rental
2005 or later	3,755	9.3%	2,843	10.4%	75.7%	912	7.0%	24.3%
2000 to 2004	3,716	9.2%	3,027	11.0%	81.5%	689	5.3%	18.5%
1990 to 1999	10,923	27.0%	8,356	30.4%	76.5%	2,567	19.7%	23.5%
1980 to 1989	13,646	33.7%	9,072	33.1%	66.5%	4,574	35.1%	33.5%
1970 to 1979	2,620	6.5%	1,134	4.1%	43.3%	1,486	11.4%	56.7%
1960 to 1969	1,333	3.3%	652	2.4%	48.9%	681	5.2%	51.1%
1950 to 1959	3,855	9.5%	2,146	7.8%	55.7%	1,709	13.1%	44.3%
1940 to 1949	333	0.8%	133	0.5%	39.9%	200	1.5%	60.1%
Before 1940	284	0.7%	83	0.3%	29.2%	201	1.5%	70.8%
<b>Total:</b>	<b>40,465</b>	<b>100.0%</b>	<b>27,446</b>	<b>100.0%</b>	<b>67.8%</b>	<b>13,019</b>	<b>100.0%</b>	<b>32.2%</b>

Source: ACS, 2007-2011.

**Graph II-1  
Age of Housing Stock: Year Unit Built**



Source: ACS, 2007-2011

In 2012, U.S. Department of Housing and Urban Development (HUD) released Comprehensive Housing Affordability Strategy (CHAS) data based on special tabulations of five year ACS estimates. CHAS data help local agencies assess local trends in housing needs and problems. **Table II-12** displays the number of households earning less than 100 percent of median income who have at least one of the housing problems listed below. According to CHAS, the four (4) housing problems include lack of kitchen or complete plumbing facilities, overcrowding, severe overcrowding, cost burden and severe cost burden. The most prevalent housing problem for households in Palmdale is the high cost of housing.

**Table II-12  
Housing Problems:**

Housing Problem	Description	Owner	Renter
Substandard Housing	Substandard Housing - Lacking complete plumbing or kitchen facilities	60	455
Over-crowded	Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	230	425
	Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	955	1,090
Cost Burden	Housing cost burden greater than 50% of income (and none of the above problems)	5,725	3,535
Income	Housing cost burden greater than 30% of income (and none of the above problems)	4,040	3,410
	Zero/negative Income (and none of the above problems)	140	190
<b>Total:</b>		<b>11,150</b>	<b>9,105</b>

Source, CHAS, 2007-2011.

**Table II-13** displays households with one or more severe housing problems, which includes lacking kitchen or complete plumbing, severe overcrowding, and/or severe cost burden.

**Table II-13**  
**Housing Problems: Households with One or More Severe Housing Problems**

Number of Households	Owner					Renter				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	1,935	2,575	2,050	410	6,970	3,720	1,345	400	40	5,505
Having none of four housing problems	555	1,290	4,095	3,195	9,135	790	1,815	2,080	890	5,575
Household has negative income, but none of the other housing problems	140	0	0	0	140	190	0	0	0	190

Source: CHAS, 2007-2011.

*Cost Burden*

Housing overpayment refers to paying more than 30 percent of income toward housings. Overpayment can be either moderate or severe. Moderate overpayment refers to paying 30 percent to 49 percent of income toward housing, and severe overpayment is anything higher. **Table II-14** shows the number of cost burdened owner and renter households by household type. **Table II-15** shows the number of severely cost burdened owner and renter households paying more than 50 percent of their monthly income for housing.

**Table II-14**  
**Cost Burden: Households Paying More than 30 Percent of Income for Housing**

Households	Owner				Renter			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,060	1,365	2,090	4,515	2,150	1,260	760	4,170
Large Related	405	1,030	1,305	2,740	960	875	445	2,280
Elderly	545	470	230	1,245	535	295	40	870
Other	185	140	270	595	485	240	130	855
Total need by income	2,195	3,005	3,895	9,095	4,130	2,670	1,375	8,175

Source: CHAS, 2007-11.

**Table II-15**  
**Severe Cost Burden: Paying More than 50 Percent of Income for Housing**

Number of Households	Owner				Renter			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	930	1,120	975	3,025	1,800	420	100	2,320
Large Related	370	735	490	1,595	750	245	0	995
Elderly	440	360	125	925	370	25	0	395
Other	145	95	100	340	455	60	0	515
Total need by income	1,885	2,310	1,690	5,885	3,375	750	100	4,225

Source: CHAS, 2007-2011.

*Overcrowding*

**Table II-16** displays different income-level households with overcrowding problems based on 2007-2011 CHAS data that uses the number of people per room (not bedroom) in the dwelling unit as a standard for measuring overcrowding. Using this standard, a household is overcrowded if there is more than one person per room. Moderate overcrowding exists when there are 1.0 to 1.5 persons per room, with severe overcrowding occurring when there are more than 1.5 persons per room. Based on the data in **Table II-16**, renters experience overcrowding problems more than owners.

**Table II-16**  
**Over Crowding Problems: More than One Person Per Room**

Number of Households	Owner					Renter				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	145	235	240	69	689	645	455	195	15	1,310
Multiple, unrelated family households	10	250	165	39	464	140	90	75	0	305
Other, non-family households	0	25	0	0	25	0	0	0	0	0
Total need by income	155	510	405	108	1,178	785	545	270	15	1,615

Source: CHAS, 2007-2011.

*For-Sale and Rental Housing Prices*

**Table II-17** shows the median sales price for single-family home in Palmdale for the 2014 calendar year. The data shows an increase percent change in the sales price for single-family homes and in the price of a condominium unit, making housing in the City of Palmdale more affordable for prospective buyers. In 2014, the average sales price for single-family homes and condominiums were \$199,000.

**Table II-17  
Median Sales Prices – 2014**

Zip Code	Single Family Homes			Condominiums			SFR Only
	Sales of Single Family Homes	Price Median SFR (\$1,000)	Price % Change from 2013	Sales Count Condos	Price Median Condos (\$1,000)	Price % Change from 2013	Median Home Price/ Sq. Ft
93550	798	\$175	20.7%	82	\$123	11.8%	\$116
93551	806	\$282	12.8%	28	\$170	3.0%	\$128
93552	471	\$208	18.6%	4	\$135	84.9%	\$114
93590	N/A	N/A	N/A	N/A	N/A	N/A	N/A
93591	95	\$115	21.1%	N/A	N/A	N/A	\$88
93599	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Feb. 2014 Dataquick / L.A. Times publishes a report from them by community/zip code

**Table II-18** lists the cost of rental housing based on the 2007-2011 ACS data for the City of Palmdale. The rents are broken down by bedroom size.

**Table II-18  
Cost of Rental Housing: Rental Units by Price and Bedroom Size**

# of Bedrooms		Less than \$200	\$200 to \$299	\$300 to \$499	\$500 to \$749	\$750 to \$999	\$1,000 or more	No cash rent	Total:
Efficiency	# of units	0	0	22	103	22	50	0	197
	% of size	0.0%	0.0%	11.2%	52.3%	11.2%	25.4%	0.0%	1.5%
	% of total	0.0%	0.0%	4.4%	6.5%	0.8%	0.7%	0.0%	
1 Bedroom	# of units	0	65	79	704	737	158	40	1,783
	% of size	0.0%	3.6%	4.4%	39.5%	41.3%	8.9%	2.2%	13.7%
	% of total	0.0%	37.1%	15.9%	44.7%	25.6%	2.1%	10.7%	
2 Bedrooms	# of units	79	92	258	403	1,484	1,659	80	4,055
	% of size	1.9%	2.3%	6.4%	9.9%	36.6%	40.9%	2.0%	31.2%
	% of total	91.9%	52.6%	51.9%	25.6%	51.5%	22.3%	21.4%	
3+ Bedrooms	# of units	7	18	138	366	638	5,563	254	6,984
	% of size	0.1%	0.3%	2.0%	5.2%	9.1%	79.7%	3.6%	53.6%
	% of total	8.1%	10.3%	27.8%	23.2%	22.1%	74.9%	67.9%	
<b>Subtotal</b>		86	175	497	1,576	2,881	7,430	374	13,019
<b>Share of Total</b>		0.7%	1.3%	3.8%	12.1%	22.1%	57.1%	2.9%	100.0%

Source: ACS, 2007-2011.

According to the National Low-Income Housing Coalition's (NLIHC) Out of Reach 2011 Report for Los Angeles County, the Fair Market Rent (FMR) for a two-bedroom apartment is \$1,465. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$4,883 monthly or \$58,600 annually. Assuming

a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$28.17.

In 2011, a minimum wage worker in Los Angeles County earned an hourly wage of \$8.00. In order to afford the FMR for a two-bedroom apartment, a household must include 3.5 minimum wage earner(s) working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

For Los Angeles County, the estimated mean (average) wage for a renter was \$17.19 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a household must include 1.6 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

**Table II-19  
Cost of Rental Housing**

Fair Market Rents by Number of Bedrooms										
Year	Efficiency		1 Bedroom		2 Bedrooms		3 Bedrooms		4 Bedrooms	
	FMR	Incr.	FMR	Incr.	FMR	Incr.	FMR	Incr.	FMR	Incr.
2007	\$843		\$1,016		\$1,269		\$1,704		\$2,051	
2008	\$863	+2%	\$1,041	+2%	\$1,300	+2%	\$1,746	+2%	\$2,101	+2%
2009	\$904	+5%	\$1,090	+5%	\$1,361	+5%	\$1,828	+5%	\$2,199	+5%
2010	\$943	+4%	\$1,137	+4%	\$1,420	+4%	\$1,907	+4%	\$2,295	+4%
2011	\$973	+3%	\$1,173	+3%	\$1,465	+3%	\$1,967	+3%	\$2,367	+3%

Source: HUD Fair Market Rents for Los Angeles County.

The HUD Fair Market Rents by number of bedrooms over the last five years are shown in **Table II-19**. **Table II-20** shows the annual household income needed to afford rental units at the Fair Market Rent levels.

**Table II-20  
Income Needed to Afford FMR – Los Angeles County 1**

Annual Income					Percent of Family AMI				
0 BR.	1 BR	2 BR	3 BR	4 BR	0 BR.	1 BR	2 BR	3 BR	4 BR
\$38,920	\$46,920	\$58,600	\$78,680	\$94,680	60.8%	73.3%	91.6%	122.9%	147.9%

Source: National Low Income Housing Coalition, 2011.

*Affordable Housing*

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

**Table II-21** below summarizes the affordable housing inventory in Palmdale.

**Table II-21  
City of Palmdale Affordable Housing, 2013**

Project Name	Location	Total Units	Total Affordable Units	Type	Date of Potential Conversion	Type of Assistance
Manzanita Villas	570 Knollview Court, Palmdale, CA 93551	144	29	Family	2042	City Regulatory Agreement
Carmel Apartments	38722 11 <sup>th</sup> Street East, Palmdale, CA 93550	112	23	Family	2023	Local Mortgage Revenue Bond
Oasis Apartments	38300 11 <sup>th</sup> Street East, Palmdale, CA 93550	336	67	Family	2025	Local Mortgage Revenue Bond
Summerwood Apartments	38272 11 <sup>th</sup> Street East, Palmdale, CA 93550	54	52	Family	02/01/2028	Multifamily Housing Revenue Bond
La Quinta Apartments	38301 11 <sup>th</sup> Street East, Palmdale, CA 93550	100	98	Family	07/01/2028	Multifamily Housing Revenue Bond
Park Vista Apartments	38204 11 <sup>th</sup> Street East, Palmdale, CA 93550	28	27	Family	07/01/2028	Multifamily Housing Revenue Bond
Impressions Apartment	38045 10 <sup>th</sup> Street East, Palmdale, CA 93550	109	107	Senior	07/01/2028	Multifamily Housing Revenue Bond
Boulders at the Ranch I	40701 Rancho Vista Blvd., Palmdale, CA 93550	358	358	Mobile Home Park	09/21/2027 for Series A 09/01/2007 and 09/01/2027 for Series B	Tax-Exempt (Series A) and Taxable (Series B) Bonds secured by Housing Set-Aside funds
Boulders at the Ranch II	5200 Entrar Drive, Palmdale, CA 93551	206	206	Mobile Home Park	09/21/2027 for Series A 09/01/2007 and 09/01/2027 for Series B	Tax-Exempt (Series A) and Taxable (Series B) Bonds secured by Housing Set-Aside funds
Boulders at the Lake	1030 East Avenue S, Palmdale, CA 93551	222	222	Mobile Home Park	09/21/2027 for Series A 09/01/2007 and 09/01/2027 for Series B	Tax-Exempt (Series A) and Taxable (Series B) Bonds secured by Housing Set-Aside funds
Palmdalia Apartments	38040 11 <sup>th</sup> Street East, Palmdale, CA 93550	64	64	Family	Tax credit require 55 years of affordability expiring in 2057 20-year HA contract expires 2032	4% tax credit purchase 2012 20-year Section 8 HAP contract

## Community Characteristics

Project Name	Location	Total Units	Total Affordable Units	Type	Date of Potential Conversion	Type of Assistance
Palmdale Gardens	38601 10 <sup>th</sup> Street East, Palmdale, CA 93550	76	76	Senior	N/A	Purchased with conventional mortgage Section 8 contract renewed annually
Palmdale East Q	1000 East Avenue Q, Palmdale, CA 93550	90	90	Family	2055 Tax Credits	Purchased with tax credit finance 2002 Section 8 contract renewed annually
East 35 <sup>th</sup> Street Apartments	37929 35 <sup>th</sup> Street East, Palmdale, CA 93550	48	48	Family	Long-term Section 8 contract expires 2025	Section 221 (D)(4) Long-term Section 8 contract
Palmdale Desert Club Apartments	37902 North 20 <sup>th</sup> Street, Palmdale, CA 93550	80	80	Family	N/A	Purchased with tax credit finance Section 8 contract renewed annually
Village Garden Apartments	1020 East Avenue R, Palmdale, CA 93550	80	80	Family	N/A	Section 8 contract renewed annually
Desert View Apartments	38633 East 10 <sup>th</sup> Street, Palmdale, CA 93550	55	55	Family	09/01/2023	221 (D)(4) MKT Section 8 NC
Whispering Palms	38250 9 <sup>th</sup> Street East, Palmdale, CA 93550	75	74	Senior	2073	Multifamily Housing Revenue Bond, HOME
Cielo Azul	38040 27 <sup>th</sup> Street East, Palmdale, 93550	80	79	Senior	2062	Housing Set Aside Funds, Tax Credits
Summer Terrace	38530 Tierra Subida Avenue, Palmdale, CA 93550	80	79	Senior	2064	Tax Credits, HOME
Palo Verde Terrace	38235 10 <sup>th</sup> Street East, Palmdale, CA 93550	78	77	Senior	2061	Tax Credits, HOME
Casablanca Apartments	4160 East Avenue R, Palmdale, CA 93550	200	200	Family	2055	Tax Credit
Wright Brothers Court	38832 4 <sup>th</sup> Street East, Palmdale, CA 93550	156	156	Family	2074	Tax Credits, HOME
<b>Total</b>		<b>2,831</b>	<b>2,347</b>			

Source: City of Palmdale 2013-2021 Housing Element

**F. Special Housing Needs Profile**

Certain residents have more difficulty finding decent and affordable housing or receiving fair housing treatment due to special circumstances. These may include employment and income, family type, disability, or other characteristics. In Palmdale, special need groups include seniors, people with disabilities, single parents, large families.

In recognition that people from different walks of life have different needs, state and federal laws encourage jurisdictions to provide a continuum of housing. **Table II-22** summarizes the level of special needs groups in Palmdale. The following discussion describes and analyzes the housing needs of each group. Data from the 2007-2011 ACS shows the size of special needs groups in Palmdale.

**Table II-22  
Special Needs Groups in Palmdale**

Special Needs	2011	
	Number	Percent of City
Senior Citizens <sup>1</sup>	9,490	23.4%
People with Physical Disability <sup>2</sup>	12,579	8.4%
Single-Parents with Children <sup>3</sup>	6,619	16.4%
Large Households <sup>4</sup>	10,740	26.5%

Source: ACS, 2007-2011 unless otherwise noted

1. Percent of households with a member age 65 or older (2009-2011)
2. Percent of residents older than 18 with a physical disability
3. Percent of households with single-parents with own children under age 18
4. Percent of households with five or more members residing in a home

*Senior Citizens*

According to the 2007-2011 ACS, 6.4% of Palmdale's residents were seniors, defined as age 65 or older. Senior households have special housing needs due to income, health care costs, and physical disabilities.

Seniors receive social services through a variety of nonprofit organizations. Regionally, the Antelope Valley Committee on Aging provides a nutrition program, transportation, paralegal service and property tax assistance, and other supportive services through a drop-in center. Congregate meals are provided in Palmdale, Lancaster, and Pearblossom, and delivered meals to homebound frail elderly. Locally, the City's Senior Center also provides a location to congregate and take classes. Antelope Valley Transit Authority provides subsidized transit services and special medical shuttles to hospitals.

Locally, the City of Palmdale offers a variety of services to address senior needs. The Palmdale Senior Center is a resource to help connect seniors to valuable outside resources and programs. The Senior Center provides high-quality nutritional, educational and cultural programs. Some programs include income tax preparation, fitness walks, wellness activities, crafts and health-related support groups.

The brand new Legacy Commons Senior Center opened in 2010. Adjacent to the new Senior Center in the heart of the City, two (2) brand-new affordable senior apartment complexes provide 153 units of affordable housing to lower income seniors. Additional affordable senior apartment complexes are located throughout the City. Notably, the Summer Terrace

Apartments located adjacent to the new Palmdale Regional Medical Center at Palmdale Boulevard and Tierra Subida provide 79 affordable senior units.

### *People with Disabilities*

The Americans with Disabilities Act defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” People with disabilities have special housing needs because of their fixed income, higher health costs, and need for accessible and affordable housing. In 2011, 8.4 percent of Palmdale's residents reported a disability.

The Center for Independent Living is the primary agency serving disabled residents in the Antelope Valley. Core services include: Advocacy, Cross Disability Peer Modeling; Housing Referrals; Personal Assistance Referrals; Systems Advocacy; Technical Assistance; Information and Referral; Emergency Services; Equipment Loans; and Assistive Technology. Representatives from the agency indicate that the primary need in the Antelope Valley is the shortage of affordable housing for very low income disabled people which is also accessible, since the vast majority of affordable housing was built before the advent of modern accessibility standards. Other local nonprofit agencies serving seniors assist in providing services.

### *Family Households*

Families with children have special housing needs due to lower per capita income, the need for affordable childcare, the need for affordable housing, or the need for larger units with 3 or more bedrooms. Families with children and especially teenagers may face discrimination in the rental housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex or unit, confine children to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether.

The 2007—2011 ACS reported 6,619 people living in households comprised of single parents with children under age 18. Another type of household that is more at-risk of experiencing housing discrimination is large families, defined as households with five or more members. According to the 2011 ACS, the City had 10,740 large families. Large families often have difficulty finding adequately sized housing and may lease smaller units due to affordability concerns, which results in overcrowding.

Homeless Persons

Housing affordability for those who are or were formerly homeless is challenging from an economics standpoint, and this demographic group may also encounter fair housing issues when landlords refuse to rent to formerly homeless persons due to poor credit history. These difficulties are more severe for homeless families that need larger affordable units. According to the 2011 Homeless County survey from the Los Angeles Homeless Services Authority (LAHSA), there were 51,340 homeless persons on a single night. In the Antelope Valley, there were 1,412 homeless persons.<sup>1</sup>

Table II-23 provides a list of current homeless facilities.

**Table II-23  
Shelter and Services for Homeless Persons**

Location	No. of Beds
Lancaster Community Shelter 44611 Yucca Avenue, Lancaster, CA 93534	40
Transitional Living Program – Lancaster	10
Homeless Solutions Access Center 45134 Sierra Highway, Lancaster, CA 93534	N/A
Valley Oasis Domestic Violence Shelter (confidential location)	56
Oasis House Transitional Housing Program 1	13
Steppin' into the Light	10
South Antelope Valley Emergency Services (SAVES) in Palmdale 1002 East Avenue Q-12, Palmdale, CA 93550	N/A
Scheuer House Antelope Valley Independent Living Program	10
Mental Health Case Management and Housing Program	N/A
Permanent Housing with Services (up to six years)	N/A

Source: Palmdale Housing Element, 2013-2021.

<sup>1</sup>The Los Angeles Homeless Services Authority (LAHSA), 2013 Homeless Count.

This page intentionally left blank.

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

### A. Owner-Occupied Housing

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

#### *Home Buying Process*

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

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

#### *Advertising*

The first step in buying a home is generally searching for available housing through advertisements that appear in magazines, newspapers, or on the Internet. Advertising is a sensitive issue in the real estate and rental housing market because advertisements advertently or inadvertently can signal preferences for certain buyers or tenants. Recent litigation has held publishers, newspapers, the Multiple Listing Service (MLS), real estate agents and brokers accountable for discriminatory ads.

Advertising can suggest a preferred buyer or tenant in several ways. Some examples include advertisements or listings that:

- Suggest a preferred type of buyer or tenant household;
- Use models that indicate a preference or exclusion of a type of resident;
- Publish advertisements or listings in certain languages; or
- Restrict publication to certain types of media or locations so as to indicate a preference.

As a rule of thumb, advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or terms suggesting preferences for one group over another (e.g., adults preferred, ideal for married couples with kids, or conveniently located near Catholic church).

### *Lending*

Initially, buyers must locate a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide sensitive information including their gender, ethnicity, income level, age, and familial status. This information is required to be gathered by the Community Reinvestment Act and the Home Mortgage Disclosure Act (HMDA); however, it does not guarantee that individual loan officers or underwriters will not misuse the information.

A report on mortgage lending discrimination by the Urban Land Institute describes four basic stages in which discrimination can occur:

- **Advertising/outreach stage.** Lenders may not have branches in certain locations, not advertise to certain segments of the population, or violate advertising rules with respect to fair housing.
- **Pre-application stage.** Lenders may not provide applicants of different racial and ethnic backgrounds the same types of information as other preferred groups, or may urge some to seek another lender.
- **Lending stage.** Lenders may treat equally qualified individuals in a different manner, giving different loan terms, preferred rates, or denying a loan based on a factor not related to ability to pay and risk.
- **Loan administration.** Lenders may treat minorities in harsher terms, such as initiating foreclosure proceedings if any payment is late, or by making loans at terms that encourage defaults.

### *Real Estate Agents Sellers*

Finding a real estate agent is normally the next step in the home buying process. The agent will find the home for the prospective buyer that best fits their needs, desires, and budget based on the amount they are qualified for by the lender. Real estate agents may also intentionally or unintentionally discriminate by steering a potential buyer to particular neighborhoods, by encouraging the buyer to look into certain areas or failing to show the buyer all choices available. Agents may also discriminate in determining who they agree to represent, who they turn away and the comments they make about their clients.

### *Sellers*

Even if a real estate agent is following fair housing practices, the current occupant (seller) may not want to sell his/her house to certain purchasers protected under fair housing laws or they may want to accept offers only from a preferred group. Oftentimes, sellers are home

when agents show the properties to potential buyers and sellers may develop certain biases based upon this contact. The Residential Listing Agreement and Seller's Advisory forms that sellers must sign disclose their understanding of fair housing laws and practices of discrimination. However, preventing this type of discrimination is difficult because a seller may have multiple offers and choose one based on bias.

### *Appraisals*

Banks order appraisal reports to determine whether or not a property is worth the amount of the loan requested. Generally, appraisals are based on the comparable sales of properties surrounding the neighborhood of the subject property. Other factors such as the age of the structure, improvements made and location are also considered. Homes in some neighborhoods with higher concentrations of minorities and poverty concentrations may appraise lower than properties of similar size and quality in neighborhoods with lower concentrations of minorities or low-income households.

Taking these factors into consideration when valuing a property in an appraisal causes the arbitrary lowering of property values and restricts the amount of equity and capital available to not only the potential home buyer but also to the current owners in the neighborhood. Disparate treatment in appraisals is difficult to prove since individual appraisers have the latitude within the generally accepted appraisal practices to influence the outcome of the appraisal by factoring in subjective opinions.

### *Insurance*

Insurance agents have underwriting guidelines which determine whether or not a company will sell insurance to a particular applicant. Currently, underwriting guidelines are not public information; however, consumers have begun to seek access to these underwriting guidelines to learn if certain companies have discriminatory policies, called redlining. Some states require companies to file the underwriting guidelines with the State Department of Insurance, making the information public.

### *Home Loan Activity*

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. In 1977, the Community Reinvestment Act (CRA) was enacted to improve access to credit for all communities, regardless of the race/ethnic or income makeup of its residents. CRA was intended to encourage financial institutions to help meet the credit needs of communities, including low-moderate income people and neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance.

In tandem with the Home Mortgage Disclosure Act (HMDA), financial institutions with assets exceeding \$10 million are required to submit detailed information on the disposition of home loans by applicant characteristics. HMDA data can then be evaluated with respect to lending patterns. This study uses a Chi-Square test to analyze loan approval rates. This statistical test can determine whether loan approval rates are significantly different for one group versus another, but cannot establish the presence of bona fide discrimination. Nonetheless, these statistical tests can certainly help provide direction on potential areas to focus further inquiry and study.

During 2012 calendar year, 12,342 households filed loan applications were filed for housing in Palmdale. Of those applications, 1,225 were withdrawn before approval or

denial and 405 were closed for incompleteness prior to a decision. Lending institutions rendered decisions on 10,712 loan applications. The data in **Table III-1** shows that the number of loan applications and loan approval rates is highest for home purchase loans, followed by refinancing and then home improvement. Federal Housing Administration (FHA) loans were more common for home purchases and for refinancing purposes. The average loan approval rate for all loan types was 81.8 percent.

**Table III-1  
Home Loan Application Activity in Palmdale**

Type	Number of Loans	Share of Loans	Number Approved	Approval Rate
<b>Home Purchase</b>	<b>4,109</b>	<b>38.4%</b>	<b>3,589</b>	<b>87.3%</b>
Conventional	1,497	14.0%	1,275	85.2%
FHA - Insured	2,302	21.5%	2,041	88.7%
VA - Guaranteed	296	2.8%	261	88.2%
FSA/RHS	14	0.1%	12	85.7%
<b>Home Improvement</b>	<b>260</b>	<b>2.4%</b>	<b>111</b>	<b>42.7%</b>
Conventional	170	1.6%	81	47.6%
FHA - Insured	89	0.8%	30	33.7%
VA - Guaranteed	1	0.0%	0	0.0%
FSA/RHS	0	0.0%	0	0.0%
<b>Refinancing</b>	<b>6,343</b>	<b>59.2%</b>	<b>5,062</b>	<b>79.8%</b>
Conventional	4,713	44.0%	3,689	83.9%
FHA - Insured	1,271	11.9%	1,066	85.8%
VA - Guaranteed	358	3.3%	307	3.4%
FSA/RHS	1	0.0%	0	0.0%
<b>Total:</b>	<b>10,712</b>	<b>100.0%</b>	<b>8,762</b>	<b>81.8%</b>

Source: 2015 Financial Institutions Examination Council – 2012 HMDA Database.

### *Mortgage Interest Rates & Fees*

A key component to securing a home loan is the interest rate and fees associated with the loan. Studies show mixed indications as to whether or not minority borrowers pay higher rates and fees. A 2009 Federal Reserve Bank of New York report on Subprime Mortgage Pricing<sup>1</sup> examined 75,000 subprime loans originated in August 2005 across the United States. The study focused on a particular type of subprime loan that was common in the lending industry at that time, characterized by a 2-28 hybrid adjustable rate mortgage (ARM) whereby the borrower is charged an initial mortgage interest rate for two years, followed by biannual rate resets based on a margin over a short-term rate. According to the study, the 2-28 ARM accounted for approximately 80 percent of subprime variable rate loans made at that time. The study found no evidence of adverse pricing by race, ethnicity, or gender in either the initial rate or the reset margin of the subprime loans included in the dataset. The study indicated that if any pricing differential exists, minority borrowers appeared to pay slightly lower rates, as do those borrowers in zip codes with a larger percentage of black or Hispanic residents or a higher unemployment rate.

<sup>1</sup> Subprime Mortgage Pricing: The Impact of Race, Ethnicity, and Gender on the Cost of Borrowing, Federal Reserve Bank of New York, by Andrew Haughwout, Christopher Mayer and Joseph Tracy, April 2009.

The Fannie Mae Foundation commissioned a study of mortgage rates from 1989 – 2001.<sup>2</sup> The study was published in the *Housing Policy and Debate*, Volume 17, Issue 1 of 2006. According to the study, the average annual percentage rate (APR) for African Americans was roughly 8.07 percent, while the average APR for whites was 7.96 percent. Although the authors concluded that the disparity in interest rates for African Americans resulted in a minimal economic impact (an increase of seven cents a month per \$1,000 of the loan amount), it was evident that African Americans, when all other factors were controlled, received higher interest rates on their home loans.

A significant conclusion of the study was the disparate loan terms for home refinancing for African Americans as compared to their white counterparts, when all other factors (e.g. credit history, loan amount and type, property, etc.) were controlled. African Americans average interest rate for refinancing a home loan was 8.82 percent, a much higher rate than whites whose average interest rate was 7.81 percent. The difference of 1.01 percent resulted in African Americans paying on average 71 cents more a month per \$1,000 of the borrowed amount, a substantial economic impact as compared to whites over the term of the loan. The average interest for Hispanics was slightly higher than that of whites as well for home loans, but there was little difference in the average interest rate amongst Hispanics and whites for refinancing. The disparity of higher interest rates for home loans of African Americans and Hispanics, as well as the disparity of higher interest rates for African Americans in refinancing home loans, if apparent in a particular community, would be an impediment to fair housing choice, as defined in the Executive Summary.

The authors looked at conventional home loans as a subset of all mortgage types analyzed in the study. Once again, the average APR for African Americans for conventional loans was higher for home purchases and also for refinancing of home loans as compared to whites. The average APR amongst Hispanics for conventional loans was also higher than whites, although the gap was not as high as it was for African Americans. Such discriminatory practices in loans for African American and Hispanic homebuyers are impediments to homeownership. (The study did conclude that there was no disparity on the interest rates charged to Hispanics as compared to whites for refinancing home loans).

Not only is there empirical evidence of discrimination in the interest rates charged for home loans and refinancing for certain minority groups, but also discrimination in the mortgage rate fees charged for home loans of African Americans and Hispanic borrowers. According to HUD's Office of Policy Development, African Americans and Hispanics pay on average \$415 and \$365 more, respectively, for closing costs on FHA mortgages as compared to whites, when all other factors such as loan amounts and property values are controlled.<sup>3</sup>

In addition, disparate mortgage fees are charged based on the racial composition of the borrower's neighborhood; borrowers in African American neighborhoods pay on average \$120 more for title services and borrowers in primarily Hispanic census tracts pay \$110 more compared to borrowers residing in non-minority neighborhoods.<sup>4</sup> The disparate charge of mortgage interest rates and fees for African Americans and Hispanics borrowers is an impediment to housing choice.

---

<sup>2</sup> Rates and Race: An Analysis of Racial Disparities in Mortgage Rates, by T. Boehm, P. Thistle, A. Schlottman, 2005.

<sup>3</sup> *Mortgage Interest Rates and Fees, A Study of Closing Costs for FHA Mortgages*, HUD Office of Policy Development and Research, by Susan E. Woodward for the Urban Institute, May 2008.

<sup>4</sup> Ibid. Study can be found at [www.huduser.org/Publications/pdf/FHA\\_closing\\_cost.pdf](http://www.huduser.org/Publications/pdf/FHA_closing_cost.pdf).

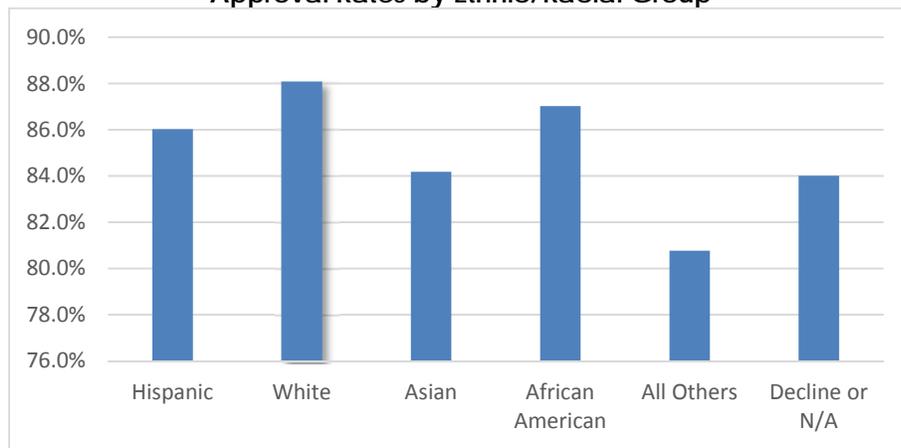
*Lending Outcomes*

This section summarizes lending activity in Palmdale. HMDA data provides some insights regarding the lending patterns in a community. However, the HMDA data is only an indicator of potential problems; it cannot be used to conclude discrimination due to the limitations of the data.

**Lending Outcomes by Income and Race/Ethnicity.** Generally, home loan approval rates increase as household income increases. This was true for each type of loan analyzed. The average approval rates for each loan type were 87.3 percent, 42.7 percent, and 79.8 percent respectively. Low-income applicants had overall approval rates with a 78.8 percent average amongst all types of home loans. The best approval rates were for middle and upper income home purchase loan applicants.

For home purchase and refinance loans regardless of income, the majority of applications were from Hispanics which is in keeping with the overall population—the majority of Palmdale residents are Hispanic. Approval rates were highest for Whites, followed by those declining to state. African Americans, which represent 14.4 percent of the City’s population, had an approval rate at 87.0 percent. Hispanics, which represent 53.6 percent of the City’s population, had an approval rate of 86.0 percent. **Chart III-1** and **Table III-2** shows loan approval rates for home purchases and refinances by applicant characteristics.

**Chart III-1**  
**Approval Rates by Ethnic/Racial Group**



Source: HMDA, 2012.

Table III-2  
Home Loan Approval Rates by Applicant Characteristics

Type	Low/Mod Income <80% MFI		Middle Income 80-120% MFI		Upper Income 120+ MFI	
Race/ Ethnicity	Loan Applications	Approval Rate	Loan Applications	Approval Rate	Loan Applications	Approval Rate
<b>Home Purchase</b>	<b>2,487</b>	<b>85.9%</b>	<b>420</b>	<b>91.9%</b>	<b>1,202</b>	<b>88.8%</b>
Hispanic	1,407	85.1%	95	95.8%	187	87.7%
White	503	87.1%	106	87.7%	561	89.1%
Asian	85	80.0%	16	87.5%	95	87.4%
African American	132	87.1%	23	78.3%	53	90.6%
All Others	18	72.2%	1	100.0%	7	100.0%
Decline or N/A	342	88.9%	179	94.4%	299	88.6%
<b>Home Improvement</b>	<b>138</b>	<b>29.0%</b>	<b>16</b>	<b>56.3%</b>	<b>106</b>	<b>58.5%</b>
Hispanic	31	25.8%	1	100.0%	9	66.7%
White	32	43.8%	3	66.7%	26	73.1%
Asian	7	28.6%	0	0.0%	6	50.0%
African American	7	28.6%	0	0.0%	8	75.0%
All Others	3	33.3%	1	100.0%	1	100.0%
Decline or N/A	58	22.4%	11	45.5%	56	48.2%
<b>Home Refinance</b>	<b>2,322</b>	<b>76.9%</b>	<b>889</b>	<b>82.9%</b>	<b>3,132</b>	<b>81.1%</b>
Hispanic	485	74.4%	70	78.6%	325	78.8%
White	740	75.8%	198	82.8%	1,434	80.6%
Asian	111	75.7%	25	64.0%	219	76.3%
African American	106	67.0%	23	60.9%	119	80.7%
All Others	13	38.5%	5	80.0%	22	77.3%
Decline or N/A	867	81.1%	568	85.2%	1,013	83.7%

Source: 2015 Financial Institutions Examination Council – HMDA Database 2012.

Differences in approval rates for home loan applications among minorities do not necessarily reflect discriminatory practices. Differences could be due to credit scores, employment history, knowledge of the lending process, debt-income ratio, or other factors. Nonetheless, the persistence of lower loan approval rates among minorities could be the subject of additional inquiry and examination.

**Lending Outcomes by Tract Characteristics.** The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low and moderate income neighborhoods. Analyzing lending patterns by neighborhood characteristics can show whether significantly fewer home loans are being approved or issued in low/moderate income neighborhoods or neighborhoods with a disproportionately high percentage of minority residents. The lack of lending activity in one or more neighborhoods has been linked to unequal access to credit among different race and ethnic groups and alleged practices of

redlining and discrimination.

**Table III-3** shows a comparison of Home purchase and refinance loan approval rates at the census tract level by the minority concentration in the tract as well as tract income level relative to the Area Median Income. Palmdale is a multi-cultural community with neighborhoods that reflect the City’s demographics.

**Table III-3  
Home Loan Approval Rates by Tract Characteristics**

Tract Characteristics	Home Purchase Loans			Home Refinance Loans		
	Number of Applications	Number Approved	Percent Approved	Number of Applications	Number Approved	Percent Approved
<b>Minority Percentage</b>						
20% to 50%	703	610	86.8%	1,734	1,382	79.7%
50% to 80%	1,755	1,550	88.3%	2,938	2,355	80.2%
80% +	1,647	1,425	86.5%	1,652	1,313	79.5%
<b>Tract Income</b>						
Low	117	99	84.6%	104	74	71.2%
Moderate	873	757	86.7%	1,206	945	78.4%
Middle	1,742	1,519	87.2%	1,876	1,498	79.9%
Upper	1,377	1,214	88.2%	3,156	2,545	80.6%

Source: HMDA data, 2012.

**Lender Performance and CRA requirements.** In 2012, the top mortgage lenders received 45.7 percent of conventional home purchase loan applications in Palmdale (**Table III-4**). The top lenders were Wells Fargo Bank, North America (NA), iMortgage, and 21<sup>st</sup> Mortgage. 21<sup>st</sup> Mortgage had one the lowest approval rate of 61.8 percent.

HMDA collects data on loan denial reasons from all lenders. The most frequently-cited denial reasons in Palmdale during 2012 included debt-to-income ratio, credit history and collateral.

**Table III-4  
Disposition of Conventional Home Purchase Loan Applications by Lending Institution**

Lender	Loan Application Outcome			
	Total Loan Applications	Share of Applicants	Percent Approved	Percent Denied
Wells Fargo Bank, NA	191	12.8%	94.2%	5.8%
iMortgage	89	5.9%	94.4%	5.6%
21 <sup>st</sup> Mortgage	76	5.1%	61.8%	38.2%
Golden Empire Mortgage, Inc.	72	4.8%	100.0%	0.0%
JP Morgan Chase Bank, NA	66	4.4%	69.7%	30.3%
Prospect Mortgage, LLC	55	3.7%	83.6%	16.4%
Mortgage Management Consultant	53	3.5%	98.1%	1.9%
Flagstar Bank	43	2.9%	90.7%	9.3%
Pacific Union Financial, LLC	39	2.6%	66.7%	33.3%
Balance of Market (Other Lenders)	813	54.3%	84.0%	16.0%
<b>Total Market (All Lenders):</b>	<b>1,497</b>	<b>100.0%</b>	<b>85.2%</b>	<b>14.8%</b>

Source: Financial Institutions Examination Council – HMDA Database Version 3.4 ©2012.

The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low and moderate income neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance. Databases maintained by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC) were researched regarding the performance of the top financial institutions issuing home loans.

**Table III-5  
Lending Institution Regulators by Type of Institutions for  
Conventional Home Loan Purchases in Palmdale, 2012**

Regulating Enforcement Agency	Type of Institution
Board of Governors of the Federal Reserve System (FRB)	State member banks; bank holding companies; nonbank subsidiaries of bank holding companies; savings and loan holding companies; edge and agreement corporations; branches and agencies of foreign banking organizations operating in the United States and their parent banks; officers, directors, employees, and certain other categories of individuals associated with the above banks, companies, and organizations (referred to as "institution-affiliated parties").
Federal Deposit Insurance Corporation (FDIC)	Insured State chartered banks that are not members of the Federal Reserve System (state nonmember banks); insured branches of foreign banks; officers, directors, employees, controlling shareholders, agents, and certain other categories of individuals (institution-affiliated parties) associated with such institutions.
National Credit Union Administration (NCUA)	Credit unions.
Office of the Comptroller of the Currency (OCC)	National banks and their subsidiaries; federally chartered savings associations and their subsidiaries; federal branches and agencies of foreign banks; institution-affiliated parties (IAPs), including (a) officers, directors, and employees, and (b) a bank's controlling stockholders, agents, and certain other individuals.

Source: Federal Financial Institutions Examination Council (FFIEC), 2015.  
<http://www.ffiec.gov/enforcement.htm>.

Databases maintained by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC) were researched regarding the performance of the top financial institutions issuing home loans. No enforcement actions were found for the top 10 home loan originators in Palmdale during 2012. **Table III-6** provides a summary of the available CRA reviews and resulting ratings for each of the top home loan originators in Palmdale during 2012.

**Table III-6  
CRA Review Results for Top Lending Institutions in Palmdale, 2012**

Lending Institution	CRA Review Year	Review Rating
Wells Fargo Bank, NA	2008	Outstanding
iMortgage	-	Not Available
21 <sup>st</sup> Mortgage	-	Not Available
Golden Empire Mortgage, Inc.	-	Not Available
JP Morgan Chase Bank, NA	2013	Satisfactory
Prospect Mortgage, LLC	-	Not Available
Mortgage Management Consultant	-	Not Available
Flagstar Bank	2010	Satisfactory
Pacific Union Financial, LLC	-	Not Available

Source: Bank websites and News Releases.

*Predatory Lending*

Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. The predatory practices include high fees, hidden costs, unnecessary insurance, and larger repayments due in later years. A common predatory practice is directing borrowers into more expensive and higher fee loans in the “subprime” market, even though they may be eligible for a loan in the “prime” market. Predatory lending is prohibited by a number of state and federal laws.

The Fair Housing Act of 1968 requires equal treatment in terms and conditions of housing opportunity and credit regardless of race, religion, color, national origin, family status, or disability. The Equal Credit Opportunity Act of 1972 also 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 would be in violation of these acts, if they target minority or elderly households to buy higher priced loan products, treat loans for protected classes differently, or have policies or practices that have a disproportionate effect on the protected classes.

In addition, the Truth in Lending Act (TILA) requires lenders to inform the borrower about payment schedules, loan payments, prepayment penalties, and the total cost of credit. In 1994, Congress amended TILA and adopted the Home Ownership and Equity Protection Act (HOEPA). HOEPA requires that lenders offering high-cost mortgage loans disclose information if the annual percentage rate (APR) is ten points above the prime or if fees are above eight percent of the loan amount. HOEPA also prohibits balloon payments for short-term loans and, for longer covered loans, requires a warning if the lender has a lien on the borrower’s home and the borrower could lose the home if they default on the loan payment.

Following North Carolina’s lead, in September 2001, California became the second state to pass a law banning predatory lending. Codified as AB489 and amended by AB344, the law enables state regulators and the Attorney General to attempt to prevent “predatory” lending practices by authorizing the state to enforce and levy penalties against licensees that do not comply with the provisions of this bill. The law

provides protections against predatory lending to consumers across the state with respect to financing of credit insurance, high loan and points, steering and flipping, balloon payments, prepayment penalties, call provisions, interest rate changes upon default, or encouragement to default when a conflict of interest exists.

### *Foreclosures*

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

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

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

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

### *Agency Coordination*

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

**National Association of Realtors (NAR).** The National Association of Realtors (NAR) is a consortium of realtors which represent the real estate industry at the local, state,

and national level. Locally, the Greater Antelope Valley Association of Realtors (GAVAR) is the main association that serves the City of Palmdale. As a trade association, members receive a range of membership benefits. However, in order to become a member, NAR members must subscribe to its Code of Ethics and a Model Affirmative Fair Housing Marketing Plan developed by HUD. The term Realtor thus identifies a licensed real estate professional who pledges to conduct business in keeping with the spirit and letter of the Code of Ethics.

Realtors subscribe the NAR's Code of Ethics, including their active support for equal housing opportunity. Article 10 of the NAR Code of Ethics provides that "Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin." Realtors shall not print, display or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, handicap, familial status, or national origin."

The NAR has created a diversity certification, "At Home with Diversity: One America" to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR "At Home with Diversity" course. The certification signals to customers that the real estate professional has been trained on working with the diversity of today's real estate markets. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan. In July 1999, the NAR Diversity Program received the HUD "Best Practices" award.

**California Association of Realtors (CAR).** The California Association of Realtors (CAR) is a trade association of 92,000 realtors statewide. As members of CAR, Realtors subscribe to a strict code of ethics. CAR has recently created the position of Equal Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and meetings typically include sessions on fair housing issues. They also maintain a fair housing and ethics information on their website. The website address is as follows: <http://www.dre.ca.gov/>.

**Realtor Associations Serving Palmdale.** Realtor associations are generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development, and other daily work necessities. The frequency and availability of courses varies among these associations, and local association membership is generally determined by where the broker is located. Complaints involving agents or brokers may be filed with these associations. Monitoring of services by these associations is difficult as detailed statistics of the education/services these agencies provide or statistical information pertaining to the members is rarely available. The Greater Antelope Valley Association of Realtors (GAVAR) serves the Palmdale area.

**California Department of Real Estate (DRE).** The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. DRE has adopted education requirements that include courses in ethics and fair housing. To renew a real

estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of the four mandated areas: Agency, Ethics, Trust Fund, and Fair Housing. The fair housing course contains information that enables an agent to identify and avoid discriminatory practices when providing real estate services.

DRE investigates written complaints received from the public alleging possible violations of the Real Estate Law or the Subdivided Lands Law by licensees or subdividers. DRE also monitors real estate licensees conducting business as mortgage lenders and mortgage brokers. If an inquiry substantiates a violation, DRE may suspend or revoke a license, issue a restricted license, or file an Order to Desist and Refrain. Violations may result in civil injunctions, criminal prosecutions, or substantial fines. The Department publishes monthly a list of names of persons and businesses which have been conducting real estate activities without a license.

DRE reviews Covenants, Conditions, and Restrictions (CC&R's) for all subdivisions of five or more lots, or condominiums of five or more units. The review includes a wide range of issues, including compliance with fair housing law. CC&R's are restrictive covenants that involve voluntary agreements, which run with the land they are associated with. In the past, CC&R's were used to exclude minorities from equal access to housing. DRE reviews and approves all CC&R prior to issuing a final subdivision public report, which is the final step necessary before real estate brokers or agents may list any of the properties in the subdivision for sale. DRE requires that each prospective buyer of a property within the subdivision is provided a copy of DRE's report discussing the DRE review of CC&Rs.

**The California Organized Investment Network (COIN).** COIN is a collaboration of the California Department of Insurance, the insurance industry, community economic development organizations, and community advocates. This collaboration was formed in 1996 at the request of the insurance industry as an alternative to state legislation that would have required insurance companies to invest in underserved communities, similar to the federal Community Reinvestment Act (CRA) that applies to the banking industry. COIN is a voluntary program that facilitates insurance industry investments providing profitable returns to investors and economic/social benefits to underserved communities.

### B. Rental Housing

Similar to the owner-occupied market, a major challenge to ensuring fair housing in the rental market is the complexity of the process. Stages in the process of renting a home include advertising, pre-application inquiries, viewing the apartment, criteria for qualifying for the lease, lease conditions, and administration of the lease. The process becomes even more difficult and subjective in a tight rental market, where the landlord has numerous options for choosing the future tenant based on subjective factors.

#### *The Rental Process*

While the process of renting an apartment or home may be less expensive and burdensome up front than the home-buying process, it may still be just as time-consuming and potential renters may still face discrimination during various stages of the rental process. Some of the ways that tenants may face discriminatory treatment are highlighted below.

#### *Advertising*

The main sources of information on rentals are newspaper advertisements, word of mouth, signs, apartment guides, the Internet, and apartment brokers. Recent litigation has held

publishers, newspapers, and others accountable for discriminatory ads. Advertising can suggest a preferred tenant by suggesting preferred residents, using models, publishing in certain languages, or restricting media or locations for advertising. Advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or other terms suggesting preferences (e.g., adults preferred, ideal for married couples with kids, or conveniently located near a Catholic church).

### *Viewing the Unit*

Viewing the unit is the most obvious place where potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, judge on appearance whether a potential renter is reliable or may violate any rules, or make any other subjective judgments. For example, if a prospective tenant is in a wheelchair, a landlord may be concerned about the wear and tear on the unit or that a disabled tenant may request too many repairs or costly modifications to the unit. If a prospective tenant arrives with many children, the landlord may be concerned that the children may disturb other renters. In addition, the prospective tenant may also have an accent or wear religious symbols or jewelry which may again play in the decision to rent the unit.

### *Qualifying for the Lease*

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history and salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent a home. An initial payment consisting of first and last months' rent and security deposit are typically required. To deter "less-than-desirable" tenants, a landlord may ask for an initial payment or security deposit higher than for others. Tenants may also face differential treatment when vacating the unit. The landlord may choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear.

### *The Lease*

Most apartments are rented under either a lease agreement or a month-to-month rental agreement. A lease is favorable from a tenant's point of view for two reasons: the tenant is assured the right to live there for a specific period of time and the tenant has an established rent during that period. Most other provisions of a lease protect the landlord. The lease agreement usually includes the rental rate, required deposit, length of occupancy, apartment rules, and termination requirements. Typically, the rental agreement is a standard form for all units in the same building. However, enforcement of rules contained in the lease agreement may not be consistent among tenants who each signed leases with identical rules. A landlord may choose to strictly enforce rules for certain tenants based on their race/ethnicity, children, or a disability – raising fair housing concerns.

*Rental Housing Services*

The City of Palmdale contracts with the Housing Rights Center (HRC), the nation’s largest non-profit, civil rights organization dedicated to promoting and securing fair housing. Since 1968, HRC’s mission is “to actively support and promote fair housing through education, advocacy and litigation, to the end that all persons have the opportunity to secure the housing they desire and can afford, without discrimination based on their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by law.” During the past year, HRC assisted over 17,000 individuals and families. The comprehensive Fair Housing services include housing discrimination complaint investigation, fair housing education and outreach, and tenant and landlord counseling.

During the four fiscal year period covering the last A.I. cycle (FY 2010-2014), HRC assisted rental housing residents in the City of Palmdale with the resolution of a wide variety of landlord/tenant issues. **Table III-7** includes a four fiscal year tabulation of landlord-tenant related inquiries received by HRC.

**Table III-7  
General Housing Inquiries (Rental)**

Inquiry Category	2010-2011	2011-2012	2012-2013	2013-2014	Total
Eviction	50	39	20	21	130
Harassment	13	4	7	5	29
Illegal Entry	5	3	5	3	16
Late Fees	3	2	4	3	12
Lease Terms	24	34	43	39	140
Lockout	0	3	5	7	15
Notices	62	63	69	77	271
Parking	2	1	0	3	6
Pets	1	2	3	2	8
Refusal to Rent	3	0	1	2	6
Rent Increase	8	20	11	4	43
Section 8 Information	8	3	8	8	27
Security Deposit	23	14	20	26	83
Substandard Conditions	50	37	25	45	157
Utilities	18	9	10	8	45
Repairs	33	38	58	46	175
Landlord/Tenant Information	31	16	22	38	107
Other Issues	2	6	6	10	24
Seeking Housing	10	22	14	25	71
Relocation	0	1	0	1	2
<b>Total:</b>	<b>346</b>	<b>317</b>	<b>331</b>	<b>373</b>	<b>1,367</b>

The top five (5) complaints involved notices (19.8 percent), repairs (12.8 percent), substandard conditions issues (11.5 percent), lease terms (10.2 percent) and eviction notices (9.5 percent). It is important to note that any resident of the HRC's service area can utilize their services and expertise to navigate the complex laws facing landlords, managers and tenants in the rental housing market. It is common for landlords, managers and tenants to take inappropriate actions against other parties due to lack of knowledge about laws affecting tenancy in rental housing.

An evaluation of the volume of inquiries by topic as listed in **Table III-7** reveals that of the top five (5) inquiries received, the number of inquiries per fiscal year are relatively consistent. However, the number of inquiries related to eviction notices have decreased. This trend leads the City to conclude that there are no private rental housing impediments to fair housing choice.

### *Agency Coordination*

Many agencies oversee the apartment rental process and related practices. This oversight includes ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the rental housing market, and some of their policies are described.

### *California Apartment Association (CAA)*

CAA is the country's largest statewide trade association for rental property owners and managers. Incorporated in 1941 to serve rental property owners and managers throughout California, CAA represents rental housing owners and professionals who manage more than 1.5 million rental units. CAA has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared towards improving the approach, attitude and professional skills of on-site property managers and other interested individuals. The CCRM program consists of 31.5 hours of training that includes fair housing and ethics along with other courses.

### *National Association of Residential Property Managers (NARPM)*

NARPM promotes standards of business ethics, professionalism, and fair housing practices in the residential property management field. NARPM is an association of real estate professionals experienced in managing single-family and small residential properties. The North Los Angeles Chapter covers Palmdale. In addition, NARPM certifies its members in the standards and practices of the residential property management industry and promotes continuing professional education. NARPM offers 3 professional designations: Residential Management Professional, RMP®, Master Property Manager, MPM®, and Certified Residential Management Company, CRMC®. These certifications require educational courses in fair housing.

This page intentionally left blank.

**A. Land Use Policy**

*General Plan*

Land use policies are fundamental to ensuring housing opportunities. The Palmdale General Plan and the Zoning Ordinance regulate the amount, location, type, and density of housing in the City of Palmdale. Land use policies that do not promote a variety of housing options can impede housing choice. The City of Palmdale allows housing in six (6) zone districts as shown in **Table IV-1**.

**Table IV-1  
Land Use Designations Allowing Residential Uses**

Designation	Code	Zone	Description
Residential	A-1	Light Agriculture	Detached single-family dwellings requiring a minimum lot size of one (1) acre per dwelling unit.
	R-1	Single-Family Residential	Detached single-family dwellings.
	R-2	Medium Density Residential	Duplexes, multiple-family, single-family attached, and single-family detached dwellings.
	R-3	Multiple-Family Residential	Duplexes, condominiums, town homes, and apartments.
	R-4	High Density Residential	Duplexes, condominiums, town homes, and apartments
Commercial	MX	Mixed Use Overlay	Facilitate the coexistence of residential and commercial land uses. Zone permits single-family attached and detached, multi-family to include condominiums, town homes, and apartments.

Sources: Palmdale General Plan, Palmdale Zoning Ordinance, 2015.

**Map IV-1** illustrates the City's land use designations.



### *Zoning Ordinance*

The purpose of this 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 the 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 at 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 Palmdale as a distinctive community with a high quality of life and a visually pleasing, secure environment for the City's residents and businesses.

### *Housing Element*

The Housing Element is one of seven mandated elements of Palmdale's General Plan. Enacted in 1969, and revised in 2008 by Senate Bill 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. The current Palmdale Housing Element identifies strategies and programs that focus on:

1. Conserving and improving existing affordable housing;
2. Providing adequate sites for residential development;
3. Assisting in the provision of affordable housing;
4. Removing governmental and other constraints to housing development; and
5. Promoting equal housing opportunities.

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 A.I. Report, housing programs which affect fair housing are described.

These goals accommodate its designated Regional Housing Needs Assessment or RHNA allocation. All the cities and counties in Los Angeles County have been allocated certain housing growth objectives that will enable the region to meet its projected housing needs in the coming years. The Southern California Association of Governments (SCAG) has been delegated with the responsibility in developing regional growth forecasts and then assigning new housing objectives for each city and county under SCAG's jurisdiction. In addition to establishing an overall objective for new housing units for the defined planning period (2014-2021), the SCAG RHNA also indicated the proportion of future housing units that should be accessible to households with varying incomes. The RHNA that is applicable to Palmdale is summarized below:

- A total of 1,395 units should be allocated to very low-income households (less than 50 percent of the Los Angeles County median income);
- A total of 827 units should be provided for low-income (50 percent - 80 percent of the median income) households;
- A total of 898 units should be provided for moderate-income (80 percent - 120 percent of the median income) households; and
- A total of 2,332 units should be provided for households with above-moderate (more than 120 percent of the median income for the county incomes).
- The total number of new housing units that must be accommodated during the 2014 - 2021 planning period is 5,452 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.

As indicated in the January 2015 report from the State Department of Housing and Community Development (HCD), the 2013 - 2021 Housing Element was reviewed on January 3, 2014 and is in compliance with State Law.

### *Housing Opportunities*

Housing Element law requires that cities facilitate and encourage the provision of a range in types and prices of housing for all economic and special needs groups. Local government policies that limit or exclude housing for persons with disabilities, lower income people, people who are homeless, families with children, or other groups may violate the Fair Housing Act. **Table IV-2** highlights permitted residential uses in the City.

**Table IV-2  
Housing Opportunities Permitted by Zone**

Housing Type	A-1	R-1	R-2	R-3	R-4	MX
Single-Family Detached	P	P	P	X	X	P
Single-Family Attached	X	X	P	P	P	P**
Two-Family (Duplex)	X	X	P	P	P	P**
Multiple-Family	X	X	P	P	P	CUP
Manufactured Home	P	P	P	X	X	X
Mobile Home Parks	X	X	CUP	CUP	X	X
Senior Housing	X	X	P*	P*	P*	P*
Second Units	P	P	P	P	P	P
Live/Work	X	X	X	X	X	P
Community Care Facilities (one to six persons)	P	P	P	P	X	P
Community Care Facilities (seven or more persons)	X	X	P	P	P	CUP
Emergency (Homeless) Shelter	X	X	X	CUP	X	X
Transitional Housing	X	P	P	P	P	CUP

Source: City of Palmdale Zoning Ordinance, 2015.

P: Permitted by right

CUP: Requires Conditional Use Permit

\*With approval of a Density Bonus Agreement.

\*\* Allowed in conjunction with commercial use or with mixed use development plan.

X: Not permitted

*Single and Multi-family*

Single-family residences are a principally permitted use in residential zones. Multiple-family residences with five (5) or more units, townhomes and condominiums are permitted by right in R-2, R-3, R-4 and the MX (Mixed Use Overlay) zones. As discussed later in this chapter, HCD typically requires jurisdictions which require conditional use permits for multiple-family in residential zones to eliminate the requirement. The use of a conditional use permit can at times constrain the development of multiple-family housing, because the project is subject to a public hearing and can be appealed to the City Council. The City of Palmdale is in compliance with HCD requirements pertaining to the zoning of multi-family developments.

*Manufactured Housing*

State law requires cities to permit manufactured housing and mobile homes on lots for single-family dwellings provided that the manufactured home meets the location and design criteria established in the Zoning Ordinance.<sup>1</sup> The City's Zoning Ordinance explicitly defines manufactured housing as follows:

Manufactured home shall mean a residential dwelling unit manufactures in sic a manner that all concealed parts or processes of manufacture cannot be inspected before

<sup>1</sup> California Government Code, § 65852.3

installation at the building site without disassembly, damage, or destruction of the part which is either wholly or partially assembled on-site as permitted by the State of California and Federal Laws.

Manufactured homes are explicitly provided for within the Zoning Ordinance provided that they are installed or constructed in accordance with the minimum construction standards for a single family detached home and not more than ten years has elapsed between the date of manufacture and the date of application for the issuance of the permit to install the manufactured home.

### *Mobile Home Parks*

State law requires that jurisdictions accommodate a mobile home park within their community; however, a city, county, or a city and county may require a use permit. A mobile home park refers to a mobile home development built according to the requirements of the Health and Safety Code, and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development.<sup>2</sup> In compliance with State Law, the City permits mobile home parks in the R-2 (Medium Residential) and R-3 (Multiple Residential) zones, subject to a Conditional Use Permit.

### *Accessory Units*

Enacted in 2002, AB1866 requires cities to use a ministerial process to consider and approve accessory units proposed in residential zones.<sup>3</sup> According to HCD, a local government must "...accept the application and approve or disapprove the application ministerially without discretionary review..." In order for an application to be ministerial, the process must apply predictable, objective, fixed, quantifiable, and clear standards. These standards must be administratively applied to the application and not otherwise be subject to discretionary decision-making by a legislative body. The City allows accessory dwelling units in all residential zones, permitted with an administrative approval. Therefore, the City is in compliance with AB1866.

### *Emergency Shelters/Transitional Housing*

State law requires cities to identify adequate sites, appropriate zoning, development standards, and a permitting process to facilitate and encourage development of emergency shelters and transitional housing. The courts have also passed subsequent rulings.<sup>4</sup> To that end, HCD requires jurisdictions to designate a zone and permitting process to facilitate the siting of such uses. If a conditional use permit is required, the process to obtain the conditional use permit may not unduly constrain the siting and operation of such facilities. The City's Zoning Ordinance provides for emergency (homeless) shelters in the R-3 zone with a conditional use permit and the C-2 zone as of right. Within the A-1 and R-1 zones, Transitional and Supportive Housing are a permitted use within a single-family dwelling unit. Within the R-2, R-3 and R-4 zones, Transitional and Supportive Housing with four or fewer units are permitted with administrative approval and with 5 or more units with Site Plan Review approval. Therefore, the City is in compliance with SB 2.

---

<sup>2</sup> California Government Code § 65852.7

<sup>3</sup> California Government Code § 65852.2

<sup>4</sup> Hoffmaster v. City of San Diego, 55 Cal.App.4th 1098.

### *Residential Care Facilities*

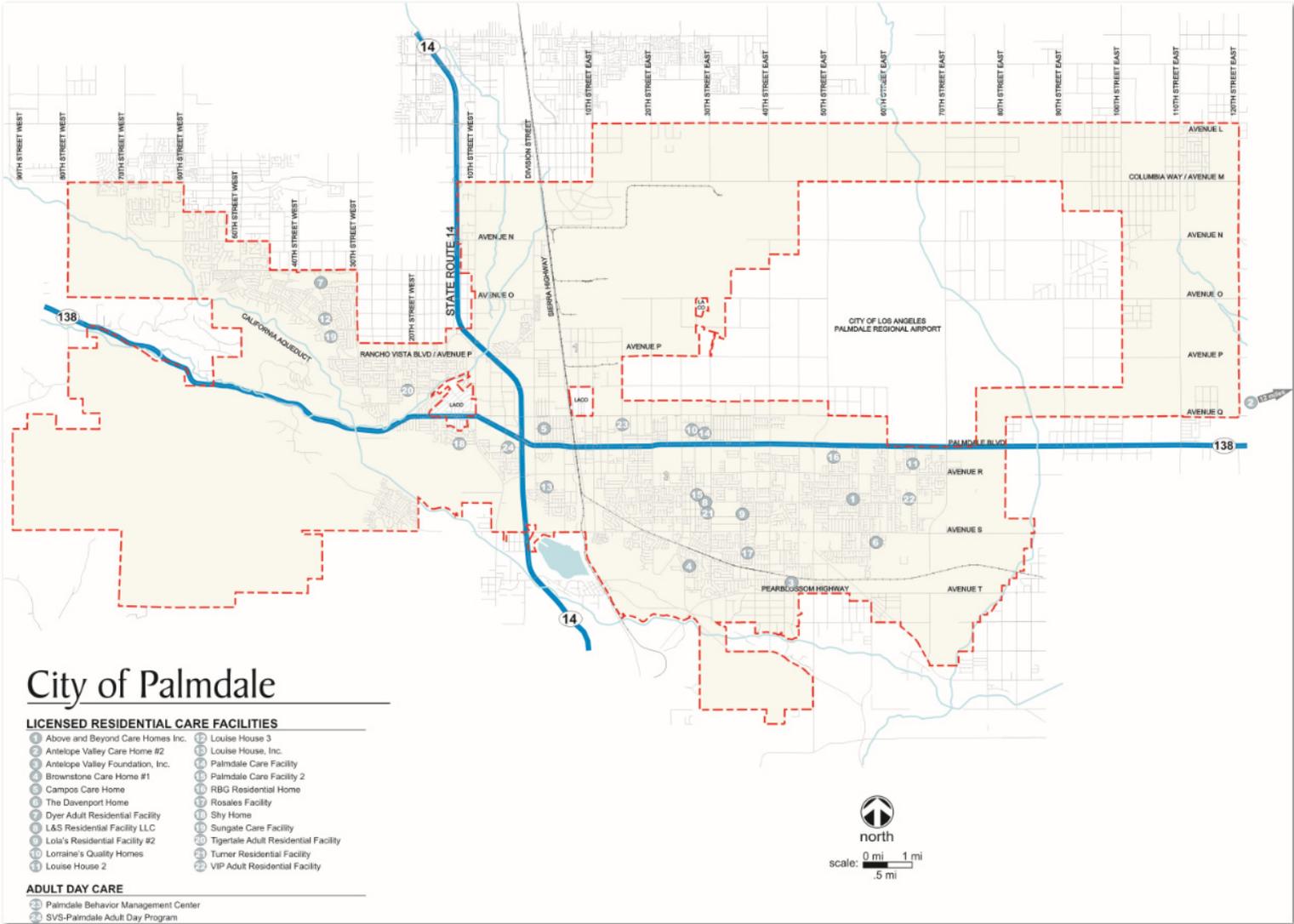
The Lanterman Developmental Disabilities Services Act declares that mentally, physically, and developmentally disabled persons, children and adults who require supervised care are entitled to live in normal residential settings. State law requires that licensed residential care facilities serving six or fewer persons be treated as a residential use under zoning, be allowed by right in all residential zones, and not be subject to more stringent development standards, fees, taxes, and permit procedures than required of the same type of housing (e.g., single-family homes) in the same zone.<sup>5</sup> **Map IV-2** and **Table IV-3** illustrates the distribution of such facilities throughout Palmdale.

The City allows licensed residential care facilities serving six (6) or fewer clients as a principally permitted use in the A-1, R-1, R-2, and R-3 zones. As of 2015, 24 licensed residential care facilities provide accommodations to over 194 residents as shown in **Table IV-3**. Residential care facilities serving seven (7) or more clients are allowable in the R-2 and R-3 zones.

---

<sup>5</sup> California Welfare and Institutions Code, §5000 et. seq. California Health and Safety Code, §1500 et. seq.

Map IV-2  
Licensed Residential Care Facilities



**Table IV-3  
Licensed Residential Care Facilities**

No.	Facility	Address	Capacity
<b>Adult Residential Facility</b>			
1	Above and Beyond Care Homes Inc.	5363 Meredith Avenue	4
2	Antelope Valley Care Home #2	39717 171 Street E.	6
3	Antelope Valley Foundation, Inc.	36448 Rodeo Street	6
4	Brownstone Care Home #1 (Pending License)	36736 Fiddleneck Court	6
5	Campos Care Home	226 E. Avenue Q-3	6
6	The Davenport Home	5722 Paddington Drive	6
7	Dyer Adult Residential Facility	40643 Champion Way	4
8	L&S Residential Facility LLC	37607 29 <sup>th</sup> Street E.	2
9	Lola's Residential Facility #2	37427 Lilacview Avenue	4
10	Lorraine's Quality Homes	2641 East Avenue Q-4	4
11	Louise House 2	6455 Tuscan Court	6
12	Louise House 3	40138 Watford Way	4
13	Louise House, Inc.	233 East Avenue R4	6
14	Palmdale Care Facility	2810 E. Avenue R-15	4
15	Palmdale Care Facility 2	37632 Dalzell Street	4
16	RBG Residential Home	5052 Rainer Avenue	6
17	Rosales Facility (Pending License)	3615 Fairfield Avenue	4
18	Shy Home	38460 Yucca Tree Street	4
19	Sungate Care Facility	3441 Sungate Drive	4
20	Tigertail Adult Residential Facility	2139 Cork Oak Street	4
21	Turner Residential Facility	2923 East Avenue R-10	4
22	VIP Adult Residential Facility	37636 Ruby Lane	6
<b>Adult Day Care</b>			
23	Palmdale Behavior Management Center	38705 15 <sup>th</sup> Street East	30
24	SVS – Palmdale Adult Day Program	38420 5 <sup>th</sup> Street West STE A-D	60

Source: State of California, 2015.

[http://www.cclld.ca.gov/docs/cclld\\_search/cclld\\_search.aspx](http://www.cclld.ca.gov/docs/cclld_search/cclld_search.aspx)

*Fair Housing Impediment Study: Review of the General Plan and Zoning Ordinance*

This Analysis of Impediments to Fair Housing Choice includes the review 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 has been interviewed. Non-profit developers specializing in the creation of housing designed to address the special needs of persons with disabilities were solicited for their input. The

data were analyzed to distinguish between regulatory and practice impediments described by the jurisdiction. **Table IV-4** summarizes the results of this study.

**Table IV-4  
Fair Housing Impediment Study**

Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Regulatory	Yes	Definition of "Family"	No definition of "Family" is contained in the Zone Code.	City uses "Family" definition set forth in State Codes.
Regulatory	Yes	Definition of "Disability"	No definition of "Disability" is contained in the Zone Code.	City uses "Disability" definition set forth in State Codes.
Practice	Yes	Personal Characteristics of residents considered?	City does not regulate or consider residents personal characteristics.	City encourages and permits ADA housing improvements
Practice	Yes	Mischaracterize ADA housing as "Boarding, Rooming House or Hotel"?	City provides for group housing as mandated by State law.	City complies with State law regarding housing opportunities. City does not restrict housing opportunities for individuals with disabilities.
Practice	Yes	On-site supporting services permitted	City provides for on-site ADA supporting services.	City complies with State law regarding ADA services.
Regulatory	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.
Regulatory	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.

## Analysis of Public Policy Impediments

Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Regulatory	Yes	Variations & Exceptions to zoning and land-use rules.	City requires a public hearing for all zoning variance as required by State law.	City complies with State law regarding the granting of variances and exceptions to zoning and land-use rules.
Regulatory	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 the Director's review and uses subject to a CUP or Site Plan Review. The MX Zone permits a residential density of 10 DU/ac.
Regulatory	Yes	Zoning Exclusion regarding Discrimination	City does not exclude or discriminate housing types based on race, color sex, religion, age, disability, marital or family 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.
Regulatory	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.
Regulatory	Yes	Zoning for ADA accessibility	City's Building Code provides for ADA access.	City's zone code defers to the Building Code regarding ADA access.
Regulatory	Yes	Occupancy Standards and Limits	City zone code does not limit occupancy. The State Building and Housing Codes establish criteria to define overcrowding .	City codes comply with State law.
Regulatory	Yes	Zoning for Fair Housing	City's Housing Element promotes Fair Housing, Zone	City's General Plan promotes and requires compliance

## Analysis of Public Policy Impediments

Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
			Code does not conflict with that policy.	with all Fair Housing laws and policies.
Regulatory	Yes	Handicap Parking for Multi-Family Development	City's Building Codes require 1 handicap parking space for each 40 required parking spaces.	City codes comply with State and Federal requirements.
Regulatory	Yes	Is a CUP required for Senior Housing?	City does not distinguish between senior citizen housing and other single-family or multi-family housing.	Developers often request modification of housing standards for senior citizen housing such as smaller dwelling sizes and reduced off-street parking.
Regulatory	Yes	Does City distinguish between handicapped housing and other types of single-family or multi-family housing?	City does not require a CUP for Handicapped Housing.	City complies with State and Federal law regarding ADA designed housing.
Regulatory	Yes	How are "Special Group Housing" defined in the zone code?	City defines "Special Group Housing" as set forth in State law.	City complies with State and Federal law regarding "Special Group Housing".
Regulatory	Yes	Does the City's Building and planning codes made specific reference to accessibility requirements as set forth in the 1988 Fair Housing Act?	City adopted California State Building & Housing Codes.	Building Department reviews all plans for compliance with adopted codes. Monitoring is the responsibility of the building department.

The City of Palmdale is committed to furthering and improving fair housing opportunities so people in all walks of life have the opportunity to find suitable housing in the community. To that end, the City contracts with a fair housing service provider to provide landlord/tenant education, conduct testing of the rental and ownership market, and investigate and

mediate housing complaints where needed. The City periodically prepares the required federal planning reports, including the analysis of Impediments to Fair Housing Choice, to document the City's progress in improving and maintaining fair housing opportunities. The City of Palmdale has adopted General Plan policies and programs that promote Fair Housing goals and objectives in accordance with State mandate. All City Planning and Building regulations implement the City's adopted policies with respect to Fair Housing.

**B. Development Policy**

*Development Standards*

The Zoning Ordinance provides design and development standards regarding where housing can be located. The Zoning Ordinance establishes minimum residential development standards to ensure the construction of quality housing, to preserve and protect neighborhoods, and to further broader City goals. **Table IV-5** summarizes these standards.

**Table IV-5  
Residential Development Standards**

Standard	Zone				
	A-1	R-1	R-2	R-3	R-4
Density (units/acre)	1.0	6.0	10.0	16.0	30-60
Minimum Lot Size (sf.)	1-acre	7,000	4,000/du	20,000	40,000
Maximum Lot Coverage	n/a	40%	50%	50%	80%
Maximum Height (stories)	2.0	2.0	2.0	3.0	5.0
Front/Rear Yard (ft.)	35/35	15/20	20/15	20/15	0-5/15
Parking Space Requirement	2-spaces in a garage.			1-covered space	1 covered space

Source: Palmdale Zoning Ordinance, 2015.

*Local Government Fees*

Since the passage of Proposition 13 in 1978, local governments have had to diversify their revenue sources. As reliance on General Fund revenues declined, local governments began charging service fees and impact fees to pay for City services needed to support the development of new housing. The City currently charges fees and assessments to cover the costs of processing permits and providing services for residential projects.

**Table IV-6** compares the minimum fees charged by Palmdale with those of Santa Clarita and Lancaster. As indicated in the table, the fees charged by the City are reasonable to those of the neighboring communities surveyed. Given the modest level of City fees, they are not deemed to be a constraint to the production of single-family housing in Palmdale.

**Table IV-6  
Comparison of City Permit Fees**

Permit	Palmdale	Santa Clarita	Lancaster
Conditional Use Permit	\$1,175 on up	\$6,260	\$1,381 on up
Conditional Use Permit Modification	-	-	\$954 on up
Variance	\$1,750	\$6,260	\$4,467
Tentative Tract	\$3,000 + \$25/per lot	\$18,825	\$7,913
Tentative Parcel Map	\$3,000 + \$25/per lot	\$13,530	\$7,313
Lot Line Adjustment	-	-	\$133
Zone Change	\$3,000	\$19,565	\$6,736
General Plan Amendment	\$3,000 + \$50/per acre	\$17,760	\$9,627
Zoning Regulation Amendment	\$2,250	-	-
Appeal Planning Commission	\$750	\$3,020	\$1,221

Source: City of Palmdale, Santa Clarita and Lancaster, 2015.

State law allows local governments to charge fees necessary to recover the reasonable cost of providing services. State law also allows local governments to charge impact fees provided the fee and the amount have a reasonable nexus to the burden imposed on local governments. While the fees in Palmdale constitute a high percentage of housing development prices, the fees are necessary to provide an adequate level of services and mitigate the impacts of housing development. To facilitate affordable housing development and to off-set the impact of these fees on development costs, the City has the ability to “gap-finance” projects with various sources.

*Building Codes*

Building codes are enacted to ensure the construction of quality housing and further public health and safety. Ensuring that buildings are accessible to people with disabilities is an important way to improve fair housing. However, the rigid adherence to non-essential codes may indirectly create discriminatory impacts on people with disabilities. The following discusses the City’s building codes and applicability to persons with disabilities.

The City of Palmdale has adopted the 2013 edition of the California Building Code, based upon the 2012 International Building Code with local amendments. 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. The California Building Standards Commission updates these codes every three years based on updates to uniform codes adopted by professional associations (such as the ICBO).

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*

Cities that use federal funds must meet federal accessibility guidelines that accommodate people with disabilities. For new construction and substantial rehabilitation, at least 5 percent of the units must be accessible to persons with mobility impairments and an additional 2 percent of the units must be accessible to persons with sensory impairments. New multiple-family housing must also be built so that: 1) the public and common use portions of such units are readily accessible to and usable by disabled persons; 2) the doors allowing passage into and within such units can accommodate wheelchairs; and 3) all units contain adaptive design features.<sup>6</sup>

The Federal Department of Housing and Urban Development also recommends, but does not require, that the design, construction and alteration of housing units incorporate, wherever practical, the concept of visitability. This recommendation is in addition to requirements of Section 504 and the Fair Housing Act. Recommended construction practices include wide enough openings for bathrooms and interior doorways and at least one accessible means of egress/ingress for each unit.<sup>7</sup>

The City's adopted Building Code contains and incorporates the latest accessibility standards promulgated by the state and federal government. The City checks plans for compliance with State and Federal accessibility law so that privately owned and publicly assisted housing with four or more units meets accessibility requirements of the Fair Housing Act. The City of Palmdale enforces all federal and state accessibility laws but does not require additional accessibility standards in excess of state and federal law.

### *Reasonable Accommodation*

Because a portion of the Palmdale housing stock was built well before the advent of modern accessibility standards, there are times when residents need to modify their home to allow access for persons with disabilities. The City encourages property owners to install features that accommodate people with disabilities (e.g., ramp to the front door, etc.). Such requests are approved upon payment of building permit and plan check fees, as applicable.

In 2001, the State Office of the Attorney General issued a letter encouraging local governments to adopt a reasonable accommodation procedure.<sup>8</sup> The Department of Housing and Community Development has also urged the same. The federal Fair Housing

---

<sup>6</sup> Section 804(f)(3)(C) of the Fair Housing Act

<sup>7</sup> HUD Directive, Number 00-09.

<sup>8</sup> State Office of Attorney General, May 15, 2001.

Act and California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodation when such accommodation may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The State Attorney also provided guidance on the preferred procedure.

The City of Palmdale adopted Zoning Ordinance Amendment 04-02 on July 12, 2004 which established a formal procedure for persons with disabilities seeking equal access to housing to request reasonable accommodation in the application of the City's zoning laws and to establish relevant criteria to be used when considering such requests.

In the City of Palmdale, a request for reasonable accommodation may be made by any person with a disability, their representative or any entity, when the application of a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities. A person with a disability is defined as a person who has a physical or mental impairment that limits or substantially limits one or more major life activities, anyone who is regarded as having such impairment or anyone who has a record of such impairment. The City's reasonable accommodation process is intended to apply to those persons who are defined as disabled under the Federal Fair Housing Act and the California Fair Employment and Housing Act. A request for reasonable accommodation may include a modification or exception to the rules, standards and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice. Requests for reasonable accommodation may be submitted on an application form provided by the Planning Department, or in the form of a letter, to the Director of Planning and shall contain the following information:

- a. The applicant's name, address and telephone number;
- b. Address of the property for which the request is being made.;
- c. The current actual use of the property;
- d. The basis for the claim that the individual is considered disabled under the Acts;
- e. The zoning code provision, regulation or policy from which reasonable accommodation is being requested; and
- f. Why the reasonable accommodation is necessary to make the specific property accessible to the individual.

If the project for which the request for reasonable accommodation is being made also requires some other discretionary approval (including but not limited to, conditional use permit, site plan review, general plan amendment, zone change, annexation, etc.) then the applicant shall file the information required together for concurrent review with the application for discretionary approval.

Requests for reasonable accommodation are reviewed subject to an Administrative Review procedure. Generally, applications for reasonable accommodations shall be submitted to the Planning Department. In making a determination regarding the reasonableness of a requested accommodation, the City considers the following factors:

1. Special need created by the disability;
2. Potential benefit that can be accomplished by the requested modification;
3. Potential impact on surrounding uses;
4. Physical attributes of the property and structures;
5. Alternative accommodations which may provide an equivalent level of benefit;

6. In the case of a determination involving a single-family dwelling, whether the structure would be considered a single housing unit if it were not using special services that are required because of the disability of the residents;
7. Whether the requested accommodation would impose an undue administrative burden on the City; and
8. Whether the requested accommodation would require a fundamental alteration in the nature of a City program or law, including but not limited to land use and zoning.

In evaluating an application regarding the reasonableness of a requested accommodation, the Planning Director shall determine that the request satisfies the requirements and, if granted, is consistent with the General Plan and all applicable codes and ordinances. Prior to rendering a decision, the Planning Director provides written notice to contiguous property owners of the request for reasonable accommodation. Such notice shall contain a description and location of the request and the anticipated decision date, and shall allow ten (10) days to submit comments to the City. Upon receipt of response(s) from contiguous owner(s) or the passage of ten (10) days, whichever occurs first, the Director may render a decision.

### *Permit Processing*

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 work toward improving the efficiency of building permit and review processes by providing one-stop processing, thereby eliminating the necessary 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.<sup>9</sup>

The City development approval process is designed to accommodate, not hinder, development. The City of Palmdale is committed to processing a project application within 30 days of submittal to deem a project application complete or incomplete. Once a project is deemed complete, it is scheduled for a hearing before either the Hearing Officer or the Planning Commission. A project only proceeds to the City Council if it requires a legislative act such as a General Plan Amendment or Zone Change or is appealed. In total, the entire process takes approximately 10-15 weeks to complete, depending on the type of applications and the approvals necessary.

If a housing project does not require a discretionary approval (four or fewer dwelling units requires an administrative approval only), the average time for processing a plan check is 4-8 weeks. If the project requires a discretionary approval as previously described, the process, due to noticing requirements, project revisions, and the generation of staff reports, typically takes eight to twelve weeks. If the project requires a legislative act by the City Council such as a General Plan Amendment or Zone Change in conjunction with the discretionary project, an additional five to six weeks is typically required to allow for preparation for and scheduling of the public hearing.

---

<sup>9</sup> Government Code Section 65920 et seq.

To mitigate the entitlement costs involved with developing affordable housing, the City allows priority development review processing for low and moderate income housing applications, as well as housing for the elderly. Expedited review processing can be concluded in 4-6 weeks. Processing times vary with the complexity of the project. Single-family homes and other minor tenant improvements can typically be processed with a 3-4 week turnaround time. Other projects requiring Conditional Use Permits, Zoning Ordinance Amendments, or other discretionary actions necessitate a higher level of review, resulting in a longer processing timeline. As supported by reasonable processing times, and the relative facility of permit procedure, the City is processing and permit procedures are not felt to constrain the development of housing.

### *Assessment*

HCD reviews development processing procedures to ensure that such procedures facilitate and encourage the construction of housing for all income levels. HCD often considers that a conditional use permit on multiple-family housing subjects the project to NIMBYism that lead to rejection of a project that otherwise complies with City regulations. The determination often is predicated on whether sufficient sites are available within a city to accommodate their share of regional housing needs.

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

### *Community Representation*

The City values citizen input on how well city government serves its residents. The City Council relies on its Planning Commission, advisory commissions, and boards to provide advice and recommendations in areas of City services. Palmdale 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 located within the City of Palmdale; however, the Housing Authority of the County of Los Angeles (HACOLA) does own and operate public housing in nearby Quartz Hill. The City reviewed HACOLA's tenant selection procedures for the units available in Quartz Hill. This review did not reveal any impediments to fair housing choice. Based on information provided by HACOLA, no complaints were received from prospective tenants alleging discrimination or unfair practices in the Housing Authority's selection of tenants to occupy public housing projects.

### *Residential Anti-Displacement Policy*

It is the policy of the City of Palmdale to comply with the requirements of Section 104(d) of the Housing and Community Development Act of 1974 with respect to the prevention and

---

<sup>10</sup> Government Code Section 65589.5.

minimization of residential displacement as a result of the expenditure of HUD assistance. The City's Consolidated Plan, Chapter III, provides the City of Palmdale Residential Anti-Displacement Policy.

### **C. Housing—Employment—Transportation Linkage**

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

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

#### *Housing Programs*

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

#### *Rental Assistance*

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

#### *Housing Programs Included in the 2013-2021 Housing Element*

The following includes a listing of the goals, objectives and policies to be implemented during the current Housing Element planning period to provide decent, affordable housing accessible to all residents.

Goal No. H.1 - The City of Palmdale will promote the construction of new housing affordable to all income groups.

Objective H1.1: Provide adequate sites at a range of densities to accommodate future housing needs.

- Policy H1.1.1: Encourage a variety of housing types such as single-family attached (townhouses), multifamily units, planned unit developments mixed use housing and other housing types that make housing more affordable.

- Policy H1.1.2: Encourage the development of new affordable units through the provision of incentives.
- Policy H1.1.3: Encourage the development of housing affordable to lower income groups in areas well served by public transportation, schools, retail and other services.
- Policy H1.1.4: Ensure that all necessary support services can be provided to new developments.
- Policy H1.1.5: Replace housing units demolished by City action.
- Policy H1.1.6: Enforce minimum standards for new residential construction as provided by the Citywide Zoning Ordinance adopted in 1994.
- Policy 1.7: Expedite permit processing.

Goal No. H2 - The City of Palmdale will preserve and improve the existing supply of affordable housing.

Objective H2.1: Bring existing housing units up to an established standard of habitability.

- Policy H2.1.1: Enforce existing standards of habitability.
- Policy H2.1.2: Provide rehabilitation assistance to homeowners and to owners of multifamily rental housing when those owners agree to maintain the affordability of assisted units.
- Policy H2.1.3: Provide grants and loans to owner-occupants of single-family homes and mobile homes for emergency repairs and rehabilitation.
- Policy H2.1.4: Require that all units developed under any of the City affordable housing programs remain affordable for the longest possible time or at least 30 years.

Objective: H2.2: Maintain the affordability of leased mobile home spaces for seniors and low-income families.

- Policy H2.2.1: Use regulatory and financial tools to make mobile home spaces permanently affordable.

Objective H2.4: Preserve existing units with expiring federal, state or local subsidies.

- Policy H2.4.1: Preserve or replace units with expiring subsidies.

Goal No. H3 - The City of Palmdale will remove government constraints on housing.

Objective H3.1: Assess financial impacts of zoning changes on housing affordability.

- Policy H3.1.1: Assess financial impacts of zoning changes on housing affordability.
- Policy H3.1.2: Assess feasibility of land use concessions and fee reductions to make new housing more affordable.
- Policy H3.1.3: Revise the Zoning Ordinance when necessary to remove constraints in compliance with State law.

Goal No. H4: The City of Palmdale will promote equal housing for all persons regardless of race or color, religion, sex, familial status, ancestry or handicap (California's Fair Employment and Housing Act protects against housing discrimination on the basis of color, disability – including AIDS or HIV status – familial status, marital status, national origin, race, religion, sex, sexual orientation and source of income.)

Objective H4.1: Promote fair housing practices and prohibit discrimination.

- Policy H4.1.1: Ensure compliance with fair housing laws by adopting development guidelines that encourage the development of mixed income housing in every zone district and in every area of the community.
- Policy H4.1.2: Provide fair housing services that include public information, counseling and investigation.
- Policy H4.1.3: Prohibit discrimination in housing.

Goal No. H5: The City of Palmdale will adequately house households with special needs.

Objective H5.1: Expand the supply of affordable housing for senior citizens.

- Policy H5.1.1: Permit a variety of housing types for seniors including dependent housing units and congregate housing with services.
- Policy H5.1.2: Support independent living for the elderly and disabled.
- Policy H5.1.3: Establish and maintain standards for units designated as senior units to ensure that these units are accessible and convenient for older persons.
- Policy H5.1.4: Encourage creation of senior housing with convenient access to transportation and commercial, recreational, cultural, civic and senior services by establishing a Senior Housing Target Area near the Senior Center in downtown Palmdale and by providing financial incentives for development of senior housing units in this target area.
- Policy H5.1.5: Conduct a design review to ensure that units designated as senior units are accessible and meet established design guidelines for such units.

Objective H5.2: Address the problems of homeless persons

- Policy H5.2.1: Provide emergency food, shelter and referrals to homeless and very low-income individuals and families in Palmdale.
- Policy H5.2.2: Maintain adequate sites or land use categories where the development of shelters for the homeless is permitted.
- Policy H5.2.3: Cooperate in regional homeless assistance feasibility studies.
- Policy H5.2.4: Provide referral services and accept referrals from the new Antelope Valley Access Center for emergency housing placement.

Objective H5.3: In compliance with California Redevelopment Law, fund affordable multifamily rental housing for families.

- Policy H5.3.1: Ensure that units for large families are included in new affordable rental housing development.

Objective H5.4: Increase handicapped access to housing

- Policy H5.4.1: Ensure access for the disabled in residential, commercial and public structures.
- Policy H5.4.2: Provide assistance to lower income households in retrofitting their homes for handicapped access.
- Policy H5.4.3: Educate property managers about the reasonable accommodation provisions of the Americans with Disabilities Act and federal and state fair housing laws through the PAC program and the fair housing services provider.

Goal No. H6: The City of Palmdale will implement energy and water conservation measures.

Objective H6.1: Implement energy and water conservation measures.

- Policy H6.1.1: Ensure that energy and water conservation measures are included in all new development through the use of an energy conservation checklist.
- Policy H6.1.2: Inform the public about retrofitting their homes with energy and water conservation measures.
- Policy H6.1.3: Incorporate xeriscape as a condition of approval for all subdivisions and housing projects.
- Policy H6.1.4: Enforce all California Building Code and California Administration Code Title 24 conservation measures.

Goal No. H7: The City of Palmdale will enhance the vitality and safety of existing residential neighborhoods.

- Policy H7.1.1: Actively enforce compliance with health, safety, building, fire, law enforcement and other regulations in all neighborhoods.
- Policy H7.1.2: Actively enforce the City's property maintenance ordinance.
- Policy H7.1.3: Improve property maintenance and management by training owners and managers.

Goal No. H8: The City of Palmdale will promote neighborhood versatility by encouraging a mix of new housing alternatives to increase affordability and promote home ownership.

Objective H8.1: Use planning and land use techniques to create more affordable new housing.

- Policy H8.1.1: Encourage voluntary inclusionary housing.
- Policy H8.1.2: Evaluate the feasibility of small lot, reduced setbacks or other modifications to reduce costs.
- Policy H8.1.3: Encourage mixed use housing in designated areas along transportation corridors and other commercial strips.
- Policy H8.1.4: Encourage transit-oriented development near the Palmdale Transportation Center.

### *Public Services and Facilities*

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

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

Public Facility	Location
Palmdale Senior Center	1002 E. Avenue Q-12
Palmdale City Library	700 E. Palmdale Boulevard
Larry Chimbole Cultural Center	38350 Sierra Highway
Palmdale Playhouse	38334 10 <sup>th</sup> Street East
Palmdale Amphitheater	2723 Rancho Vista Boulevard (Ave. P)

Public Facility	Location
Hammack Activity Center	815 E. Avenue Q-6
Palmdale Transportation Center	3900 Clock Tower Plaza Drive
Palmdale Regional Airport	39516 N. 25 <sup>th</sup> Street East
Palmdale Oasis Park & Rec. Center	3850-A East Avenue S
Palmdale Oasis Pool	3850-C East Avenue S
Dry Town Water Park	3850-B East Avenue S
South Valley WorkSource Center	1817 E. Avenue Q, Suite A-12
Poncitrán Square	38315 9th Street East
Barrel Springs Trail and Arena	Sierra Highway & Barrel Springs Road
Joshua Ranch Trail	Located near Highland High School
Best of the West Softball Complex	2723-F Rancho Vista Boulevard
Melville J. Courson Park	38226 10th Street East
Pelona Vista Park	37800 Tierra Subida Avenue
Manzanita Heights Park	431 Mesa Verde Avenue
Marie Kerr Park	39700 30th Street West
Marie Kerr Recreation Center	2723-A W. Rancho Vista Blvd.
Marie Kerr Park Pool	2723-C W. Rancho Vista Blvd.
Hillside Park	41003 50th Street West
Desert Sands Park	39117 3rd Street East
Joe Davies Heritage Airpark at Palmdale Plant 42	2001 East Avenue P
William J. McAdam Park	38115 30th Street East
Domenic Massari Park	37716 55th Street East

Source: City of Palmdale, 2015.

*Housing—Employment—Transportation Linkage*

Public transit helps move people who cannot afford personal transportation or who elect not to drive. Elderly and disabled persons also rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Many lower income persons are also dependent on transit to go to work. 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.

**Local and Regional Services.** The Antelope Valley Transit Authority (AVTA) was formed as a Joint Powers Authority to serve the cities of Palmdale, Lancaster, and surrounding communities in the Antelope Valley. AVTA provides local service routes, commuter services and specialized transit services to seniors and disabled people.

AVTA has 10 local routes serving the City of Palmdale, as shown in **Table IV-8**. Local transit service operates Monday through Friday from 6 A.M. to 11 P.M. On weekends, the service operates from 7 A.M. to 7 P.M. AVTA has a “leave no passenger behind” policy

that requires all final runs of the day to wait for connecting buses (at each transfer center).

**Table IV-8  
AVTA Local Service Routes in Palmdale**

Line	Weekday Times	Description
<i>Core Routes</i>		
1	5:35 A.M. – 11:55 P.M.	Servicing Lancaster Senior Center, all along 10th Street West, and Ave. S and 47th Street East in Palmdale.
2	6:00 A.M. – 11:55 P.M.	Servicing Antelope Valley Mall, 10th St. West, Palmdale Blvd., 40th St. East, AV Medical Center, Ave. R, and 47th St. East, with connections to Rt. 3 at 47th and Ave. S, and AV Mall.
3	5:45 A.M. – 11:05 P.M.	Servicing Antelope Valley Mall, Ave. P, 10th St. West, Ave. R, 40th St. East and Ave. S, with connections to Rt. 2 at AV Mall and 47th and Ave. S.
6	6:30 A.M. – 8:42 P.M.	Servicing Pearblossom Hwy., 82nd St. East, Ave. T, 87th St. East, Ave. U, 96th St. East, Ave. S, 110th St. East, Ave. R, 90th St. East, Palmdale Blvd, and Littlerock High, with connections at 47th St. East and Ave. S.
7	5:15 A.M. – 9:15 P.M.	Servicing Quartz Hill from the Palmdale Transportation Center to AV Mall, Rancho Vista Blvd. & Town Center, 50 <sup>th</sup> Street W. & Avenue M, 60 <sup>th</sup> Street W. & Ave. L, High Desert Hospital, Avenue H & 25 <sup>th</sup> St. W (AV Fair), Avenue I & 10 <sup>th</sup> St. W., Sierra Highway & Lancaster Blvd.
<i>Supplemental Routes</i>		
10 Lancaster / Palmdale Express	7:15: A.M. – 10:25 P.M.	Servicing the University of Antelope Valley, Lancaster City Park, AV Mall, Palmdale Transportation Center, Palmdale Boulevard, and Avenue S & 47 <sup>th</sup> Street E.
Lake L.A. Express	5:51 A.M. – 8:38 P.M.	Servicing Town Center Plaza, Ave. N-8, 155th St. East, Ave. N, 170th St. East, East Ave. J, 20th St. East, East Palmdale Blvd., and 160th St. East, with connections at Palmdale Transportation Center and Lancaster City Park.
4, 97, 99	6:45 A.M. – 8:40 P.M.	Servicing Antelope Valley High School, Eastside High School, Highland High School, and Littlerock High School Areas.

Source: AVTA, 2015.

Cash fares for local transit are \$1.50 one way, \$2.00 for a four (4) hour pass, \$3.75 for an All Day Pass and \$50.00 for a 31-Day Pass. Reduced one-way and pass fares are available for seniors and the disabled as well as persons with a valid Medicare Card. Additionally, senior or disabled persons may ride free on AVTA local transit on weekdays from 9:00 A.M. to 5:00 P.M. and all day on weekends. Children 44 inches and under in

height may ride free on regular transit only. There is a limit of four (4) free children per fare paying adult. Each additional child must pay 25 cents.

In addition to local transit service, AVTA offers three (3) weekday only commuter routes departing from the Palmdale Transit Center, including Route 785 to four (4) destinations in Downtown Los Angeles, Route 786 to four (4) destinations in Century City/West Los Angeles and Route 787 to eight (8) destinations in the West San Fernando Valley.

AVTA also offers two specialized transportation services to disabled people and seniors. Dial-A-Ride provides curb-to-curb transportation for the elderly and persons with disabilities. Each van is lift-equipped, and service is available weekdays from 6:00 A.M. to 7:30 P.M. and weekends from 8:00 A.M. to 5:30 P.M. Dial-A-Ride trips are provided by reservation only. Seniors and disabled people also rely on public transit to visit doctors. To meet this need, AVTA offers a special medical shuttle. AVTA will shuttle riders to major medical facilities in Los Angeles County, including UCLA and USC Medical Center, Kaiser Permanente facilities, Olive View Medical Center, Granada Hills Community Hospital, Veterans Hospitals in Sepulveda and West Los Angeles, and Children's Hospital in Los Feliz.

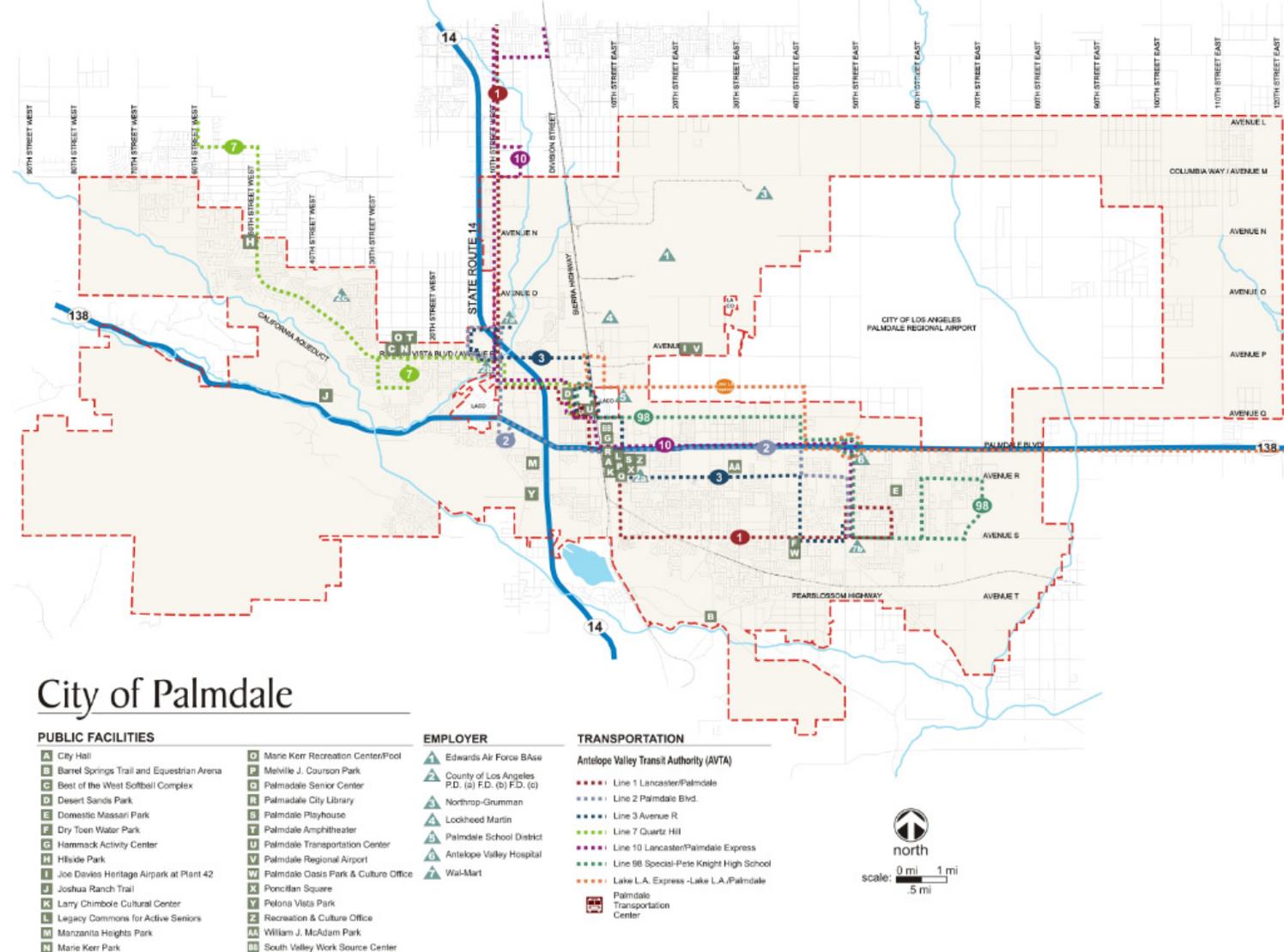
In compliance with the Americans with Disabilities Act (ADA) and Title VI of the Civil Rights Act, all buses are equipped with lifts to carry wheelchairs and other mobility devices allowing people with a disability to board buses. Further, the ADA mandates that transit providers also implement a complementary paratransit service for people whose disabilities prevent them from using fixed-route public transit. Established in 1994, Access Services Incorporated is a nonprofit corporation that provides transit services to disabled people. ASI provides transit services within a  $\frac{3}{4}$  mile radius of any fixed route bus.

The Antelope Valley is served also by Metrolink trains, which run daily along the Antelope Valley Line starting in Lancaster and running south through Santa Clarita, San Fernando, Burbank, Glendale and ending at Union Station in Downtown Los Angeles. Trains begin as early as 4:00 A.M. and end as late as 11:00 P.M. Metrolink is a premier regional rail system, including commuter and other passenger services, which links people to employment and activity centers.

**Service Standards.** AVTA has adopted service standards to ensure a high level of service and equitable distribution of services among the many communities served. Perhaps the most important indicator is route coverage. All areas having a minimum residential density of 3.5 dwelling units per acre or employment density of 10 jobs per acre, as measured over an area of 25 acres, should be provided with a transit service that places 90% of residences and jobs within one-half mile of a bus stop. To provide adequate access to persons with disability, service is available through the AVTA service area within a  $\frac{3}{4}$  mile radius either side of an existing AVTA fixed-route.

**Map 6** shows Public Facilities and Employers in relation to public transportation routes. The current AVTA fixed routes are reflected on the map, which indicates that the major employers and public facilities within the City of Palmdale are all well-served by public transportation lines within  $\frac{1}{2}$  of a mile from a transit line. Based on this analysis, it appears that major transit lines serve areas in the central core of the City with high concentrations of affordable rental housing developments and assisted housing, within approximately  $\frac{1}{2}$  mile of an AVTA fixed route.

Map IV-3  
Transit Access to Public Facilities and Employers



Source: City of Palmdale, 2015.

## Analysis of Current Fair Housing Activity

---

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

The comprehensive fair housing services include:

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

The Outreach Department develops and distributes educational literature and resources that describe ways to prevent housing injustices and the applicable laws that protect against discrimination. The materials are made available free to the public in various languages including English, Spanish, Korean, Mandarin, Armenian, Cantonese and Russian.

- **Housing Discrimination Complaint Investigation:** HRC investigates allegations of housing discrimination under the fair housing laws. The Investigations Department conducts fact finding investigations and proposes potential solutions for victims of housing discrimination. Case resolution can include mediation, conciliation, a referral to state and federal administrative agencies, or referral to HRC's Litigation Department.
- **Tenant and Landlord Counseling:** HRC provides free telephone and in-person counseling to both tenants and landlords regarding their rights and responsibilities under California law and local city ordinances. Housing Counselors are trained in landlord/tenant law. Counselors are also trained to ask basic questions that are likely to reveal potential discrimination without prompting the caller to prematurely identify discrimination as the cause.

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

**A. Fair Housing Education**

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

- **Conduct Training Workshops for Consumers:** The general types of activities conducted for consumers include a comprehensive fair housing presentation, a discussion about common forms of housing discrimination, and a question-and-answer session. During these workshops, HRC also distributes literature that consumers can refer to when specific issues arise.
- **Conduct Training Workshops for Housing Providers:** The general types of activities conducted for housing providers include monthly Fair Housing Certification Training seminars for housing industry professionals at their main office located in Los Angeles. These seminars are tailored to provide detailed analysis of fair housing laws and interpretation, with specific information on discrimination against families with children, people with disabilities, sexual harassment, hate crimes, and advertising.
- **Increase Public Awareness:** The general types of activities conducted to increase public awareness includes developing and distributing hundreds of pieces of multi-lingual literature in the City, aimed at a variety of audiences, describing how housing injustices arise, the laws that protect against housing discrimination, and ways to prevent housing inequality. Materials are distributed during neighborhood visits and via mailings through the City, can also be found in a variety of languages.

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

**Table V-1  
Education and Outreach Provided by HRC in Palmdale**

Location and Activity	2010-2011	2011-2012	2012-2013	2013-2014	Total
Agency Contacts	11,158	47,774	6,949	13,370	79,251
Literature Distribution	284	563	234	475	1,556
Walk-In Clinics	0	0	2	10	12

Source: HRC, 2015.

**Table V-2  
Education and Outreach Provided by HRC – All Service Areas**

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

Source: HRC, 2014.

## B. Fair Housing Discrimination Complaints

### *Discrimination Complaint Intake and Investigation*

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

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 characteristics. The State of California has identified marital status, sexual orientation, ancestry, age, source of income and arbitrary characteristics as additional protected classes.

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

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

HRC handled a total of 51 discrimination complaints over a five-year period from July 1, 2009 to June 30, 2014. **Table V-3** shows the discrimination complaints in Palmdale by complaint

basis. Note that each of the 51 discrimination complaints may have had more than one attributable basis of discrimination.

**Table V-3  
Fair Housing Discrimination Complaints by Basis (Duplicated)**

Basis*	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Age	0	0	0	0	1	<b>1</b>
Ancestry	0	0	0	0	0	<b>0</b>
Arbitrary	0	0	0	0	0	<b>0</b>
Color	0	0	0	0	0	<b>0</b>
Familial Status	0	3	3	1	20	<b>27</b>
Gender	0	2	0	0	1	<b>3</b>
Marital Status	0	0	0	0	0	<b>0</b>
Mental Disability	4	3	3	4	6	<b>20</b>
National Origin	0	0	0	0	3	<b>3</b>
Physical Disability	14	17	10	14	17	<b>72</b>
Race	4	3	2	5	5	<b>19</b>
Religion	0	0	0	0	0	<b>0</b>
Sexual Orientation	0	0	0	0	0	<b>0</b>
Source of Income	0	0	0	0	0	<b>0</b>
<b>Total:</b>	<b>22</b>	<b>28</b>	<b>18</b>	<b>24</b>	<b>53</b>	<b>145</b>

Source: HRC, 2015.

*\*Some complaints included more than one basis of discrimination. This table reflects a duplicated count.*

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

**Table V-4** shows the findings and disposition of the 51 unduplicated discrimination complaints received by HRC in the last five (5) years. Allegations of discrimination based on physical or mental disability remained the most frequently reported to the HRC from July 1, 2009 to June 30, 2014 (72 physical disability complaints and 20 mental disability complaints). The majority of discrimination allegations were sustained as a result of the investigation conducted by HRC.

According to the 2010 A.I., the City of Palmdale averaged 40 discrimination complaints per year from July 1, 2006 to June 30, 2009. Data supplied by HRC in **Table V-4** indicates that the number of fair housing discrimination complaints in Palmdale decreased substantially for the fiscal years ending June 30, 2010, June 30, 2011 and June 20, 2012, then increased from less than 10 per year to 28 in the fiscal year ended June 30, 2014.

**Table V-4  
Fair Housing Discrimination Complaints: Findings and Disposition**

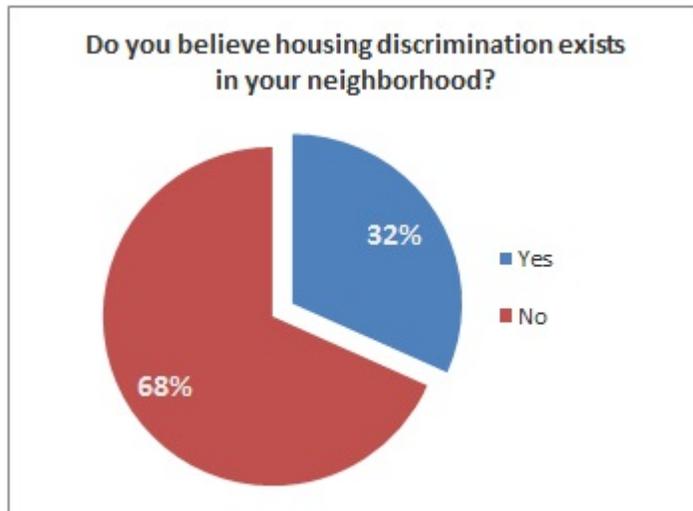
Findings	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Inconclusive Evidence	1	3	0	2	8	14
No Evidence	0	0	0	0	0	0
Pending Finding	0	0	0	0	2	2
Sustains Allegation	4	3	4	6	18	35
<b>Total:</b>	<b>5</b>	<b>6</b>	<b>4</b>	<b>8</b>	<b>28</b>	<b>51</b>
Disposition	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Client Withdrew	1	2	0	0	7	10
No Enforcement Possible	2	3	2	4	13	24
Referred-Private Attorney	0	0	0	0	0	0
Referred to DFEH	0	0	0	0	0	0
Referred to HUD	0	0	0	0	0	0
Pending Finding	0	0	0	0	3	3
FHF Successful Conciliation	2	1	2	4	5	14
<b>Total:</b>	<b>5</b>	<b>6</b>	<b>4</b>	<b>8</b>	<b>28</b>	<b>51</b>

Source: HRC, 2015.

C. Community Perspectives on Fair Housing Discrimination

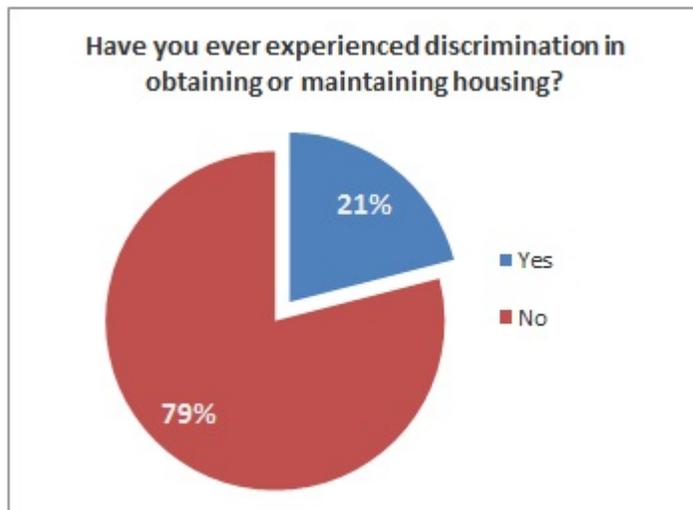
To gather additional perspectives on fair housing choice in Palmdale, residents responding to the 2015-2019 Consolidated Plan Community Survey were asked a series of questions about their personal experience with housing discrimination and whether or not housing discrimination exists in Palmdale. The results of the survey reveal that 68 percent of the 161 people responding to the fair housing questions do not believe housing discrimination exists in their own neighborhood (Figure V-1). As shown in Figure V-2, 34 out of 161 residents or 21 percent indicated that they have experienced discrimination in obtaining or maintaining housing.

Figure V-1



Source: City of Palmdale Consolidated Plan Survey, 2014.

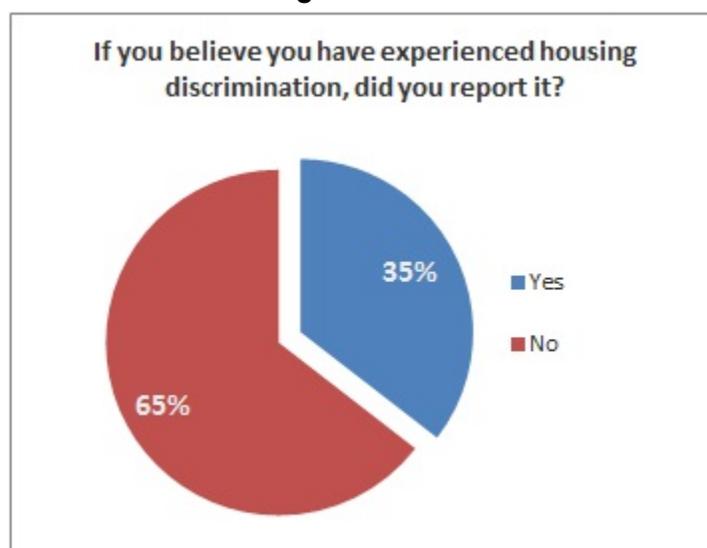
Figure V-2



Source: City of Palmdale Consolidated Plan Survey, 2014.

Of the 34 respondents who believe they have experienced housing discrimination in the process of obtaining or maintaining housing, 22 did not report the perceived discriminatory act or acts (Figure V-3).

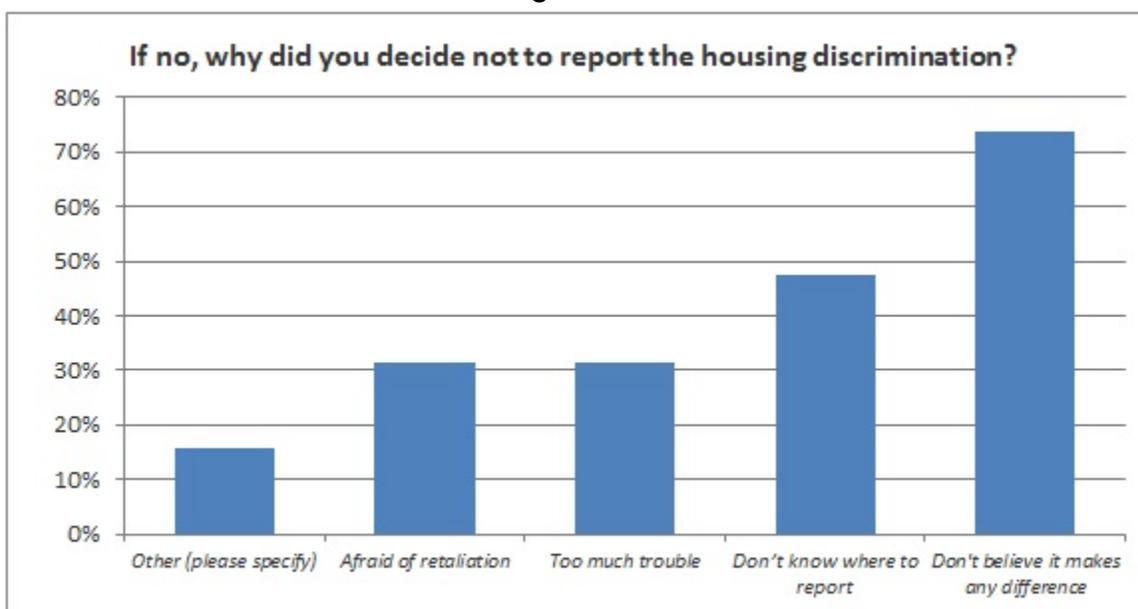
Figure V-3



Source: City of Palmdale Consolidated Plan Survey, 2014.

Of the 22 people who did not report the perceived discrimination to FHF or another competent authority, the majority of respondents shown in **Figure V-4** did not believe it would make any difference or did not know where to seek help addressing the discriminatory act. Other respondents thought it would be too much trouble to report the act or were afraid of retaliation.

Figure V-4



Source: City of Palmdale Consolidated Plan Survey, 2014.

**Table V-5** shows how the 34 residents who believed they were discriminated against categorized the act or acts of discrimination. Residents were able to select more than one basis of discrimination.

**Table V-5  
Basis of Discrimination for Survey Respondents**

Basis of Discrimination	Total
Age	10
Color	7
Disability	9
Familial Status	8
Gender	5
National Origin	6
Race	21
Religion	10
Other	5

Source: 2015-2019 Consolidated Plan Community Survey, 2014.  
*\*Respondents were permitted to indicate more than one basis of discrimination. This table reflects a duplicated count.*

**D. 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 environmental justice. HUD also investigates complaints alleging discriminatory zoning 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 by the federal Fair Housing Act. As of September 30, 2013, there were 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.

## Analysis of Current Fair Housing Activity

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

HUD annually compiles data on housing discrimination complaints filed with HUD or FHAP agencies and issues an Annual Report on Fair Housing to Congress. The most recent Annual Report on Fair Housing was issued by HUD Secretary Julián Castro on November 7, 2014 covering the period of October 1, 2011 to September 30, 2013. The Annual Report on Fair Housing indicates that the overall number of housing discrimination complaints filed with HUD and FHAP declined each fiscal year from 2010-2013. **Table V-6** provides information on the complaints received by HUD and FHAP during this period for the top eight bases of discrimination.

**Table V-6**  
**HUD and FHAP Discrimination Complaints, 2010-2013**

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

Source: HUD Annual Report on Fair Housing 2012-2013, November 7, 2014.

<http://portal.hud.gov/hudportal/documents/huddoc?id=2012-13annreport.pdf>

Note: Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point.

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

All complaints to HUD and FHAP agencies must specify the section of the Fair Housing Act that was allegedly violated or would have been violated. HUD and FHAP agencies record these discriminatory practices in categories known as "issues." **Table V-7** shows the number of complaints filed with HUD and FHAP agencies from 2010 to 2013, broken down by issue. If a single complaint alleged multiple issues, it was counted under each issue alleged.

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

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

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 managers through mediation in a free and timely manner. Mediation takes place within the first 30 days of filing of the complaint, often avoiding the financial and emotional costs resulting from a full DFEH investigation and potential litigation.

## Analysis of Current Fair Housing Activity

**Table V-7**  
**Issues in HUD and FHAP Complaints, 2010-2013**

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

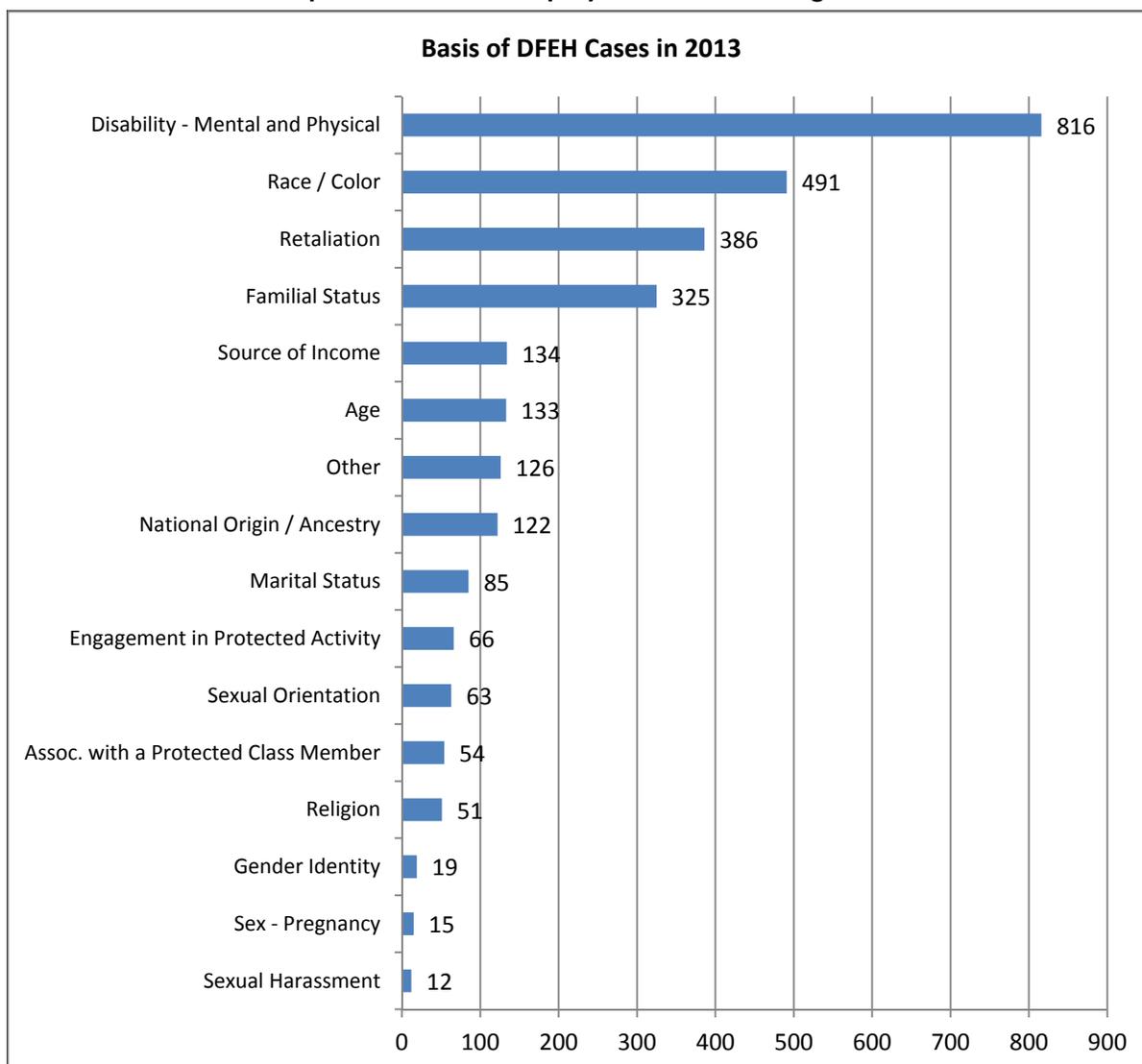
Source: The State of Fair Housing FY 2011 Annual Report

**Note:** Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point

**E. State of California Fair Housing Enforcement**

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

**Figure V-1**  
**State Department of Fair Employment and Housing Cases**



Source: DFEH website: <http://www.dfeh.ca.gov/Statistics.htm>

**F. 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. According to FBI reports<sup>1</sup>, one (1) hate crime case was filed from calendar years 2006 and 2007. The FBI classifies hate crimes into one of five (5) primary bias motivation categories, including: race, religion, sexual orientation, ethnicity or disability. The one (1) hate crime reported for the City of Palmdale was bias classified for ethnicity. As illustrated in **Table V-8**, housing discriminatory 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.

**Table V-8  
Hate Crime Incidents Reported to the FBI in Palmdale 2008 – 2012**

Calendar Year	Race	Religion	Sexual Orientation	Ethnicity	Disability	Total
2012*	10	1	3	3	0	<b>17</b>
2011	9	0	2	1	0	<b>12</b>
2010	4	1	0	1	0	<b>6</b>
2009	6	1	1	1	1	<b>10</b>
2008	7	1	4	2	0	<b>14</b>
<b>Total:</b>	<b>36</b>	<b>4</b>	<b>10</b>	<b>8</b>	<b>1</b>	<b>59</b>

Source: FBI Hate Crime Incidents by State and Agency, 2008-2012. [http://www.fbi.gov/about-us/investigate/civilrights/hate\\_crimes](http://www.fbi.gov/about-us/investigate/civilrights/hate_crimes).

\*Includes one incident reported with more than one bias motivation.

In Palmdale, there were a total of 59 hate crimes reported to the FBI during 2008-2012. The most prevalent hate crime bias motivation reported was race (61.0 percent of all cases). The relatively low occurrence of hate crimes within the community indicates that hate-motivation does not appear to coincide with the incidence of housing discrimination in Palmdale and does not indicate an impediment to fair housing choice.

**G. Fair Housing Legal Status**

From July 1, 2009 to June 30, 2014, no cases were filed in a court of competent jurisdiction by the HRC to enforce fair housing laws. HRC was successful in conciliating or otherwise addressing the fair housing cases that were investigated on behalf of the City of Palmdale during this time period; therefore, there is no litigation to report.

<sup>1</sup> FBI Hate Crime Incidents By State and Agency, 2008-2012. [http://www.fbi.gov/ucr/hc2008/data/table\\_13.html](http://www.fbi.gov/ucr/hc2008/data/table_13.html)

This page intentionally left blank.

Previous chapters of this A.I. study examined changes in Palmdale during the last five (5) years, analyzed public policies for impediments to fair housing, and documented fair housing opportunity in Palmdale. Building upon the previous analysis, this chapter recommends actions to improve housing opportunity in Palmdale. **Table VI-3** at the end of this chapter summarizes the unresolved impediments and recommendations to address these impediments to fair housing choice with an implementation schedule.

**A. Existing Impediments to Fair Housing Choice**

HUD requires the City to analyze past performance with respect to the resolution of impediments to fair housing choice that were identified in prior A.I.s. The 2010 Analysis of Impediments to Fair Housing Choice identified four (4) impediments to fair housing choice, of which three (3) remain unresolved and shall be continued into the Fair Housing Plan for the 2015-2019 planning period.

**1. Discrimination against Persons with Disabilities.** Housing Rights Center (HRC) fair housing discrimination complaint data indicates that a majority of discrimination complaints from 2006-2009 were based on physical or mental disability. The high number of disability-related complaints in Palmdale was consistent with data from other cities at that time and revealed a lack of understanding and sensitivity of the fair housing rights of the disabled.

**2015 Status: Unresolved.** Physical and mental disability fair housing discrimination complaints continue to be the most common basis for fair housing discrimination complaints in Palmdale. **Table VI-1** displays the top six (6) highest number of fair housing discrimination complaints in the City for the last five fiscal years. There were a total of 145 complaints within the last five fiscal years, and 92 (63.4 percent) are related to physical and mental disabilities complaints.

**Table VI-1  
Fair Housing Discrimination Complaints by Basis**

Basis	2009-10	2010-11	2011-12	2012-13	2013-14	Total
Physical Disability	14	17	10	14	17	<b>72</b>
Familial Status	0	3	3	1	20	<b>27</b>
Mental Disability	4	3	3	4	6	<b>20</b>
Race	4	3	2	5	5	<b>19</b>
Gender	0	2	0	0	1	<b>3</b>
National Origin	0	0	0	0	3	<b>3</b>

Source: HRC, 2015.

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

- 2. Lack of Awareness of Fair Housing Laws.** A general lack of knowledge of fair housing rights and responsibilities continues to exist. Increased fair housing complaint intake by the City’s contracted fair housing service provider and interaction with housing providers and housing seekers during workshops demonstrates a lack of understanding of both Federal and State fair housing laws.

**2015 Status: Ongoing.** Data shows a continuing pattern of fair housing discrimination complaints and general inquiries each year. According to the 2010 A.I., the City of Palmdale averaged 40 discrimination complaints per year from July 1, 2006 to June 30, 2009. Data supplied by HRC in 2015 indicates that the number of fair housing discrimination complaints in Palmdale decreased substantially for the fiscal years ending June 30, 2010, June 30, 2011 and June 20, 2012. However, the number of complaints began to increase again from less than 10 per year to 28 in the fiscal year ended June 30, 2014.

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

- 3. Race/Ethnic Relations.** Race/ethnic relations may contribute to bias or stereotypes that have an impact on Fair Housing Choice. Fair housing complaint data from 2006-2009 indicates that race/ethnicity was the second-leading cause of housing discrimination in the City. Further, 33 hate crimes were reported to the Federal Bureau of Investigation (FBI) from 2006-2008—most on the basis of race/ethnicity.

**2015 Status: Ongoing. Table VI-2** illustrates the number of hate crime incidents reported to the FBI in Palmdale from 2008-2012. Hate crime incidents related to race and ethnicity continues to be a challenge.

**Table VI-2  
Hate Crime Incidents Reported to the FBI in Palmdale 2008 – 2012**

Calendar Year	Race	Religion	Sexual Orientation	Ethnicity	Disability	Total
2012	10	1	3	3	0	17
2011	9	0	2	1	0	12
2010	4	1	0	1	0	6
2009	6	1	1	1	1	10
2008	7	1	4	2	0	14
<b>Total:</b>	<b>36</b>	<b>4</b>	<b>10</b>	<b>8</b>	<b>1</b>	<b>59</b>

Source: FBI Hate Crime Incidents by State and Agency, 2008-2012. [http://www.fbi.gov/about-us/investigate/civilrights/hate\\_crimes](http://www.fbi.gov/about-us/investigate/civilrights/hate_crimes)

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

### **B. New Impediments to Fair Housing Choice**

The 2015 A.I. did not reveal any new impediments to fair housing choice. The City actively works to affirmatively further fair housing choice for all residents.

### **C. Fair Housing Plan**

This A.I. identifies common problems and barriers to fair housing in Palmdale. This section builds upon the previous analysis, outlines conclusions, and provides recommendations for the City to address impediments to the fair housing identified earlier. These recommendations will serve as the basis for the City to develop an action plan to eliminate identified Impediments. The recommendations listed in **Table VI-3** on the following page are designated for action by the City, and other service agencies that assist Palmdale residents.

**Table VI-3  
Fair Housing Plan**

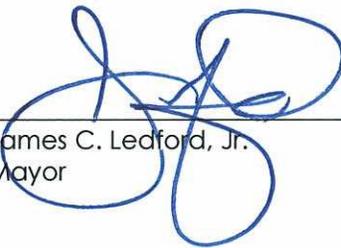
Impediments to Fair Housing Choice		Recommendations	Lead Agency	Timeframe
1.	Discrimination against Persons With Disabilities	<p>To address the lack of understanding and sensitivity to the fair housing needs of physically and mentally disabled people, it is recommended that the City provide for additional fair housing workshops geared toward disabled housing issues including reasonable accommodation and emphasizing that landlords may not refuse to rent on the basis of disability or any arbitrary factor.</p> <p>These workshops should be designed to specifically address this population's particular housing needs and rights. Additionally, it is recommended that the City provide for additional discrimination testing to be conducted by the City's contracted fair housing service provider for disability complaints.</p>	<p>Contracted Fair Housing Service Provider</p> <p>Department of Neighborhood Services</p>	Ongoing to June 30, 2020
2.	Lack of Awareness of Fair Housing Laws	<p>It is recommended that the City's contracted fair housing service provider continue to provide fair housing technical assistance to real estate professionals with fair housing questions or concerns in Palmdale and the region.</p> <p>It is recommended that the City continue existing efforts to provide for expanded participation in fair housing education workshops for prospective homebuyers, renters, and providers of housing such as multifamily management companies, independent landlords and real estate agents or brokers to facilitate awareness of fair housing laws and the rights and responsibilities of tenants and landlords under California law.</p>	<p>Contracted Fair Housing Service Provider</p> <p>Department of Neighborhood Services</p>	Ongoing to June 30, 2020

Impediments to Fair Housing Choice		Recommendations	Lead Agency	Timeframe
3.	Race/Ethnic Relations	<p>In partnership with community nonprofits, fair housing organizations, other government agencies and special districts, provide public information programs disseminating information on fair housing laws, inclusion and diversity.</p> <p>Distribute, as part of the PAC certification process, a City orientation guide to all residents of apartments to make them aware of the range of services available to them.</p> <p>It is recommended that the fair housing service provider continue to conduct fair housing workshops for residents, apartment owners, and property managers.</p>	<p>Department of Neighborhood Services</p> <p>Contracted Fair Housing Service Provider</p>	Ongoing to June 30, 2020

This page intentionally left blank.

**Signature Page**

I, James C. Ledford, Jr., Mayor of the City of Palmdale, hereby certify that this Analysis of Impediments to Fair Housing Choice represents the City's conclusions about impediments to fair housing choice, as well as actions necessary to address any identified impediments.



---

James C. Ledford, Jr.  
Mayor

5-7-2015  
Date