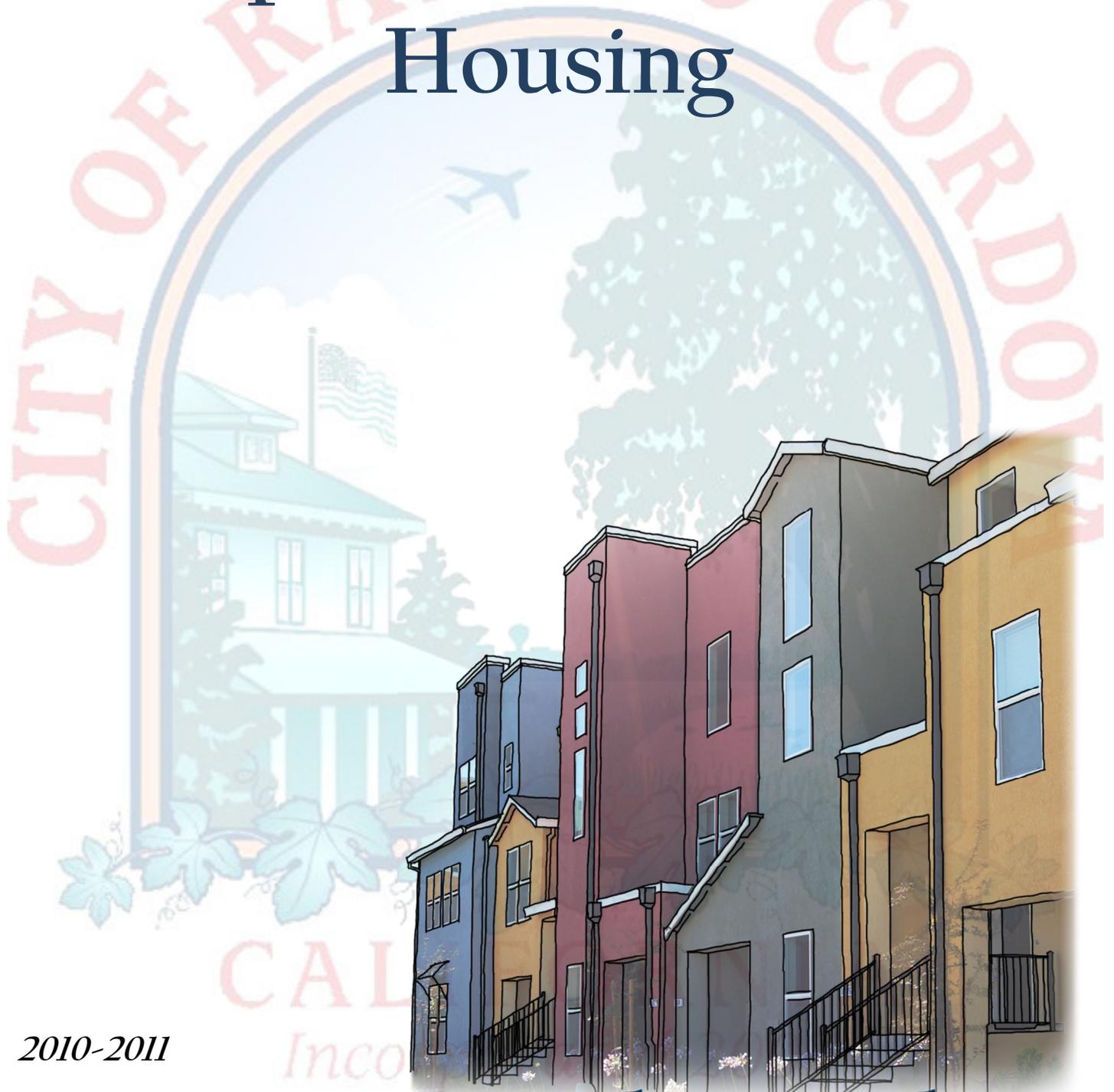


Analysis of Impediments to Fair Housing



2010-2011

CITY OF Rancho Cordova
Housing Services

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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EXECUTIVE SUMMARY

As a recipient of funds from the U.S. Department of Housing and Urban Development (HUD), the City of Rancho Cordova is required to conduct an Analysis of Impediments to Fair Housing Choice (AI) and to periodically review that analysis and update it as necessary. This AI is the first produced by the City and provides a detailed look into the fair housing environment in the City of Rancho Cordova. More specifically, this document includes an analysis of local factors that may impact fair housing choice, the identification of specific impediments to fair housing choice, and a plan to address those impediments. As part of its ongoing responsibilities as a recipient of HUD funds, the City of Rancho Cordova must also continuously ensure equal access to services and programs it provides or assists in the community.

WHAT IS AN IMPEDIMENT TO FAIR HOUSING CHOICE?

As defined by the U.S. Department of Housing and Urban Development Fair Housing Planning Guide (1996), impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, 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 race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor.

To affirmatively further fair housing, a community must work to remove impediments to fair housing choice.

COMMUNITY PARTICIPATION

As part of the AI process, the report incorporates the issues and concerns of residents, housing professionals, and service providers. To ensure the report responds to community concerns, an online fair housing survey was conducted. See **page 51** for a summary of the survey results and **Appendix A** for the complete survey results.

FUNDING SOURCE

Preparation of this report was funded with Community Development Block Grant (CDBG) administration funds.

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IMPEDIMENTS IDENTIFIED

This analysis has identified the following impediments and actions to address the impediments. The section of this document titled Conclusions and Recommendations includes additional details regarding the findings of the analysis and the actions the City plans to take.

Affordable Housing

1. **Impediment: Lower-income households are challenged to find affordable housing in Rancho Cordova.**

Mortgage Lending

2. **Impediment: Differential origination and approval rates based on race, ethnicity, and neighborhood.**
3. **Impediment: Lack of knowledge about the requirements of mortgage lenders and the mortgage lending/home purchase process, particularly among lower-income and minority households.**

Fair Housing Education and Enforcement

4. **Impediment: Lack of knowledge of fair housing rights.**
5. **Impediment: Lack of information on the nature and basis of housing discrimination.**
6. **Impediment: Unequal distribution of lower-income households and minority households.**

Housing Choice

7. **Impediment: Lack of adequately sized homes for large renter households.**

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

INTRODUCTION

RANCHO CORDOVA OVERVIEW

On July 1, 2003, after more than 20 years of advocacy, the City of Rancho Cordova officially incorporated, becoming the seventh community in Sacramento County and the 478th city in the State of California. A part of the greater Sacramento region, Rancho Cordova lies on the Highway 50 corridor between Sacramento and Folsom, and is situated next to Mather Field and the American River. Located in the eastern part of Sacramento County, Rancho Cordova is a community with a rich history dating back to the first 12 miles of railroad in California, a thriving military base in its time, and the home of a successful aerospace industry.

The community chose to incorporate in order to retain the existing identity while improving the quality of life of the area, to increase representation and accessibility of local government, to provide greater control over local land use, planning, and regulatory matters, and to provide an increased level of service to Rancho Cordova residents.

OBLIGATION OF HUD GRANTEES TO “AFFIRMATIVELY FURTHER FAIR HOUSING”

The Department of Housing and Urban Development (HUD) requires that all jurisdictions receiving federal funds through their programs certify that they are “affirmatively furthering fair housing.” This means that the grantee will:

- 1) Conduct an analysis of impediments to fair housing choice;
- 2) Take appropriate actions to overcome the effects of impediments identified through that analysis; and
- 3) Maintain records reflecting the analysis and actions.¹

SCOPE AND INTENT OF THE ANALYSIS OF IMPEDIMENTS

This AI adheres to the recommended scope of analysis and format in the Fair Housing Planning Guide (1996) developed by the U.S. Department of Housing and Urban Development. The purpose of an AI as defined by HUD is to review conditions in the jurisdiction that may impact the ability of households to freely choose housing and to be treated without regard to race, ethnicity, religion, gender, national origin, source of income, age, disability, or other protected status. HUD has provided guidance to grantees that the AI is to

¹ “Analysis of Impediments to Fair Housing Choice Reissuance,” Memorandum from Nelson R. Bregón, General Deputy Assistant Secretary for Community Planning and Development, and Carolyn Peoples, Assistant Secretary for Fair Housing and Equal Opportunity, September 2, 2004.

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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

review the general state of fair housing, the enforcement of fair housing law, grantee efforts to promote fair housing, access to credit for the purpose of housing, and general constraints to the availability of a full range of housing types.²

Also as defined by HUD, the obligation of a grantee to assure equal access to housing is inclusive of both making efforts to address the unequal access to housing as may be the result of housing discrimination and making efforts to promote equal access to housing. The scope of this analysis therefore includes both an examination of the incidence of housing discrimination experienced by persons residing in Rancho Cordova and also the broader questions of housing supply and housing and population characteristics that provide a context for the housing needs of persons residing in Rancho Cordova.

As directed by HUD, this AI examines the affordability of housing in the jurisdiction, with an emphasis on housing affordable to households with annual incomes classified as low income. (Low income is defined as equal to or less than 80 percent of the adjusted area median income as most recently published by the U.S. Department of Housing and Urban Development.) The AI also should include information on local housing and population characteristics similar to those required in the Consolidated Plan including summary demographics, income, employment, and housing market conditions. The AI should include maps illustrating concentrations of low-income households and minority persons.

The AI must also assess how laws, governmental policies, real estate practices, and local conditions affect the location, availability, and accessibility of housing. The analysis of their impact on housing choice should highlight areas where corrective actions might broaden the housing options of persons protected by fair housing laws, persons with special housing needs, and lower-income households.

Many factors in the public and private domains may impede equal access to housing or fair housing choice. Impediments to fair housing choice are defined by HUD as:

- Any actions, omissions, or decisions *taken because of* race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor 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 race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.

² Ibid; *Fair Housing Planning Guide*, HUD 1996

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

To affirmatively promote equal housing opportunity, a community must work to remove or mitigate impediments to fair housing choice. The City of Rancho Cordova is dedicated to providing fair housing opportunities to all residents and to ensuring compliance with all applicable laws throughout the City.

At its conclusion, the AI must include the identification of impediments and barriers to fair housing choice and propose actions to address those impediments and barriers. HUD defines an impediment to fair housing choice as any action, omission, or decision that is intended to or has the effect of restricting a person's choice of housing on the basis of race, color, religion, sex, disability, familial status, or national origin. HUD defines barriers to housing choice as factors, such as income level and housing supply, which limit a person's choice of housing.

AI Goals

Adhering to the AI requirements and guidance from HUD, this AI has three major goals:

- To provide an **overview** of the City of Rancho Cordova and current conditions as they impact fair housing choice.
- To **review the policies and practices** of the City as they impact fair housing choice and the provision of housing, specifically affordable housing and housing for special needs households.
- To **identify impediments to fair housing choice and actions** the City will take to remove those impediments or to mitigate the impact those impediments have on fair housing choice.

The analysis suggested by HUD to fulfill these goals includes the following:

- A review of the laws, regulations, and administrative policies, procedures, and practices of the City of Rancho Cordova which impact fair housing choice.
- An assessment of how those laws affect the location, availability, and accessibility of housing.
- An assessment of conditions, both public and private, limiting fair housing choice.

WHAT IS HOUSING DISCRIMINATION?

Equal access to housing is fundamental to each person being able to meet essential needs and to pursuing personal, educational, employment, or other goals. In recognition of equal housing access as a fundamental right, the governments of the United States and the State of California have both established fair housing as a right protected by law. In general, when discussing housing discrimination, this AI will rely on the definitions established by law.

Federal fair housing laws prohibit discrimination in the sale, rental, lease, or negotiation for real property based on race, color, religion, sex, national origin, familial status, and disability. The California fair housing

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

laws are built upon the federal laws and add marital status, ancestry, age, source of income, and sexual orientation. California law (the Unruh Act) has also been held to offer protection against both arbitrary and intentional discrimination by a business establishment on the basis of personal characteristics similar to those of protected classes.³

ORGANIZATION OF THE REPORT

This report is divided into seven sections, including this introduction, as described below:

1. **Introduction** explains the purpose of the analysis of impediments to fair housing, defines fair housing, lists the data and funding sources for the report, and describes the public participation process.
2. **Community Participation** describes the community outreach program and summarizes comments from residents and various agencies on fair housing issues such as discrimination, housing impediments, and housing trends.
3. **Community Profile** describes the housing and population characteristics of the City of Rancho Cordova. Population characteristics include income, age, race, ethnicity, familial status, and disability. Employment characteristics are also included. Housing characteristics include unit type and tenure, housing cost, and overcrowding. The geographic concentration of households by income, race, and ethnicity is also examined.
4. **Private Sector Practices** assesses the access to financing for different groups. Predatory and subprime lending issues are discussed. This section also assesses the nature and extent of fair housing complaints and violations in different areas of Sacramento County. Trends and patterns of impediments to fair housing, as identified by public and private agencies, are included.
5. **Public Policies** reviews public policies and practices to determine the potential impact on fair housing and the provision of an adequate number and appropriate types of housing. This section also evaluates the City's policies and practices related to the promotion of equal opportunity contracting.
6. **Assessment of Fair Housing Practices** evaluates existing public and private programs, services, practices, and activities that assist in providing fair housing in the City. This section also reviews the City of Rancho Cordova's most recent Consolidated Plan, and the annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPERs), to identify actions taken to affirmatively further fair housing.
7. **Conclusions and Recommendations** summarizes the findings regarding fair housing issues in the City and provides recommendations for furthering fair housing.

³ Please see the publications "Fair Housing: You Are Protected Under California Law!" (DFEH-157H) and "Public Access Discrimination and Civil Rights" (DFEH-167) published by the State of California Department of Fair Employment and Housing.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

DATA SOURCES

In preparing this Analysis of Impediments to Fair Housing Choice (AI), many data sources were consulted. A comprehensive listing is shown below. Please note, when this AI was prepared, data from the 2010 U.S. Decennial Census had not yet been released.

American Community Survey (ACS) 2006–2008, U.S. Census Bureau. ACS data is obtained from a nationwide survey on demographic, social, economic, and housing information conditions. The number of surveys conducted in a given year may be too few to be considered a representative sample, so the data is aggregated into a three-year period to provide a more accurate picture.

2000 Decennial Census, U.S. Census Bureau. The U.S. Constitution provided for a census of the population every 10 years. The 2000 Census contains comprehensive information for describing demographic and housing characteristics. As this data is now 10 years old and may not accurately reflect economic conditions in the nation and in Rancho Cordova, in most instances more recent data from various sources has been utilized for this AI.

State Department of Finance (DOF). The Department of Finance provides estimates on current population and housing stock based on housing construction and demolition data submitted annually by local jurisdictions.

Employment Development Department (EDD). The Employment Development Department provides current and projected labor market data.

Comprehensive Housing Affordability Strategy (CHAS). Developed by the Census Bureau for HUD using 2000 Census data, the CHAS database contains information on low-and moderate-income households, as well as housing problems (i.e., cost burden, overcrowding, and substandard conditions).

U.S. Bureau of Labor Statistics. The U.S. Bureau of Labor Statistics provides labor market data including data on employment, wages, and earnings.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

COMMUNITY PROFILE

In the sale and rental of housing, fair housing laws protect several “classes” from discrimination. State and federal fair housing laws prohibit discrimination based on a person’s race, color, religion, sex, disability, familial status, or national origin.

This chapter of the AI analyzes the demographic profile, income distribution, housing stock characteristics, and access to public transportation in Rancho Cordova. By assessing this information, the housing patterns in Rancho Cordova can be determined in relation to race/ethnicity, income, and other characteristics.

DEMOGRAPHIC DATA

Information in this section is primarily based on the California Department of Finance (DOF), 2006–2008 American Community Survey (ACS) and 2000 U.S. Census. More current data has been provided where readily available.

Population

The need for fair housing services generally increases as a city’s population grows in numbers and with the population growth. According to the DOF, as of January 2009, the City of Rancho Cordova had a population of 61,817, representing an increase of 12.3 percent from 2000 to 2009. When compared to Sacramento County as a whole, the county had a slightly larger increase of 17.1 percent from 2000 to 2009.

TABLE 1
POPULATION 2000–2009

Jurisdiction	2000	2009	Total Growth (2000–2009)	
			Number	Percentage
Rancho Cordova*	55,060	61,817	6,757	12.3%
Sacramento County	1,223,499	1,433,187	209,688	17.1%

Source: 2000 Census, Department of Finance 2009 E-5 Report

Note: Rancho Cordova was a Census Designated Place (CDP) in 2000 and incorporated in 2003.

Age Distribution

Age is a protected class under state fair housing law, and therefore persons cannot be discriminated against based on age. Persons may encounter discrimination when selecting housing if a property owner or manager makes decisions based on the age of the applicant. For example, a property manager may limit the number of children or prohibit children, prefer working-age single adults (rather than college-age adults), or discourage seniors who may have disabilities. Housing providers are within their rights to establish reasonable occupancy limits and rules for tenants, but those rules cannot be based on the age of the resident.

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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

It may be the case that landlords do not want to rent to households with children or to seniors, and in some cases they may deny a group/roommates of younger adults. With the current economic state and constrained finances, many younger adults are moving back in with their parents or into group/roommate living arrangements.

According to the 2006–2008 ACS (**Table 2**), a quarter of the population in the City of Rancho Cordova is in the 20 to 34 age group. This is the age group that is most likely to be moving back into their parents' home or into roommate living situations. It is safe to assume that with such a high percentage, this age range may encounter some fair housing issues. This may also be the case for seniors (65 years and older) and families with children. Seniors make up 10.4 percent of the City's population and children under 20 years of age make up 28.9 percent.

**TABLE 2
AGE CHARACTERISTICS, 2008**

Age Group	Rancho Cordova		Sacramento County	
	Number	Percentage	Number	Percentage
Under 5 years	4,598	7.7%	102,879	7.5%
5 to 9 years	3,886	6.5%	95,250	6.9%
10 to 14 years	4,511	7.6%	100,493	7.3%
15 to 19 years	4,255	7.1%	100,346	7.3%
20 to 24 years	4,001	6.7%	94,550	6.8%
25 to 34 years	11,029	18.5%	210,758	15.3%
35 to 44 years	7,861	13.2%	199,852	14.5%
45 to 54 years	8,152	13.7%	190,444	13.8%
55 to 59 years	2,901	4.9%	76,258	5.5%
60 to 64 years	2,202	3.7%	55,729	4.0%
65 to 74 years	3,547	5.9%	78,458	5.7%
75 to 84 years	1,978	3.3%	53,858	3.9%
85 years and over	745	1.2%	21,833	1.6%
Total	59,666	100.0%	1,380,708	100.0%
Median Age	32.5		34.3	

Source: 2006–2008 American Community Survey 3-year estimates

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Race and Ethnicity

State and federal fair housing laws prohibit discrimination on the basis of race or ethnicity. Race and ethnicity are typically the most prevalent bases for fair housing complaints (see Private Sector Practices for fair housing complaint information).

According to the 2006–2008 ACS (**Table 3**), almost half of the City of Rancho Cordova is made up of minority population (44.7 percent). This percentage is similar to that of Sacramento County as a whole, where the minority population totals 47.8 percent.

TABLE 3
RACE AND ETHNICITY, 2008

Race	Rancho Cordova		Sacramento County	
	Number	Percentage	Number	Percentage
White alone	33,004	55.3%	720,918	52.2%
Black or African American alone	5,229	8.8%	135,518	9.8%
American Indian and Alaska Native alone	450	0.8%	9,057	0.7%
Asian alone	6,656	11.2%	183,556	13.3%
Native Hawaiian or Pacific Islander alone	470	0.8%	10,933	0.8%
Some other race	73	0.1%	4,902	0.4%
Two or more races	2,399	4.0%	42,065	3.0%
Hispanic Origin	11,385	19.1%	273,759	16.1%
Total	59,666	100.0%	1,380,708	100.0%

Source: 2006–2008 American Community Survey 3-year estimates

Minority Concentration

Fair housing concerns tend to occur when one or more racial or ethnic groups are separated from one another in different neighborhoods. To gather this information, data on race and ethnicity were examined at the block group level to determine areas of minority and ethnic concentration (2000 U.S. Decennial Census, Summary File 3). Minority population is defined as the total population less those who responded “White alone” to the U.S. Census. Block group areas where the percentage of total minority population exceeds the group’s countywide total percentage by at least one percentage point are considered to be areas of “minority concentration.” Areas that have a minority population at least 1.5 times the countywide total percentage are considered to be areas of “high minority concentration.”

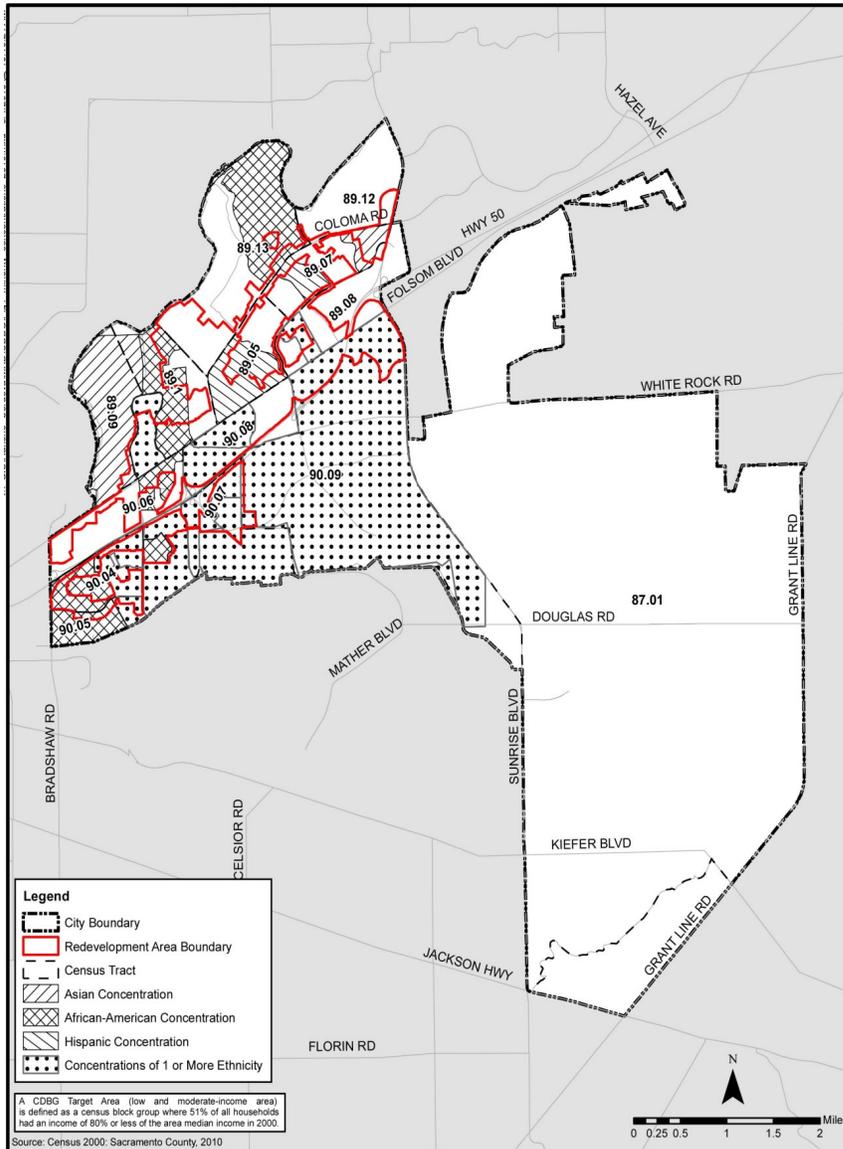
As shown in **Figure 1**, a large portion of Rancho Cordova has a concentration of minority population. The main area of concentration is located in the northwestern part of the City, which is mainly the older area of Rancho Cordova.

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Because the City must rely on the 2000 U.S. Census data in order to determine minority concentration at the block group level, the newly developed areas in the City are not included. One large area, Anatolia, was developed after the 2000 Census and includes approximately 5,000 units. As newer areas are developed, the minority concentration may shift or increase. There is a higher possibility for lower-income concentration, because the low- and very low-income households will tend to live in the older, less expensive areas of the City.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

FIGURE 1
AREAS OF MINORITY CONCENTRATION



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Sex /Gender

Fair housing law prohibits the discrimination on the bases of a person’s sex or gender. An example of this type of discrimination would be renting to one sex and not to the other.

According to the 2006–2008 ACS, the City of Rancho Cordova has approximately 9,983 married-couple families, 1,464 male-headed households, and 2,859 female-headed households (**Table 4**). Please note, the 2006–2008 ACS did not provide a breakdown for nonfamily households by male or female, so 7,580 nonfamily households were not included in these numbers.

TABLE 4
HOUSEHOLDS BY SEX/GENDER

Household Type	Rancho Cordova	
	Number	Percentage
Married-couple family	9,983	45.6%
Male householder,	1,464	6.7%
Female householder	2,859	13.1%
Nonfamily households	7,580	34.6%
Total Households	21,886	100.0%

Source: 2006–2008 American Community Survey 3-year estimates

Ancestry and Place of Birth

Fair housing law prohibits the discrimination on the bases of a person’s national origin (ancestry or place of birth). National origin discrimination involves treating people unfairly because they are from a particular country or part of the world, because of ethnicity or accent, or because they appear to be of a certain ethnic background. National origin discrimination also can involve treating people unfairly because they are married to (or associated with) a person of a certain national origin.

Ancestry

The 2006–2008 ACS provides ancestry data at the city level. The following table (**Table 5**) shows the top 10 ancestries reported for the City of Rancho Cordova. According to the table, persons of German ancestry constituted the largest group.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

TABLE 5
TOP 10 ANCESTRIES REPORTED

Ancestry Reported	Rancho Cordova	
	Number	Percentage
German	7,858	13.17%
Irish	5,440	9.12%
English	4,744	7.95%
Italian	3,331	5.58%
Ukrainian	2,651	4.44%
American	1,672	2.80%
French (except Basque)	1,620	2.72%
Norwegian	1,135	1.90%
Scottish	1,115	1.87%
Scotch-Irish	1,109	1.86%

Source: 2006–2008 American Community Survey 3-year estimates

Foreign-Born Persons

According to the 2006–2008 ACS, there were 15,107 (25.3 percent) foreign-born persons in the City of Rancho Cordova. When looking at Sacramento County as a whole, 270,055 foreign-born persons comprised 19.6 percent of the total population (**Table 6**).

TABLE 6
PLACE OF BIRTH

Population Description	Rancho Cordova	Sacramento County
Total population	44,559	1,110,653
Total foreign born	15,170	270,055
Percentage total population foreign born	25.3%	19.6%

Source: 2006–2008 American Community Survey 3-year estimates

Religious Denomination

Given this information and our outreach to various organizations, there is no indication of discrimination based on religious denomination.

The Association of Religious Data Archives provides statistical data by city for religious groups, including the number of congregations and the number of adherents. As of 2000, the religious bodies that form the major denominational groups in the City of Rancho Cordova were Catholic, Evangelical Protestant, Mainline Protestant, and Orthodox.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Persons with Disabilities

The Fair Housing Amendment Act of 1988 prohibits discriminatory housing practices based on handicap status. The act was intended to prohibit the application of special restrictive covenants and conditions or special use permits that have the effect of limiting the ability of such individuals to live in the residence of their choice. In addition, the law prohibits applying one standard to one class of individuals while applying a different standard to another class of individuals.

For example, it would be illegal to ask a disabled individual applying for an apartment to provide a credit report if non-disabled applicants did not have to provide one.

Physical, Mental, and/or Developmental Disabilities

Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one's mobility, or make it difficult to care for one's self. Persons with disabilities frequently have special housing needs, often related to a potentially limited ability to earn a sufficient income, a lack of accessible and affordable housing, and higher health costs associated with a disability. In addition, persons with self-care and mobility limitations may require special housing design features such as wheelchair ramps, holding bars, special bathroom designs, wider doors, and other design features.

Data on physical, mental, and/or developmental disabilities was taken from the 2000 U.S. Census because the ACS data was unavailable. According to the 2000 Census, 20.7 percent of the population age 5 and older (10,302 individuals) who lived in Rancho Cordova reported a disability. This percentage is almost identical to the county as a whole, with 20.0 percent of the population reporting a disability.

As age increases, the incidence of disability increases. Nearly half (45.3 percent) of the population 65 and older reported having a disability in the City of Rancho Cordova. The county as a whole had a slightly lower percentage at 42.9 percent.

Persons with HIV/AIDS

Persons with HIV/AIDS sometimes face biases and misunderstanding about their illness that affect their access to housing. In addition, persons with HIV/AIDS may also be targets for hate crimes, which include crimes committed because of a bias against sexual orientation. Due to their disabilities, many are lower income in need of housing assistance. The National Commission on AIDS states that up to half of all Americans with AIDS are either homeless or at imminent risk of becoming homeless due to their illness, lack of income or other resources, and weak support network.

According to the County of Sacramento, Department of Health and Human Services, Division of Public Health, between 1982 and 2007 a total of 3,613 cumulative cases of AIDS were reported to the County of Sacramento. Of those cases, 2,010 (55.6 percent) are deceased and 1,603 (44.4 percent) are currently living with AIDS. During the fourth quarter of 2007 (October 2007 to December 2007), 15 new cases of AIDS

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were reported in Sacramento County. Of the 15 new cases, 6 (40.0 percent) were Caucasian, 5 (33.3 percent) African American, 3 (20 percent) Hispanic, and 1 (6.7 percent) Asian and Pacific Islander.

The County of Sacramento, Department of Health and Human Services, Division of Public Health estimates that of the 3,613 cases of AIDS in Sacramento County between 1982 and 2007, 71 to 100 cases were in the City of Rancho Cordova.

Licensed Community Care Facilities

Persons with special needs such as the elderly and those with disabilities must also have access to housing in a community. Residential community care facilities provide a supportive housing environment to persons with special needs in a group situation. Restrictions that prevent this type of housing represent a fair housing concern since lack of such housing impedes special needs groups from access to adequate housing. Currently, 16 residential care facilities are located in Rancho Cordova that can accommodate up to 92 persons.

According to the State of California's Community Care Licensing Division, the following care facilities are located in the City of Rancho Cordova:

- Adult Residential Facilities (ARF) are facilities of any capacity that provide 24-hour nonmedical care for adults ages 18 through 59 who are unable to provide for their own daily needs. Adults may be physically handicapped, developmentally disabled, and/or mentally disabled. There are currently 3 facilities in the City that can accommodate 14 persons.
- Group homes are facilities of any capacity and provide 24-hour nonmedical care and supervision to children in a structured environment. There is currently 1 facility in the City that can accommodate 6 persons.
- Residential Care Facilities for the Elderly (RCFE) provide care, supervision, and assistance with daily living activities to persons 60 years of age and over and persons under 60 with compatible needs. There are currently 10 facilities in the City that can accommodate 60 persons.
- Small Family Homes (SFH) provide 24-hour-a-day care in the licensee's family residence for six or fewer children who are mentally disabled, developmentally disabled, or physically handicapped and who require special care and supervision as a result of such disabilities. There are currently 2 facilities in Rancho Cordova that can accommodate 12 persons.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Homeless Persons

Homelessness is the result of several factors—loss of employment, inability to find jobs, need for retraining, cost of housing, chronic health problems, physical disabilities and mental health disability, and drug and alcohol addictions.

Homeless people face critical housing needs due to their very low incomes and the lack of appropriate types of housing. Homeless persons may encounter fair housing issues when landlords refuse to rent to them even if they have the rent and required deposit. The perception may be that homeless or formerly homeless persons are economically (and sometimes mentally) unstable. These difficulties are further exacerbated for homeless families that need larger affordable units.

Individuals or families that are homeless have a variety of special needs, including emergency shelter, counseling, job training, transitional housing, and permanent supportive housing, among other needs. According to the 2009 Point-in-Time Homeless Count conducted by the Sacramento County Department of Human Assistance Homeless Programs (DHA), there were 2,800 homeless persons in Sacramento County, 468 of whom were chronic homeless persons.

To provide population characteristics for those in shelters, data was pulled from the Homeless Management Information System (HMIS) and/or from questionnaires and case notes administered by shelter and housing staff. Homeless people counted on the street were asked a series of questions in interviews. The characteristics of the 2009 homeless population in Sacramento County included:

Characteristic	Number	Percentage of Total
Chronically Homeless	468	16.7%
Mentally Ill	753	26.9%
Substance Abuse	1,345	48.0%
Veterans	426	15.2%
Persons with HIV/AIDS	60	2.1%
Victims of Domestic Violence	699	25.0%
Unaccompanied Youth (under 18)	35	1.3%

Emergency food, clothing, and shelter services are provided to lower-income persons and the homeless in Rancho Cordova by the following agencies:

- Al Ramos Homeless Ministry;
- River City Community Homeless and Homeless Project;
- Laverne Adolpho Housing;

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

- Salvation Army;
- St. John's Shelter;
- St. Francis House; and
- Cordova Community Food Locker.

The Mather Community Campus in Rancho Cordova is a transitional housing project that provides housing, job training, and employment to individuals and families on the former Mather Field Air Force Base. The Mather Community Campus has permission to house up to 200 singles and 55 families. Currently, 160 singles and 30 families with children reside there.

The Sacramento County Continuum of Care manages the Homeless Management Information System (HMIS) for all jurisdictions in the county, including Rancho Cordova. Though data gathered is not specific by jurisdiction, it does provide a robust data set that identifies overall homeless populations in detail. The HMIS shows that the City of Rancho Cordova, as of 2010, has approximately 143 homeless persons, 82 persons in emergency shelters, 18 in transitional housing, and 43 in permanent or supportive housing. Of the 143 total homeless, 21 are veterans.

HOUSEHOLD AND FAMILY COMPOSITION (FAMILIAL STATUS)

The Fair Housing Amendment Act of 1988 prohibits discriminatory housing practices based on familial status. The law protects families with children less than 18 years of age, pregnant women, or families in the process of securing custody of a child under 18 years of age.

The Census provides information both about housing units (physical dwellings) and the households (people) who occupy the housing units. Households include families, which are a group of two or more people who reside together and who are related by birth, marriage, or adoption, and groups of two or more unrelated persons who reside together.

According to the 2006–2008 ACS, family households accounted for approximately 65.4 percent of all households citywide, while nonfamily households comprised 34.6 percent of all households. Sacramento County as a whole had the same breakdown as the City. A summary of Rancho Cordova's household characteristics is provided in **Table 7**.

According to the DOF, Rancho Cordova's average household size was 2.63 persons per household in 2009, as compared to the county as a whole at 2.65 persons per household.

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TABLE 7
HOUSEHOLD COMPOSITION, 2008

Household Type	Rancho Cordova		Sacramento County	
	Number	Percentage	Number	Percentage
Total Households	21,886	100.0%	501,417	100.0%
Family households (families)	14,306	65.4%	327,637	65.3%
With own children under 18 years	7,186	32.8%	168,279	33.6%
Married-couple family	9,983	45.6%	231,057	46.1%
With own children under 18 years	4,798	21.9%	111,681	22.3%
Male householder, no wife present, family	1,464	6.7%	28,889	5.8%
With own children under 18 years	620	2.8%	15,368	3.1%
Female householder, no husband present, family	2,859	13.1%	67,691	13.5%
With own children under 18 years	1,768	8.1%	41,230	8.2%
Nonfamily households	7,580	34.6%	173,780	34.7%
Householder living alone	5,636	25.8%	135,259	27.0%
65 years and over	1,645	7.5%	43,355	8.6%
Average Household Size (2009)*	2.63	--	2.65	--

Source: 2006–2008 American Community Survey 3-year estimates, * Department of Finance, 2009

Large Households

Large households are defined as having five or more members. These households are usually families with two or more children or extended families with family members such as in-laws or grandparents. Large households typically reside in smaller units (resulting in overcrowding) in order to save for necessities such as food, clothing, and medical care.

Large households, typically families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. Some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex or confine them to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether.

The 2006–2008 ACS identified 2,594 households in Rancho Cordova with five or more persons, representing 11.9 percent of all households. This percentage was nearly the same as in Sacramento County as a whole, in which large households represented 11.7 percent of all households.

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Single-Parent Households

Single-parent families, particularly female-headed families, often require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Because of their relatively lower income and higher living expenses, female-headed families have more limited opportunities to find affordable, decent, and safe housing.

Female-headed families may be discriminated against in the rental housing market because some landlords are concerned about the ability of these households to make regular rent payments. Consequently, the landlords may require more stringent credit checks for women, which would be a violation of fair housing law.

According to the 2006–2008 ACS, 10.9 percent (2,388 households) of all households in the City of Rancho Cordova were headed by single parents with children under the age of 18. Of the 2,388 households, 1,768 households or 8.1 percent were female-headed households and 620 households or 2.8 percent were male-headed households.

INCOME DATA

Household income is the most important factor affecting housing opportunity, determining a household's ability to balance housing costs with the basic necessities of life. While economic factors that affect a household's housing choices are not fair housing issues per se, the relationship between household income, household type, race/ethnicity, and other factors often creates misconceptions and biases that raise fair housing concerns. For example, a fair housing concern arises when someone refuses to rent to a family of a particular race because of a belief that people of that race tend to be lower income.

Household Income Groups

Income levels are defined as a percentage of the area median income (AMI). HUD produces annual estimates of AMI for all metropolitan areas and rural counties in the nation; the estimates are adjusted based on household size but are commonly quoted for a four-person household. The 2010 AMI for Sacramento County was \$73,100 for a household of four. HUD has defined the following income categories for Sacramento County, based on the median income for a household of four persons:

- Extremely low income: 30 percent and below of median income (\$0 to \$21,950)
- Very low income: 31 to 50 percent of median income (\$21,951 to \$36,550)
- Low income: 51 to 80 percent of median income (\$36,551 to \$58,500)

According to the 2006–2008 ACS, the median household income for Rancho Cordova was \$51,020, which was lower than for Sacramento County overall (\$57,779).

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Table 8 provides a summary of income statistics as reported by the 2006–2008 ACS for the City of Rancho Cordova and Sacramento County.

**TABLE 8
INCOME CHARACTERISTICS, 2008**

	Rancho Cordova	Sacramento County
Median Household Income	\$51,020	\$57,779
Median Family Income	\$57,510	\$66,812
Per Capita Income	\$23,962	\$27,293
Percentage of Households Below Poverty Level	12.8%	9.2%
Percentage of Female-Headed Households with Children Below the Poverty Level	27.0%	28.7%
Percentage of Persons 65 Years and Older Below Poverty Level	7.1%	7.8%

Source: 2006–2008 American Community Survey 3-year estimates

Household Income by Race, Age, and Sex

The chance of discrimination tends to be higher for certain populations, usually based on race, size, and ages. These populations are discriminated against because of the assumption that certain households may make less money than others, or some households may be younger and therefore thought to not make as much money.

To provide a picture of the current earnings for households in the City of Rancho Cordova, **Table 9** provides the median income in the last 12 months, by race of the householder, age of householder, size of the household, and tenure.

**TABLE 9
MEDIAN INCOME BY RACE, AGE, SIZE, AND TENURE**

	Median Income
Race	
White	\$53,688
Black/African American	\$34,625
American Indian and Alaska Native	\$30,671
Asian	\$74,417
Hawaiian and Other Pacific Islander	\$59,435
Hispanic or Latino	\$37,956

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	Median Income
Household Size	
1-person household	\$32,790
2-person household	\$58,235
3-person household	\$59,491
4-person household	\$66,935
5-person household	\$57,951
6-person household	\$48,581
Age	
Householder under 25 years	\$31,695
Householder 25 to 44 years	\$56,594
Householder 45 to 64 years	\$57,861
Householder 65 years and over	\$41,621
Tenure	
Owner-occupied	\$68,937
Renter-occupied	\$33,747

Source: 2006–2008 American Community Survey 3-year estimates

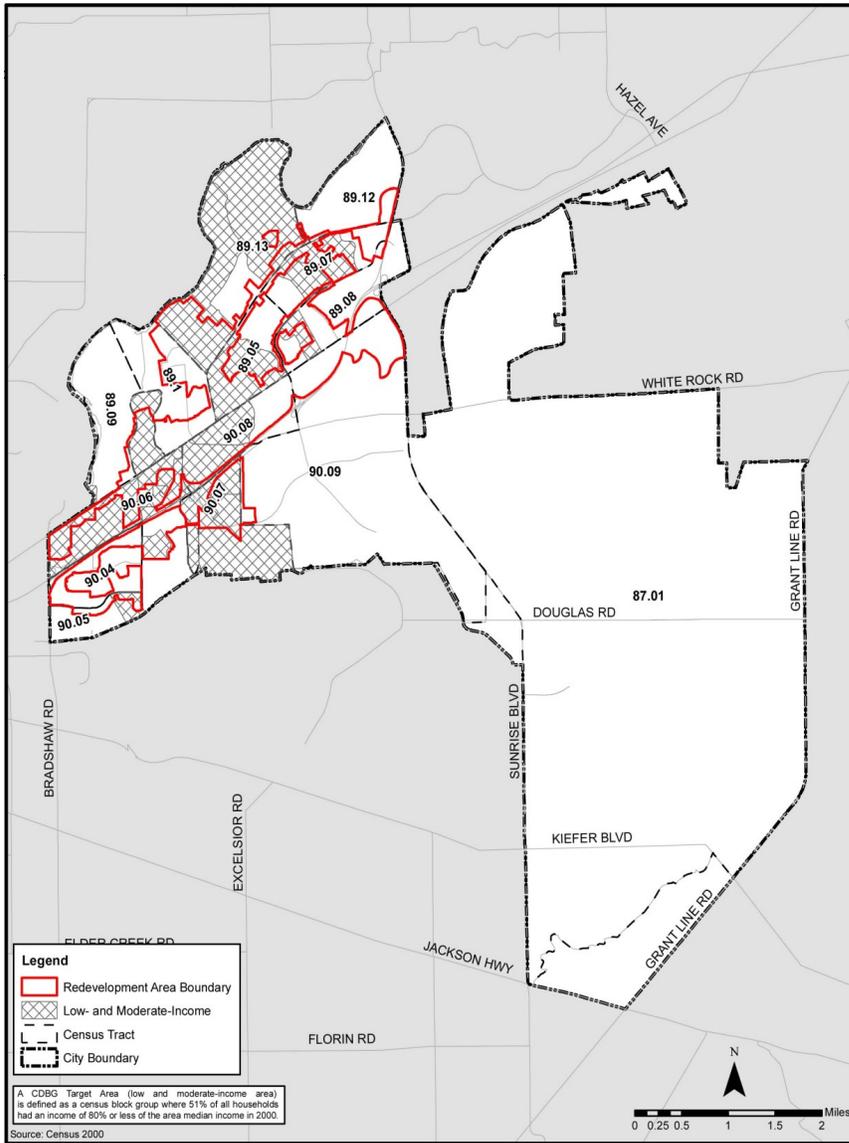
Areas of Low- and Very Low-Income Concentration

Data on income was examined at the block group level to determine areas of low- and very low-income concentration (2010 HUD Low and Moderate Income Summary Data). Low-income areas are those that have 51 percent or more low-income persons. The City of Rancho Cordova has a continuous area located in the northwestern area of the City that is considered a low-income area (see **Figure 2**).

The HUD Low and Moderate Income Summary Data relies on the 2000 Census and therefore does not include the newly developed areas in the City. Anatolia, which was developed after the 2000 Census was completed, includes approximately 5,000 units. As the newer areas are developed, there may be higher possibility, the lower-income concentration may shift or increase. The low- and very low-income households will tend to live in the older, less expensive areas of the City.

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FIGURE 2
AREA OF LOW- AND MODERATE-INCOME CONCENTRATION



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EMPLOYMENT

Labor Force

Table 10 provides a summary of the civilian labor force, employment (the number employed), unemployment (the number unemployed), and the unemployment rate for 2008, 2009, and up to March 2010 for the City of Rancho Cordova and Sacramento County. The 2008 and 2009 data are annual averages, and the 2010 data was collected for January, February, and March 2010. When comparing the 2008 data to the March 2010 data for the City of Rancho Cordova, the unemployment rate increased dramatically from 8.2 percent in 2008 to 15.0 percent in March 2010 (an increase of 6.8 percent) due to the current economic condition. This increased unemployment rate is also the trend in Sacramento County, with a 5.2 percent increase in unemployment from 2008 to March 2010.

TABLE 10
LABOR FORCE DATA, 2008–2010

Labor Force	Rancho Cordova			Sacramento County		
	March 2010	2009	2008	March 2010	2009	2008
Total Labor Force	31,500	31,300	30,900	690,000	687,600	683,400
Employment	26,800	27,200	28,300	599,600	609,600	634,500
Unemployment	4,700 (15.0%)	4,100 (13.0%)	2,500 (8.2%)	90,400 (13.1%)	78,000 (11.3%)	48,900 (7.2%)

Source: Employment Development Department, Monthly Labor Force Data for Cities and Census Designated Places, 2008, 2009, March 2010
Note: Data is not seasonally adjusted.

Occupations/Industry

Tables 11 and 12 provide a summary of civilian employment by occupation and industry for residents in the City of Rancho Cordova. In 2007, over one-quarter of civilian employees, aged 16 and over, had occupations in management, professional, and related occupations (the locations of these jobs were not necessarily in the City) and about 16 percent worked in educational services, health care, and social assistance.

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**TABLE 11
EMPLOYMENT BY OCCUPATION**

Occupation	Employed Civilian Population 16 Years and Over	
	Number	Percentage
Management, professional, and related occupations	8,474	30.6%
Sales and office occupations	8,058	29.1%
Service occupations	5,533	20.0%
Construction, extraction, maintenance and repair occupations	2,917	10.5%
Production, transportation, and material moving occupations	2,705	9.8%
Farming, fishing, and forestry occupations	40	0.1%

Source: 2006–2008 American Community Survey 3-year estimates

**TABLE 12
EMPLOYMENT BY INDUSTRY**

Industry	Employed civilian Population 16 Years and Over	
	Number	Percentage
Educational services, and health care and social assistance	4,475	16.1%
Professional, scientific, and management, and administrative and waste management services	4,322	15.6%
Retail trade	3,373	12.2%
Public administration	2,735	9.9%
Construction	2,368	8.5%
Finance and insurance, and real estate and rental and leasing	2,323	8.4%
Arts, entertainment, and recreation, and accommodation, and food services	2,078	7.5%
Manufacturing	1,671	6.0%
Transportation and warehousing, and utilities	1,438	5.2%
Other services, except public administration	1,144	4.1%
Wholesale trade	830	3.0%
Information	834	3.0%
Agriculture, forestry, fishing and hunting, and mining	136	0.5%

Source: 2006–2008 American Community Survey 3-year estimates

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Major Employers

The City of Rancho Cordova is located in a prime location along the Highway 50 corridor, which offers potential for continued community growth and prosperity. Rancho Cordova has a large job base with many Fortune 500 companies (Vision Service Plan, Aerojet, Franklin Templeton, EDS, and Health Net) in a range of industries.

In 2009, the City of Rancho Cordova's Economic Development Department created an employment development map showing the top employers in the City. **Table 13** lists the 25 major employers in the City of Rancho Cordova.

TABLE 13
MAJOR EMPLOYERS

Employer
1,000+ Employees
Vision Service Plan (VSP)
Electronic Data Systems (EDS)
Delta Dental
Verizon Wireless
Franklin Templeton Investor
501-999 Employees
Catholic Healthcare West
Bank of America
Ed Fund
Volcano Corp
BloodSource
California Employment Development Dept.
California Dept. of Child Support Services
Veterans Affairs Medical Center
Sacramento County Office of Education
Sutter Health
California Emergency Management Agency
251-500 Employees
Progressive Insurance
CVC Construction
Sprint Communications
Cisco Systems
Motion Control Engineering
Sutter Connect
California Air National Guard
California State Controllers Office
California Dept. of Technology

Source: City of Rancho Cordova, Economic Development Map, 2009

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Employment Location

Table 14 below provides shows the number of persons who work in their place of residence or outside their place of residence. Based on the 2006–2008 ACS, 71.1 percent of the employed population in Rancho Cordova worked outside of the City.

This high level of commuter jobs can indicate a mismatch between the type of housing available in the City and the type of housing both desired by and affordable to those who work in Rancho Cordova.

TABLE 14
WORKERS BY PLACE OF WORK, 2008

	Rancho Cordova	
	Number	Percentage
Total employed persons residing in Rancho Cordova	26,787	100.0%
Employed persons residing in Rancho Cordova who work in Rancho Cordova	7,733	28.9%
Employed persons residing in Rancho Cordova who work outside of Rancho Cordova	19,054	71.1%

Source: 2006–2008 American Community Survey 3-year estimates

HOUSING PROFILE

A discussion of fair housing choice must be preceded by an assessment of the housing market in question. This section provides an overview of the characteristics of the local and regional housing markets. A housing unit is defined as a house, an apartment, or a single room occupied as a separate living quarter or, if vacant, intended for occupancy as a separate living quarter. Separate living quarters are those in which the occupants live and eat separately from any other persons in the building and which have direct access from the outside of the building or through a common hall. The housing stock consists of all housing units located in a community.

Housing Type

The DOF annual estimates of the number of housing units by type for each jurisdiction is based on reported building and demolition permits. As of 2009, the City of Rancho Cordova had a total of 24,463 housing units. A little more than half of units in the city were single-family detached units (54.0 percent) and 31.4 percent were multifamily units (see **Table 15**).

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

TABLE 15
HOUSING UNITS BY TYPE, 2009

Structure Type	Rancho Cordova	
	Number	Percentage
Single-Family Detached	13,252	54.0%
Single-Family Attached	2,094	8.5%
Multifamily (2 to 4 units)	2,025	8.2%
Multifamily (5 or more units)	5,703	23.2%
Mobile Homes	1,389	5.7%
Total Housing Units	24,463	100.0%

Source: Department of Finance, 2009

Housing Tenure

Housing tenure refers to whether a unit is owner-occupied or renter-occupied. The tenure distribution of a community’s housing stock influences several aspects of the local housing market. Residential mobility is influenced by tenure, with ownership housing evidencing a much lower turnover rate than rental housing.

Housing cost burden is generally more prevalent among renters than among owners. Purchasing a home requires significant resources. In general, obtaining a mortgage will require evidence of credit worthiness and the income available to make monthly mortgage payments. Housing cost burden for homeowners is in some sense regulated by the marketplace. Those without the resources to purchase a home must rent or face homelessness. This puts renters at the mercy of the marketplace and they often carry a much higher cost burden. Tenure preferences are primarily related to household income, composition, and age of the householder. Single persons and younger householders in general have lower household incomes. These households and lower-income households in general typically lack the income and credit to purchase a home.

According to the 2006–2008 ACS, of Rancho Cordova’s occupied housing units (21,886), a little more than half of the units were owner-occupied (55.5 percent) and 44.5 percent were renter-occupied (see **Table 15**). This is a change from 2000, when there were more renter-occupied housing units (51.6 percent) than owner-occupied (48.7 percent).

Table 16 presents the vacancy rate for the City of Rancho Cordova. Vacancy rate measures the overall housing availability in a community and is often a good indicator of how efficiently for-sale and rental housing units are meeting the current demand for housing. As of 2008, the vacancy rate in the City was 10.8 percent, which was more than double the vacancy rate in 2000.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

TABLE 16
HOUSING UNITS BY TENURE, 2000 AND 2008

Structure Type	2000		2008	
	Number	Percentage	Number	Percentage
Owner-Occupied*	9,894	48.7%	12,140	55.5%
Renter-Occupied*	10,481	51.6%	9,746	44.5%
Total Occupied Units	20,312	94.5%	21,886	89.2%
Vacant Units	1,184	5.5%	2,658	10.8%
Total Housing Units	21,496	100.0%	24,544	100.0%

*Source: 2000 U.S. Census, 2006–2008 American Community Survey 3-year estimates
* Tenure is based on total number of occupied housing units (20,312 units in 2000 and 21,886 units in 2008).*

Overcrowding

The U.S. Census Bureau defines overcrowding as occurring when a housing unit is occupied by more than the equivalent of one person per room (excluding bathrooms, kitchens, hallways, and porches), and units with more than 1.50 persons per room are considered highly overcrowded. For example, a typical home might have three bedrooms, a living room, and a dining room, for a total of five rooms. If more than five people were living in the home, it would be considered by the Census Bureau to be overcrowded.

Overcrowding occurs when housing costs are so high relative to income that families have to reside in small units or double up to devote income to other basic needs such as food and medical care. It can also occur when the appropriate type and size of units are not available because they are not produced in adequate numbers or are not available at an affordable price. Both conditions are an issue of supply. Overcrowding also may result in increased traffic within a neighborhood, deterioration of homes, and a shortage of on-site parking. Maintaining a reasonable level of occupancy and alleviating overcrowding is an important contributor to quality of life.

Data on overcrowding was taken from the 2000 U.S. Census because the 2006–2008 ACS data does not provide information on overcrowding by tenure.

- According to the 2000 U.S. Census, 2,351 households, or 11.5 percent of all households in Rancho Cordova, were considered overcrowded and 1,257 (6.2 percent) were severely overcrowded.
- Of the renter-occupied households, approximately 18.8 percent of renter households were overcrowded and 10.7 percent were severely overcrowded.
- Of the owner-occupied households, approximately 3.9 percent of owner households were overcrowded and 1.4 percent were severely overcrowded.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Housing Conditions

An indication of the quality of the housing stock is its general age. Typically, housing over 30 years old is likely to have rehabilitation needs that may include plumbing, roof repairs, foundation work, and other repairs.

Table 17 below displays the age of Rancho Cordova’s housing stock as of 2010. Among these units, the majority of the housing (25.0 percent) was built between 1970 and 1979. Of the total housing units in Rancho Cordova, only 38.3 percent of the units were less than 30 years old, 43.8 percent were 30 to 50 years old, and 17.8 percent were more than 50 years old. **Table 18** provides a comparison of the age of the housing stock for surrounding cities.

TABLE 17
HOUSING AGE, 1950–2010

Year Structure Built	Rancho Cordova	
	Number	Percentage
2005 to 2010*	2,485	10.02%
2000 to 2004	1,870	7.54%
1990 to 1999	1,693	6.83%
1980 to 1989	3,677	14.82%
1970 to 1979	6,250	25.20%
1960 to 1969	4,474	18.04%
1950 to 1959	3,665	14.78%
Prior to 1950	690	2.78%
Total Units	24,804	100.0%

Source: 2006–2008 American Community Survey 3-year estimates; *Department of Finance, 2010

TABLE 18
COMPARATIVE HOUSING AGE

Year Structure Built	Rancho Cordova	Sacramento	Rocklin	Roseville	Folsom	Citrus Heights	Elk Grove
2005 to 2010*	8.8%	9.0%	8.4%	11.6%	11.3%	0.9%	17.7%
2000 to 2004	7.6%	9.8%	29.7%	21.9%	21.4%	2.3%	31.8%
1990 to 1999	6.9%	6.7%	29.9%	28.3%	31.1%	6.5%	28.7%
1980 to 1989	15.0%	14.3%	16.7%	17.1%	19.7%	24.6%	12.8%
1970 to 1979	25.5%	15.2%	10.0%	8.6%	8.8%	40.7%	6.2%
1960 to 1969	18.3%	11.7%	3.3%	4.4%	2.8%	14.6%	1.5%
1950 to 1959	15.0%	12.9%	0.5%	4.2%	3.0%	7.6%	0.7%
Prior to 1950	2.8%	20.4%	1.5%	4.0%	2.0%	2.8%	0.6%

Source: 2006–2008 American Community Survey 3-year estimates; *Department of Finance, 2010

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Housing Costs and Affordability

Housing Cost

The recent freeze of credit markets, the economic downturn, and related changes in the housing market have dramatically altered housing prices. The trend has been toward lower prices as demand has decreased and supply increased. This is especially the case in the single-family resale market.

Home Purchase Cost

The sales prices of homes as well as the cost and availability of mortgage credit have changed significantly over the past four years across the nation. This trend was particularly dramatic in the last year (2009).

According to Trulia Real Estate, an online real estate source, the median sales price for homes in Rancho Cordova for February through April 2010 was \$210,000 (the Housing Affordability section starts on page 33). This price represents a decline of 18.3 percent when compared to the same time period from the prior year (2009). **Table 19** depicts home sale prices over the past five years for the City of Rancho Cordova.

TABLE 19
CITY OF RANCHO CORDOVA MEDIAN SALES PRICE, 2010

Home Size	Feb–April 2010	3 Months Prior	1 Year Prior	5 Years Prior
1 Bedroom	n/a	n/a	n/a	n/a
2 Bedrooms	\$74,168	\$90,500	\$141,734	\$228,500
3 Bedrooms	\$162,000	\$166,125	\$155,000	\$309,000
4 Bedrooms	\$226,450	\$229,500	\$265,000	\$383,500
All Properties	\$210,000	\$217,000	\$257,000	\$330,000

Source: Trulia Real Estate, May 2010

Rental Costs

A survey of rentals in Rancho Cordova was carried out in June 2010 and showed that the average monthly rent for apartments of all types ranged from \$740 for a one-bedroom to \$805 for a three-bedroom unit, and the average monthly rent for a single-family home ranged from \$840 for a two-bedroom home and \$1,300 for a six-bedroom home. (Note: Only one five-bedroom home and one six-bedroom home were listed.) The price ranges and median rents for apartments and single-family homes of varying sizes are shown in **Table 20**.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

TABLE 20
RENTAL LISTINGS, RANCHO CORDOVA

Unit Size	Median Price	High Price	Low Price
Apartments			
1 Bedroom	\$740	\$815	\$650
2 Bedrooms	\$805	\$950	\$649
Single-Family Homes			
2 Bedrooms	\$840	\$875	\$795
3 Bedrooms	\$1,225	\$1,450	\$950
4 Bedrooms	\$1,750	\$2,100	\$1,395
5 Bedrooms	\$1,895	n/a	n/a
6 Bedrooms	\$1,300	n/a	n/a

*Source: Rental Survey, June 2010
Please note: Rents do not include utilities.*

The U.S. Department of Housing and Urban Development publishes annual Fair Market Rents (FMR), which include an estimated utility cost. The figures effective in 2010 for Sacramento County are shown in **Table 21** below.

TABLE 21
2010 FAIR MARKET RENT (FMR)

Unit Size	2010 FMR
0 Bedroom	\$409
1 Bedroom	\$420
2 Bedrooms	\$547
3 Bedrooms	\$719
4 Bedrooms	\$753

Source: HUD 2010 Fair Market Rent Documentation System

Housing Affordability

Housing affordability can be calculated by comparing the cost of renting or owning a home with the maximum affordable housing costs to households at different income levels. Taken together, this information can generally indicate the size and type of housing available to each income group and can estimate which households are most susceptible to overcrowding and overpayment.

In evaluating affordability, the maximum affordable price refers to the maximum amount that could be afforded by households in the upper range of their respective income category. Households in the lower end

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of each category can afford less in comparison. **Table 22** shows the annual income for extremely low-, very low-, and low-income households by household size and the maximum affordable housing payment.

Maximum affordable sales prices are based on 10 percent down and a 30-year fixed-rate mortgage at 5.6 percent annual interest rate. Maximum affordable rental prices are based on 30 percent of a household's total income, excluding costs of tenant-paid utilities. The 2010 AMI for Sacramento County was \$73,100 for a household of four.

**TABLE 22
AFFORDABLE MORTGAGE/RENT AMOUNTS**

	1-Person	2-Persons	3-Persons	4-Persons
Extremely Low (<30%)				
Annual Income	\$15,400	\$17,600	\$19,800	\$21,950
Monthly Income	\$1,283	\$1,467	\$1,650	\$1,829
Maximum Sales Price	\$51,224	\$58,600	\$65,813	\$73,040
Monthly Rent	\$385	\$440	\$495	\$548
Very Low (31–50%)				
Annual Income	\$25,600	\$29,250	\$32,900	\$36,550
Monthly Income	\$2,133	\$2,438	\$2,742	\$3,046
Maximum Sales Price	\$85,148	\$97,255	\$10,9526	\$121,634
Monthly Rent	\$640	\$731	\$822	\$913
Low (51–80%)				
Annual Income	\$40,950	\$46,800	\$52,650	\$58,500
Monthly Income	\$3,413	\$3,900	\$4,388	\$4,875
Maximum Sales Price	\$136,223	\$155,869	\$174,946	\$194,836
Monthly Rent	\$1,023	\$1,170	\$1,316	\$1,462

Source: HUD 2010 Income Limits Documentation System (<http://www.move.com/home-finance/financial-calculators/home-affordability-calculator>)

Ownership Affordability

According to **Table 22** above, assuming the buyer is paying 10 percent down, has a 5.6 percent interest rate, and has no other debt payments, a prospective buyer in the extremely low-income category for a four-person household in Sacramento County could afford a maximum purchase price of \$73,040, a prospective buyer in the very low-income category for a four-person household could afford a maximum purchase price of \$121,634, and a prospective buyer in the low-income category for a four-person household could afford a maximum purchase price of \$194,836. When these maximums are compared to the current median sales price of \$210,000 (see **Table 19**), only a household earning a moderate income would be within reach of affording the median-priced home in Rancho Cordova.

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Rental Affordability

As shown in **Table 22**, a very low-income household of four could afford up to \$913 a month for rent. If the same household of four lived in a three-bedroom unit in Rancho Cordova, according to the above rental prices listed in **Table 20**, the household would be paying approximately \$1,225 per month, indicating that a household earning 50 percent of the AMI would need to allocate over 40 percent of their gross income to be able to afford the rent for a three-bedroom unit. This indicates a need for housing affordable to extremely low- and very low-income households.

Housing Cost Burden

In general, federal housing programs consider housing to be affordable if a household is paying no more than 30 percent of its gross income for housing.⁴ This definition is employed in many affordable housing programs such as the Housing Choice Voucher program, the HOME program, Low-Income Housing Tax Credits (Section 42), and the Section 202 and 811 programs. Under this standard, households that pay more than 30 percent of their gross income on housing are considered to have a “cost burden.” Cost burden typically occurs when housing costs increase faster than income. While housing affordability in itself is not a fair housing issue, to the extent that housing cost burden is disproportionately impacting the most vulnerable members of a community, particularly those with special needs, the question of access to a range of housing choices arises.

The Comprehensive Housing Affordability Strategy (CHAS) data, which was developed by HUD to assist jurisdictions to write their Consolidated Plans, has special tabulation data based on the 2000 U.S. Census. According to this data (see **Table 23**), 1,500 owner households and 3,889 renter households earned less than 50 percent of the AMI in the City of Rancho Cordova in 2000. Of those households, 772 owner-occupied households and 2,026 renter-occupied households fell into the extremely low-income category.

**TABLE 23
HOUSING COST BURDEN**

	Total Renters	Total Owners	Total Households
Household Income ≤ 50% AMI	3,889	1,500	5,389
Household Income ≤ 30% AMI	2,026	772	2,798
% Cost Burden > 30%	35.8%	27.0%	31.6%
% Cost Burden > 50%	15.0%	8.4%	11.8%

Source: CHAS, 2000

⁴ U.S. Department of Housing and Urban Development (<http://www.hud.gov/offices/cpd/affordablehousing/>)

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PUBLIC AND ASSISTED HOUSING

Section 8 Rental Assistance

The Housing Authority for the County of Sacramento operates under the organization of the Sacramento Housing and Redevelopment Agency (SHRA). The Housing Authority provides low-income families with affordable rental housing that is decent, safe, and sanitary. The Housing Authority provides rental assistance to approximately 11,000 families in its Section 8 Housing Choice Voucher and affordable housing programs.

The Section 8 Housing Choice Voucher Program provides rental subsidies to low-income (50 percent of the County AMI) households that spend more than 50 percent of their gross income on housing costs. The recipient is responsible for a portion of the rent, not exceeding 30 percent of his/her monthly income unless the rent is above the payment standard established by HUD.

Section 8 rental assistance is typically issued as vouchers. The voucher system allows the voucher holder to choose housing that rents at levels higher than the Fair Market Rents (FMR) but up to the SHRA established payment standard. The voucher holders must make up the difference between the payment standard and the actual rents. The intent of the voucher system is to provide greater mobility and location choices for recipients. The City of Rancho Cordova currently has 349 residents using vouchers to assist with housing costs.

Public Housing

The City of Rancho Cordova has a total of 93 public housing units within the city limits. Of those, 33 units are in two apartment buildings, 38 units are duplexes, triplexes, or fourplexes, and the remaining 22 units are single-family homes. Some of these units are administered by SHRA, which serves as the public housing authority for Sacramento County. The City of Rancho Cordova does not have its own local housing authority. Resident initiatives are handled directly by SHRA.

Affordable Housing Projects in Rancho Cordova

There are ten affordable housing developments located in Rancho Cordova with a total of 722 low- and very low-income units, which account for approximately 3 percent of the total housing stock. The address, number of affordable units by bedroom size and income level, and source of financing for each affordable development is provided in **Table 24**.

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**TABLE 24
AFFORDABLE HOUSING PROJECTS**

Name	Address	Affordable Units	Income Level	Financing
Affordable Projects				
Chesapeake Commons	3600 Data Drive	63	Very Low	Housing Choice Voucher; bond program
		117	Low	
Fountain Crest	2719 Mills Park Drive	14	Very Low	Housing Choice Voucher
		57	Low	
Park Meadows Apartments (formerly Cordova Meadows)	2314 Sierra Madre Court	183	Very Low	Tax Credits
Rancho Cordova Apartments	10685 Coloma Road	20	Very Low	Tax Credits
		75	Low	
McGregor Commons	2464 McGregor Drive	27	Very Low	Private (Retirement Housing Foundation)
La Loma Apartments ¹	2088 West La Loma Drive	30	Very Low	California Housing Finance Agency
Coloma Woods ²	2300 Heather Glen Lane	28	N/A	221(d)(4); Housing Choice Voucher
Mills Tower Apartments ³	10499 Mills Tower Drive	9	–	221(d)(4); Housing Choice Voucher
Sunrise Meadows ⁴	11020 Coloma Road	45	Low; Very Low	236(j)(1); Housing Choice Voucher
		54		
<i>Subtotal</i>	<i>10 properties</i>	722	–	–
Public Housing Units				
Ponderosa Apartments	2970 Portsmouth Drive	9		Public Housing
Single-Family Homes	2915 Dain Court	6		Public Housing
	2913 Dain Court			
	2909 Dain Court,			
	2919 Dain Court			
	2917 Dain Court			
2911 Dain Court				
Silva Apartments	10382 S. White Rock Road	8		Public Housing
Coloma Road Apartments	10730 Coloma Road	24		Public Housing
Triplex	2605 El Parque Circle	3		Public Housing

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Name	Address	Affordable Units	Income Level	Financing
Triplex	2609 El Parque Circle	3		
Triplex	2613 El Parque Circle	3		
Triplex	2613 El Parque Circle	3		
Triplex	2619 El Parque Circle	3		
Triplex	2623 El Parque Circle	3		
Fourplex	2701 El Parque Circle	4		
Fourplex	2703 El Parque Circle	4		
Fourplex	2707 El Parque Circle	4		
Single-Family Homes	2608 El Parque Circle 2610 El Parque Circle 2602 El Parque Circle 2604 El Parque Circle 2606 El Parque Circle	5		
Single-Family Homes	2619 Bravado Drive 2615 Bravado Drive 2617 Bravado Drive	3		
Single-Family Home	2264 El Manto Drive	1		
Single-Family Home	2336 Rosado Way	1		
Single-Family Home	10537 Malaga Way	1		
Single-Family Home	2435 Moraine Cir	1		
Single-Family Home	3112 Portsmouth Drive	1		
Single-Family Home	10408 Abington Way	1		
Single-Family Home	9925 Redstone Drive	1		
Single-Family Home	9960 Lincoln Village Drive	1		
<i>Subtotal</i>	<i>34 properties</i>	<i>93</i>	--	--
Grand Total	44 properties	815	--	--

Source: City of Rancho Cordova, March 2011

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PRIVATE SECTOR PRACTICES

This section of the AI discusses the City’s efforts to determine and evaluate the practices of the private sector as they relate to fair housing choice, including the policies and practices of real estate agents, property managers, and mortgage lenders. Mortgage lending patterns are discussed in the next section titled Mortgage Lending.

REAL ESTATE SALES PRACTICES

In the State of California, a broker or salesperson must be licensed by the Department of Real Estate (DRE) in order to conduct business in the field of real estate. The DRE also enforces violations of California real estate law. In the City of Rancho Cordova, any case of discrimination or other fair housing violation that is experienced by an individual from a real estate professional should be reported to the local representative association and/or to the DRE.

The real estate industry in California is highly professionalized. Almost all real estate brokers and salespersons are affiliated with a real estate trade association. The two largest are the California Association of Realtors (CAR), associated with the National Association of Realtors (NAR), and the California Association of Real Estate Brokers (CAREB), associated with the National Association of Real Estate Brokers (NAREB). The use of the term “Realtor” is restricted by NAR as a registered trademark. Members of NAREB are licensed to use the professional designation “Realtist.”

NAR has a professional code of conduct that specifically prohibits unequal treatment in professional services or employment practices on the basis of “race, color, religion, sex, handicap, familial status, or national origin” (Article 10, NAR Code of Ethics). Both prohibit members from promulgating deed restrictions or covenants based on race.

Article 10 of the NAR Code of Ethics reads: “Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin.”

A Realtor pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations upon Realtors and is also a firm statement of support for equal opportunity in housing. A Realtor who suspects discrimination is instructed to call the local Board of Realtors. Local Boards of Realtors will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase, or rental of housing. Local Boards of Realtors have a responsibility to enforce the Code of Ethics through professional standards, procedures, and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

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The CAR has many local associations throughout the state. The City of Rancho Cordova is served by the Sacramento Association of Realtors (SAR). The Sacramento Association of Realtors holds the local real estate members liable to the professional code of ethics. Beyond the local board, real estate professionals are also held to a code of ethics mandated by the CAR, the NAR, and the DRE.

On a case-by-case basis, the Sacramento Association of Realtors will work directly with fair housing and ethical complaints submitted by clients of associated Realtors. When complaints are submitted, the Grievance Committee reviews the complaints to determine if an official hearing is warranted and if the complaint should be passed on to the DRE. SAR has other committees that are designed with a focus toward promoting equal housing opportunities. The SAR Equal Opportunity/Cultural Diversity Committee works to disseminate information and education, primarily through partnering and connecting with community-oriented, equal opportunity groups and organizations. The SAR Housing Opportunities Committee educates the real estate community and general public about housing opportunities and affordability.

CAR offers continuous online courses dealing with fair housing requirements and issues. Part of the license renewal requirements for all sales agents and brokers is continuous education on fair housing laws and regulations. According to the course description, the course will provide an overview of the federal fair housing laws and an in-depth discussion of the individual laws and their application to the practice of real estate. The course also provides CAR members with a study of the State of California fair housing laws and regulations. The course emphasizes anti-discriminatory conduct that all licensees should practice and concludes by discussing the voluntary affirmative action marketing program and why promoting fair housing laws is a positive force at work in California and throughout the nation.

NAREB Realtists follow a strict code of ethics stating that “any Realtist shall not discriminate against any person because of Race, Color, Religion, Sex, National Origin, Disability, Familial Status or Sexual Orientation” (Part I, Section 2, NAREB Code of Ethics):

- In the sale or rental of real property.
- In advertising the sale or rental of real property.
- In the financing of real property.
- In the provision of professional services.

Part I, Section 2 of the NAREB Code of Ethics continues to state that any “Realtist shall not be instrumental in establishing, reinforcing or extending any agreement or provision that restricts or limits the use or occupancy of real property to any person or group of persons on the basis of race, color, religion, sex, national origin, disability, familial status, or sexual orientation.”

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RENTAL AND PROPERTY MANAGEMENT

The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. CAA incorporated in 1941 to serve rental property owners and managers throughout California. CAA represents rental housing owners and professionals who together manage more than 1.5 million rental units.

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

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

The CAA offers a Certificate in Residential Management (CRM), which includes a course on fair housing law. In addition, the CAA website provides links to the Fair Housing Institute and Fair Housing Network.

The CAA has a local association with offices based out of Sacramento. Founded in 1951, the Rental Housing Association of Sacramento Valley (RHA) is a nonprofit organization that serves Amador, El Dorado, Nevada, Placer, Sacramento, Sutter, Yolo, and Yuba counties. RHA offers a wide range of products and services, including a variety of educational opportunities. On a continuous basis, RHA offers its members the following fair-housing-related educational courses:⁵

- **California Certified Residential Manager (CCRM) Series, Preparing the Property for Market (PMR) 107: Fair Housing: It's the Law**

This course highlights that fair housing practices are not only ethical, they are pragmatic. RHA members learn that with discrimination complaints, undercover investigations, fines, and penalties on

⁵ Rental Housing Association of Sacramento Valley website, www.rha.org.

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the rise, it is imperative that all owners and their employees are trained to understand and abide by all federal, state, and local laws regarding fair housing.

- **How to Comply with Fair Housing Laws**

With the ever-changing and important role that fair housing plays in the rental housing industry, property managers and rental owners alike benefit from this course. The class covers a general overview of fair housing and discrimination, how to adhere to the Americans with Disabilities Act and the rental owner's obligations to provide "reasonable accommodations" to their residents. RHA will also discuss registered sex offenders and the Megan's Law website.

In addition to the regular course offerings, RHA hosts several educational conferences, events, and seminars featuring current industry topics and changes in laws regulating the rental housing industry. More specifically, RHA will conduct those fair-housing-specific seminars described above approximately once every two months as part of nearly 200 educational courses offered by the association. In addition to offering its approximately 1,500 members continuous educational opportunities, RHA acts as a continuous source of advisement and guidance for the local property managers, landlords, and other members.⁶

RHA does not directly handle fair housing complaints that may originate from one of the properties managed by an RHA member. RHA will provide advice and guidance to members who are dealing with a possible situation that may violate fair housing law and will refer members to legal representation for cases that are filed. For any resident/tenant who feels they have been discriminated against by a registered member of the RHA, the association would refer the complainant to the California Department of Fair Employment and Housing (DFEH). This type of scenario in which a resident/tenant submits a fair housing complaint to RHA is extremely rare and there is no data available from RHA.

ADVERTISEMENT

Over a two-week period in June 2010, a review of rental housing advertisements for the City of Rancho Cordova was conducted to identify any fair housing violations or impediments. All advertisements were examined for language that explicitly or implicitly indicated that housing would not be made available to persons with regard to membership in a protected class or that there would be a preference for or a bias against persons belonging to a protected class. No advertisements were found that would comprise an illegal or unfair housing opportunity.

⁶ Correspondence with Cory Koehler, Senior Deputy Director of RHA, June 1, 2010.

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MORTGAGE LENDING

Lending practices in the private sector may impact a household's access to housing. A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. In the past, financial institutions did not always employ fair lending practices. Credit market distortions and other activities such as redlining prevented some groups from equal access to credit. (Redlining is a now illegal and discontinued practice where banks would not extend mortgage credit to purchase homes in certain areas. The banks would use maps wherein these areas were outlined in red ink.) The passage of the Community Reinvestment Act in 1977 was designed to improve access to credit for all members of the community. This section reviews the lending practices of financial institutions and the access to financing from all households, particularly minority households and those of very low and low incomes.

Community Reinvestment Act

The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including very low- and low-income persons and neighborhoods.

Conventional Versus Government-Backed Financing

Conventional financing is market-rate-priced loans provided by private lending institutions such as banks, mortgage companies, and savings and loans. To assist households that may have difficulty in obtaining home mortgage financing in the private market due to income and equity issues, several government agencies offer loan products that have below-market interest rates and are insured (or underwritten) by the agencies. Sources of government-backed financing include loans insured or underwritten by the Federal Housing Administration (FHA-insured), the Department of Veterans Affairs (VA-guaranteed), and Farm Service Agency or Rural Housing Services (FHS/RHS). Often, these types of loans are offered to the consumer through private lending institutions and often make the difference in qualifying or not qualifying for a mortgage.

HOME MORTGAGE DISCLOSURE ACT (HMDA) DATA ANALYSIS

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Federal Reserve Board's Regulation C. This regulation provides the public loan data that can be used to assist:

- In determining whether financial institutions are serving the housing needs of their communities;
- Public officials in distributing public-sector investments to attract private investment to areas where it is needed; in identifying possible discrimination lending patterns.

Under the HMDA, lenders are required to disclose information on the disposition of home loan applications and on race or national origin, gender, and annual income of loan applicants.

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Overview

The HMDA data set reports lending records for the Sacramento-Yolo Metropolitan Statistical Area (MSA). To prepare this analysis, the MSA data set is reduced to show only the census tracts that make up the boundaries of the City of Rancho Cordova.⁷ In addition, lending actions within the data set are narrowed to show lending actions for owner-occupied home purchases. All lending actions for home improvement requests, refinancing requests, non-owner-occupied purchases, and loans purchased by investment institutions are removed and not part of this analysis.

Table 25 displays the top ten lending institutions in Rancho Cordova. As shown, the top ten lenders processed more than half (645) of the 1,202 lending requests in 2008. All other lenders in the City (114) processed 557 applications. Wells Fargo and Bank of America processed more than one-fifth of all lending applications.

TABLE 25
MAJOR LENDERS IN 2008

Lending Institution	Applications Processed	Share of Processed Applications
JP Morgan Chase Bank	23	1.9%
US Bank	24	2.0%
Flagstar Bank	36	3.0%
Plaza Home Mortgage, Inc	37	3.1%
Vitek Mortgage Group	39	3.2%
Mountain West Financial, Inc	46	3.8%
Sierra Pacific Mortgage Company, Inc	62	5.2%
Countrywide Bank, FSB	116	9.7%
Bank of America	125	10.4%
Wells Fargo Bank	137	11.4%
Subtotal	645	53.7%
All Others	557	46.3%
Total	1,202	100.0%

Source: Home Mortgage Disclosure Act LAR data, 2008

⁷ Census tracts include 88, 89.05, 89.07, 89.08, 89.09, 89.1, 89.11, 89.12, 89.13, 90.04, 90.05, 90.06, 90.07, 90.08, and 90.09.

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Property Type

Table 26 displays the number and share of home purchase requests by the type of property associated with the request. Most home purchase requests are for homes in structures with one to four units. As shown in the table, 97.4 percent of all requests are for the purchase of homes in structures with one to four units, followed by 2.6 percent for manufactured housing, and less than 0.01 percent for housing in structures with five or more units.

TABLE 26
NEW AND EXISTING HOME PURCHASES BY PROPERTY TYPE

Loan Purpose	1 to 4 Family Units		Manufactured Housing		Multifamily		Total
	#	%	#	%	#	%	
Home Purchase	1,169	97.4%	32	2.6%	1	Less than 0.01%	1,202

Source: Home Mortgage Disclosure Act LAR data, 2008

Home Purchase Lending

Because we are interested in analyzing lending patterns, it is important to analyze the outcome of lending requests. As mentioned, mortgage loans are categorized as either conventional or government-backed, making it important to analyze the outcome of lending requests by the type of loan requested. **Table 27** summarizes the outcome of loan requests by the type of loan being requested. Conventional loans represent the majority of loan types requested (676), followed by FHA (481), and VA-guaranteed (45).

As shown in **Table 27**, 57.4 percent of loans requested result in origination and 42.6 percent fail to originate⁸. Of the 512 loans that failed to originate, 220 or 43 percent did not originate because of denial. As expected, conventional loan requests represented the smallest loan type to originate (52.8 percent), followed by FHA (62.6 percent), and VA-guaranteed (71.1 percent).

TABLE 27
LOAN REQUEST TYPE BY LENDING OUTCOME

Loan Type	Applications Received		Loans Originated		Loans Failed		Loans Denied	
	#	%	#	%	#	%	#	%
Conventional	676		357	52.8%	319	47.2%	148	21.9%
FHA-Insured	481		301	62.6%	180	37.4%	69	14.3%
VA-Guaranteed	45		32	71.1%	13	28.9%	3	6.7%
Total	1,202		690	57.4%	512	42.6%	220	18.3%

Source: Home Mortgage Disclosure Act LAR data, 2008

Note: "Loans Failed" includes loan applications resulting in denial, applications approved but not accepted, withdrawn applications, and incomplete files.

⁸ Loan origination describes lending requests that result in an approved loan and a mortgage is issued. Loans failing to originate are lending requests that do not result in an approved loan or mortgage.

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Table 28 summarizes loan request types by loan applicant race. As shown, 68.7 percent of loan applicants report race as White, followed by 13.1 percent as Asian, and 12.4 percent do not provide race information. Of all loan types, conventional loan requests are the most popular request among non-White applicants, followed by FHA loan requests.

**TABLE 28
APPLICANT RACE BY LOAN REQUEST TYPE**

Applicant Race	Total Applications		Conventional		FHA-Insured		VA-guaranteed	
	#	%	#	%	#	%	#	%
American Indian or Alaska Native	12	1.0%	8	1.2%	4	0.8%		0.0
Asian	157	13.1%	120	17.8%	36	7.5%	1	0.0
Black or African American	36	3.0%	15	2.2%	20	4.2%	1	0.0
Native Hawaiian or other Pacific Islander	22	1.8%	12	1.8%	9	1.9%	1	0.0
White	826	68.7%	437	64.6%	351	73.0%	38	0.8
Race not provided	149	12.4%	84	12.4%	61	12.7%	4	0.1
Total	1,202	100.0%	676	100.0%	481	100.0%	45	1.0

Source: Home Mortgage Disclosure Act LAR data, 2008

Table 29 summarizes loan request types by loan applicant ethnicity. As shown, roughly 8 percent of all loan applicants are Hispanic/Latino, which makes the Hispanic/Latino population the third largest group of persons requesting a loan. VA-guaranteed loan applications are the most common loan type requested among Hispanic/Latino borrowers.

**TABLE 29
APPLICANT ETHNICITY BY LOAN TYPE REQUEST**

Applicant Ethnicity	Total Applications		Conventional		FHA-Insured		VA-guaranteed	
	#	%	#	%	#	%	#	%
Hispanic/Latino	95	7.9%	52	7.7%	39	8.1%	4	8.9%
Not Hispanic/Latino	967	80.4%	541	80.0%	389	80.9%	37	82.2%
Ethnicity not provided	139	11.6%	82	12.1%	53	11.0%	4	8.9%
Not Applicable	1	0.1%	1	0.1%	0	0.0%	0	0.0%
Total	1,202	100.0%	676	100.0%	481	100.0%	45	100.0%

Source: Home Mortgage Disclosure Act LAR data, 2008

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Lending Outcomes

Table 30 shows lending actions by race. As shown, 57.4 percent of all primary residence loan applications in the City result in origination. Of the 512 loan applications failing to originate, 220 of those (43 percent) did so because of denial. Loan origination for the non-White population (48.4 percent) is nearly 10 percent less than for all loan applicants (57.4 percent). Of the 194 failed loan applications for non-White applicants, 38.7 percent failed due to loan denial, which is less than the share of denied loan applications as a percentage of loan failures for White applicants (45.6 percent).

Table 31 summarizes, by race, the explanation for each of the 220 denied loans in the City. As shown, unfavorable debt-to-income ratios, poor credit histories, and insufficient collateral are the top three reasons loan applications result in denial. Of the non-White applicants, Asians have the greatest number of denied loans (33), 36 percent of which are denied for unfavorable debt-to-income ratios. Thirty-one (31) percent of loan denials among White applicants are due to unfavorable debt-to-income ratios.

**TABLE 30
LENDING OUTCOME BY RACE**

Applicant Race	Total Applications	Origination		Failure		Denial	
		#	%	#	%	#	%
American Indian or Alaska Native	12	6	50.0%	6	50.0%	1	8.3%
Asian	157	76	48.4%	81	51.6%	33	21.0%
Black or African American	36	17	47.2%	19	52.8%	10	27.8%
Native Hawaiian or other Pacific Islander	22	11	50.0%	11	50.0%	4	18.2%
White	826	508	61.5%	318	38.5%	145	17.6%
Race not provided	149	72	48.3%	77	51.7%	27	18.1%
Total	1,202	690	57.4%	512	42.6%	220	18.3%

Source: Home Mortgage Disclosure Act LAR data, 2008

Note: "Loans Failed" includes loan applications resulting in denial, applications approved but not accepted, withdrawn applications, and incomplete files

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**TABLE 31
REASON FOR DENIAL BY RACE**

Applicant Race	Debt-to-Income	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other
American Indian or Alaska Native	0	0	0	0	0	0	0	0	1
Asian	12	2	3	2	1	5	2	0	6
Black or African American	0	0	3	4	0	0	1	0	2
Native Hawaiian or other Pacific Islander	0	0	3	0	0	0	1	0	0
White	45	2	19	15	3	9	5	1	46
Race not provided	12	1	2	3	0	0	2	0	7
Total	69	5	30	24	4	14	11	1	62

Source: Home Mortgage Disclosure Act LAR data, 2008

Table 32 shows lending actions by ethnicity. The share of loan applications that originate for Hispanic/Latino applicants (52.6 percent) is lower than the share of loan originations for all applicants (57.4 percent). Of the 45 loan applications failing to originate for Hispanic/Latino applicants, 19 (42 percent) did so because of denial. Non-Hispanic applicants experience loan origination at a rate of 59.5 percent, which is 6.9 percent higher than the rate Hispanic/Latino applicants experience loan origination.

**TABLE 32
LENDING ACTION OUTCOME BY ETHNICITY**

Applicant Ethnicity	Total Applications #	Origination		Failure		Denial	
		#	%	#	%	#	%
Hispanic/Latino	95	50	52.6%	45	47.4%	19	20.0%
Not Hispanic/Latino	967	575	59.5%	392	40.5%	170	17.6%
Ethnicity not provided	139	64	46.0%	75	54.0%	31	22.3%
Not Applicable	1	1	100.0%	0	0.0%	0	0.0%
Total	1,202	690	57.4%	512	42.6%	220	18.3%

Source: Home Mortgage Disclosure Act LAR data, 2008

Note: "Loans Failed" includes loan applications resulting in denial, applications approved but not accepted, withdrawn applications, and incomplete files.

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Table 33 summarizes, by ethnicity, the explanation for each of the 220 denied loans in the City. As shown, debt-to-income (31.4 percent), credit history (13.6 percent), and collateral (10.9 percent) represent the most common reasons applications were denied. Of the 19 loan applications denied for Hispanics, 26.3 percent were denied because of debt-to-income ratios.

**TABLE 33
REASON FOR DENIAL BY ETHNICITY**

Applicant Race	Debt-to-Income	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other
Hispanic/Latino	5	0	1	2	0	1	3	0	7
Not Hispanic/Latino	53	4	26	17	4	12	6	1	47
Ethnicity not provided	11	1	3	5	0	1	2	0	8
Not Applicable	0	0	0	0	0	0	0	0	0
Total	69	5	30	24	4	14	11	1	62

Source: Home Mortgage Disclosure Act LAR data, 2008

Mortgage Lending by Area

In addition to analyzing lending outcomes for individual applicant characteristics, it is important to analyze lending patterns by neighborhood characteristics, specifically census tracts. This section analyzes lending outcomes by census tracts and compares outcomes in each census tract to race and income characteristics of each census tract.

Table 34 shows lending actions and socioeconomic characteristics for Rancho Cordova census tracts. HMDA data is available at the census tract level, but not at the block group level. The census tracts presented in **Table 34** are those located in the City of Rancho Cordova.

As shown, the share of non-White households in the City is 38.4 percent. Census tracts with 1 percent more non-White persons than the overall city share are considered concentrated areas. According to **Table 34**, four census tracts (90.04, 90.06, 90.07, and 90.09) are concentrated with non-White persons and Hispanic persons. As detailed in **Table 34**, there does not appear to be a correlation with higher rates of loan denial in neighborhoods with concentrated populations of non-White persons, with the exception of tract 90.06, which has a minority population of 40.8 percent and a loan denial rate of 27.2 percent.

According to HUD's Low/Mod summary data, 50.4 percent of the total census tract populations are low/mod. Low/Mod persons are persons that earn 80 percent or less of the area median income, and areas with at least 51 percent low/mod persons are considered CDBG target areas. As shown in **Table 34**, eight census tracts (88, 89.05, 89.07, 89.11, 89.13, 90.06, 90.07, and 90.08) have higher shares of low/mod persons than the overall share in the City, all of which are considered CDBG target areas. Of the census tracts that

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exceed the overall share of low/mod persons in Rancho Cordova, there does not appear to be a correlation with higher rates of denial, with the exception of tract 90.06, which is 58 percent low/mod and experiences the highest loan denial rate (27.2 percent)

TABLE 34
LENDING ACTIONS AND CHARACTERISTICS FOR RANCHO CORDOVA
CENSUS TRACTS

Census Tract	Total Applications	Origination	Failure	Denial	Non-White Population	Low/Mod Population
88	168	64.3%	35.7%	20.8%	22.2%	97.8%
89.05	78	56.4%	43.6%	23.1%	24.0%	52.9%
89.07	72	63.9%	36.1%	15.3%	23.1%	52.4%
89.08	87	55.2%	44.8%	16.1%	17.8%	46.8%
89.09	44	59.1%	40.9%	18.2%	29.9%	23.8%
89.10	51	68.6%	31.4%	15.7%	24.3%	43.9%
89.11	14	64.3%	35.7%	0.0%	33.7%	67.9%
89.12	59	66.1%	33.9%	18.6%	21.3%	34.2%
89.13	62	64.5%	35.5%	14.5%	17.9%	51.3%
90.04	79	59.5%	40.5%	21.5%	41.4%	36.2%
90.05	69	44.9%	55.1%	17.4%	32.8%	48.9%
90.06	81	44.4%	55.6%	27.2%	40.8%	58.0%
90.07	27	37.0%	63.0%	18.5%	47.8%	69.6%
90.08	70	58.6%	41.4%	12.9%	31.8%	61.8%
90.09	241	53.9%	46.1%	17.0%	39.9%	39.8%
Total	1202	57.4%	42.6%	18.3%	38.4%	50.4%

Source: Home Mortgage Disclosure Act LAR data, 2008; 2000 Census; and 2010 HUD Low/Mod Data

Note: "Loans Failed" includes loan applications resulting in denial, applications approved but not accepted, withdrawn applications, and incomplete files. Non-White Population figures come from the 2000 Census and Low/Mod Population figures come from HUD's 2010 Low/Mod Data.

Table 35 shows the reasons for denied loan applications by census tract. As shown, debt-to-income (31.4 percent), credit history (13.6 percent), and collateral (10.9 percent) are the most frequent reasons loans are denied in all census tracts. In census tract 90.06, the most common reasons for loan denial are debt-to-income ratio and credit history.

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TABLE 35
REASON FOR DENIAL BY CENSUS TRACT

Census Tract	Debt-to-income	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Other
88	13	2	3	3	1	3	2	8
89.05	3	0	3	4	0	1	0	7
89.07	4	0	2	0	1	2	0	2
89.08	4	0	5	1	0	0	0	4
89.09	3	1	0	1	0	0	0	3
89.10	4	0	0	1	1	0	0	2
89.11	0	0	0	0	0	0	0	0
89.12	3	0	0	2	0	0	1	4
89.13	4	0	1	0	0	0	1	3
90.04	3	0	5	2	0	1	2	4
90.05	3	0	0	2	0	1	2	4
90.06	6	0	6	1	0	2	0	7
90.07	1	0	1	1	0	0	1	1
90.08	2	1	0	1	0	1	1	3
90.09	16	1	4	5	1	3	1	10
Total	69	5	30	24	4	14	11	62

Source: Home Mortgage Disclosure Act LAR data, 2008

Summary of Lending Data

In 2008, of the 1,202 loan requests in the City to purchase a mortgage for a primary residence, lending institutions approved financing for 57.4 percent and denied 18.3 percent. Over the same time period, of the 47,536 loan requests in the Sacramento—Arden-Arcade—Roseville MSA,⁹ lending institutions approved financing for 59.7 percent and denied 16.7 percent. Conventional mortgage requests result in lower rates of loan origination than do FHA and VA mortgage requests. As detailed in **Table 30**, only White applicants experience a higher rate of loan origination than the overall rate for all applicants in Rancho Cordova. Asian and African American applicants experience the highest rates of loan failure for all races and ethnicities, mostly because of debt-to-income ratio, credit history, and collateral.

With the exception of tract 90.06, it does not appear that areas with higher concentrations of non-Whites and low/mod persons correlate with higher than expected loan denial rates. Approximately 27 percent of

⁹ The Sacramento—Arden-Arcade—Roseville MSA is comprised of the following counties: El Dorado, Placer, Sacramento, and Yolo.

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mortgage applications in tract 90.06 result in denial, as compared to 18.3 percent for the City as a whole. Tract 90.06 also has a larger share of non-White persons and low/mod persons as compared to the City as a whole. Debt-to-income ratio and credit history are the most frequent reasons applicants from tract 90.06 are denied. The 2008 lending data does not appear to show unfair access to mortgage credit for Rancho Cordova households.

FAIR HOUSING COMPLAINTS AND ENFORCEMENT

Patterns of complaints and enforcement are useful to assess the nature and level of potentially unfair or discriminatory housing practices in the private sector. Several public and private agencies may receive complaints about unfair housing practices or housing discrimination.

At the federal level, the Office of Fair Housing and Equal Opportunity (FHEO) of the Department of Housing and Urban Development receives complaints of housing discrimination. FHEO will attempt to resolve matters informally. FHEO may act on those complaints if they represent a violation of federal law and FHEO finds that there is “reasonable cause” to pursue administrative action in federal court.

At the state level, the Department of Fair Employment and Housing (DFEH) has a similar role to FHEO. DFEH also receives, investigates, attempts to settle, and can take administrative action to prosecute violations of the law. HUD and DFEH have some overlap in jurisdiction and, depending on the nature of the case, may refer cases to one another. DFEH is a HUD Fair Housing Assistance Program (FHAP) grantee, meaning that it receives funding from HUD to enforce federal fair housing law in California.

U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity

The San Francisco FHEO office provided information on fair housing complaints and cases for the period January 1, 2007, through December 31, 2009.¹⁰ FHEO did not directly receive any fair housing complaints over this three-year period that were filed directly with HUD, but did report six cases that were filed through agencies participating in the Fair Housing Assistance Program (FHAP). HUD provides FHAP funding annually on a noncompetitive basis to state and local agencies that enforce fair housing laws that are substantially equivalent to the Fair Housing Act.

Of the six complaints recorded in the FHEO report, two cases were filed in 2007, three were filed in 2008, and the final complaint was filed in 2009. Of the cases filed in 2007, one was filed on the basis of race and the other on the basis of national origin. In 2008, each of the three reported cases was on different classes of discrimination that included race, sex, and retaliation. In 2009, the final year of the FHEO report, the single

¹⁰ Correspondence, Chuck Hauptman, HUD-FHEO, San Francisco.

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case filed was on the basis of familial status. This lack of repetitive basis for complaints would indicate that in Rancho Cordova there is not a particular protected class that is more frequently being discriminated against.

The FHEO report shows that all six cases were closed by December 31, 2009. Four (67 percent) of the six cases were closed through a determination of no cause. The remaining two cases were closed through conciliation or resolution. Both of these cases involved compensation to reach conciliation or resolution. One of the cases closed in 2008 carried a compensation amount of \$2,500. The final case closed in 2009 delivered a compensation amount of \$2,000. Together, the two cases involving compensation resulted in \$4,500 being paid to the complainants to achieve conciliation or resolution.

A survey of Fair Housing Plans from surrounding jurisdictions reveals that reported housing discrimination is less frequent in Rancho Cordova. According to the Sacramento Housing and Redevelopment Agency (SHRA), there were 517 cases reported between 1997 and 2004 to the Human Rights and Fair Housing Commission (SHRA does not report housing complaints from HUD-FHEO). SHRA does not detail the types of complaints reported by the Human Rights and Fair Housing Commission, making it difficult to compare fair housing trends between Rancho Cordova and surrounding areas. SHRA serves unincorporated Sacramento County, City of Folsom, City of Isleton, City of Galt, and City of Sacramento.

California Department of Fair Employment and Housing

The California Department of Fair Employment and Housing provided records of housing complaints filed from the City of Rancho Cordova for the period January 2005 through December 2009.¹¹ The department received two complaints between 2005 and 2009.

The first complaint was filed in 2006 with a basis of national origin. DFEH records report that the specific action that led to the reported discrimination was one of unequal terms in a rental housing environment. The second fair housing case was filed in early 2008 with a basis of physical disability. This case carried multiple actions that fostered alleged discrimination including eviction and denied reasonable accommodations regarding disability in a rental housing environment.

The DFEH closed both fair housing complaint cases filed between 2005 and 2009. The 2006 case based on discrimination toward national origin was closed through no probable cause to prove the violation of the statute. The time frame between the case being filed and closed was two days short of a full year. The second case filed in 2008 with a basis physical disability was closed under the same category of no probable cause to prove the violation of the statute. The time frame needed to close this case was less than five months.

¹¹ Correspondence, Karen Gilbert, Research Analyst, California Department of Fair Employment and Housing

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Together, only eight complaints originating out of Rancho Cordova were filed with either the DFEH or FHEO over the last five years. This low number is an indicator that there are not significant and continuous fair housing law violations occurring within the housing community of Rancho Cordova.

Local Private Sector Reports

Multiple local agencies provide fair housing information, education, training advocacy, and other related services and/or resources to residents of Rancho Cordova. One agency acts as the primary entity capable of and responsible for receiving, directly handling, and maintaining a working database of fair housing complaints in the City of Rancho Cordova. The Regional Human Rights/Fair Housing Commission (HRHF), which is based in Sacramento, is in contract with the City of Rancho Cordova to provide direct fair housing services to the community.

HRHF was founded in 1963 and focuses its efforts on fostering inclusiveness across multiple social levels and environments through education and outreach programs on civil rights. HRHF frequently provides training on the federal and state laws regarding illegal fair housing conditions. It also operates a tenant/landlord hotline regarding any form of related questions to fair housing, equal opportunity, or other related management issues. When a fair housing complaint is generated due to some form of discrimination, HRHF stands ready to record the complaint, documents the complaint with the appropriate authorities, and provides advisement and mediation services to most complaint cases. When cases require legal services, HRHF refers complainants to their sister nonprofit agency, the Center for Human Rights Law and Advocacy.

The Center for Human Rights Law & Advocacy (CHRLA) is a nonprofit public benefit corporation organized and operated exclusively for charitable and educational purposes. CHRLA's specific purpose is to provide charitable assistance and education to the public through various activities. Events in the past have included the annual Hate Crime Conference, Martin Luther King Jr. Celebration, and Fair Housing Month activities. Through CHRLA, the Human Rights/Fair Housing Commission is able to offer limited assistance to callers outside the Sacramento area seeking information about their rental rights and responsibilities. A CHRLA satellite office is located in Rancho Cordova.¹²

Between August 2007 and March 2010, the Regional Human Rights/Fair Housing Commission opened cases for 41 fair housing violation complaints originating out of Rancho Cordova. These complaints included various basis of discrimination including physical disability, race, mental disability, national origin, and familial status. **Table 36** shows physical disability was the most commonly reported basis of discrimination as it occurred in 28 of the cases (68.3 percent). The second most common basis was race that occurred in 12 cases (29.3 percent) reported. The remaining three bases of mental disability, national origin, and familial status were all reported in only one case. A filed case can include multiple bases of discrimination.

¹² Correspondence with Barbara Lehman, Executive Director, Human Rights/Fair Housing Commission, June 1, 2010.

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TABLE 36
FAIR HOUSING COMPLAINTS, PRIVATE SECTOR,
AUGUST 2007–MARCH 2010

Basis of Complaint	Number	Percentage
Physical Disability and Accommodation	28	68.3%
Race	12	29.3%
Familial Status	1	2.4%
National Origin	1	2.4%
Mental Disability	1	2.4%
Other	0	–
Total*	43*	

Source: Fair housing complaint reports generated by the HRFH, August 2007–March 2010

**The total number of basis of complaints can exceed the total number of cases reported as a single case could contain multiple bases of complaint.*

Comment [rs1]: Beyond scope of the AI.

Out of the 41 cases reported, 40 of the cases have been closed. **Table 37** shows that 28 of the cases (70.0 percent) closed by HRFH over the nearly three-and-a-half-year reporting period were closed due to no evidence or insufficient evidence to support the claim. Eleven (27.5 percent) of the cases reported were closed as conciliated as the respondents were required to attend fair housing and equal opportunity training courses. These courses are often facilitated by HRFH, which allows the agency to ensure the respondent attended the course and provides additional opportunity to follow up with those involved in the complaint case. A single case filed in the middle of 2009 with a basis of disability was closed by HRFH, but the complainant decided to file the case directly with HUD. No further details were provided regarding this case. The final case reported, which is the most recent, was opened in March 2010 and at the time of this report was not closed.

TABLE 37
CLOSED FAIR HOUSING CASES, PRIVATE SECTOR,
AUGUST 2007–MARCH 2010

Basis of Complaint	Number	Percentage
No Evidence/Insufficient Evidence	28	70.0%
Referral to Other Agency	–	–
Agency Mitigation/Successful Conciliation	11	27.5%
Administratively Closed/Filed with HUD	1	2.5%
Closed by an Attorney	–	–
Total	40	100%

Source: Fair housing complaint reports generated by the HRFH, August 2007–March 2010

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With 41 fair housing complaint cases reported between August 2007 and March 2010, and only 11 cases requiring agency mitigation with successful conciliation, no severe fair housing conditions appear to be present in the City of Rancho Cordova. However, with a large majority of the complaints (97.6 percent) having a basis of disability or race, additional education and community outreach regarding fair housing rights of these protected classes may help in reducing the number of complaints that do originate out of Rancho Cordova.

ONLINE FAIR HOUSING SURVEY

In conjunction with the Analysis of Impediments to Fair Housing, the City of Rancho Cordova's Housing Services Department conducted an online survey for the community to respond to fair housing needs questions. The survey was made available on the City's home page between June and September 2010. There were several press releases made to announce the survey as well as advertisement at City Council meetings to encourage community members to take the survey. The goal of the survey was to identify whether barriers and adverse policies exist in the City's housing market. Five surveys were developed to target the following constituencies:

- Local government staff
- Real estate agents/property managers
- Lenders
- Housing providers
- Residents

There were no responses to the real estate agent/property manager survey or the lender survey, although several lenders were directly contacted and asked to fill out the survey. Please see a summary of the responses below and **Appendix A** for the complete results.

Local Staff

Response

Thirteen local staff members responded. Two were elected officials, one was a manager or administrator, four were from the Engineer/Public Works department, four from the Planning/Community Development department, and two marked other.

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Prevalence of Housing Discrimination/Segregation

The majority (58.3 percent) believed that housing discrimination has become “somewhat less” or “much less” of a problem, 8.3 percent believed that it has become “somewhat more” of a problem, and the remainder (33.3 percent) did not believe that housing discrimination is a problem.

More than half (53.8 percent) of the respondents agreed that their communities had “significant areas of residential poverty concentration,” 23.1 percent “somewhat agreed,” and 23.1 percent “agreed.” Almost half (46.2) “agreed,” 38.6 percent “somewhat agreed,” 7.7 percent “agreed,” and 7.7 percent “somewhat disagreed” that their communities had “significant areas of racial/ethnic concentration.”

Land Use

Seven of the thirteen respondents strongly agreed and somewhat agreed that the City’s land use policies are helping to reduce concentrations of poverty and ethnic/racial concentrations. Over half (66.7 percent) knew that the City has a policy requiring the equal distribution of affordable housing.

Fair Housing Knowledge/Reporting

Half believed that residents understand fair housing rights “somewhat well,” one-quarter believed “very poorly,” 16.7 percent believed “somewhat poorly,” and the remaining believed “not at all.”

More than half (61.5 percent) believed that persons who experience discrimination “probably would” report it to a government agency, 23.1 percent that a person “probably would not” report it, and the remaining respondents didn’t know.

The majority of local staff believed that people will not report fair housing discrimination because they believe that fair housing violations will not result in meaningful action, followed by difficult or time-consuming, don’t feel they know their fair housing rights, and fear of reprisal.

Other Comment/Additional Information

Overall city staff believes there is a need for internal education and improvement to fair housing services.

Housing Providers

Response

Five service providers responded. One indicated they were from a nonprofit 501(c)(3) organization, one indicated they weren’t from a 501(c)(3) organization, and three skipped the question.

Prevalence of Housing Discrimination/Segregation

Of the respondents, 40 percent believed that housing discrimination was “common,” another 40 percent believed it was “rare,” and the remaining 20 percent believed it is “somewhat rare.” About half also believed

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that housing discrimination has become “somewhat more” or “much more” of a problem, while a few indicated that it had become “somewhat less” of a problem.

Fair Housing Knowledge/Reporting

Most respondents (80 percent) believed that residents of Rancho Cordova understand their fair housing rights “very well” or “somewhat well.” The remainder said that they don’t understand at all.

Responses were almost split down the middle whether or not it was likely a person would report housing discrimination to an advocate or lawyer. Two respondents indicated they thought a person probably would report, and three respondents indicated a person would probably not or definitely would not report. This leads us to believe that more housing providers feel that tenants are experiencing housing discrimination and are less likely to report such incidents

Most respondents believe that when it is not reported, discrimination is not reported because of the following reasons (in rank order):

- Belief that no meaningful action will take place
- Don’t want the hassle/don’t have the time
- Fear of reprisal
- Don’t feel I understand my fair housing rights

Most have clientele who have recently experienced housing discrimination.

The top five bases of discrimination cited were:

- Race/ethnicity
- Religion
- National origin
- Disability
- Household size

The most common discriminatory actions were:

- Refusal to rent or sell housing
- Refusal to show available housing
- Being provided misleading information about the availability of housing for sale or for rent

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- Being provided misleading information about the price or rent of housing for sale or for rent
- Having different conditions imposed on the purchase or rental of housing for sale or for rent

Most often, no action was taken in response to the experience of housing discrimination, although in a few instances an attorney was contacted.

The most common groups to experience discrimination are believed to be:

- Black/African American
- Hispanic/Latino
- Immigrant families
- Persons who do not speak English as their first language

Also mentioned were mixed-race persons.

Communication

The most effective media for communicating fair housing information was judged to be:

- Cable television
- Radio
- Newspaper
- Government websites
- Online videos
- Online social networks

Constituencies who should be targeted for fair housing education include the following:

- Average resident
- Real estate brokers/agents
- Mortgage lenders
- Property managers/landlords
- Home insurance agents

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Other Comment/Additional Information

The following comment was provided:

- Fair housing does not address disability issues, such as wheelchair ramps.

Residents

Response

The online survey had twelve responses, seven of which were homeowners and five were renters.

Prevalence of Housing Discrimination

The majority of respondents stated that housing discrimination occurs “rarely” (33.3 percent) or “somewhat commonly” (33.3 percent). The remainder believed that housing discrimination was either “somewhat rare” or didn’t know of a problem in the past. Most (83.3 percent) believed that they felt they understand their fair housing rights “somewhat well” or “very well.”

Fair Housing Knowledge

Most respondents (58.3 percent) said that they “definitely would” or “probably would” report housing discrimination to an advocate or lawyer. Most believed that it is not reported because of the following reasons (in rank order):

- Belief that no meaningful action will take place
- Don’t want the hassle/don’t have the time
- Fear of reprisal
- Don’t feel I understand my fair housing rights

Only one of the eleven residents who completed the survey felt they had recently experienced housing discrimination. The incident was on the basis of race/ethnicity. The discriminatory action was because of:

- Being provided misleading information about the availability of housing for sale or for rent
- Having different conditions imposed on the purchase or rental of housing for sale or for rent

The resident took action and consulted a fair housing counselor/advocate. The result was “no action taken.”

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Other Comment/Additional Information

The following comments were provided:

- While I applaud the efforts to improve access to affordable housing, I'm concerned about the effects of introducing crime into neighborhoods. I would actually prefer to see a less aggressive approach to improving access to affordable housing.
- City has too much affordable housing now. It's dragging the city down. Clean it up!

Summary Analysis

In general, the survey indicates the need for further investigation into fair housing. The most significant aspect of the results is the prevalence of housing discrimination on the basis of race/ethnicity, specifically discrimination among Black/African American as well as Latino/Hispanics. As reported by housing provider respondents, discrimination is most likely to occur on the basis of race/ethnicity, especially among African American and Hispanic households. The survey results also show that there is a need to:

- Educate City staff on fair housing obligations of the City, including affordable housing and the role City staff have in education and enforcement.
- Educate the public on the resources available to those who experience housing discrimination and that it's against the law.
- Educate the public about affordable housing and that providing affordable housing is an obligation the City has.
- Improve the perceptions of affordable housing.

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PUBLIC POLICIES

CITY PROGRAMS

The City of Rancho Cordova offers multiple programs that encourage fair housing choice or support the City's efforts to remove regulatory barriers to equal housing opportunities. Most of the programs promote affordable housing opportunities for low- to moderate-income households (up to 80 percent or 120 percent of AMI) and preserve the City's existing housing stock.

Neighborhood Stabilization Program (NSP)

The City of Rancho Cordova received Neighborhood Stabilization Program funds (NSP) through the Housing and Economic Recovery Act (HERA) of 2009.

Neighborhood Stabilization Program Round 1 (NSP1)

Under NSP1, HUD allocated \$3.92 billion on a formula basis to 309 grantees including 55 states and territories and 254 selected local governments. The program was designed to stabilize communities across America hardest hit by foreclosures. Grant agreements for these funds have already been signed.

The amount allocated to the City of Rancho Cordova was based on a formula calculated by the State of California Department of Housing and Community Development. Rancho Cordova was allocated approximately \$1.1 million based on population, foreclosure rates, and low-income housing needs. The City has submitted the NSP1 application and is awaiting the results of the award.

Owner-Occupied Housing Rehabilitation Program

The owner-occupied housing rehabilitation program concentrates on fully rehabilitating housing units, bringing each unit into compliance with local, state, and federal codes. The program will also serve as a valuable resource for households looking to abate lead-based paint issues. The program will offer low-interest and/or deferred loans to target-income homeowners. This program is funded with CDBG funds.

Emergency Repair Program

The Emergency Repair Loan Program is designed to provide financial assistance for repairs that correct health or safety hazards in the home. This includes water heater replacement, plumbing or electrical repair, roof repair or replacement, heating and cooling system repair, structural repairs needed due to wind, water, or fire damage, and door, window, and lock replacement. Disabled accessibility improvements are also included.

A forgivable loan is given, which is an interest-free loan on which the balance is reduced by 20 percent of the total loan amount each year that the homeowner continues to occupy the home. A five-year grant agreement is recorded against the property conditioning the homeowner to reside in the home for a minimum of five

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years from the date of assistance, or the homeowner will have to repay the full amount of the original assistance.

Rental Housing Inspection Program

The rental housing inspection program will fund salary and benefits for a 0.5 full-time equivalent (FTE) code enforcement officer whose duties will include inspecting all of the rental units within the designated deteriorated area. The City has many rental units that are likely out of compliance with applicable codes, and this program, in coordination with public and private investment, will arrest the decline of the area by forcing rental property owners to improve their properties to a minimum standard. This program is funded with CDBG funds.

Permanent Supportive Housing

The Mather Community Campus (MCC) in Rancho Cordova is a transitional housing project that provides housing, job training, and employment to individuals and families on the former Mather Field Air Force Base. Residents are referred either from emergency shelters or from residential substance abuse treatment facilities. MCC is a Volunteers of America facility that is the result of collaboration with Sacramento Area Emergency Housing Center and Crossroads Diversified Services. In 2009, 39 persons graduated from the two-year housing and job-training program at MCC.

Affordable Housing Development

Using the City's Very Low Income Housing Trust Fund (VLIHTF) and NSP funds, the City assists with the development of housing affordable to target-income households.

The Crossings at New Rancho

The Crossings at New Rancho is an 18 unit multifamily complex being built behind the old Stagger Inn site by Urban Housing Communities. It includes 12 two-bedroom units and 6 three-bedroom units, a community center, covered parking, and energy-efficient fixtures. The Crossings will be a family-friendly and community-oriented development that will meet some of the affordable housing needs of the area with large, comfortable, and energy-efficient units.

Horizons at New Rancho

Horizons at New Rancho is a proposed affordable assisted living facility to be located on the old Stagger Inn site. The proposed design includes approximately 50 beds in a variety of unit configurations with emphasis placed on livability, efficiency, and community. The Housing Services Department is currently working to obtain funding that will allow this project to move forward. For more information, contact the Housing Services Department.

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Code Compliance

As part of the City's efforts to eliminate regulatory barriers to equal housing opportunities, the City's code enforcement program funds salary and benefits for a 0.5 full-time equivalent code enforcement officer whose responsibilities will include responding to code enforcement complaints and proactively enforcing code.

Volunteers in Neighborhood Services (VINS)

As part of the City's Strong Neighborhoods Initiative, the City created Volunteers in Neighborhood Services (VINS). The mission of the Strong Neighborhoods Initiative is to foster city pride, increase property values, and encourage residents to enhance their homes, street, and community. VINS works in partnership with the community and is guided by the following objectives:

- Providing voices as ambassadors/liaisons to the City in combined efforts to improve the quality of life in neighborhoods;
 - Educating neighbors about community resources;
 - Being a community leader by setting an example;
 - Participating in community events;
 - Empowering neighborhoods by being involved
- Celebrating successes;
- Suggest to City staff, changes and ways to strengthen codes; and
- Accepting of all members of the community that want to be involved.¹³

VINS currently offers the following volunteer programs and opportunities for residents:

- Adopt a Neighborhood (possible activities)
 - Remove signs in the right-of-way
 - Report code violations
- Blight Busters
 - Hand out educational brochures with the Animal Services Division
- Graffiti Abatement
 - Paint out graffiti
- Event Planning
 - Assist with printing and/or folding flyers

¹³ Extracted from <http://www.cityofranhocordova.org/Index.aspx?page=449> on February 23, 2011.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

- General office assistance
- Represent the City during events such as Kid's Day or Fourth of July
- Clean Corridor Program
 - Adopt a street to pick up litter
- Other assignments as approved

In addition to the programs and opportunities described above, VINS also offers an opportunity for volunteers to assist with mitigating the negative neighborhood effects of property degradation due to home abandonment. Cordova Pride is a VINS program that focuses efforts on improving neighborhoods one house at a time. Through Cordova Pride, VINS in coordination with neighborhood volunteers have successfully cleaned up abandoned homes throughout the City.¹⁴

¹⁴ Extracted from <http://www.cityofranhocordova.org/Index.aspx?page=584> on February 23, 2011.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

BUILDING AND PLANNING PRACTICES

Public policies established at the state, regional and local levels can affect housing development and therefore may have an impact on the range and location of housing choices available to residents. This section discusses the public policies enacted by the City of Rancho Cordova and their potential impacts on housing development. Zoning and housing-related documents (e.g., housing elements, previous fair housing assessments, and consolidated plans) were reviewed to identify potential impediments to fair housing choice and affordable housing development.

Housing Element Law and Compliance

As part of evaluating potential impediments to fair housing choice and housing development, the City of Rancho Cordova's Housing Element was reviewed. California housing element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community.

California state housing element law requires each jurisdiction to:

- Identify adequate sites that will be made available through appropriate zoning and development standards and with the services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the city's regional housing needs.
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.
- Conserve and improve the condition of the existing affordable housing stock.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

Land Use Policies and Practices

The City's ordinances contain a variety of zoning districts that allow a range of housing opportunities for persons with special needs, including people with disabilities, people requiring transitional housing or emergency shelter, and farm workers. It is the policy of the City of Rancho Cordova to periodically evaluate local zoning laws and policies that may affect fair housing choice.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Zoning Districts

The following is a detailed description of residential zoning districts, as well as the commercial districts that permit or conditionally permit residential development in the City of Rancho Cordova.

Residential Districts

The following descriptions of each residential zoning district identify the characteristic uses, intensity of uses, and level of development intended for that district.

Rural Residential (RR) Zoning District. This district is applied to areas of the City where development is limited to low-density concentrations of single-family dwellings. The zone implements the General Plan's Rural Residential land use category by allowing residential developments of between 0.1 and 0.5 dwelling units per acre.

Estate Residential (ER) Zoning District. This district is applied to areas of the City where development is limited to low-density concentrations of single-family dwellings. The zone implements the General Plan's Estate Residential land use category by allowing for residential development of between 0.51 and 2.0 dwelling units per acre.

Residential (RD) Zoning District. This district is established to provide sufficient space in appropriate locations for residential development to meet the housing needs of the City's present and expected future population with due allowance for the need for a choice of sites. There are 12 individual RD zones (RD-1, RD-2, RD-3, RD-4, RD-5, RD-6, RD-7, RD-10, RD-15, RD-20, RD-25, and RD-30). The number associated with the RD district corresponds to the maximum gross density allowed in the district.

Medium Density Residential (MDR). This district designates property for the development of a wide range of housing types with a density range between 6.1 and 18.0 dwelling units per acre. The MDR district is intended for higher-density single-family homes (attached or detached), condominiums, and small apartment complexes.

High Density Residential (HDR). This district designates property for the development of residential uses with a density between 20.1 and 40.0 dwelling units per acre. The HDR district is intended for higher-density residential development, such as apartments, condominiums, lofts, and other multi-story residential uses.

Residential Mobile Home Zoning District (RMH). This district provides for the development of mobile home parks and/or the placement of mobile homes on individual lots within an approved subdivision of lots to accommodate mobile homes as the primary dwelling unit.

Mixed-Use Districts

The following descriptions of each mixed-use zoning district identify the characteristic uses, intensity of uses, and level of development intended for that district.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Residential Mixed Use (RMU) Zoning District. This district is intended to designate property for the development of medium- and high-density housing that may incorporate office and/or commercial services. This district allows between 6.1 and 40.0 dwelling units per acre.

Commercial Mixed Use (CMU) Zoning District. This district is intended to designate property for vibrant commercial and mixed-use development. Business and professional office uses, as well as residential uses (density between 10 and 18 units per acre; 10 to 40 units per acre in the downtown), are also permitted by right when integrated vertically or horizontally with commercial uses.

Office Professional Mixed Use (OPMU) Zoning District. This district is intended to designate property for the development of larger office buildings and business parks with supporting retail and service uses. This district also allows residential uses to be integrated with office use where compatible at a density between 10 and 18 units per acre.

Specific Plan and Special Planning Areas

Rancho Cordova has Specific Plans (SP) and Special Planning Areas (SPA) that are each distinguished by their location and unique development characteristics. Once adopted, SPs and SPAs replace the zoning of the property with zoning unique to the project area. While SPs rely on the existing development standards in the Zoning Code, SPAs may establish development standards for minimum lot area, building setbacks, lot width and depth, and building height that differ slightly from citywide development standards. Specifically, SPAs are designed to protect certain resources of the City from incompatible land uses and to preserve areas with unique social, architectural, or environmental characteristics not otherwise adequately protected by regular zoning. In general, the intent of an SPA is to allow flexibility in development standards and existing zoning. Developers are encouraged to vary housing designs and densities in these areas, including such types as mixed-use commercial/residential developments and carriage houses. Developers are required to maintain minimum densities based on the established zoning for the area.

In many cases, SPs and SPAs allow unique uses and development standards for the planning area. These unique zoning provisions may increase flexibility for subsequent development within the planning area. All SPs and SPAs must be consistent with the City's General Plan. The SPAs and SPs are not considered to hamper housing development and, in reality, may promote housing development through the easing of some standards.

Provisions for a Variety of Housing

Permitting different types of housing is essential to providing a full range of housing choice. The City of Rancho Cordova has many zoning districts that permit a variety of housing types. Some of the housing types include single-family residential housing, multifamily residential housing, residential accessory dwelling units, mobile homes, duplexes, and residential care homes. **Table 38** shows the housing types permitted in the various zoning districts in Rancho Cordova. No significant barriers were identified for any of the housing types listed below.

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**TABLE 38
HOUSING TYPES PERMITTED BY ZONE**

Land Use Category	RR	ER	RD-1, -2, -3	RD-4	RD-5, -6	RD-7	RD-10	RD-15	RD-20, -25, -30	MDR	HDR	RMH
Multifamily Dwelling	N	N	N	N	N	N	P	P	P	P	P	N
Second Unit Dwelling	P	P	P	P	P	P	P	P	P	P	P	P
Single-Family Dwelling	P	P	P	P	P	P	P	P	P	P	N	P
Two-Family Dwelling	N	N	N	L	L	L	P	P	P	P	N	N
Emergency Shelter	N	N	N	N	N	C	C	C	C	C	C	C
Adult Care Facility	C	C	C	C	C	C	C	C	C	C	C	C
Adult Care Home	P	P	P	P	P	P	P	P	N	N	N	N
Manufactured Home	P	P	P	P	P	P	P	P	P	P	P	P
Single-Room Occupancy (SRO)	N	N	N	N	N	N	N	N	C	N	C	N
Transitional/Supportive Housing	N	N	P	P	P	P	P	P	P	P	P	P

Source: 2008–2013 Rancho Cordova Housing Element
Use regulations in the table are shown with representative symbol by use classification listing:
 “P” symbolizes uses permitted allowed by right
 “L” symbolizes uses that require approval of a Limited Use Permit
 “C” symbolizes uses that require approval of a Conditional Use Permit
 “N” symbolizes uses that are not permitted

Care Facilities

In order to assure that persons with the need for supported living services are able to find housing outside an institutional setting, it is important that local land use policy provide for community care facilities. Under current zoning regulations, residential care facilities for six or fewer adults or eight or fewer children are allowed in the City’s residential zones by right. Residential care facilities with more than six adults or eight children are permitted in all land use zones in the City by obtaining a conditional use permit. Below are the City’s current definitions of adult day care facility and adult day care home.

Adult Day Care Facility. State-licensed facilities that provide nonmedical care and supervision for more than six adults for periods of less than 24 hours, with no overnight stays.

Adult Day Care Home. Defined by state law as the provision of nonmedical care to six or fewer adults, including seniors, in the provider’s own home, for a period of less than 24 hours at a time. Homes serving more than six adults are included in “Adult Day Care Facility.”

See the Persons with Disabilities section for a listing of the type of licensed care facilities in the City of Rancho Cordova.

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Persons with Disabilities

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling.

The California Government Code requires localities to analyze potential and actual constraints and to include programs to accommodate housing for disabled persons. The Building Code adopted by the City of Rancho Cordova incorporates accessibility standards contained in Title 24 of the California Code of Regulations.

The City completed a Housing Element update in December 2009 and as a part of that update looked at the following requirements related to persons with disabilities:

- Definition of “family” – The Rancho Cordova Zoning Code defines family as “a single residential unit or person or group of persons living together as a domestic unit in a single residential unit.” This definition is consistent with current housing law.
- Separation requirements – The City’s Zoning Code does not impose any separation requirements between group homes or residential care facilities.
- Site planning requirements – The site planning requirements for residential care facilities are no different than for other residential uses in the same zone.
- Reasonable accommodation – A request for reasonable accommodation may be made by any person with a disability, their representative, or any entity, when the application of a requirement of the Zoning Code or other City requirement, policy, or practice acts as a barrier to fair housing opportunities. A person with a disability is 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. Reasonable accommodations are intended to apply to those persons who are defined as disabled under the acts.
- 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. A reasonable accommodation is granted to the household that needs the accommodation and does not apply to successors in interest to the site and may be granted without the need for the approval of a variance.

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Emergency Shelters; Transitional and Supportive Housing

State law requires jurisdictions to provide adequate sites for a variety of housing types including emergency shelters and transitional/supportive housing. Action H.4.4.6 of the Rancho Cordova Housing Element, adopted in 2009, states that emergency shelters will continue to be allowed as a permitted use without a conditional use permit in the Office/Industrial/Mixed Use (OIMU) and the Light Industrial Business Park (LIBP) zones.

Permit Processing

The application process varies depending on the type of entitlement that is being requested. Single-family subdivisions that do not require any change to the zoning are submitted to the Planning Department, reviewed by staff for their conformance to the Design Guidelines, and presented at a public hearing before the Planning Commission for approval.

Multifamily projects are processed in the same manner, with the exception of mixed-use sites developing as 100 percent residential, which are subject to design review not only by the Planning Commission but also by the City Council. Specific plans, rezoning requests, subdivisions, and variances require staff and Planning Commission review for approval. Multifamily development in commercial and business zones requires the same procedure as in residential zones.

Many other factors, such as public sentiment, may also affect the determination of approval of a project. The time frame for processing an application in the City of Rancho Cordova is no longer than that of the majority of jurisdictions in the region and may be considerably shorter.

Density Bonus Ordinance

The City of Rancho Cordova density bonus provisions are consistent with state law and are as follows.

The City of Rancho Cordova shall grant one density bonus, with concessions or incentives, as specified in Section 4.4.050 (Number and Types of Incentives and Bonuses Allowed) of the Zoning Code, or provide other incentives or concessions of equivalent financial value based upon the land cost per dwelling unit, when the applicant for the housing development seeks and agrees to construct a housing development, excluding any units permitted by the density bonus awarded, that will contain at least one of the following:

- 10 percent of the total units of a housing development for lower-income households;
- 5 percent of the total units of a housing development for very low-income households;
- Housing for special needs populations;
- A senior citizen housing development; or

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

- 10 percent of the total dwelling units in a common interest development as defined in Section 1351 of the California Civil Code for persons and families of moderate income, provided that all units in the development are offered to the public for purchase.

Available Vacant Land

As of December 2009, the City of Rancho Cordova had approximately 522.6 acres of vacant single-family zoned land, 451.93 acres of vacant multifamily zoned land, and 35.32 acres of underutilized multifamily land. The single-family zoned land was used to accommodate the City's above-moderate housing need, and the multifamily (vacant and underutilized) zoned land was used to accommodate the extremely low-, very low-, low-, and moderate-income housing need.

Many of the multifamily sites are located adjacent to existing residential developments, indicating that infrastructure is available, and the sites do not have other known constraints to development. The total number of units that could be developed is based on a holding capacity of 80 percent of the maximum number of units allowed by each zoning designation or in a specific planning area. Sites with residential densities of at least 20 units per acre are assumed to accommodate housing units affordable to extremely low-, very low-, and low-income households.

The land inventory analysis in the City's 2008–2013 Housing Element indicates that the City is able to accommodate its 2006–2013 Regional Housing Needs Allocation for all income categories and has a surplus of 1,189 units.

Accessibility of Public Transit

Public transit plays an important role in analyzing access to housing. Public transit should link lower-income persons, who are often transit-dependent, to major employers where job opportunities may be available. The lack of an integral relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice because persons who depend on public transit will have limited choices regarding places to live.

Elderly and disabled persons tend to be more transit-dependent than other persons. Specifically, many elderly and disabled persons rely on public transit to visit doctors and go to medical appointments, go shopping, or attend activities offered at community facilities. Housing for the elderly and disabled should be located near transit routes, or alternative transit should be made available for persons with special needs. This section discusses the accessibility of public transit to major employers, shopping centers, and community and medical facilities from lower-income areas and from housing for persons with special needs.

The Regional Transit (RT) Light Rail network is a main form of public transportation in the Sacramento region. The system consists of one route that runs from north to south (Blue Line) and another that runs from west to east (Gold Line). The Gold Line connects Downtown Sacramento to the Folsom Boulevard

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Corridor, with three stops in the City of Rancho Cordova. As identified in the City's Folsom Boulevard Specific Plan, the Folsom Boulevard corridor will develop with housing, retail, and office space. Housing is planned as mixed-income with retail and office space to meet the diverse needs of corridor residents. RT's Gold Line is an important component of the plans along the corridor and will provide a reliable alternative means of transportation to City residents. Additionally, the Gold Line connects users to the entire Sacramento region by connecting to the Blue Line and RT's bus system.

The City also has the Mills Station Crossing project, which will be located at a key site along the Folsom Boulevard Corridor in the heart of the City's Redevelopment Project area. Mills Station Crossing is within close proximity to the Mills light rail station across the street, which gives the opportunity to create an urban infill master-planned development. The site is located on Folsom Boulevard near Mather Field Road, within ¼ mile of a Highway 50 interchange.

The project site is located at the Mather Field "Pulse Point," an identified node of activity designated for focused investment due to the proximity to transit and a high-traffic corridor. The site is surrounded by a variety of uses, including light industrial, retail, and residential. The City adopted the Folsom Boulevard Specific Plan along this corridor in 2006 to allow for denser, mixed-use development.

According to the 2006–2008 ACS, in the City of Rancho Cordova:

- 5.2 percent of workers use public transportation and the median age of workers using public transportation is 34.7.
- Of the 1,381 workers using public transportation:
 - 56.1 percent earn less than \$24,999;
 - 31.6 percent earn more than \$25,000 and less than \$64,999; and
 - 12.3 earn more than \$65,000.
- The median earning of workers in the City is \$33,581 and the median earning of workers that rely on public transportation is \$21,250.
- Of the 1,853 workers that are below 100 percent of the poverty level, 9.3 percent rely upon public transportation, and of the 2,310 workers that are between 100 and 149 percent of the poverty level, 7.4 percent rely upon public transportation.
- 1,381 workers report using public transportation, of which:
 - 19.6 percent work in management and/or professional occupations;
 - 15.1 percent work in service occupations; and

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

- 60.8 percent work in sales and office occupations.
- 948 householders occupying rental housing use public transportation as compared with 433 householders occupying owner-occupied housing.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

ASSESSMENT OF FAIR HOUSING PRACTICES

The City of Rancho Cordova contracts directly with the Regional Human Rights/Fair Housing Commission (HRHF), a local fair housing agency based in Sacramento which is responsible for receiving, directly handling, and maintaining a working database of fair housing complaints in the City of Rancho Cordova.

HRHF frequently provides training on the federal and state laws regarding illegal fair housing conditions. It also operates a tenant/landlord hotline regarding any form of related questions to fair housing, equal opportunity, or other related management issues. When a fair housing complaint is generated due to some form of discrimination, HRHF stands ready to record the complaint, documents the complaint with the appropriate authorities, and provides advisement and mediation services to most complaint cases. When cases require legal services, HRHF refers complainants to their sister nonprofit agency, the Center for Human Rights Law and Advocacy.

HOUSING ELEMENT

The City of Rancho Cordova continues to support the efforts and actions to eliminate affordable housing barriers identified in its Housing Element. The 2008–2013 Rancho Cordova Housing Element identifies affordable housing barriers and outlines the City’s plans to eliminate these barriers.

Fair and equal housing opportunity remains an important issue in Rancho Cordova to ensure that all persons, regardless of their status, have the opportunity to find a suitable home. The Rancho Cordova Housing Element includes the following policy and action to follow in the ongoing efforts to promote fair and equal housing opportunities.

- **Policy H.4.7** – The City will continue to promote equal housing opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, disability, familial status, source of income, or sexual orientation.
 - **Action H.4.7.1** – The City will direct specific fair rights inquiries to the Sacramento Center for Human Rights Law and Advocacy. The City will post newsletters and brochures from the Center for Human Rights Law and Advocacy at the permit counter.

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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

RANCHO CORDOVA ANNUAL ACTION PLAN

The Annual Action Plan adopted by the City of Rancho Cordova reinforces the City's commitment to removing or reducing barriers to affordable housing over the next five years. The actions listed include supporting and/or implementing the following

- Provide housing programs that preserve the quality and affordability of ownership housing stock for target-income households;
- Arrest decline in deteriorated areas of the City by requiring rental property owners to fix code violations and improve their properties, by increasing code enforcement efforts;
- Assist community-based organizations with additional financing that allows them to provide new or expanded services to target low-income residents, especially seniors and youth; and
- Improve public facilities in target areas.

The City has completed the following ADA projects with CDBG money:

- White Rock Pathway project (\$80,000 of CDBG) – This project consisted of taking an existing pathway, widening it, and repaving it as well as improving line of sight by including lighting to make the pathway more accessible, and eliminated barriers to the entry.
- Horn Road Sidewalk Improvements Project (\$130,000 of CDBG) – This project consisted of installing 867 feet of new sidewalk and replacing about 50 feet of damaged sidewalks. The project also consisted of removing and replacing 12 sidewalk ramps to meet ADA requirements along Horn Road from Old Winery Place to Routier Road.
- White Rock Neighborhood Pedestrian and Safety Improvement (\$400,000 of CDBG) – The project consisted of sidewalks, curb and gutter, and ramp installation and improvements.

RANCHO CORDOVA CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

According to the 2009–2010 Consolidated Annual Performance and Evaluation Report (CAPER), the City provided fair housing and counseling services to approximately 238 households. This included providing assistance with housing discrimination and tenant and landlord laws, investigating fair housing complaints, providing outreach and education through public forums, and distributing fair housing literature and newspaper articles.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CONCLUSIONS AND RECOMMENDATIONS

The purpose of this analysis is to determine the possible existence of impediments to housing choices based upon race, religion, sex, color, national origin, handicap (disability), or familial status and, where identified, suggest necessary steps to reduce and/or eliminate such impediments. This section describes those impediments and the corresponding actions identified through the analysis.

The identified impediments are grouped into four broad categories: affordable housing, mortgage lending, fair housing enforcement and education, and housing choice. Within each category are one or more impediments followed by one or more actions the City of Rancho Cordova plans to undertake to address each impediment. It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, this analysis is stating the nature of a problem that the actions to address will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

To facilitate reporting of accomplishments and the association of planned activities with impediments and actions, each impediment and action is identified by a number. Actions are labeled according to the impediment they address.

Please note that state law requires local jurisdictions in California to assess barriers to affordable housing as part of the General Plan Housing Element. Programs to address impediments to fair housing may be addressed through the implementation of the Housing Element.

AFFORDABLE HOUSING

The provision of affordable housing and the support of existing and new affordable housing is critical to assuring that all households have access to quality housing.

Although the City of Rancho Cordova has many affordable projects within the City, housing affordability issues in both the ownership and rental sectors of the housing market still exist. Even with declining home prices offering a median sales price of about \$210,000, only a household earning a moderate income would be within reach of affording the median-priced home in Rancho Cordova. There is a high probability that households earning less than 80 percent AMI overpay to own a home.

Rental affordability is an issue for persons and families earning extremely-low and very-low household incomes. The average four-person household within these income categories would have to allocate nearly 40 percent of their income to cover the average costs of a three-bedroom unit within the City of Rancho Cordova.

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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

1. **Impediment: Lower-income households are challenged to find affordable housing in Rancho Cordova..**

1.1. Action: Continue to provide assistance to preserve existing affordable housing by establishing a biannual monitoring program to identify assisted housing units at risk of losing their affordability subsidies or requirements, and continue to assist in the creation of new affordable housing by prompting available incentives. Incentives will be promoted on the City's website, in brochures, and by making referrals.

1.2. Action: Continue to offer regulatory relief and incentives such as fee reductions or deferrals, reduced parking requirements, density bonuses, priority permit processing, technical assistance in project processing, and accessing funding for special needs households and for the development of affordable housing.

1.3. Action: Assure the availability of adequate sites for the development of affordable housing through implementation of actions H1.2.1, H1.2.2, and H4.1.2 in the 2008–2013 Housing Element.

MORTGAGE LENDING

The analysis of home mortgage lending patterns revealed that minority applicants had a higher likelihood of not receiving requested mortgage credit. The analysis suggested that this might be due to poor preparation prior to application for credit as well as a lack of collateral.

The mortgage lending analysis also suggests that those who request mortgage credit to purchase homes in areas that have concentrations of lower-income households and concentrations of minority households are less likely to receive that credit. The analysis suggests that this is related to factors associated with relative income and wealth (credit risk, debt to income, loan to value).

Two general strategies are suggested from the analysis: pre-purchase counseling for homebuyers and the encouragement of lenders to reach out to under-represented populations. (The availability of appropriately priced housing is also linked to the ability to achieve appropriate loan-to-value and debt-to-income ratios. See Affordable Housing above.)

2. **Impediment: Differential origination and approval rates based on race, ethnicity, and neighborhood.**

2.1. Action: The City of Rancho Cordova will periodically monitor Home Mortgage Disclosure Act (HMDA) data and report significant trends in mortgage lending by race, ethnicity, and neighborhood.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

3. Impediment: Lack of knowledge about the requirements of mortgage lenders and the mortgage lending/home purchase process, particularly among lower-income and minority households.

3.1. Action: The City will offer and support pre-purchase counseling and homebuyer education programs.

3.2. Action: The City of Rancho Cordova will study the potential benefit to offer and to support home purchase programs targeted to lower-income (low and very low), immigrant, and minority households.

FAIR HOUSING EDUCATION AND ENFORCEMENT

Promoting fair housing includes both education and enforcement. The City of Rancho Cordova will continue to support both education and enforcement efforts.

The online survey indicated that there is a need for education regarding fair and equal treatment to persons of different races/ethnicities and for persons with disabilities.

Respondents from the online survey also expressed concern regarding unequal distribution of lower-income households and race/ethnicity. Survey respondents are concerned with the concentrations of lower-income and minority households. Findings from the survey regarding unequal distribution are supported by the analysis of geographic concentrations of lower-income households and minority households.

4. Impediment: Lack of knowledge of fair housing rights.

4.1. Action: Support efforts to educate tenants and owners and agents of rental properties regarding their fair housing rights and responsibilities.

4.2. Action: Support local advocate agencies and community stakeholders in efforts to disseminate fair housing information to people within the community.

5. Impediment: Lack of information on the nature and basis of housing discrimination.

5.1. Action: Monitor the incidence of housing discrimination complaints by reviewing reports made to enforcement agencies and advocates, consulting with fair housing educators and housing providers, and soliciting public comment. The results will be reported annually in the CAPER.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

5.2. Action: Include a review of prior year performance regarding affirmatively furthering fair housing in the annual planning for the use of CDBG funds. Identify funding support that addresses the removal of impediments or advancing specific fair housing goals.

5.3. Action: Work with local agencies such as the Human Rights and Fair Housing Commission to improve the collection and reporting of information on discrimination, particularly based on race, disability, familial status, and national origin.

6. **Impediment: Unequal distribution of lower-income households and minority households.**

6.1. Action: The City encourages a mixture of household incomes in new developments. As part of the Annual Action Plan, the City will track changes in geographic concentrations for lower-income and minority households via U.S. Decennial Census data and American Community Survey data.

HOUSING CHOICE

Large low-income families are at risk of living in overcrowded conditions due to a lack of appropriately sized homes, which is a barrier to housing choice.

The U.S. Census Bureau defines overcrowding as occurring when a housing unit is occupied by more than the equivalent of one person per room (excluding bathrooms, kitchens, hallways, and porches), and units with more than 1.50 persons per room are considered highly overcrowded.

Overcrowding occurs when housing costs are so high relative to income that families have to reside in small units or double up to devote income to other basic needs such as food and medical care. It also occurs when the appropriate type and size of units are not available because they are not produced in adequate numbers or are not available at an affordable price. Overcrowding also may result in increased traffic within a neighborhood, deterioration of homes, and a shortage of on-site parking. Maintaining a reasonable level of occupancy and alleviating overcrowding is an important contributor to quality of life and furthering fair housing.

As presented in the analysis of overcrowded conditions in the City and according to the 2000 U.S. Census, 18.8 percent of renter households are overcrowded and 10.7 percent of those households are highly overcrowded.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

7. Impediment: Lack of adequately sized homes for large renter households.

7.1. Action: The City will explore strategies (such as pursue HOME funding or support applications for subsidized housing) to ensure appropriate amounts of adequately sized units are added to the City's rental housing supply as a result of new construction.

7.2. Action: The City will implement the actions under policy H.4.4 in the 2008–2013 Housing Element, which states the City will assist with the development of housing for the special needs populations, including housing accessible for persons with disabilities (including veterans as a primary target group), large households, the homeless, and single-parent households.