City of Pasadena

Analysis of Impediments to Fair Housing Choice

May 2020

City of Pasadena Housing Department 649 North Fair Oaks, Suite 202 Pasadena, CA 91103

Signature Page

Fair Housing Choice (AI) was	that this 2020 City of Pasadena Analysis of Impedim pproved by the City Council on July 20, 2020 and s conclusions about impediments to fair housing cheess any identified impediments.	that it
Steven Mermell		
City Manager City of Pasadena, CA		

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Chapter 1: Introduction

Incorporated in 1886, Pasadena is a thriving community of 146,000 persons located at the foot of the San Gabriel Mountains. The City is renowned for its vibrant economy, institutions for higher education, cultural amenities, strong neighborhoods, diverse housing, and high quality of life. These amenities distinguish Pasadena as one of the most livable and sought-after communities in Los Angeles County and in Southern California. To ensure that Pasadena remains a desirable place to live, civic leaders must make sure that an environment exists where equal access to housing opportunities is treated as a fundamental right.

A. Purpose of Report

The City of Pasadena has established a commitment towards providing equal housing opportunities for its existing and future residents. Through the federally funded Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs, and other state and local programs, the City works to provide a decent living environment for all.

Pursuant to CDBG regulations [24 CFR Subtitle A §91.225(a)(1)], to receive CDBG funds, a jurisdiction must certify that it "actively furthers fair housing choice" by:

- Completing an Analysis of Impediments to Fair Housing Choice (AI);
- Taking action to eliminate identified impediments; and
- Maintaining fair housing records.

This report, the Analysis of Impediments to Fair Housing Choice (commonly known as the "AI"), provides an overview of laws, regulations, conditions, and other possible obstacles that may affect an individual's or household's access to housing in Pasadena. The AI includes:

- An assessment of conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing; and
- A comprehensive review of Pasadena's laws, regulations, and administrative policies, procedures, and practices, and an assessment of how they affect the location, availability, and accessibility of housing.

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

B.Fair Housing Legal Framework

Fair housing is a right protected by both Federal and State of California laws. These laws ensure that virtually every housing unit in California is subject to fair housing practices.

1. Federal Laws

The federal **Fair Housing Act of 1968** and **Fair Housing Amendments Act of 1988** (42 U.S. Code §§ 3601-3619, 3631) prohibit discrimination in all aspects of housing, including the sale, rental, lease or negotiation for real property. The Fair Housing Act prohibits discrimination based on the following protected classes:

- Race or color
- Religion
- Sex
- Familial status
- National origin
- Disability (mental or physical)

Specifically, it is unlawful to:

- Refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, disability, familial status, or national origin.
- Discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, disability, familial status, or national origin.
- Make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, disability, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.
- Represent to any person because of race, color, religion, sex, disability, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.
- For profit, induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, disability, familial status, or national origin.

Reasonable Accommodations and Accessibility: The Fair Housing Amendments Act requires owners of housing facilities to make "reasonable accommodations" (exceptions) in their rules, policies, and operations to give people with disabilities equal housing opportunities. For example, a landlord with a "no pets" policy may be required to grant an exception to this rule

and allow an individual who is blind to keep a guide dog in the residence. The Fair Housing Act also requires landlords to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces, at the tenant's own expense. Finally, the Act requires that a portion of new multi-family housing developments with four or more units be designed and built to allow access for persons with disabilities. This includes accessible common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units.

HUD Final Rule on Equal Access to Housing in HUD Programs: On March 5, 2012, HUD published the Final Rule on "Equal Access to Housing in HUD Programs regardless of Sexual Orientation or Gender Identity." It applies to all McKinney-Vento-funded housing programs, as well as to other housing assisted or insured by HUD. The rule creates a new regulatory provision that generally prohibits considering a person's marital status, sexual orientation, or gender identity (a person's internal sense of being male or female) in making housing assistance available.

2. California Laws

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The **Fair Employment and Housing Act** (FEHA) (Gov. Code §§12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising
- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices (zoning)
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex
- Marital status
- Source of income
- Sexual Orientation
- Gender identity/expression
- Genetic information
- Familial status (e.g., households with children under 18 years of age)
- Religion
- Mental/Physical Disability

- Medical Condition
- Age

In addition, the California FEHA contains similar reasonable accommodations and accessibility provisions as the Federal Fair Housing Amendments Act.

The **Unruh Civil Rights Act** provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists "sex, race, color, religion, ancestry, national origin, disability, or medical condition" as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics.

Furthermore, the **Ralph Civil Rights Act** (California Civil Code section 51.7) forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can include: verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The **Bane Civil Rights Act** (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by making it illegal to interfere by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act are not allowed for speech alone unless that speech itself threatened violence.

The California Civil Code Section 1940.3 prohibits landlords from questioning potential residents about their immigration or citizenship status. Landlords in most other states are free to inquire about a potential tenant's immigration status and to reject applicants who are in the United States illegally. In addition, this law forbids jurisdictions from passing laws that direct landlords to make inquiries about a person's citizenship or immigration status.

In addition to these laws, Government Code Sections 111135, 65008, and 65580-65589.8 prohibit discrimination in State-funded programs and in land use decisions. Specifically, recent changes to Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including permanent supportive housing for the disabled and housing for the homeless.

Most recently in 2019, the State passed SB 329 and SB 222, expanding the source of income protection. Under SB 329 and SB 222, all landlords in California will be required to accept Section 8 and VASH vouchers and other forms of rental assistance and to consider them as part of an applicant's income. Both will go into effect on January 1, 2020.

3. Fair Housing Defined

In light of the various pieces of fair housing legislation passed at the federal and state levels, fair housing throughout this report is defined as follows:

A condition in which individuals of similar income levels in the same housing market have a like range of choice available to them regardless of their characteristics as protected under State and Federal laws.

Housing Issues, Affordability, and Fair Housing

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

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either or both parties on their rights and responsibilities. Tenant/landlord disputes and housing discrimination cross paths when the disputes are based on factors protected by fair housing laws and result in differential treatments.

4. Impediments Defined

Within the legal framework of federal and state laws and based on the guidance provided by HUD's *Fair Housing Planning Guide*, impediments to fair housing choice can be defined as:

- Any actions, omissions, or decisions taken because of the characteristics protected under State and Federal laws, 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 characteristics protected under State and Federal laws.

To affirmatively promote equal housing opportunity, a community must work to remove impediments to fair housing choice. Furthermore, eligibility for certain federal funds requires the compliance with federal fair housing laws.

C. Organization of the Report

This report is divided into eight chapters:

- **Chapter 1: Introduction** defines "fair housing" and explains the purpose of this report.
- **Chapter 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.
- Chapter 3: Community Profile presents the demographic, housing, and income characteristics in Pasadena. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed. In addition, this section evaluates if community care facilities, public and assisted housing projects, as well as Section 8 recipients in the City are unduly concentrated. Also, the degree of housing segregation based on race is evaluated.
- **Chapter 4: Lending Practices** assesses the access to financing for different groups. Predatory and subprime lending issues are discussed.
- **Chapter 5: Public Policies** analyzes various public policies and actions that may impede fair housing within the City.
- **Chapter 6: Fair Housing Practices** evaluates existing public and private programs, services, practices, and activities that assist in providing fair housing in the City. This chapter also assesses the nature and extent of fair housing complaints and violations in different areas of the City. Trends and patterns of impediments to fair housing, as identified by public and private agencies, are included.
- **Chapter 7: Impediments and Actions** summarizes the findings regarding fair housing issues in Pasadena and provides a plan of action for furthering fair housing practices.

This report also includes a Signature Page with the signature of the City's Chief Elected Official, together with a statement certifying that the Analysis of Impediments represents the City of Pasadena's official conclusions regarding impediments to fair housing choice and the actions necessary to address identified impediments.

D. Data and Methodology

According to the *Fair Housing Planning Guide*, HUD does not require jurisdictions to commence a data collection effort to complete the AI. Existing data can be used to review the nature and extent of potential issues. Various data and existing documents were reviewed to complete this AI, including:

- 1990-2010 U.S. Census and multiple sets of American Community Surveys¹
- 2019 State Department of Finance Population and Housing Estimates
- 2000 and 2013 City of Pasadena AI reports
- 2014-2021 City of Pasadena Housing Element
- Zoning Code, various plans, and resolutions of the City of Pasadena
- California Department of Social Services Community Care Licensing Division
- 2018 Employment Development Department employment and wage data
- 2012 and 2017 Home Mortgage Disclosure Act (HMDA) data on lending activities
- Current market data for rental rates, home prices, and foreclosure activities
- Fair housing records from the Housing Rights Center
- Section 8 data from the City's Housing Authority

Sources of specific information are identified in the text, tables, and figures.

The 2010 Census no longer provides detailed demographic or housing data through the "long form". Instead, the Census Bureau conducts a series of American Community Surveys (ACS) to collect detailed data. The ACS surveys different variables at different schedules (e.g. every year, every three years, or every five years) depending on the size of the community. Multiple sets of ACS data are required to compile the data for Pasadena in this report, including the 2013-2017 ACS Five Year Estimates.

Chapter 2: Community Participation

This Analysis of Impediments to Fair Housing Choice (AI) report has been developed to provide an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals, and service providers. To assure the report responds to community needs, a community outreach program consisting of three public meetings, a fair housing survey, and interviews with key agencies was conducted in the development of this report. This chapter describes the community outreach program conducted for this report.

A. Public Meetings

Two public meetings were held to solicit input from the general public, service providers, and housing professionals, including:

- Real estate associations/realtors
- Apartment owners and managers associations
- Homeowner and neighborhood associations
- Fair housing service providers
- Supportive service providers and advocacy groups (e.g., for seniors, families, disabled persons, immigrant groups)
- Educational institutions
- Faith-based organizations
- Housing providers

As summarized in Table 1, two separate meetings were held in the City. Both meetings were open to everyone in the City, but personal invitations were sent out to agencies and organizations that serve population with special needs and low- and moderate-income households. Detailed information on the agencies invited can be found in **Appendix A**.

Table 1: Community Meeting Locations

Location	Date/Time	
Fair Oaks Renaissance Plaza Community Room 649 N. Fair Oaks Avenue, Suite 203 Pasadena, CA 91103	September 25, 2019 9:30AM	
Robinson Park Recreation Center 1081 N. Fair Oaks Ave. Pasadena, CA 91103	October 1, 2019 6:30PM	

To encourage attendance and participation, the meetings were publicized through the following methods:

- Emailed to community stakeholders and service providers.
- Mailings to 77 community organizations and service providers.
- Posted flyers on the City website.

Ten residents and representatives of service providers attended the workshops. The participants were a mixture of residents, landlords, community organizers, and service providers. Representatives from the Housing Rights Center, Housing Works, and Council District 5 attended a meeting.

Key Issues Identified

A few issues were noted at the meetings:

- Housing affordability, primarily unpredictable and frequent rent increases.
- Lack of accountability for developers to rent promised affordable housing units to low income persons.
- Residents are not always clear on where to seek assistance with fair housing issues and/or think the services (hours and programs) need to be expanded
- Retaliation for those residents that have reported discrimination and fear of retaliation from those that have not.
- Confusion about what constitutes a fair housing issue and lack of education about new laws that may protect them.

B.Fair Housing Survey

The Fair Housing Survey sought to gain knowledge about the nature and extent of fair housing issues experienced by Pasadena residents. The survey consisted of 15 questions designed to gather information on a person's experience with fair housing issues and perception of fair housing issues in his/her neighborhood. A copy of the survey is included as **Appendix B**.

The survey was made available in English and Spanish, and distributed via the following methods:

- Distributed at various community locations and public counters.
- Posted on the City's website.
- Solicited the participation of service providers to also post the survey link on their websites and to help distribute surveys to their clients.

Because the survey sample was not controlled, results of the survey are used only to provide insight regarding fair housing issues, but cannot be treated as a statistically valid survey.² Furthermore, fair housing is a complex issue; therefore, a survey of this nature can only explore the perception of housing discrimination but cannot be used as proofs of actual discrimination.

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² A survey with a "controlled" sample would, through various techniques, "control" the socioeconomic characteristics of the respondents to ensure that the respondents are representative of the general population. This type of survey would provide results that are statistically valid but is much more costly to administer.

Who Responded to the Survey?

A total of 540 Pasadena residents responded to the Fair Housing Survey. The responses were from residents representing zip codes across the entire City. The majority of survey respondents were: renters (56 percent), female (71 percent), non-Hispanic (76 percent), and White (71 percent). Respondents similarly represented different age groups from young adults (25-34; 18 percent), adults (34-44; 24 percent), middle age (45-54; 21 percent), older age (55-64; 20 percent), to seniors (65+, 17 percent). The majority of the respondents did not have a disability (90 percent) and did not live with children in their home (76 percent).

A vast majority of survey recipients felt that housing discrimination was not an issue in their neighborhoods. Of the 540 responses, approximately 81 percent (434 persons) had not experienced housing discrimination. Of the 99 respondents (19 percent) that had experienced discrimination in the past, 87 answered questions about fair housing.

Who Do You Believe Discriminated Against You?

Among the persons indicating that they had experienced housing discrimination, 80 percent (69 persons) indicated that a landlord or property manager had discriminated against them, while 16 percent (14 persons) of respondents identified Real Estate Agents as the source of discrimination. City or County staff were identified as the source of discrimination by 13 percent of respondents (11 persons). Responses for the fair housing survey are not mutually exclusive; respondents had the option of listing multiple perpetrators of discrimination. "Other" responses included property managers and landlords (3 responses), sources of help (1 response), the City (1 response), and subsidized programs (1 response).

Number Percent* Landlord/Property Manager 79.3% 14 16.1% Real Estate Agent Government Staff Person 11 12.6% 7 Other 8.0% Mortgage lender 5 5.7% Insurance Broker/ Company 3 3.4% **Total Respondents** 87

Table 2: Perpetrators of Discrimination

Notes:

- 1. Categories are not mutually exclusive.
- Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

Where Did the Act of Discrimination Occur?

Among the persons indicating that they had experienced housing discrimination, 57 percent (50 persons) indicated that the discrimination they experienced occurred in an apartment complex. About 38 percent (33 persons) indicated that the discrimination occurred in a single-family neighborhood (most likely renters renting homes), and 17 percent (15 persons) indicated that it

took place when applying to a City/County program. "Other" responses described situations rather than the location of discrimination.

Table 3: Location of Discrimination

	Number	Percent
Apartment Complex	50	57.5%
Single-Family Neighborhood	33	37.9%
When Applying for City/County Programs	15	17.2%
Public or Subsidized Housing Project	10	11.5%
Condo/Townhome Development	9	10.3%
Other	6	6.9%
Mobile Home Park	2	2.3%
Total Respondents	87	

Notes:

- 1. Categories are not mutually exclusive
- Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

On What Basis Do You Believe You Were Discriminated Against?

Of the 87 people who felt they were discriminated against, 48 percent (42 persons) indicated that they believed the discrimination was based on race, 30 percent (26 persons) believed it was based on family status, 25 percent (22 persons) believed it was based on age, and 24 percent (21 persons) believed it was based on source of income. Other responses included discrimination based on color, gender, marital status, and disability.

Table 4: Basis of Discrimination

	Number	Percent
Race	42	48.3%
Family Status	26	29.9%
Age	22	25.3%
Source of Income	21	24.1%
Color	15	17.2%
Other	13	14.9%
Gender	12	13.8%
Marital Status	12	13.8%
Disability/Medical Conditions	11	12.6%
National Origin	5	5.7%
Ancestry	4	4.6%
Sexual Orientation	4	4.6%
Religion	2	2.3%
Total Respondents	87	

Notes:

- 1. Categories are not mutually exclusive
- Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

How were You Discriminated Against?

Of the 87 people who felt they were discriminated against, the most common acts of discrimination were being charged not being shown an apartment and paying higher security deposit. "Other" responses mostly described situations of being denied apartment (such as being told unit was no longer available, not answering calls from potential tenants, denying due to disability or support animals, and told they are not good fit).

Table 5: Acts of Discrimination

	Number	Percent
Other	40	45.4%
Not Shown Apartment	29	33.3%
Higher Security Deposit than Industry Standard	27	31.4%
Higher Rent than Advertised	23	26.7%
Provided Different Housing Services or Facilities	13	15.1%
Total Respondents	87	

Notes:

- 1. Categories are not mutually exclusive
- 2. Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

Requests for Reasonable Accommodation

Among the persons indicating that they had experienced housing discrimination, 15 percent (13 persons) indicated that they had been denied "reasonable accommodation" in rules, policies or practices for their disability. Most valid requests denied were related to allowing a service animal in the unit (4 persons). However, the majority of the written narratives from respondents were related to building maintenance and repairs. This is evidence that many do not fully understand the modifications/flexibility covered under reasonable accommodation.

Why Did You Not Report the Incident?

Of the survey respondents who felt they were discriminated against, only eight percent (7 persons) reported the discrimination incident. Many of the respondents who did not report the incident indicated that they did not believe it would make a difference (46 percent or 35 persons) or they did not know where to report the incident (18 percent or 14 persons), and 10 percent (eight persons) felt it was too much trouble. Another seven percent (5 persons) were afraid of retaliation. "Other" responses described experiences where reporting was too much trouble or respondents were afraid of retaliation.

Table 6: Reason for Not Reporting Discrimination

	Number	Percent
Don't Believe it Makes Any Difference	35	46.1%
Don't Know Where to Report	14	18.4%
Other	14	18.4%
Too Much Trouble	8	10.5%
Afraid of Retaliation	5	6.6%
Total Respondents	75	

Notes:

- 1. Categories are not mutually exclusive
- Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

How Did You Report the Incident? What Is the Status of the Complaint?

The respondents that reported the incident indicated using fair housing services (two persons) or a government entity (2 persons). However, respondents described that resource links were not easily available.

Of those respondents that did report the discrimination event, 67 percent (12 persons) reported that their complaint was unresolved while 17 percent (3 persons) reported their complaint was resolved via mediation.

Table 7: Status of Complaint

	Number	Percent
Unresolved	12	66.7%
Resolved via Mediation	3	16.77%
In Litigation	2	11.1%
Unresolved/Pending Resolution	1	5.6%
Total Respondents	18	

Notes.

- 1. Categories are not mutually exclusive
- Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

What Was the Basis of the Hate Crime Against You?

Of all respondents completing the survey, eight percent (35 persons) indicated that a hate crime had been committed in their neighborhood. Most of these respondents (74 percent or 23 persons) indicated that the hate crime committed was based on race. Other top causes of the alleged hate crimes included color and source of income.

C. Staff Interviews

The City's Accessibility Issues Coordinator identified the following issues:

- Unsuitable housing for people with disabilities: People with disabilities are living in units that do not meet their needs and there is no accessible housing available to them (too expensive or does not meet their needs).
- Underreporting: People with disabilities also do not report acts of discrimination because either they do not know their experience was an act of discrimination or they fear retaliation.
- Lack of accessible affordable housing: Accessibility in terms of both affordability and
 accessibility features. For new affordable housing developments, set-aside units are
 prioritized for veterans, homeless, and foster youth, such that people with disabilities
 often do not have access to these units. Limited affordable housing units may also leave
 people with disabilities in units that are not suitable for them. For example, people that
 need to be in a lower level unit but are housed in an upper unit and face increasing
 mobility challenges.
- Digital accessibility: As advertisements move to a digital platform, people with disabilities face increasing challenges in navigating the search for a suitable home. These challenges include use and access to a computer/internet as well as the ability to read (e.g. people with developmental disabilities or blind).
- Aging population of caretakers: People with disabilities and developmental disabilities may face increasing challenges as their caregivers (Baby Boomers) begin to need care themselves. Many of these persons could face homelessness with the loss of their primary caregivers.
- Segregation: Most of the housing for people with disabilities is still segregated. People
 with disabilities are living in segregated housing. Licensed care facilities are not enough
 to meet the needs of people with disabilities as not all people with disabilities need
 around the home care.

D. Public Review of Draft AI

In accordance with 24 CFR 91.05(c)(2) and subpart B of the federal regulations relative to citizen participation for Community Planning and Development Programs and applicable waivers made available to those requirements through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), the Draft AI was made available for a 10-day public review from July 2020 10, to July 20, 2020 on the Housing Department (www.cityofpasadena.net/Housing). Notices of availability of the document and/or public hearings were published in newspaper(s) of general circulation. Copies of these notices can be found in **Appendix C.**

Chapter 3: Community Profile

Incorporated in 1886, Pasadena is a thriving community of 146,000 persons and located at the base of the San Gabriel Mountains just north of Los Angeles. The City of Pasadena is known for its vibrant economic base, cultural amenities, diverse housing opportunities, and high quality of life. These amenities have distinguished Pasadena as one of the most livable and sought after communities within the greater Los Angeles metropolitan area.

Pasadena benefits significantly from a strong economy, several colleges and universities, and world-famous cultural institutions. The economy is anchored by several major corporations, a vibrant Central Business District, and a strong base of technology, financial, and health-related employment. The City is home to higher educational institutions, including the seventh largest community college in the nation (Pasadena City College), Cal-Tech, and other private universities (such as Art Center College and Los Angeles College of Music). Pasadena is also known for its breadth of cultural institutions and active community involvement.

With these amenities comes a high demand for housing, as people from many backgrounds and income ranges seek to share the benefits the City offers. Pasadena has a large number of special needs groups, including seniors, disabled persons, families with children, homeless persons, emancipated youth, and other groups. Many of these groups are more likely to face housing discrimination or to be negatively impacted by governmental actions or housing market conditions. In the past, some neighborhoods have experienced disinvestment, creating adverse housing conditions for residents. However, during the housing boom, many homebuyers and developers sought housing opportunities in the older neighborhoods with lower housing prices, resulting in gentrification. Civic leaders and City staff are constantly working to balance the need to reinvest in older neighborhoods and the unintended consequence of gentrification.

A. Demographic Profile

As a first step in evaluating fair housing in Pasadena, this section discusses the City's population, the types and prices of available housing, and the housing options for persons with specialized needs. This section provides background for the later analysis of factors that may affect housing opportunity.

1. Population Growth

Pasadena is the ninth largest city in Los Angeles County with a population of 146,312 according to the 2019 State Department of Finance Population and Housing Estimates. In the past decade, the City's population growth rate exceeded that of Los Angeles County and more than doubled the growth rate between 2000 to 2010 (Table 8).

The Southern California Association of Governments (SCAG) population projections estimated that Pasadena's population will increase to approximately 150,700 persons by 2045. However, population trends observed so far (146,000 in 2019) suggest greater growth. Regardless of the magnitude, Pasadena's population is dynamic and will result in changing housing needs. Therefore, addressing emerging housing needs will be an important priority for years to come.

Table 8: Population Growth (2000-2019)

Jurisdiction	2000	2010	2010	2019 Growth Rate 2000-2010 2010-2019 2000-2019		
			2019			2000-2019
Pasadena	133,936	137,122	146,312	2.4%	6.7%	9.2%
Los Angeles County	9,519,330	9,818,605	10,253,716	3.1%	4.4%	7.7%
State of California	33,873,086	37,253,956	39,927,315	10.0%	7.2%	17.9%

Sources: U.S. Census Bureau, 2000; State of California Department of Finance Population and Housing Estimates, 2019.

2. Age Composition

Pasadena's housing needs are partially influenced by the age composition of its residents. Persons of different ages often have different lifestyles, family structures, and income levels that affect their preference and ability to afford housing. Typically, young adult households may occupy apartments, condominiums, and smaller single-family homes because of size and/or affordability. Middle-age adults may prefer larger homes as they begin to raise their families, while seniors may prefer apartments, condominiums, mobile homes, or smaller single-family homes that have lower costs and less extensive maintenance needs. Moreover, housing needs also change over time as people age. As a result, evaluating changes in the age groups in a community can provide insight into changing housing needs in Pasadena.

Despite modest population growth, the median age of residents in Pasadena increased from 34.5 to 37.9 years between 2000 and 2017, as shown below in Table 9. The increase in median age possibly resulted from a 35 percent increase in the number of seniors and a decline in adults, college-age residents, and most notably, children. The increase in median age may be attributable to the rising housing costs in the community, limiting housing opportunities for younger families and individuals. As shown in Table 9, the proportions of school-age children, college-age young adults, and adults at family-forming age have decreased over time.

Table 9: Age Composition and Trends

	2000		20	010	2	2000-2017	
Age Group	No. of Persons	Percent of Total	No. of Persons	Percent of Total	No. of Persons	Percent of Total	Percent change
0-19 (children)	34,092	25.5%	29,848	21.8%	28,938	20.5%	-15.1%
20-24 (college)	9,334	7.0%	9,268	6.8%	9,319	6.6%	-0.2%
25-44 (adults)	46,748	34.9%	45,371	33.1%	46,371	32.8%	-0.8%
45-64 (middle age)	27,540	20.6%	34,073	24.8%	34,682	24.6%	25.9%
65+ (seniors)	16,222	12.1%	18,562	13.5%	21,921	15.5%	35.1%
Total	133,936	100.0%	137,122	100.0%	141,231	100.0%	7.3%
Median Age (years)	34.5		37.2		3	-	

Source: U.S. Census Bureau, 2000-2010; American Community Survey, 2013-2017.

3. Race and Ethnic Composition

Housing needs and preferences are sometimes influenced by cultural practices. The nation's demographic profiles are becoming increasingly diverse in their racial and ethnic compositions. According to the Census, in 2018 about 40 percent of U.S. residents were non-White. Pasadena has gradually transformed into a multi-cultural community, where no single racial/ethnic group comprises an absolute majority. Race and ethnic background is a protected status under State and Federal fair housing laws. Thus, this section provides an overview of race and ethnic change in Pasadena, while later sections discuss differences in income and other characteristics that affect housing opportunity.

While the City's population increased by five percent between 2000 and 2017, Pasadena also saw changes in the race-ethnic composition of its residents. As shown in Table 10, the share of the population comprised of White and Black residents declined by two and four percentage points, respectively. Meanwhile, the share of Hispanic and Asian residents increased by one and six percentage points, respectively. According to the 2017 American Community Survey, White residents still comprised a plurality of Pasadena's population (37 percent), followed by Hispanic (34 percent), Asian (16 percent), and Black (10 percent) residents.

2000 2010 2017 2000-2017 No. of Percent of Percent of No. of Persons No. of Persons % of Total % Change **Persons** Total **Total** White 52,381 39.1% 53,135 38.8% 51,579 36.5% -1.5% Hispanic 44,734 33.4% 46,174 33.7% 48,617 34.4% 8.7% Black 18,711 14.0% 13,912 10.1% 13,743 9.7% -26.6% Asian 13,357 10.0% 19,293 16.0% 69.3% 14.1% 22,618 All Others 4,753 3.5% 4,608 3.4% 4,514 3.2% -5.0% Total 133,936 100.0% 137,122 100.0% 141,231 100.0%

Table 10: Race and Ethnic Trends

Source: U.S. Census Bureau, 2000-2010; American Community Survey, 2013-2017.

Racial and Ethnic Concentrations

Patterns of racial and ethnic concentration are present within particular areas of the City. Figure 1 on the following page illustrates concentrations of minority households by Census block group in Pasadena. Areas of minority "concentration" are defined as Census blocks whose proportion of minority households is greater than the overall Los Angeles County average of 72.2 percent. As shown in Figure 1, areas of minority concentrations can be found mostly North of the 210 Freeway, except between North Fair Oaks Avenue and North Los Robles Avenue.

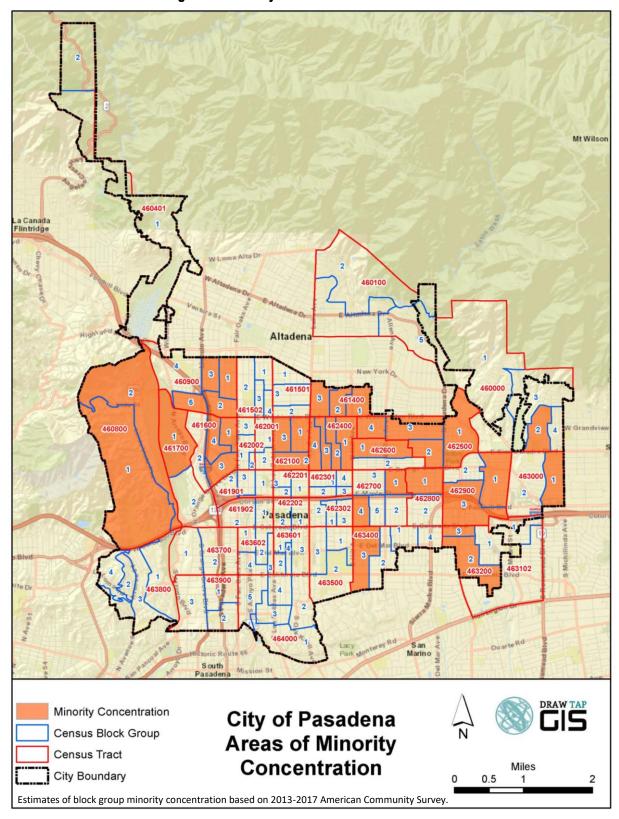


Figure 1: Minority Concentrations in Pasadena

Residential Segregation

Residential segregation refers to the degree to which groups live separately from one another. The term segregation historically has been linked to the forceful separation of racial groups. However, as more minorities move into suburban areas and outside of traditional urban enclaves, segregation is becoming increasingly self-imposed. Originally, many ethnic groups gravitated to ethnic enclaves where services catered to them, and not until they reached a certain economic status could they afford to move to outer suburban areas. Unlike the original enclaves, now living in an ethnic community is often a choice many are making. While some people believe that newly arrived immigrants in highly concentrated ethnic communities may resist blending into the mainstream, primarily because of the proliferation of native-language media and retail businesses, others feel that immigrants living with persons of similar heritage create a comfort zone that may help them transition to the mainstream and improve their economic situation. Some researchers have evaluated the degree of racial and ethnic integration as an important measure or evidence of fair housing opportunity.

Different statistical techniques are used to measure the degree of segregation experienced by different racial/ethnic groups, including the dissimilarity index. The dissimilarity index, presented in Table 11 represents the percentage of one group that would have to move into a new neighborhood to achieve perfect integration with another group. An index score can range in value from zero, indicating complete integration, to 100, indicating complete segregation. A value of 60 (or above) is considered very high, values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low. A high value indicates that the two groups tend to live in different Census tracts.

In Pasadena, the dissimilarity indices reveal that the City is moderately segregated and that segregation has worsened between 2010 and 2019. Between the two time points, Hispanic, Asian, and Black groups have become slightly more segregated. Hispanic and Black groups are more segregated (index \approx 50) than Asian groups (index \approx 26).

Dissimilarity Index with Whites Percent of Total Population Race/Ethnic Group (2017)2010 Trend 2019 Non-Hispanic White 36.5% Hispanic or Latino 34.4% 49.6 50.7 Asian 9.7% 25.7 21.6

49.5

Table 11: Racial Integration

Source: Affirmatively Furthering Fair Housing (AFFH) Tool Data and Mapping Tool, August 2019; American Community Survey, 2013-2017.

16.0%

Black or African American

52.9

Linguistic Isolation

Since language barriers can impede fair housing choice it is important to understand the degree to which the City's households are linguistically isolated. Previous Census Bureau data products used the term "linguistically isolated" to describe household where no one age 14 and over speaks English only or speaks English 'very well. This analysis is no longer available but instead the Census Bureau collects information on English-speaking ability and limited English-speaking ability of persons over 5 years old in the American Community Survey.

In 2017, approximately 45 percent of all Pasadena residents over age five spoke languages other than English at home and approximately 40 percent of those residents spoke English less than "very well." The prevalence of limited English proficiency appears to be greatest among Hispanic households. Approximately 27 percent of Pasadena residents spoke Spanish at home and 41 percent of these persons spoke English "less than very well." In comparison, while a similar proportion (41 percent) of Asian and Pacific Island language speakers speak English "less than very well", Asian/Pacific Island language speakers comprise only 10 percent of the population. Language barriers can be a potential impediment to fair housing if prospective buyers or renters do not speak the same language as listing agents, landlords, or property managers.

Table 12: English Language Ability

nd Pacific
Language Spanish Speakers Speakers

	Asian and Pacific Island Language Speakers		Spanish Speakers		Other Language Speakers		All Non-English Language Speakers	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Language Spoken at Home	13,100	10%	36,297	27%	10,245	8%	59,642	45%
English Speaking Ability								
"Very Well"	7,719	59%	21,473	59%	7,622	74%	36,814	62%
"Well"	3,196	24%	6,396	18%	1,527	15%	11,119	19%
"Not Well"	1,548	12%	5,940	16%	711	7%	8,199	14%
"Not at All"	637	5%	2,488	7%	385	4%	3,510	6%

Source: American Community Survey, 2013-2017.

B.Household Profile

In general, housing needs also differ depending on household characteristics. For instance, single-person households typically look for smaller and more affordable units, while families prefer larger housing units that can accommodate children. Furthermore, housing needs change over time along with changes in the size and composition of a household. Therefore, understanding the makeup of Pasadena's population provides insight into housing needs.

A household is defined by the Census as all persons occupying a housing unit. Families are a subset of households and include all persons living together who are related by blood, marriage or adoption. Non-family households include persons living alone or with nonrelatives, but do not include persons in group quarters such as convalescent homes or dormitories.

Household type and size, income level, the presence of persons with special needs, and other household characteristics may affect access to housing. This section details the various household characteristics that may affect equal access to housing.

1. Household Composition and Size

Household composition and size are often two interrelated factors. Communities that have a large proportion of families with children tend to have a large average household size. Such communities have a greater need for larger units with adequate open space and recreational opportunities for children.

From 2000 through 2017, the composition of households living in Pasadena changed little. As shown in Table 13, the number of households increased by only 5.6 percent over the last two decades. The largest increase (nine percent) during this time period was among non-family households (householders living alone or with non-relatives), while the only decline (three precent) was among "other" family households (family households with male or female householders and no spouse of householder present). Average household and family size did not change between 2000 to 2017.

Table 13: Household Characteristics

Ususahald Tuna	2000		2010		2017		Percent Change	
Household Type	Number	Percent	Number	Percent	Number	Percent	2000-2017	
Total Households	51,844		55,270		54,734		5.6%	
Family	29,858	57.6%	30,876	55.9%	30,702	56.1%	2.8%	
Married couple	21,362	71.5%	22,285	72.2%	22,488	73.2%	5.3%	
Other	8,496	39.8%	8,591	38.6%	8,214	36.5%	-3.3%	
Nonfamily	21,986		24,394		24,032		9.3%	
Singles	17,460	79.4%	18,838	77.2%	18,548	77.2%	6.2%	
Average Household Size	2.52		2.42		2.51		1	
Average Family Size	3.3	0	3.18		3.31		-	

Sources: Bureau of the Census, 2000-2010 Census; 2013-2017 American Community Survey (ACS)

C. Income Profile

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. Regular income is the means by which most individuals and families finance current consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population.

Households with lower incomes are limited in their ability to balance housing costs with other needs and often the ability to find housing of adequate size. While economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

For purposes of most housing and community development activities, HUD has established the four income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA). HUD income definitions differ from the State of California income definitions. Table 14 compares the HUD and State income categories. This AI report is a HUD-mandated study and therefore HUD income definitions are used. For other housing documents of the City, the State income definitions may be used, depending on the housing programs and funding sources in question.

Table 14: Income Category Definitions

HUI	D Definition	State of California Definition				
Extremely Low-Income	extremely Low-Income Less than 30 percent of AMI		Less than 30 percent of AMI			
Low-Income	31-50 percent of AMI	Very Low-Income	31-50 percent of AMI			
Moderate-Income	51-80 percent of AMI	Low-Income	51-80 percent of AMI			
Middle/Upper-Income	Creater than 90 percent of AMI	Moderate-Income	81-120 percent of AMI			
	Greater than 80 percent of AMI	Above Moderate-Income	Greater than 120 percent of AMI			

Source: Department of Housing and Urban Development and California Department of Housing and Community Development, 2013.

1. Median Household Income

Pasadena households had a median income of \$76,264 in 2017. Table 15 displays median household income in the City and Los Angeles County, as recorded by the American Community Survey. Overall, median household income in the City continues to be significantly higher than the County as a whole and increasing at a higher rate.

Table 15: Median Household Income

Jurisdiction	Median Hous	% Change		
Junsaiction	2010	2017	% Change	
Pasadena	\$65,422	\$76,264	16.6%	
Los Angeles County	\$55,476	\$61,015	10.0%	

Source: American Community Survey 2006-2010, 2013-2017.

2. Income Distribution

HUD periodically receives "custom tabulations" of Census data from the U.S. Census Bureau that are largely not available through standard Census products. The most recent estimates are derived from the 2012-2016 ACS Five-Year Estimates. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low-income households. The CHAS cross-tabulates the Census data to reveal household income in a community in relation to the AMI. As defined by CHAS, housing problems include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden, including utilities, exceeding 30 percent of gross income; and
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

According to HUD's CHAS data, Pasadena saw little changes in the income distribution of residents during the 2000s (Table 16). There was a 62-percent increase in the *number* of extremely low-income households, a 12-percent increase in the *number* of low income households, and five-percent decrease in the *number* of middle and upper income households between 2000 and 2016. Middle- and upper-income households still made up the majority of households (58 percent, but down from 64 percent in 2000).

Table 16: Household Income Distribution

Classification	2000		2016		Change			
	Households	%	Households	%	Households	%	Proportion of Households	
Extremely Low Income (<30% AMI)	6,174	12%	10,000	18%	3,826	62%	6%	
Low Income (31-50% AMI)	5,120	10%	5,735	10%	615	12%	1%	
Moderate Income (51-80% AMI)	7,114	14%	7,220	13%	106	1%	-1%	
Middle Income/Upper (>80% AMI)	33,435	64%	31,910	58%	-1,525	-5%	-6%	
Total	51,843	100%	54,865	100%	3,022	6%	0%	

Source: Comprehensive Housing Affordability Strategy (CHAS), American Community Survey, 2000, 2012-2016.

Although aggregate information on income levels is useful for looking at trends over time or comparing income levels for different jurisdictions, income levels may also vary significantly by household type, size, and race/ethnicity. Different households can have very different housing needs as well as housing choices available to them.

3. Household Income by Household Type

Income often varies by household type (elderly, small, and large families). Among the household types, elderly and "other" households had the highest proportion of extremely low-income households, at 28 percent and 20 percent, respectively. As Figure 2 shows, 51 percent of elderly households were low-moderate income, earning less than 80 percent AMI largely due to the predominance of fixed incomes among the elderly. Approximately 51 percent of large family households were also low-moderate income in 2016. The percent of low-moderate income households for elderly and large family households is higher than the City's 42 percent share of low-moderate income households. Because low- and moderate-income households have less income for housing, tradeoffs in expenditures to afford other living essentials may result in overpayment, overcrowding, and/or other substandard conditions in housing units.

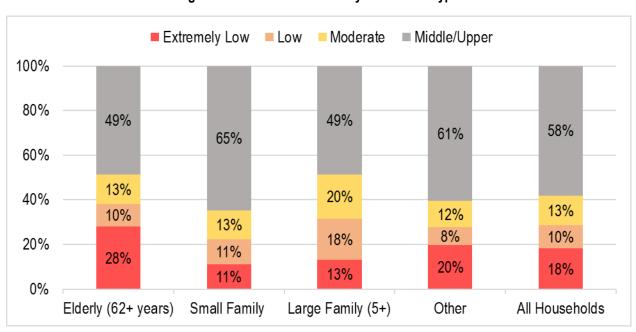


Figure 2: Income Distribution by Household Type

Sources: HUD Comprehensive Housing Affordability Strategy (CHAS) Data and American Community Survey 2012-2016 Estimates.

HUD's CHAS data (Table 17) also showed that the majority of the City's extremely low, low, and moderate-income households experienced at least one housing problem (including cost burden and overcrowding). Cost burden was specifically an issue among most of these households. Proportionally, more renter-households (54 percent) also faced housing problems compared to owner-households (34 percent).

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³ "Other" households include non-family households such as single persons living alone or unrelated individuals living together.

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Table 17: Housing Problems by Household Income and Tenure

	Renters				Owners				Total
	Elderly	Small Families	Large Families	Total Renters	Elderly	Small Families	Large Families	Total Owners	Households
Extremely-Low-Income (0-30% AMI)	2,795	1,920	460	7,865	1,175	350	70	2,140	10,005
% with Housing Problems	79.2%	89.1%	96.7%	81.9%	77.0%	92.9%	100.0%	81.8%	81.9%
% With Cost Burden	77.5%	83.6%	92.4%	79.3%	75.7%	90.0%	100.0%	80.6%	79.6%
Low-Income (31-50% AMI)	775	1,905	590	4,430	640	380	150	1,300	5,730
% with Housing Problems	84.5%	92.1%	100.0%	93.3%	64.1%	56.6%	100.0%	69.2%	87.9%
% With Cost Burden	83.9%	90.8%	86.4%	90.9%	64.1%	56.6%	96.7%	69.2%	86.0%
Moderate-Income (51-80% AMI)	885	1,835	430	4,760	1,025	760	370	2,460	7,220
% with Housing Problems	81.9%	60.2%	68.6%	67.1%	54.6%	64.5%	73.0%	64.0%	66.1%
% With Cost Burden	81.4%	53.4%	41.9%	61.2%	55.1%	58.6%	62.2%	61.0%	61.1%
Middle/Upper-Income (80%+ AMI)	1,595	5,300	580	14,280	5,285	7,870	1,380	17,635	31,915
% with Housing Problems	35.4%	18.9%	56.0%	21.4%	15.6%	18.8%	28.3%	21.0%	21.2%
% With Cost Burden	27.0%	13.6%	13.6%	15.6%	15.4%	17.5%	19.6%	19.5%	17.8%
Total Households	6,050	10,960	2,060	31,335	8,125	9,360	1,970	23,535	54,870
% with Housing Problems	68.8%	50.8%	80.3%	53.7%	33.2%	26.8%	44.7%	33.7%	45.1%
% With Cost Burden	65.5%	45.9%	58.0%	49.2%	33.0%	25.2%	36.3%	32.2%	41.9%

Note: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, American Community Survey, 2012-2016.

4. Household Income by Race/Ethnicity

Race/ethnicity is also a characteristic that is often related to housing need. This is because different race/ethnic groups may have different housing preferences. Overall, lower income⁴ households comprised 28 percent of all households in Pasadena in 2016 (Figure 3). However, certain race/ethnic groups had higher proportions of lower income households compared to the City. Specifically, a higher percentage of Hispanic and Black households have lower income levels compared to the City (40 and 42 percent, respectively). Less than half of the Hispanic and Black households have middle- or upper-income levels, compared to 68 percent of Non-Hispanic Whites and 65 percent Asian/Pacific Islander households.

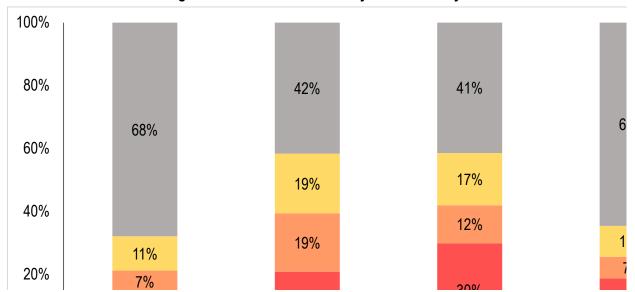


Figure 3: Income Distribution by Race/Ethnicity

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, American Community Survey 2012-2016 Estimates.

5. Concentrations of Low- and Moderate-Income Population

Figure 4 illustrates the Low and Moderate Income (LMI) areas in the City by Census block group. For the purposes of implementing the Community Development Block Grant (CDBG) program, HUD defines an LMI area as a Census block where over 51 percent of the population earns no more than 80 percent of the AMI. As shown in Figure 4, a significant number of block groups in the northwest portion of the City are identified as LMI areas. A correlation is also present between the LMI areas of Pasadena and the portions of the City where a minority concentration exist (Figure 1 on page 18). Generally, Census data shows that the City's LMI blocks encompass Northwest Pasadena and a narrow strip parallel to the 210 Freeway extending southward to Colorado Boulevard. These areas also have the highest concentrations of African American, Hispanic, Asian, Pacific Islander, and Native American households.

March 2020

⁴ "Lower income" here refers to extremely low- and low-income group categories.

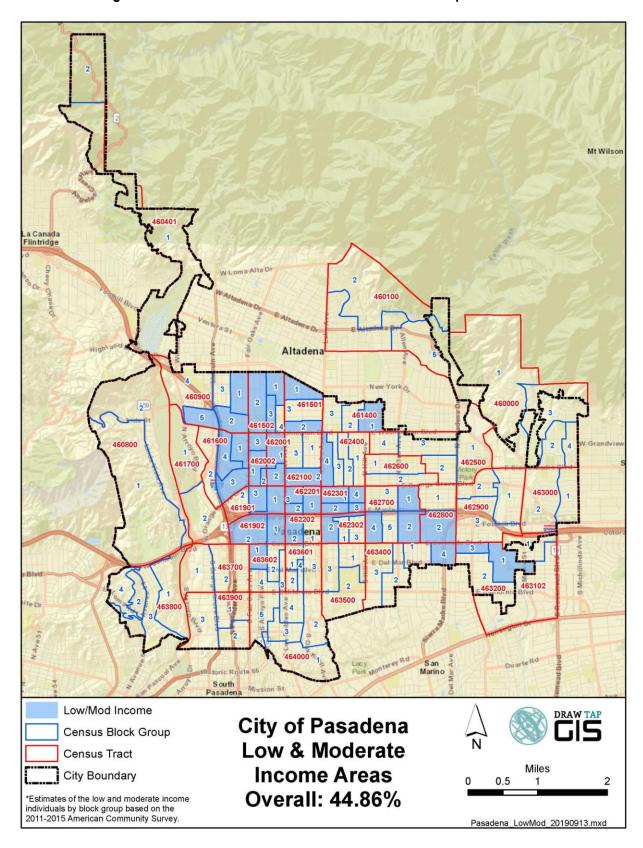


Figure 4: Low- and Moderate-Income Census Block Groups in Pasadena

D. Special Needs Households

Certain individuals and families in Pasadena may have more difficulty finding decent and affordable housing or receiving fair housing treatment due to special circumstances. These circumstances may relate to employment and income, family type and characteristics, disability, or various other household characteristics. In Pasadena, special need groups include large households, single-parent households, persons with disabilities, persons with HIV/AIDS, homeless persons, and children leaving the foster care system, among others.

1. Large Households and Families with Children

Large households are defined as those with five or more members. These households are usually families with two or more children or families with extended family members such as in-laws or grandparents. It can also include multiple families living in one housing unit in order to save on housing costs.

Families with children often face housing discrimination by landlords who fear that children will cause property damage. Some landlords may also have cultural biases against children of opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. In 2017, approximately 25 percent (13,848) of all households in Pasadena had children under the age of 18.

According to the 2013-2017 ACS, eight percent of the City's households had five or more members. Similar proportions of owner-households and renter-households were considered large households (nine and eight percent, respectively). Due to the limited availability of affordable housing, many small households double-up to save on housing costs and tend to opt for renting.

Of the City's large households, 51 percent were renters in 2016. Over one-half of these large renter-households (66 percent) were lower income. The 2012-2016 Comprehensive Housing Affordability Strategy (CHAS) data prepared by HUD reports that 79 percent of the City's large renter-households suffered from one or more housing problems, including housing overpayment, overcrowding, and/or substandard housing conditions. Part of the reason for higher rates of overpayment and overcrowding among large families is due to the limited availability of suitable housing. Pasadena currently has a shortage of large rental units that are capable of accommodating families with children, particularly large families.

According to the 2013-2017 American Community Survey, about one-third (19,879) of the housing units in Pasadena had six or more rooms, the size of a typical three-bedroom unit. Considering that 4,544 large households resided in the City, there is an adequate supply of large units in Pasadena to accommodate the needs of larger households (in numeric terms). However, many of the City's larger units are ownership units and finding affordable housing of adequate size may be a challenging task for many households, particularly lower and moderate renter-households.

To address these needs, 60 complexes and approximately 1,239 units of affordable family housing are available in Pasadena (Table 30). Moreover, 1,202 low income Pasadena families are recipients of Housing Choice Vouchers (Section 8) for rental assistance. The City has also assisted many low-moderate income families to purchase a home in Pasadena. Despite these resources, however, the need for large family housing far exceeds the availability of suitable housing in Pasadena.

2. Single-Parent Households

Single-parent households often require special consideration and assistance as a result of their greater need for affordable housing, as well as accessible day care, health care, and other supportive services. Due to their relatively lower per-capita income and higher living expenses such as day-care, single-parent households have limited opportunities for finding affordable, decent, and safe housing. In 2017, approximately 4,290 single-parent households resided within Pasadena, representing eight percent of the City's households. Of these single-parent households, 73 percent (3,128) were female-headed households. Data from the 2013-2017 ACS indicates that approximately 24 percent of the City's female-headed households with children had incomes below the poverty level.

Single-parent households, especially single mothers, may also experience discrimination in the rental housing market. At times, landlords may be concerned about the ability of such households to make regular rent payments and therefore, may require more stringent credit checks or higher security deposit for women.

3. Seniors

Seniors (persons age 65 and above) are gradually becoming a more substantial segment of a community's population. Elderly households are vulnerable to housing problems and housing discrimination due to limited income, prevalence of physical or mental disabilities, limited mobility, and high health care costs. The elderly, and particularly those with disabilities, may face increased difficulty in finding housing accommodations, and may become victims of housing discrimination or fraud.

The 2013-2017 ACS indicates that about 16 percent of all residents in the City were ages 65 and over. Approximately 43 percent of households in the City had at least one individual who was 65 years of age or older. Furthermore, 2012-2016 CHAS data found that approximately 50 percent of elderly households in the City earned low and moderate incomes. Approximately 46 percent of all elderly households experienced housing problems, such as cost burden or substandard housing. Housing problems were significantly more likely to affect elderly renter-households than elderly owner-households in the City.

4. Persons with Disabilities

The Americans with Disabilities Act (ADA) defines a disability as a "physical or mental impairment that substantially limits one or more major life activities." Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination in the housing market because of the need for

wheelchairs, home modifications to improve accessibility, or other forms of assistance. Landlords/owners sometimes fear that a unit may sustain wheelchair damage or may refuse to exempt disabled tenants with service/guide animals from a no-pet policy. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Landlords often refuse to rent to tenants with a history of mental illness. Neighbors may object when a house becomes a group home for persons with mental disabilities. While housing discrimination is not covered by the ADA, the Fair Housing Act prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS.

In the 2013-2017 ACS, 14,197 Pasadena residents over the age of five reported having a disability, representing approximately 10 percent of the City's population. Among persons living with disabilities in Pasadena, ambulatory disabilities were the most prevalent (58 percent), followed by independent living disabilities and cognitive disabilities (50 and 42 percent, respectively).

Presently, the City enforces all state and federal laws requiring accessibility standards in existing multi-family projects. Persons with special needs, such as those with disabilities, require appropriate housing. Licensed community care facilities, alcohol and other drug rehabilitation facilities, skilled nursing homes, and other types of facilities provide a supportive housing environment suitable for persons with special needs. There are a total of 177 such facilities or homes in Pasadena with a capacity to serve 7,603 adults, seniors, and youth (Table 31).

5. Persons with Developmental Disabilities

As defined by the Section 4512 of the California Welfare and Institutions Code, "developmental disability" means "a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. As defined by the Director of Developmental Services, in consultation with the Superintendent of Public Instruction, this term shall include mental retardation, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to mental retardation or to require treatment similar to that required for individuals with mental retardation, but shall not include other handicapping conditions that are solely physical in nature." This definition also reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. This equates to 2,195 persons in Pasadena with developmental disabilities, based on the 2019 California Department of Finance population estimates. The Frank D. Lanterman Regional Center serves residents with development disabilities in the Pasadena area. The Center served about 1,560 persons from the ZIP Codes that generally comprised the City of Pasadena in September 2019. About 43 percent of these clients were children and about 70 percent lived at home with parents or guardians.

6. Persons with HIV/AIDS

Persons with HIV/AIDS face an array of barriers to obtaining and maintaining affordable, stable housing. For persons living with HIV/AIDS, access to safe, affordable housing is as important to their general health and well-being as access to quality health care. For many, the persistent shortage of stable housing can be the primary barrier to consistent medical care and treatment. In addition, persons with HIV/AIDS may also be targets of hate crimes, which are discussed later in this document. Despite federal and state anti-discrimination laws, many people face illegal eviction from their homes when their illness is exposed. The Fair Housing Amendments Act of 1988, which is primarily enforced by HUD, prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS. According to the California HIV Surveillance Report, as of 2017, there were 586 persons living with diagnosed HIV infection in Pasadena.

The Housing Opportunities for Persons with AIDS (HOPWA) program is a federally funded housing program designed to address the specific housing needs of persons living with HIV/AIDS and their families. The Los Angeles Housing Department administers the HOPWA grant for 29 agencies and four housing authorities to provide housing-related supportive services and rental assistance programs to low-income, homeless, and at-risk homeless persons living with HIV/AIDS in Los Angeles County. The City of Pasadena does not receive HOPWA funds directly from HUD. However, the City does have a Memorandum of Understanding (MOU) with the Los Angeles Housing Department (LAHD) to administer HOPWA Tenant-Based Rental Assistance (TBRA).

Currently the City of Pasadena provides approximately 15 TBRA certificates for very low-income households living with HIV/AIDS. The HOPWA program provides twelve months of rental assistance via a housing voucher to very low-income persons, both individuals and in families, diagnosed with HIV/AIDS. Applicants are referred by community agencies serving persons living with HIV/AIDS, including the Foothill AIDS Project. After the initial twelve months of assistance, program participants transition to the Housing Choice Voucher Program (HCVP) for ongoing rental assistance.

7. Homeless Persons

According to HUD, a person is considered homeless if they are not imprisoned and: (1) lack a fixed, regular, and adequate nighttime residence; (2) their primary nighttime residence is a publicly or privately operated shelter designed for temporary living arrangements, an institution that provides a temporary residence for individuals that should otherwise be institutionalized; or (3) a public or private place not designed for or ordinarily used as a regular sleeping accommodation.

Homeless persons often have a difficult time finding housing once they have moved from a transitional housing or other assistance program. Housing affordability for those who are or were formerly homeless is challenging from an economics standpoint, and this demographic group may encounter fair housing issues when landlords refuse to rent to formerly homeless persons. Under California laws, a landlord can deny rental to an applicant based on credit

history, employment history, and rental history. However, the perception may be that homeless persons are economically (and sometimes mentally) unstable.

Determining the number of homeless persons in a jurisdiction is difficult because of the transient nature of the population. According to the City of Pasadena 2019 Homeless Count, there were 542 adults and children were experiencing homelessness on a given night (321 unsheltered, 221 sheltered). This represented a 20 percent decrease from 2018 counts (677) and a 55 percent decrease from the peak year count in 2011 (1,216). The most significant decrease from 2018 to 2019 was among those experiencing unsheltered homelessness (31 percent decrease). This decline reflects the success of Pasadena and its surrounding communities at coordinating resources on a local level to serve residents. According to the 2019 Pasadena Homeless Count, "in 2018, 149 people (122 households) who were formerly homeless in Pasadena were permanently housed through rapid rehousing or supportive housing programs in Pasadena and throughout the County. A recent influx of rapid rehousing funding to the City has enabled individuals and families with lower housing barriers to quickly regain self-sufficiency and exit homelessness to stable housing." ⁵

Of the 542 adults counted, 35 percent women and 65 percent were men. Gender was not recorded for children. Furthermore, of the 542 adults counted, 257 (47 percent) homeless adults were Whites, representing the largest ethnic group counted. African Americans or Blacks represented one-third of the adults counted (30 percent or 163 adults) and made up approximately one third of the homeless adult population.

The City prioritizes the development of permanent supportive housing as an effective way to end homelessness for individuals, particularly those who are chronically homeless. Additional beds of emergency shelter are prioritized only as a means to house homeless individuals while working to place these persons quickly into permanent housing. As with individuals, permanent housing is the most effective way to end homelessness for families, but approximately half of the families who are homeless at any given time will need additional assistance to stabilize and save before moving into permanent housing. The Ten-Year Strategy to End Homelessness supports the development of additional units of transitional housing to assist these families.

8. At-Risk Youth

The City of Pasadena has a large population of youth in or aging out of the foster care system (emancipated youth). According to 2013-2017 ACS estimates, 1.4 percent (359 children) of Pasadena's children population are foster youth. Because of their troubled backgrounds, foster children need housing and a higher level of supportive services related to education, employment, mental health, and other issues.

The City is home to a variety of organizations providing services and residential facilities to foster children or for children experiencing mental health, substance abuse, or other traumatic conditions. Some of the large groups are:

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⁵ 2019 Homeless Point-in-Time Count for Greater Los Angeles Area, LAHSA, 2019, p.9.

- Five Acres: Originally founded as an orphanage in 1888, Five Acres offers residential care and education, mental health services, foster care and adoptions, and domestic violence prevention. Five Acres currently offers a Short Term Therapeutic Residential Program at two locations: its main campus in Altadena and Altadena and "Solita" a residential group home Pasadena. The main campus provides a temporary home for up to 80 children aged six to 14. The Solita location offers care for up to 6 youth aged 11 to 18 years old.
- Hillsides: Hillsides operates a 17-acre campus in Pasadena. They offer parenting classes, mental health support, residential treatment services, residential and day school for children with disabilities, and support services for former foster youth. Residential facilities include five group homes on the main grounds. In 2005, Hillsides purchased an apartment building in Pasadena that now houses 28 emancipated foster youth.
- Hathaway/Sycamores: This multiservice children's services agency provides residential and housing services, school-based support, comprehensive mental health services, and youth leadership and education programs for children, young adults, and their families. They offer more than 100 units across their service area to support Transitional Aged Youth (TAY). The organization operates out of a central facility in Pasadena.

E. Housing Profile

A discussion of fair housing choice must be preceded by an assessment of the housing market. A diverse housing stock that includes a mix of conventional and specialized housing helps ensure that all households, regardless of their income level, age group, and familial status, have the opportunity to find suitable housing. This section provides an overview of the characteristics of the local and regional housing markets.

The Census Bureau defines a housing unit as a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or, if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building and which have direct access from outside the building or through a common hall.

1. Housing Growth

Between 2000 and 2017, Pasadena's housing stock increased by over 11 percent to 60,286 units. However, the growth mostly occurred between 2000 and 2010. Between 2010 and 2017, Pasadena's housing stock increased by only 1.2 percent. The City's rate of growth between 2010 and 2017 was comparable to Los Angeles County's housing stock growth.

Table 18: Housing Stock Growth

City/Aroa	2000	2010	2017	% Change		
City/Area	2000	2010	2017	2000-2010	2010-2017	
Pasadena	54,132	59,551	60,286	10.0%	1.2%	
Los Angeles County	3,270,909	3,445,076	3,506,903	5.3%	1.8%	

Source: Bureau of the Census, 2000-2010 Census; American Community Survey, 2013-2017.

2. Housing Condition

Assessing housing conditions in the City can provide the basis for developing policies and programs to maintain and preserve the quality of the housing stock. Housing age can indicate general housing conditions within a community since housing units are subject to gradual deterioration over time. Deteriorating housing can depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood.

Housing maintenance and repair needs often vary by the age of the home. During the first 30 years, homes typically require minor painting, landscaping, and other preventive maintenance. At 30 years, homes need painting, stucco, repair of appliances, and other minor repairs to maintain their quality. Structures older than 50 or 60 years often require upgrades in plumbing, electrical, heating, and other major components or lead-based paint removal to bring the property up to current health and safety standards. Housing units constructed prior to 1978 are likely to contain lead-based paint.

Pasadena has a wide mix of housing types built during different periods of time. Table 19 shows the distribution of housing units by the decade the structure was built. As shown, only 15 percent of the housing stock was built in the last 30 years (after 1990). About 33 percent of the housing stock was built 30 to 60 years ago (1960s through 1990s). And over half of available housing (53 percent) was built before 1960 and is over 60 years old.

Table 19: Housing Stock Age

Decade	Number of Units	Percent of Units
2010s	1,149	2%
2000s	4,204	7%
1990s	3,321	6%
1980s	5,732	10%
1970s	7,488	12%
1960s	6,757	11%
1940-1960	14,444	24%
Pre 1940s	17,191	29%
Total	60,286	100%

Source: American Community Survey, 2013-2017.

Despite its older housing stock, much of the housing in Pasadena is in good condition, reflecting the City's established support for older neighborhoods. City staff inspects an average of 1,800 single-family and duplex units through its Occupancy Inspection Program and 5,500 multifamily rental units through the Quadrennial Inspection Program. Through the Occupancy Inspection Program, Code Compliance Officers inspect all single-family residences and duplex properties (prior to the sale of a property using an expansive checklist of Major and Minor violations. The Quadrennial Inspection Program was established in 1987 to ensure the quality and maintenance of the City's multi-family housing stock. All rental properties containing three or more units are subject to the Quadrennial Inspection Program, and are inspected once every four years.

These programs have been credited with helping to ensure that Pasadena's single- and multifamily housing and properties are adequately maintained and repaired. On January 2019, in response to a significant improvement in the City's housing stock and changes to the real estate environment, the Occupancy Inspection Program was replaced by Presale Self-Certification Program. The Presale Self-Certification Program eliminates and reduces the delays in the sale/transfer of a residential property and eliminates redundancies and ineffectiveness associated with private and city inspections while continuing to require the abatement of life and safety code violations.

Substandard Conditions

In certain areas of Pasadena, isolated structures are in need for repair. The Census Bureau reported the following in the 2013-2017 ACS estimates that 367 housing units had incomplete plumbing facilities and 1,386 units had incomplete kitchens. These homes typically have multiple property maintenance and building code violations.

Given the racial/ethnic composition of the City population, City programs should be equipped to handle multi-lingual services. Particularly for code enforcement services, residents may feel intimidated if Code Enforcement Officers do not provide adequate explanation of the citations or where residents may obtain assistance. The Code Compliance Division has English and Spanish in-house language capabilities.

Lead-Based Paint Hazards

Housing age is the key variable used to estimate the number of housing units with lead-based paint (LBP). Starting in 1978, the federal government prohibited the use of LBP on residential property. Housing constructed prior to 1978, however, is at-risk of containing LBP. According to the 2013-2017 ACS, an estimated 45,880 units (representing 76 percent of the housing stock) in the City were constructed prior to 1980.

The potential for housing to contain LBP varies depending on the age of the housing unit. National studies published by the Environmental Protection Agency estimate that 60 percent of all residential structures built prior to 1980 contain LBP. Housing built prior to 1940, however, is much more likely to contain LBP (estimated at 87 percent of housing units). Table 20 estimates the number of housing units in Pasadena containing LBP, utilizing the assumptions outlined above. It should be noted however, that not all units with LBP present a hazard. Properties most at risk include structures with deteriorated paint, chewable paint surfaces, friction paint surfaces, and deteriorated units with leaky roofs and plumbing.

Table 20: Lead-Based Paint Estimates

Year Built	Units	LBP Probability	Units with LBP
1960-1979*	14,245	0.24	3,419
1940-1959	14,444	0.69	9,966
Before 1940	17,191	0.87	14,956
Total Units	45,880	0.60	28,341

Source: American Community Survey, 2013-2017.

The City's Public Health Department is in charge of mitigating lead-based paint hazards and identifying those who may already be affected through the efforts of its Pasadena Childhood Lead Poisoning Prevention Program (PCLPPP). The program screens children six years of age and younger and responds to any confirmed cases through support by a Public Health Nurse and environmental source testing. Community outreach efforts are also administered by the program through educational seminars and workshops, which detail preventative measures to avoid exposure as well methods to assess the risk of exposure to lead sources.

The City's housing rehabilitation programs integrate information on the dangers of lead-based paint hazards as a means to educate homeowners who rehabilitate their homes. Another Program led by the City is the Maintenance Assistance Services to Homeowners (MASH), which receives CDBG funding to provide minor housing rehabilitation services to residents of the CDBG Benefit Service Area. Among its project activities, the MASH Program targets homes to provide lead-based paint stabilization services and also provides general information to the public as a participant in the PCLPPP. MASH Program staff is state certified (State of California) in lead-based paint stabilization methods.

The coordinated efforts of the PCLPPP and Housing Department as well as the appropriate division/sections of the Planning Department are aimed at developing a comprehensive program of enhanced identification and enforcement. Current code compliance officers and inspectors continue to receive training in hazard identification.

The City remains committed to maintaining its role as part of the statewide efforts to educate and enhance public awareness about the dangers of lead-based paint hazards.

3. Tenure

Tenure in the housing industry typically refers to the occupancy of a housing unit – whether the unit is owner occupied or occupied rental unit. Tenure preferences are primarily related to household income, composition, and ages of the household members; and housing cost burden (overpayment) is generally more prevalent among renters than among owners. However, the high costs of homeownership in Southern California also create high levels of housing cost burden among owners. The tenure distribution (owner versus renter) 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. Furthermore, renters and homeowners face different fair housing issues during

^{*}Estimates based on figures published by the EPA in "Steps to Lead Safe Renovation, Repair, and Painting" (2015). The probability factor from the national study was 24% for homes built between 1960 and 1977, but the ACS only provides housing age by decade.

the house seeking process and during tenancy. Between 2000 and 2017, the City's homeowner and renter proportions remained stable around 44 and 56 percent, respectively. The distribution of renters and owners in Pasadena is not unlike that for Los Angeles County.

Overall vacancy rates have increased by about six percentage points from 4.4 percent in 2000 to 10.1 percent in 2017. The increase in the overall vacancy rates is mostly attributed to "other" vacancies ("seasonal" and "rented or sold but not occupied") while rental and homeowner vacancies remained similar between 2000 and 2017. The increased vacancy rates for seasonal and other vacant units may be an indication of housing units being used for vacation rentals.

The difference in vacancy rates by tenure is significant. The vacancy rate remained under three percent for rental units and at around one percent for owner units from 2000 to 2017 (Table 22). Residential vacancy rates are a good indicator of how well the current supply of housing is meeting the demand for various types of units. A certain number of vacant housing units are needed in any community to moderate the cost of housing, allow for sufficient housing choices, and provide an incentive for landlords and owners to maintain their housing. The Southern California Association of Governments (SCAG) has identified optimal vacancy rates of five percent for rental housing and two percent for ownership units. Owner and rental vacancies were still below "optimal" in 2017, increasing the likelihood of housing discrimination as the number of house-seekers increases while the number of available units remains relatively constant. Managers and sellers are then able to choose occupants based on possible biases because the applicant pool is large.

Table 21: Housing Tenura and Vacancy

Tanura	2000		2010		2017		Percent Change
Tenure	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	2000-2017
Total Occupied Units	51,827	100.0%	52,987	100.0%	54,734	100.0%	5.6%
Owner Occupied	23,670	45.7%	24,086	45.5%	23,872	43.6%	0.9%
Renter Occupied	28,157	54.3%	28,901	54.5%	30,862	56.4%	9.6%
Vacancy Rates							
Owner Vacancy	449	1.4%	495	2.0%	289	1.2%	-35.6%
Rental Vacancy	764	2.9%	1,078	3.6%	937	2.9%	22.6%
Overall Vacancy	2,287	4.4%	4,201	7.9%	5,552	10.1%	142.8%

Note: "Overall Vacancy" rates include "other" vacancies in addition to owner/rental, including "seasonal" and "rented or sold but not occupied" Source: US Census 2000, American Community Survey Estimates 2006-2010 and 2013-2017.

Table 22: Tenure

	% Owner-occupied	% Renter-Occupied	Total
Pasadena	43.6%	56.4%	54,734
Los Angeles City	36.8%	63.2%	1,364,227
Los Angeles County	45.9%	54.1%	3,295,198

Source: American Community Survey Estimates, 2013-2017.

Though the homeownership rate in the City has remained steady since 2010, the composition of homeowners has changed somewhat. As shown in Table 23, homeowners in the City have generally become older. From 2010 to 2017, the proportion of homeowners under 54 decreased but the proportion of homeowners 55 and over increased by seven percentage points. As prices have increased for housing, only adults well positioned in their careers can afford to purchase a home. Table 23 also shows that homeownership shares among the various racial/ethnic groups have shifted slightly between 2010 and 2017. While Whites continued to have the highest rate of homeownership (53 percent), they represented a smaller share of homeowners in the City. Asian homeowners represented an increased share at 20 percent.

Furthermore, a substantial income disparity exists between owner- and renter-households. Table 24 illustrates the heavy concentration of lower income renter-households in Pasadena compared to owner-households. According to HUD's Comprehensive Housing Affordability Strategy (CHAS) data, 38 percent of renter households were extremely low or low income, compared to 13 percent of owner households. The proportion of lower-income households was also higher for renter households than for the City overall (38 percent versus 27 percent in City).

Table 23: Homeownership by Age and Race

Characteristic	2020	2017	Percentage Points Change
< 35	9%	8%	-1%
35-54	43%	37%	-6%
55+	48%	55%	+7%
Total	24,086	23,872	-1%
White	57%	53%	-4%
African American	9%	8%	-1%
Asian	14%	20%	+6%
Hispanic	19%	18%	-1%

Source: U.S. Census Bureau 2000, American Community Survey, 2013-2017. Census data for 2000 was not available.

Table 24: Income by Tenure

Tenure	Extremely Low 0-30% AMI	Low 31-50% AMI	Moderate 51-80% AMI	Middle/Upper 81+% AMI	Total
Renters	7,065	4,575	4,790	14,310	30,740
% Renters	23%	15%	16%	47%	56%
Owners	1,775	1,425	2,460	18,135	23,795
% Owners	7%	6%	10%	76%	44%
Total	8,840	6,000	7,250	32,445	54,535
%	16%	11%	13%	59%	100%

Source: HUD CHAS Data, 2012-2016.

4. Housing Type

Pasadena has a broad range of housing opportunities reflective of a diverse community as shown in Table 25. Between 2010 and 2019, there was a notable shift in Pasadena's housing stock composition, as multi-family housing increased to make up more than 50 percent of the housing stock. Between 2010 and 2019, there was a significant amount of construction of multi-family housing projects (4,089). During this period the number of single-family homes decreased by 0.3 percent but single-family attached homes decreased by 27.5 percent. A unique feature of Pasadena's housing stock is the prevalence of condominiums, of which the City has more than 5,000 units. As mentioned earlier, households between 18 and 34 years of age provide the primary market for multi-family housing, in particular apartments and affordable condominiums. Households with children typically form the largest market for larger single-family detached and attached homes.

In the past decade, developers have concentrated on building multi-family homes in Pasadena. From 2010 through 2019, the number of multifamily units has increased by 15 percent. Based on the housing type and price points, developers appear to be building multi-family housing for two broad demographic groups: (1) middle-aged baby boomers without children who desire the cultural amenities of Pasadena's urban life; and (2) single professional adults or recently married couples who desire to be "where the action is" in Pasadena. In either case, both groups tend to have greater levels of disposable income for housing, yet there is significant unmet demand in other groups.

Table 25: Housing Stock Composition

Housing Type	2010		20	119	Change	
Housing Type	Number	Percent	Number	Percent	Number	Percent
Single-Family Homes	30,701	52.4%	30,618	48.9%	-83	-0.3%
Single-Family Detached	24,873	42.5%	26,393	42.1%	1,520	6.1%
Single-Family Attached	5,828	9.9%	4,225	6.7%	-1,603	-27.5%
Multi-Family Homes	27,816	47.5%	31,905	50.9%	4,089	14.7%
Multi-Family (2-4 units)	4,654	7.9%	5,269	8.4%	615	13.2%
Multi-Family (5+ units)	23,162	39.5%	26,636	42.5%	3,474	15.0%
Mobile Homes	73	0.1%	130	0.2%	57	78.1%
Total	58,590	100.0%	62,653	100.0%	4,063	6.9%

Sources: Bureau of the Census, 2010 Census; California Department of Finance Population and Housing Estimates, 2019.

F. Housing Cost and Affordability

Many housing problems such as housing overpayment or overcrowded housing are directly related to the cost of housing in a community. If housing costs are relatively high in comparison to household income, a correspondingly high prevalence of problems occurs. This section evaluates the affordability of the housing stock in Pasadena to lower and moderate-income households. However, housing affordability alone is not necessarily a fair housing issue. Fair housing concerns may arise only when housing affordability interacts with other factors covered under the fair housing laws, such as household type, composition, and race/ethnicity.

1. Ownership Housing Costs

Like much of Southern California, the City of Pasadena has seen significant rises in property values throughout the community. Pent-up demand for housing, historically low interest rates, and creative mortgage packages led to easy credit and unprecedented escalation of housing prices in the State of California. This pressure has been acutely felt in Pasadena, where the City is greatly sought after for its job base, location, housing quality, and level of amenities.

Table 26: Median Home Values

	2000	2005	2010	2015	2017	% Change (2000-2017)
Pasadena	\$286,400	\$610,600	\$616,500	\$697,900	\$802,500	181%
Los Angeles County	\$209,300	\$487,300	\$429,500	\$499,500	\$595,400	184%

Source: US Census Bureau, 2000; American Community Survey 2005, 2010 (1-Year Estimate), 2015 (1-Year Estimate), 2017 (1-Year Estimate).

In Pasadena, the median value of homes has almost tripled from \$286,000 to \$802,000 from 2000 to 2017 (Table 26). Median sale prices have also increased significantly in the past 20 years (Figure 5). Zillow reported that the median sales price for all homes increased from \$460,000 to \$792,000 in the six years between 2013 and 2019. Since 2008, the Pasadena housing market has remained relatively resilient to a gradual slowing in the residential real estate market, though it has impacted land values.

Pasadena Los Angeles County Sales Price (in thousads) Median (

Figure 5: Median Home Sales Prices in Pasadena and Los Angeles County

Source: Zillow, 2019. Median sales value selected for May of each year.

Given the geographic diversity in Pasadena, housing prices vary significantly by area. The highest average prices for single-family homes and condominiums were found in the Arroyo (both North and South) and the South and Southeast sectors in Pasadena. The lowest average home prices are found in North Central, West Central and South, and mid Central and Southeast. These patterns appear to continue in 2019 according median sale price data in Trulia (Figure 6).

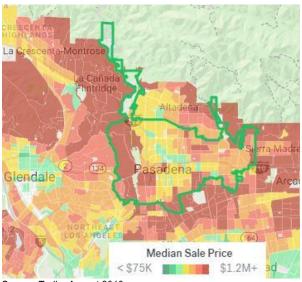


Figure 6: Median Home Sales Prices in Pasadena (August 2019)

Source: Trulia, August 2019.

2. Rental Housing Costs

The high demand for rental apartment housing, coupled with generally low vacancy rates have led to a situation where rents are increasing at a rapid pace. According to Trulia, the lowest median rent prices are found in the Northeast area of the City. Similar to median sales prices, median rent prices are highest along the Arroyo (both North and South) and the South and Southwest areas in Pasadena (Figure 7). Even in more affordable areas in Pasadena (e.g., Northeast) or for individual buildings with more modest amenities, the median rents for apartments are significantly increasing faster than inflation. Notably, apartment listings are concentrated in the more expensive areas of Pasadena -- Southwestern areas (Figure 7).

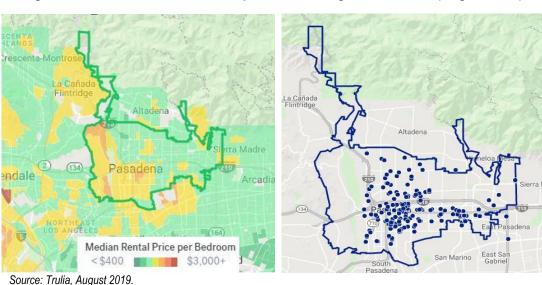


Figure 7: Median Rent Prices and Apartment Listings in Pasadena (August 2019)

More information on current rental rates in Pasadena was obtained from a review of advertisements in the *Zillow* and *Craigslist*. Available rental housing ranged from studios to three-bedroom units, with the majority of apartment units advertised being one- and two-bedroom units. Table 27 summarizes average apartment rents by unit size. Overall, 145 units of varying sizes were listed as available for rent in July 2019 for an average rent of \$2,114.

Rent prices vary significantly by unit size. In July 2019, average rents ranged from \$1,700 for studios to \$2,519 for three-bedroom units. The rents for three-bedroom units are significantly higher due to the shortage of large units -- only five percent (seven) of the units advertised at the time of the survey were three-bedroom units.

Size **Number Advertised Average Rent** Studio 18 \$1,673 One-Bedroom 67 \$2,185 Two-Bedroom 53 \$2,081 7 Three-Bedroom \$2,519 0 Four-Bedroom N/A Total 145 \$2,114

Table 27: Average Rents in Pasadena

Source: Zillow and Craigslist, 2019. Search performed July 2019.

3. Housing Affordability

Housing affordability can be estimated 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 indicate which households are more susceptible to overcrowding and cost burden. While housing affordability alone is not a fair housing issue, fair housing concerns may arise when housing affordability interacts with factors covered under the fair housing laws, such as household type, composition, and race/ethnicity.

The federal Department of Housing and Urban Development (HUD) conducts annual household income surveys to determine the maximum payments that are affordable for different household income groups. 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 categories. Table 28 shows the annual household income by household size and generally, the maximum affordable housing payment based on the standard of 30 to 35 percent of household income. General cost assumptions for utilities, taxes, and property insurance are also shown.

The citywide median home price (\$792,000) in 2019 places homeownership out of reach for all of Pasadena's households with extremelylow to middle incomes. Given the high costs of homeownership in the City, lower and moderate-income households are usually limited to rental housing. However, the affordability problem also persists in the rental market. Most appropriately-sized rental housing in Pasadena is also unaffordable for the City's lower and moderate-income households. For example, the average rent for a two-bedroom apartment was

\$2,082 in July 2019 (Table 27). This cost exceeds the "affordable rental" cost for three- and four-person households from extremely low- to middle-income (Table 28).

The situation is exacerbated for large households with lower and moderate incomes (given the limited supply of large units) and for seniors with their fixed incomes. When the housing market is tight, with high demand, low vacancies, and rising costs, the potential for discriminatory housing practices also increases.

Table 28: Housing Affordability Matrix – Los Angeles County (2019)

		Affordab	le Costs	Util	ities	Taxes	Affordable	Affordable
Household	Annual Income	Rental	Ownership	Renters	Owners	and Insurance	Rent	Home Price
Extremely L	ow Income (0-30% A	AMI)						
1-Person	\$21,950	\$549	\$549	\$122	\$90	\$192	\$427	\$62,067
2-Person	\$25,050	\$626	\$626	\$143	\$111	\$219	\$483	\$68,904
3-Person	\$28,200	\$705	\$705	\$161	\$133	\$247	\$544	\$75,697
4-Person	\$31,300	\$783	\$783	\$191	\$164	\$274	\$592	\$80,206
5-Person	\$33,850	\$846	\$846	\$223	\$202	\$296	\$623	\$81,006
Low Income	(31-50% AMI)							
1-Person	\$36,550	\$914	\$914	\$122	\$90	\$320	\$792	\$117,284
2-Person	\$41,800	\$1,045	\$1,045	\$143	\$111	\$366	\$902	\$132,251
3-Person	\$47,000	\$1,175	\$1,175	\$161	\$133	\$411	\$1,014	\$146,797
4-Person	\$52,200	\$1,305	\$1,305	\$191	\$164	\$457	\$1,114	\$159,249
5-Person	\$56,400	\$1,410	\$1,410	\$223	\$202	\$494	\$1,187	\$166,289
Moderate Inc	come (51-80% AMI)							
1-Person	\$58,450	\$768	\$895	\$122	\$90	\$313	\$646	\$114,519
2-Person	\$66,800	\$877	\$1,023	\$143	\$111	\$358	\$734	\$128,984
3-Person	\$75,150	\$987	\$1,151	\$161	\$133	\$403	\$826	\$143,216
4-Person	\$83,500	\$1,097	\$1,279	\$191	\$164	\$448	\$906	\$155,353
5-Person	\$90,200	\$1,184	\$1,382	\$223	\$202	\$484	\$961	\$161,991
Median-Inco	me (81 to 100% AM)						
1-Person	\$51,150	\$1,151	\$1,343	\$122	\$90	\$470	\$1,029	\$182,252
2-Person	\$58,500	\$1,316	\$1,535	\$143	\$111	\$537	\$1,173	\$206,393
3-Person	\$65,800	\$1,480	\$1,727	\$161	\$133	\$604	\$1,319	\$230,301
4-Person	\$73,100	\$1,645	\$1,919	\$191	\$164	\$672	\$1,454	\$252,114
5-Person	\$78,950	\$1,776	\$2,072	\$223	\$202	\$725	\$1,553	\$266,493
Middle-Inco	ome (100 to 120%	AMI)						
1-Person	\$61,400	\$1,407	\$1,642	\$122	\$90	\$575	\$1,285	\$227,407
2-Person	\$70,150	\$1,608	\$1,876	\$143	\$111	\$657	\$1,465	\$257,998
3-Person	\$78,950	\$1,809	\$2,111	\$161	\$133	\$739	\$1,648	\$288,357
4-Person	\$87,700	\$2,010	\$2,345	\$191	\$164	\$821	\$1,819	\$316,622
5-Person	\$94,700	\$2,171	\$2,533	\$223	\$202	\$887	\$1,948	\$336,161
Assumptions:		•	•	•	•	•		

Assumptions:

- 1. California Department of Housing and Community Development (HCD) income limits, 2019.
- 2. Health and Safety code definitions of affordable housing costs (between 30 and 35 percent of household income depending on tenure and income level).
- 3. Housing Authority of the County of Los Angeles (HACoLA), Utility Allowance, 2019.
- 4. 35 percent of monthly affordable cost for taxes and insurance.
- 5. Five percent down payment.
- 6. Four percent interest rate for a 30-year fixed-rate mortgage loan.
- 7. Taxes and insurance apply to owner costs only; renters do not usually pay taxes or insurance.

Sources:

- 1. HCD Income Limits, 2019.
- 2. Veronica Tam and Associates.

G. Housing Problems

A continuing priority of communities is enhancing or maintaining quality of life for residents. A key measure of quality of life in Pasadena is the extent of "housing problems." The Department of Housing and Urban Development (HUD) assesses housing need within a city according to two criteria: the number of households that are paying too much for housing and the number of households living in overcrowded units.

1. Housing Cost Burden

Housing cost burden is an important issue for Pasadena residents. According to the federal government, any housing condition where a household spends more than 30 percent of income on housing is considered "cost burdened. A payment of 30 to 50 percent household income is considerate moderate cost burden. Payment in excess of 50 percent household income is considered severe cost burden. Cost burden is an important housing issue because paying too much for housing leaves less money available for emergency expenditures.

Housing cost burden varies by tenure, household income, and special needs. According to 2012-2016 CHAS data shown in Figure 8, housing cost burden is more prevalent among renter-households (49 percent) than owner-households (31 percent). Also, a higher proportion of renter-households experienced severe cost burdens (25 percent) than owner households (15 percent).

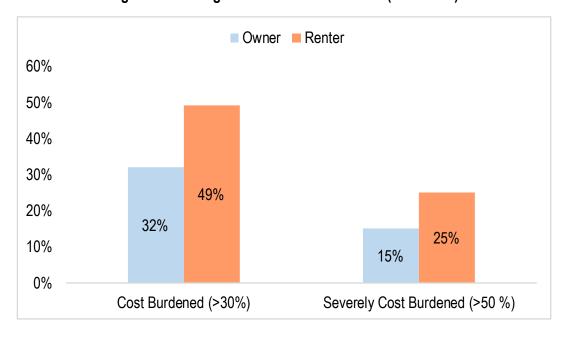
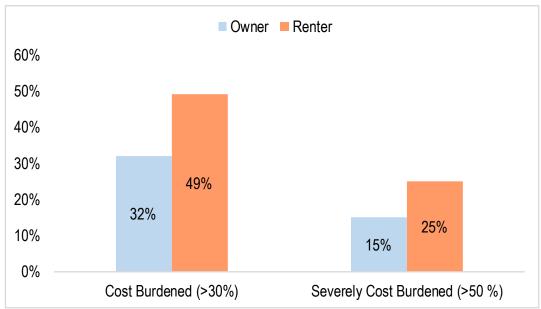


Figure 8: Housing Cost Burden in Pasadena (2012-2016)



Source: HUD CHAS Estimates, American Community Survey, 2012-2016.

2. Overcrowding

Some households may not be able to accommodate high cost burdens for housing and may instead accept smaller housing or reside with other individuals or families in the same home. This choice could result in housing overcrowding. Overcrowding is a serious housing problem in that it can strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes.

According to the Census Bureau, "overcrowding" occurs when a household has more members than habitable rooms in a home (e.g., a three-person family may live in an apartment with a bedroom and a living room and be considered "overcrowded"). Moderate overcrowding refers to 1.0 to 1.5 persons per habitable room and severe overcrowding occurs when a home has more than 1.5 occupants per habitable room. Household overcrowding is reflective of various living situations: (1) a family lives in a home that is too small; (2) a family chooses to house extended family members; or (3) unrelated individuals or families are doubling up to afford housing. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to the perception of overcrowding.

The prevalence of overcrowding decreased in Pasadena from 15 percent in 2000 to six percent in 2017. In 2000, approximately eight percent of homeowners (or 1,868 households) and 21 percent of renter-households (or 5,945 households) lived in overcrowded conditions. By 2017, overcrowding had decreased to two percent of homeowners (471 households) and nine percent of renters (2,677).

However, overcrowding conditions are more prevalent and severe for renters than homeowners. Figure 9 shows that the proportion of owner- and renter-occupied households with severe overcrowding have decreased since 2000 but continue to be higher for renter-

households (3.6 percent, 1,099 households) compared to homeowner households (0.4 percent, 103 households).

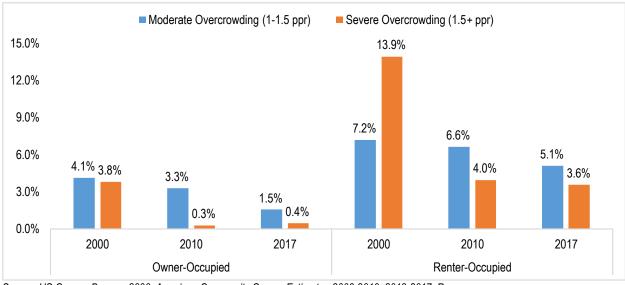


Figure 9: Housing Overcrowding by Tenure in Pasadena (2000-2017)

Source: US Census Bureau, 2000, American Community Survey Estimates, 2006-2010, 2013-2017. Ppr= persons per room.

H. Assisted Housing

To further fair housing in Pasadena, the City provides a range of housing options for all persons. Housing opportunities include conventional single-family and multi-family housing. For those with special needs, however, the City also provides a large inventory of subsidized single-family and multi-family housing, community care facilities, emergency shelters and transitional housing, as well as other treatment and recovery centers. This section inventories the range of housing opportunities for persons with special needs and displays the general location.

1. Housing Choice Voucher (Section 8) Rental Assistance

The Housing Choice Voucher (HCV) program (formerly known as the Section 8 program) is a rent subsidy program that helps lower income families and seniors pay rents of private units. Voucher holders pay a minimum of 30 percent of their income for rent and the local housing authority pays the difference up to the payment standard established by the housing authority. The program offers lower income households the opportunity to obtain affordable, privately owned rental housing and to increase their housing choices. The housing authority establishes payment standards based on HUD Fair Market Rents. The owner's asking price must be supported by comparable rents in the area. Any amount in excess of the payment standard is paid by the program participant.

The City of Pasadena Housing Department currently administers the Housing Choice Voucher program for the City. As of July 2019, 1,202 households were receiving Housing Choice Vouchers. An additional 23,189 households were on the waiting list for assistance. The

Housing Department does not own or operate any public housing projects. The Housing Department utilizes a rent limit that is equivalent to 90 percent of the Fair Market Rent. While this threshold limits the number of housing units eligible to participate in the program, it also stretches the available funding to cover more households.

Table 29 summarizes the characteristics of the recipients/head of households being assisted by the Housing Choice Voucher program. The City's voucher recipients are primarily White and Black households. Compared to the citywide demographic profile (as shown in Table 10), the racial/ethnic composition of voucher recipients seems disproportionately skewed toward White and Black households. While Hispanic population represents about 34 percent of the population, only 17 percent of the vouchers are being held by Hispanic households. Asians represent about 16 percent of the population but only four percent of the voucher recipients.

Of the 1,202 households receiving Housing Choice Vouchers in July 2019, 70 percent were had a head of household with a disability, 59 percent had an elderly head of household, and 12 percent were female-headed households with children. However, with diminishing funding and rising housing costs, the Voucher Program has closed its waiting list. The ability of the City to mitigate the distribution of assistance is therefore limited.

Table 29: Characteristics of Housing Choice Voucher Recipients

Category	Percent
Number of recipients	1,202
Race	
White	62%
Black	34%
Asian	4%
American Indian	1%
Ethnicity	
Hispanic	17%
Non-Hispanic	83%
Household Type	
Elderly	59%
Disabled	70%
Non-elderly	20%
Elderly	50%
Non-Elderly No Children Non-Disabled	10%
Non-Elderly With Children Non-Disabled	11%
Female-Headed Household with Children	12%

Source: City of Pasadena Housing Department, 2019.

2. Assisted Housing Projects

Publicly subsidized affordable housing provides the largest supply of affordable housing in most communities. The City of Pasadena has a significant number of affordable housing units that receive public subsidies in return for long-term affordability controls. Typically, these residential projects provide units affordable to lower and moderate income households, including persons with special needs.

As in typical urban environments throughout the country, however, areas designated for high density housing in the City are usually adjacent to areas designated for commercial and industrial uses. Lower and moderate-income households tend to live in high density areas, where the lower land costs per unit (i.e. more units on a piece of property) can result in lower development costs and associated lower housing payments. Therefore, the location of public/assisted housing is partly the result of economic feasibility. Access to public transportation is also an important consideration when siting affordable housing. Smart growth and sustainable development principles encourage the location of higher density housing along transportation corridors.

Table 30 summarizes the publicly subsidized units in Pasadena. Additional affordable units are also provided in the City through the inclusionary program and are deed restricted as affordable in perpetuity. Currently, 13 apartment complexes in Pasadena provide 1,049 units that are dedicated solely to occupancy by lower and moderate income seniors. Pasadena also has 60 apartment complexes providing 1,239 units for families. Overall there are 2,786 affordable units for lower income family, senior, and special needs households in the City.

Figure 10 Figure 1illustrates the location of the City's affordable units. Most of Pasadena's affordable housing stock is concentrated in the western half of the City, near the 210 Freeway and west of Lake Avenue. The west side of the City, specifically northwest Pasadena, also happens to have a substantial portion of the City's minority and lower and moderate income residents. There is a distinct lack of affordable housing in the eastern half of the City. The lack of affordable housing resources in these regions may become acute as the population in these areas increases.

Table 30: Assisted Rental Housing Inventory (2019)

Project Name	Address	Target Population	Total Units	Affordable Units	Assistance	Year Completed
Villa Marengo Townhomes	281 East Villa Street	Family	80	41	City funded	1987
Villa Parke Homes- Sites 1-3	422 North Raymond Avenue	Family	9	9	City funded	1989
Centennial Houses	830 Pasadena Avenue	Family	2	2	City funded	1991
Villa Los Robles	473 North Los Robles Avenue	Family	8	8	City funded	1992
Holly Street Village Apartments	151 East Holly Street	Family	375	75	City funded	1994
Parke Los Robles	626 North Los Robles Avenue	Family	12	12	City funded	1994
Villa Washington	264 East Washington Boulevard	Family	21	21	City funded	1995

	14000 No. (In December 1					
1392-1394 N. Raymond Ave	1392 North Raymond Avenue	Family	2	2	City funded	1996
North Raymond Apartments	543 North Raymond Avenue	Family	3	3	City funded	1996
Stalhuth House	131 East Washington Boulevard	Family	2	2	City funded	1997
Raymond Grove Plaza	474 East Orange Grove Boulevard	Family	12	12	City funded	1998
505 N. Marengo	505 North Marengo Avenue	Family	7	7	City funded	2000
Agape Court	445 North Garfield Avenue	Family	46	10	City funded	2000
El Sereno Apartments	1525 North El Sereno Avenue	Family	6	6	City funded	2001
Orange Grove Gardens Apartments	252 East Orange Grove Boulevard	Family	38	37	City funded	2006
Parke St. Apartments	270 Parke Street	Family	9	9	City funded	2012
Windrose Place	271 East Bellevue Drive	Family	134	27	Density Bonus	1987
Acappella of Pasadena	145 Chestnut Street	Family	143	12	Density Bonus	2002
Arpeggio of Pasadena	325 Cordova Street	Family	135	11	Density Bonus	2002
Avalon Pasadena (Archstone)	25 South Oak Knoll Avenue	Family	120	10	Density Bonus	2004
33 S. Wilson Ave	33 South Wilson Avenue	Family	45	4	Density Bonus	2006
Holliston Villa	636 North Holliston Avenue	Family	10	1	Density Bonus	2009
Linda Rosa Apartments	422 Linda Rosa	Family	7	1	Density Bonus	2010
Allen House	1808 Las Lunas Street	Family	7	6	HUD	1917
Casa D'Oro II	1115 North Chester Avenue	Family	6	6	HUD	1926
Wagner House	1894 Wagner Street	Family	4	3	HUD	1929
Northwest Manors II	700 East Mountain Street	Family	26	26	HUD	1956
Northwest Manors I	985 North Raymond Avenue	Family	44	44	HUD	1958
Dudley House	2131 East Dudley Street	Family	7	6	HUD	1959
The Groves	965 North Raymond Avenue	Family	18	18	HUD	1963
La Pintoresca	1275 La Pintoresca Drive	Family	64	64	HUD	1969
Washington Townhouse	529 East Washington Boulevard	Family	20	20	HUD	1972
Community Arms Apartments	169 East Orange Grove Boulevard	Family	133	131	HUD	1973
Villa Yucatan	2186 East Villa Street	Family	14	14	HUD	1973
Magnolia Townhomes	1172 North Raymond Avenue	Family	5	5	HUD	1981
Kings Villages	1141 North Fair Oaks Avenue	Family	313	313	HUD	2004

Subsidized Housing Corporation	126 Grandview St	Family	1	1	HUD	N/A
Subsidized Housing Corporation	159 W Washington Blvd	Family	1	1	HUD	N/A
Subsidized Housing Corporation	1831 Newport Ave	Family	1	1	HUD	N/A
Subsidized Housing Corporation	1931 N Raymond Ave	Family	1	1	HUD	N/A
Subsidized Housing Corporation	1938 North Summit Ave	Family	1	1	HUD	N/A
Subsidized Housing Corporation	651 North Summit Ave	Family	1	1	HUD	N/A
168 N. Wilson Ave	168 North Wilson Avenue	Family	23	17	Inclusionary	2005
Walnut Place	712 East Walnut Street	Family	28	3	Inclusionary	2005
Del Mar Station / Avalon	265 Arroyo Parkway	Family	347	21	Inclusionary	2006
Trio Apartments	621 East Colorado Boulevard	Family	304	18	Inclusionary	2006
Pasadena Place	169 West Green Street	Family	38	3	Inclusionary	2007
Renaissance Court	456 East Orange Grove Boulevard	Family	31	5	Inclusionary	2007
Del Mar Garden Apartments	240 East Del Mar Boulevard	Family	31	3	Inclusionary	2009
Westgate Apartments (Phases 1-8)	231 South DeLacy Street	Family	480	96	Inclusionary	2010
119 S. Los Robles	119 South Los Robles Avenue	Family	50	4	Inclusionary	2015
Luxe Pasadena	1769 E. Walnut Street	Family	131	10	Inclusionary	2016
The Andalucia	686 E. Union Street	Family	118	11	Inclusionary	2016
The Ellington	3330 E. Foothill Boulevard	Family	212	25	Inclusionary	2016
Del Mar Gardens	2424 East Del Mar Boulevard	Family	17	1	Inclusionary	2017
Off-site units for 388 S. Los Robles)	67 & 73 South Vinedo Avenue	Family	3	2	Inclusionary	2017
177 E. Del Mar Blvd	177 East Del Mar Boulevard	Family	17	1	Inclusionary	2018
Los Patios De Cordova	218 South Oakland Avenue	Family	21	2	Inclusionary	2018
Vinedo Garden Apartments	60-70-80 S Vinedo Avenue	Family	26	3	Inclusionary	2018
Avila Apartments	75 West Walnut Street	Family	201	30	Inclusionary	2019
Woodbury Apartments	476 Woodbury Road	Senior	12	12	City funded	1989
Hudson Oaks	1267 North Hudson Avenue	Senior	45	44	City funded	2012
Heritage Square Apartments	762 N. Fair Oaks Avenue	Senior	70	69	City funded	2016
Green Hotel	50 East Green Street	Senior	139	138	HUD	1900
Villa Raymond	455 North Raymond Avenue	Senior	61	60	HUD	1928
Pilgrim Towers East	440 North Madison Avenue	Senior	158	157	HUD	1973
Pilgrim Towers North	560 East Villa Street	Senior	258	205	HUD	1979

Hudson Gardens (Group Home)	1255 North Hudson Avenue	Senior	41	3	HUD	1982
Concord Pasadena	275 Cordova Street	Senior	150	149	HUD	1989
Pasadena Silvercrest	975 East Union Street	Senior	75	74	HUD	1996
Telacu Courtyard	42 E. Walnut Street	Senior	70	69	HUD	1997
Rosewood Court	1888 North Fair Oaks Avenue	Senior	65	65	HUD	2004
Fountain Glen/ Fountains at Pasadena	775 East Union Street	Senior	98	4	Inclusionary	2004
Green Street	1299 East Green Street	Single	89	89	Inclusionary	2009
Fuller Theological Seminary	255 North Madison Avenue	Single/Student	179	169	Inclusionary	2006
Crown House (Group Home)	3055 East Del Mar Boulevard	Special needs	11	10	City funded	1987
Centennial Place	235 East Holly Street	Special needs	144	143	City funded	1991
Homes for Life	489 North Madison Avenue	Special needs	1	1	City funded	1994
Euclid Villa (Transitional Housing)	154 South Euclid Avenue	Special needs	15	15	City funded	2000
Villa Apartments	2089 East Villa Street	Special needs	5	5	City funded	2001
Chester House (Group Home)	1115 North Chester Avenue	Special needs	1	1	City funded	2001
Wynn House (Group Home)	1920 East Villa Street	Special needs	1	1	City funded	2001
Navarro House (Homeless)	1516 North Navarro Street	Special needs	6	6	City funded	2002
Sierra Rose (Special Needs) (Group Home)	3057 East Del Mar Boulevard	Special needs	6	6	City funded	2002
Marv's Place	143 N. Mar Vista Avenue	Special needs	20	19	City funded	2016
Pasadena Accessible Apartments	915 East Rio Grande Street	Special needs	13	13	HUD	2002
HFL Ashtabula Homes	386 Ashtabula Street	Special needs	21	20	HUD	2003
Total			5,725	2,786		

Source: City of Pasadena, 2019.

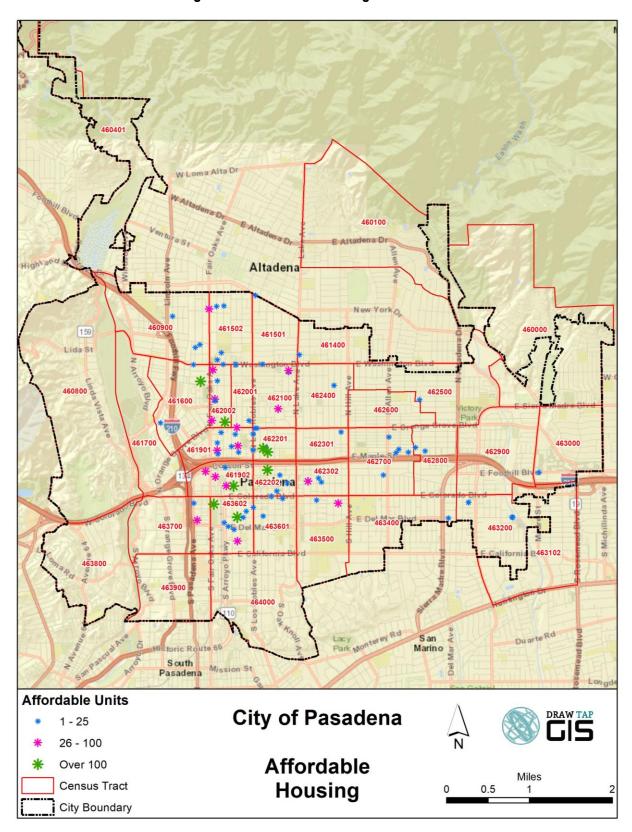


Figure 10: Affordable Housing in Pasadena

3. 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. 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.

According to the State of California Community Care Licensing Division of the State's Department of Social Services, as of July 2019, there were 177 State-licensed community care facilities located in Pasadena, with a total capacity of 7,708 (Table 31). The locations of these facilities are shown in Figure 11. Concentrations of licensed care facilities can be seen in the northwest portion of the City and much of Pasadena's larger community care facilities are located in the northern half of the City, north of the 210 Freeway.

Table 31: Licensed Community Care Facilities by Type

Туре	Number of Facilities	Total Capacity
Adult Day Care	7	468
Adult Residential Care	44	442
Child Care Center	64	3,878
Group Home	8	105
Infant Center	15	383
Residential Care for the Elderly	32	2,097
School Age Child Care Center	6	331
Small Family Homes	1	4
Total	177	7,708

Source: State of California Department of Social Services, Community Care Licensing Division, July 2019
Group home information is not available through the State of California Department of Social Services. Value provided here is value reported from Pasadena's Analysis of Impediments, 2013.

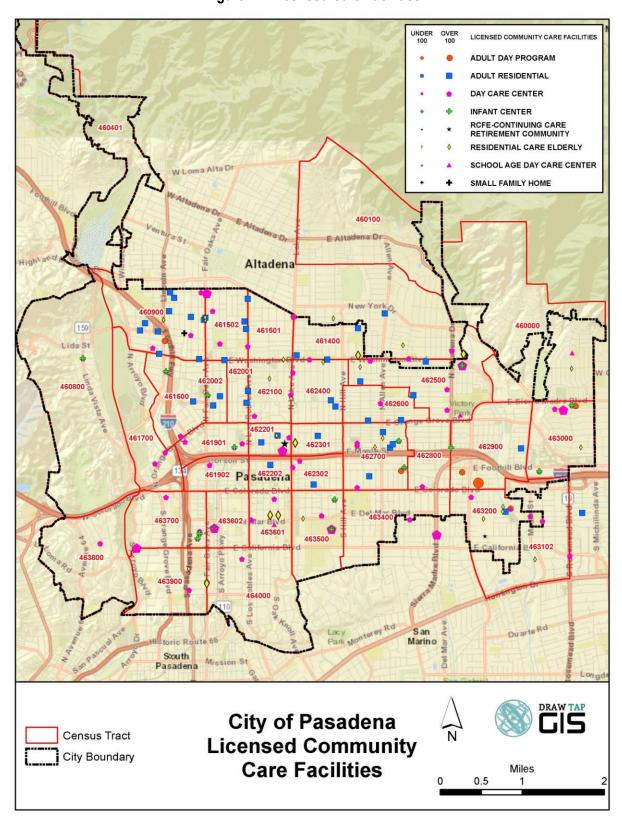


Figure 11: Licensed Care Facilities

I. Equal Provision of and Access to Government Services

Fair housing also considers that condition of equal access to public services. The provision of adequate parks and recreation opportunities has become a rising concern as it relates to environmental justice.

1. Parks and Recreation Facilities

Parks and recreation activities are important resources within any community. Parks and open spaces create a sense of community and enhance quality of life for all Pasadena residents, promoting this sense of community both in neighborhoods and across demographic groups. Parks and open spaces can assist in the growth and development of people, families and community and, perhaps most importantly offer a vital respite from urban stress and allow recreational outlets for all ages. Improving recreational opportunities and expanding a community's park system within underserved areas are important objectives for the City.

The City of Pasadena's existing park system is large and complex; it is over 100 years old and park development did not follow an organized set of predetermined guidelines. This organic growth blurs the clear distinction between all park types. Parks are classified by type based primarily on their size, function and character. The Pasadena Municipal Code (Section 4.17.040) contains four park classifications: Citywide, Community, Neighborhood, and Pocket parks.

A complete list of park facilities in Pasadena are identified in Table 32 and Figure 12. Overall, Pasadena has 15 neighborhood parks, five community parks, and four citywide parks, totaling 338 acres. Active parkland in Pasadena is concentrated in the far western edges of the City. Several parks are also located within northwest Pasadena, where much of the City's minority and lower and moderate-income residents reside.

Table 32: Parkland in Pasadena

Park	Address	Acreage	Туре
Brookside Park	360 N. Arroyo Boulevard	61.6	Citywide
Rose Bowl Area H	747 Seco Street	19	Citywide
Hahamongna Watershed Park	4550 Oak Grove Drive	90	Citywide
Lower Arroyo Park	W Colorado and S Arroyo	50.9	Citywide
Central Park	275 S. Raymond Avenue	9.2	Community
Memorial Park	85 E. Holly Street	5.3	Community
Robinson Park	1081 N. Fair Oak Avenue	6.7	Community
Victory Park	2575 Paloma Street	26.6	Community
Villa Parke	363 E. Villa Street	11.9	Community
Allendale Park	1130 S. Marengo Avenue	2.9	Neighborhood
Brenner Park	235 W. Barthe Drive	2.7	Neighborhood
Eaton Blanche Park	3100 E. Del Mar Boulevard	5.5	Neighborhood
Grant Park	232 S. Michigan Avenue	2.5	Neighborhood
Hamilton Park	3680 Cartwright Street	7.4	Neighborhood
Jefferson Park	1501 E. Villa Street	4.4	Neighborhood
La Pintoresca Park	45 E. Washington Boulevard	3.2	Neighborhood
McDonald Park	1000 E. Mountain Avenue	5	Neighborhood
Singer Park	California Boulevard & St. John Avenue	3	Neighborhood
Vina Vieja Park	3026 E Orange Grove Boulevard	7.6	Neighborhood
Washington Park	Washington Blvd. & El Molino Avenue	5.5	Neighborhood
Defenders Park	Orange Grove Blvd. & Colorado Blvd.	1.8	Pocket
Eaton Sunnyslope Park	Sunnyslope Ave & Paloma St	2	Pocket
Gwinn Park	Orange Grove Blvd. & Sunnyslope Avenue	2.7	Pocket
San Rafael Park	Colorado Boulevard & Melrose Avenue	0.9	Pocket
Total		338.3	

Source: City of Pasadena Green Space, Recreation and Parks Master Plan, 2007; City of Pasadena Recreation Program Guide, Spring/Summer 2019.

Altadena 461501 saden1 San South City of Pasadena Park Park Acreage Low/Mod Income & Census Block Group Low/Mod Census Tract Miles 0.5 City Boundary **Income Areas**

Figure 12: Active Parkland

Estimates of the low and moderate income individuals by block group based on the 2011-2015 ACS (most recent available through HUD).

2. Public Transit

Equal provision of transit services is indirectly a fair housing issue if transit-dependent populations are not adequately served by public transit, thereby limiting their housing choice. One way to measure this is to compare the relationship between existing transit routes, employment centers, and areas where residents are using transit regularly.

Public transit should link lower and moderate-income persons, who are often transit dependent, to major employers where job opportunities exist. Access to employment via public transportation can reduce welfare usage rates and increase housing mobility, which enables residents to locate housing outside of traditionally lower and moderate-income neighborhoods. The lack of a 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. In addition, elderly and disabled persons also often rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Public transit that provides a link between job opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs.

According to the 2013-2017 ACS, in Pasadena six percent of the City's commuters age 16 and older used public transit as their primary means of transportation to work. Hispanic workers constitute the largest group of public transportation riders (47 percent), followed by White residents (21 percent of transit users) and Black residents (15 percent of transit users). The following section provides a general overview of public transit systems and amenities available in Pasadena.

The City of Pasadena benefits from an extensive network of local and regional transit routes that provide good citywide coverage. A study conducted for the Arroyo Verdugo Region (Cities of Pasadena, Glendale, and Burbank) indicates that approximately 119,000 people, or 89 percent of the population, reside within a one-quarter-mile (approximately 1,000 feet) walk of a transit route. According to Pasadena's 2019 Short Range Transit Plan, most areas of Pasadena have access to bus service within a ¼ mile (Figure 13). Service is more limited in lower density residential neighborhoods in the western and northeast portions of Pasadena, where transit ridership is typically low.

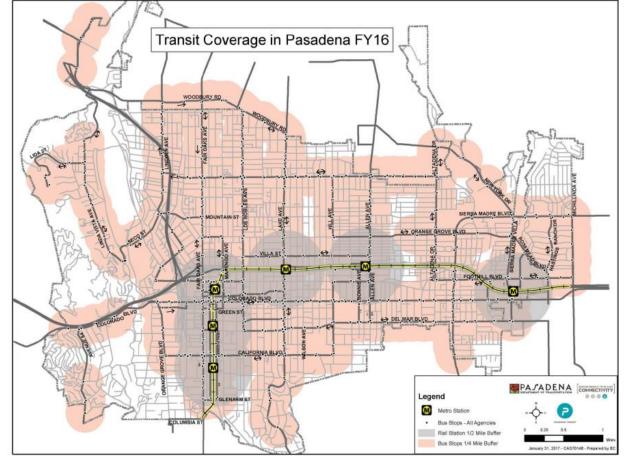


Figure 13: Transit Coverage in Pasadena

Source: Pasadena's Short Range Transit Plan, April 2019.

While there are only six routes in the City that are truly "local" (beginning and ending within the City limits), the network is a first step in supporting the local transit needs of the City. The following transit routes provide service within the City:

- Nine local routes provided by the City, Pasadena Transit (Routes 10, 20, 31/32, 40, 51/52, and 60) and Metro (177, 686, and 687)
- Ten regional bus routes provided by Metro (180, 181, 256, 258, 260, 264, 266, 267, and 268) and Foothill Transit (187)
- Three regional express routes provided by Metro (487 and 501) and LADOT (Route 549)
- Two regional rapid routes provided by Metro (762 and 780)
- One regional light rail line operated by LA Metro (Gold Line)

In addition to its six fixed-route services, Pasadena Transit also has two paratransit service providers, Dial-a-Ride and Access Services. Paratransit is an alternative mode of flexible passenger transportation that does not follow fixed routes or schedules.

Dial-a-ride is shared curb-to-curb transportation service operated by Pasadena Transit for senior and disabled residents in a 36-square mile area that includes Pasadena, San Marino, and the unincorporated areas of Altadena, Kinneloa, Chapman Woods, and East San Gabriel. Residents in this service area are eligible to become a Dial-A-Ride member if they are at least 60 years old or have a disability that prevents them from being able to use regular fixed route transit services. The Dial-A-Ride program has developed a network of relationships and partnerships that has resulted in the provision of transportation that helps support and enhance public, non-profit, and private programs serving the most economically disadvantaged and vulnerable area residents.

Access Services is a public entity that serves as the Los Angeles County Consolidated Transortation Service Agency (CTSA) and administers the Los Angeles County's Federal Coordinated Paratransit Plan ("Plan") on behalf of the County's 45 public fixed route operators (including Pasadena Transit). Pursuant to the Plan, Access Services facilitates the provision of "complementary" ADA paratransit services to certain persons with disabilities as required by the Federal Government (42 U.S.C. S12143).

There are also significant developments in the area of regional public transit that will have lasting beneficial impacts on the City of Pasadena. Metro is currently constructing the Regional Connector, a 1.9 mile underground light rail system planned for 2021 that will connect the Metro Gold Line to the 7th Street/Metro Center Station in downtown Los Angeles. Currently, if passengers are travelling between Pasadena and sections of downtown, Long Beach, Santa Monica or mid-city Los Angeles, two transfers are required which adds additional travel time. However, when the Regional Connector opens, only one transfer will be required. Metro estimates that the opening of the Regional Connector will increase ridership on all connecting rail lines by seven to ten percent which includes the Gold Line. It is anticipated that Pasadena Transit will experience a corresponding increase in demand. Current plans by Pasadena Transit include changes to the route structure to support the Gold Line service, increased service levels, and acquisition of new vehicles including plans for clean-fuel vehicles.

3. Major Employers

Pasadena has been a national attraction for visitors and tourists to Southern California because of its favorable year-round climate. The City has a strong office market driven by demand from a variety of professional services in the technical, scientific, legal, finance and insurance, and management fields. In 2018, the employment of the City was estimated at 110,737 jobs. Industry sectors comprising the largest shares of the City employment included Professional, Scientific and Technical (15 percent), Health Care and related (13.4 percent), Construction (11 percent) and Educational Services (Figure 14); taken together these industries comprised nearly 50 percent of the City's employment base. The 10 major employers within the City as of July 2019 are listed in Table 33.

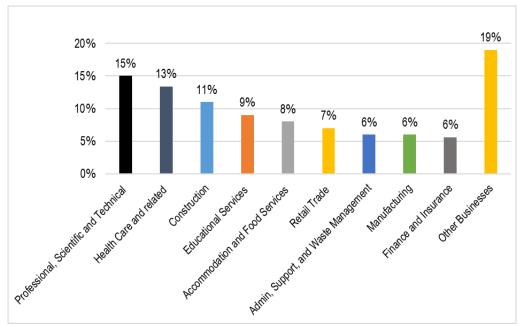


Figure 14: Pasadena Employment Sector Shares

Source: Pasadena Chamber of Commerce Business Directory, Visitor and Community Guide, 2019.

Table 33: Major Employers in Pasadena (2019)

Business	Address	Industry	# of Employees
California Institute of Technlogy - Jet Propulsion Laboratory	4800 Oak Grove Drive Pasadena, California 91109	Aerospace	6,197
California Institute of Technlogy - Campus	1200 E California Blvd, Pasadena, CA 91125	Education	3,900
Huntington Memorial Hospital	100 W. California Blvd., Pasadena, CA. 91105	Health	3,737
Kaiser Permanente	393 East Walnut Street Pasadena, 91188-0001	Health	3,152
Pasadena City College	1570 E. Colorado Blvd, Pasadena, California 91106	Education	2,619
Pasadena Unified School District	351 South Hudson Avenue Pasadena, California 91109	Education	2,420
The City of Pasadena	100 North Garfield Avenue # 228, Pasadena, CA 91101	Government	2,139
Bank of America	101 S Marengo Ave, Pasadena, CA 91101	Finance	1,410
Art Center College of Design	950 South Raymond Avenue, Pasadena, CA 91105	Education	1,177
Hathaway-Sycamores	100 W. Walnut St., Suite 375 Pasadena, CA 91124	Social Service	673

Source: City of Pasadena, 2019.

As shown in Figure 15, all of the City's major employers are located directly on or adjacent to public transit routes. However, having regional access to jobs by means of public transit does not necessarily translate into stable employment. Lower income workers, especially female heads of household with children, have unique travel patterns that may prevent them from obtaining work far from home, regardless of access to public transit. Women in general are disproportionately responsible for household-supporting activities such as trips to grocery stores or to accompany young children to and from schools. Women using public transit are

often limited to looking for employment near home that will allow them time to complete these household-sustaining trips.

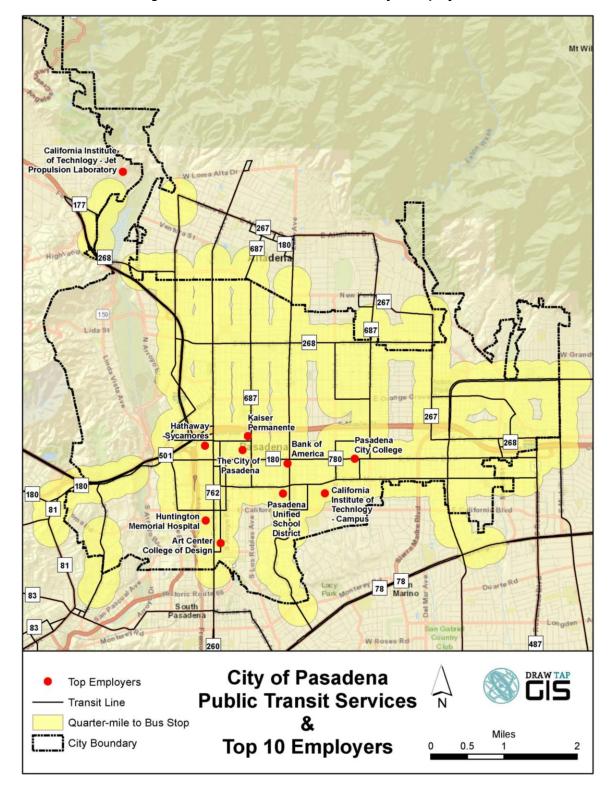


Figure 15: Public Transit Services to Major Employers

4. Affordable Housing

Figure 16 illustrates the location of the City's affordable housing projects in relation to regional transit services. As shown, most affordable housing projects in the City are situated along transit routes, with all but three being located within one-quarter mile of a bus stop. These three projects are located just outside the quarter-mile radius though.

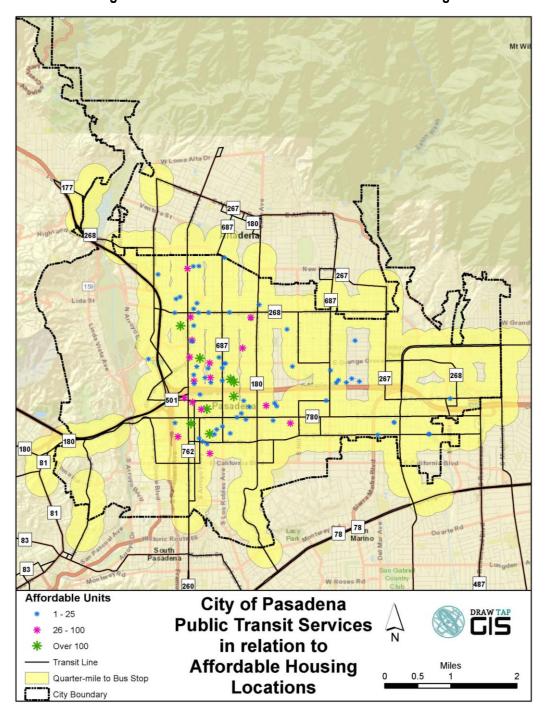


Figure 16: Public Transit Services to Affordable Housing

5. Public Schools

Public education in the City of Pasadena is administered by the Pasadena Unified School District (PUSD). In addition to the City of Pasadena, PUSD also serves the City of Sierra Madre and the unincorporated community of Altadena. As of September 2019, the District had a total of 33 schools, including 20 elementary schools, three K-12 schools, four middle schools, three high school, and three alternative schools. PUSD had 16,340 students enrolled in its schools for the 2018-2018 school year. A majority of these enrolled students were Hispanic (60 percent), a tenth were Black (11 percent), and about 17 percent were White.

As part of President Johnson's "War on Poverty," the Elementary and Secondary Education Act (ESEA) was passed in 1965. It is often regarded as the most far-reaching federal legislation affecting education ever passed by Congress. The act is an extensive statute that funds primary and secondary education, while emphasizing equal access to education and establishing high standards and accountability. A major component of ESEA is a series of programs typically referred to as "Title I." Title I programs distribute funding to schools and school districts with a high percentage of students from low income families. To qualify as a Title I school, a school typically must have around 40 percent or more of its students coming from families who are low income. The programs also give priority to schools that are in obvious needs of funds, low-achieving schools, and schools that demonstrate a commitment to improving their education standards and test scores.

Of the 33 schools that make up Pasadena Unified School District, 27 of them are Title I schools. Figure 17 and Figure 18 illustrate the location of the City's Title I schools in low-moderate income areas and areas of minority concentration. The City's Title I schools are located throughout the City, with no particular pattern of concentration.

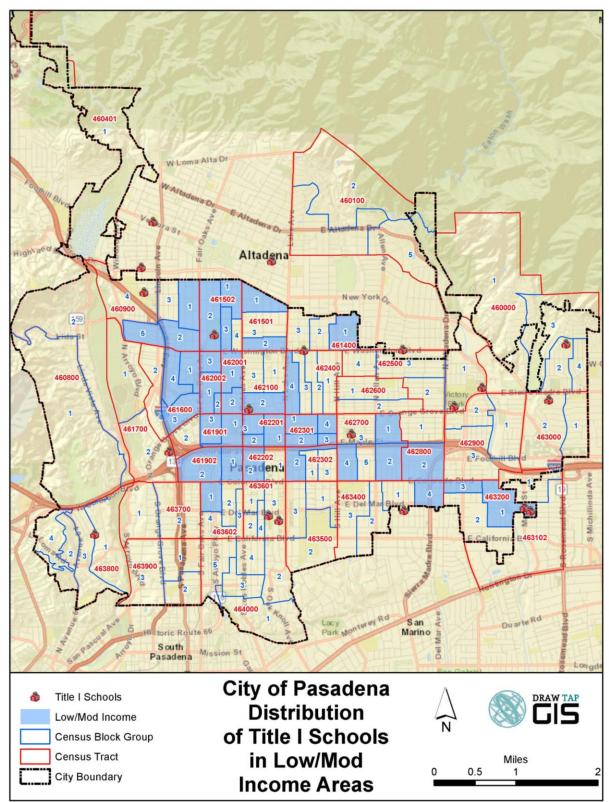


Figure 17: Distribution of Title I Schools and Low-Moderate Income Areas

Estimates of the low- and moderate-income individuals by block group based on the 2011-2015 ACS (most recent available through HUD)

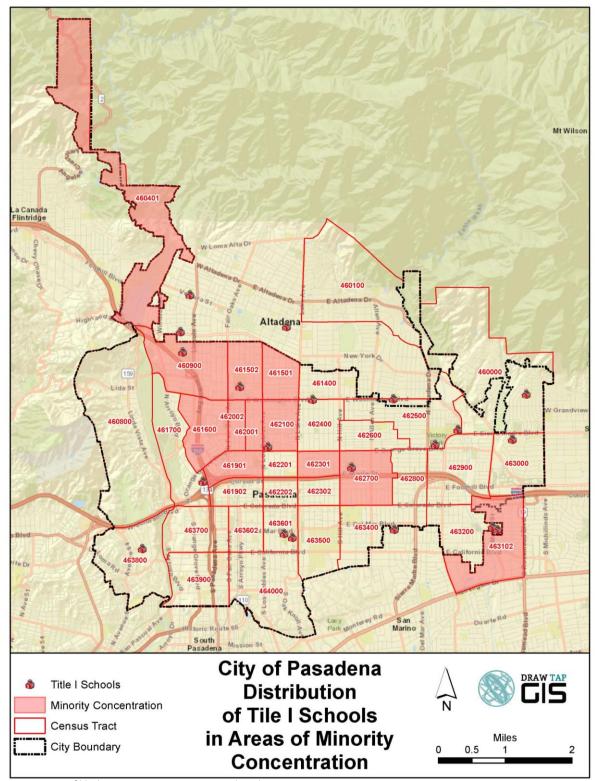


Figure 18: Distribution of Title I Schools and Areas of Minority Concentration

Estimates of block group minority concentration based on 2013-2017 American Community Survey.

6. ADA Compliant Public Facilities (Section 504 Assessment)

The Americans with Disabilities Act (ADA) of 1990 is federal civil rights legislation, which makes it illegal to discriminate against persons with disabilities. Title II of the ADA requires elimination of discrimination in all public services and the elimination of architectural barriers in all publicly owned buildings and facilities. It is important that public facilities are ADA compliant to facilitate participation among disabled residents in the community planning and decision-making processes.

The City of Pasadena is actively working towards fulfilling the ADA's Title II requirements. In November 2009, the City initiated the Americans with Disabilities Act (ADA) Transition Plan 2010-2015 to address structural modifications necessary to make services and programs in City facilities accessible to the public. Bi-annual progress reports as requirered were generated and published. All access issues included in the 2010 plan in 2010 were addressed by June 2016, with a few exceptions, many of which were to be addressed by 2018. Curb ramps and sidewalks are to be continually upgraded in association with resurfacing and pedestrian accessibility projects.

The ADA Compliance Plan 2017-2021, the successor to the Transition Plan, guides the City in continuoing to make services and programs accessible to people with Disabilites. The Plan is maintined through the Pasadena Citizen Service Center, which allows for tracking of progress on Compliance Plan items in real time. As Capital Improvement Projects (CIP) are developed and funded, the Compliance Team ensures that accessibility is factored into every project.

7. Disparities in Access to Opportunity

HUD has developed a series of indices for the purpose of fair housing assessment to help inform communities about disparities in access to opportunity. HUD-provided index scores are based on nationally available data sources and assess residents' access to key opportunity assets in Pasadena. Table 30 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- Low Poverty Index: The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. *The higher the score, the less exposure to poverty in a neighborhood.*
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. *The higher the score, the higher the school system quality is in a neighborhood.*
- Labor Market Engagement Index: The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.
- Transit Trips Index: This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50%

of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.

- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. *The higher the index, the lower the cost of transportation in that neighborhood.*
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.
- Environmental Health Index: The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census blockgroup.

As shown in Table 34, in Pasadena Black (non-Hispanic) and Hispanic residents were more likely (compared to other racial/ethnic groups) to be impacted by poverty, limited access to proficient schools, lower labor participation rate and more likely to utilize public transportation.

Table 34: Opportunity Indicators by Race/Ethnicity

City of Pasadena	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportatio n Cost Index	Jobs Proximity Index	Environmenta I Health Index
Total Population							
White, Non-Hispanic	66.32	46.16	78.66	77.60	82.83	61.28	19.02
Black, Non-Hispanic	47.37	32.92	53.35	80.68	84.88	53.79	21.96
Hispanic	48.40	31.79	53.88	81.80	85.90	50.75	20.32
Asian or Pacific Islander, Non-Hispanic	64.73	45.51	77.04	80.67	86.56	66.21	16.49
Native American, Non-Hispanic	55.77	38.47	64.68	80.43	85.55	58.27	18.56
Population below federal poverty line							
White, Non-Hispanic	57.61	39.55	70.05	81.76	87.13	62.28	16.96
Black, Non-Hispanic	40.76	25.80	50.80	84.61	88.30	49.93	18.80
Hispanic	40.39	27.40	47.66	83.58	87.93	51.08	18.50
Asian or Pacific Islander, Non-Hispanic	57.34	37.23	66.41	84.01	90.38	68.54	14.48
Native American, Non-Hispanic	34.98	10.52	35.21	87.74	88.85	23.04	17.04

Note: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Source: AFFHT Data Table 12, September 2017

Chapter 4: Lending Practices

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the current lending/credit crunch. This chapter reviews the lending practices of financial institutions and the access to financing for all households, particularly minority households and those with lower incomes. Lending patterns in lower and moderate income neighborhoods and areas of minority concentration are also examined. However, publicly available data on lending does not contained detailed information to make conclusive statements of discrimination, but can only point out potential areas of concerns. Furthermore, except for outreach and education efforts, local jurisdictions' ability to influence lending practices is limited. Such practices are largely governed by national policies and regulations.

A. Background

Discriminatory practices in home mortgage lending have evolved over the last five to six decades. In the 1940s and 1950s, racial discrimination in mortgage lending was easy to spot. From government-sponsored racial covenants to the redlining practices of private mortgage lenders and financial institutions, minorities were denied access to home mortgages in ways that severely limited their ability to purchase a home. Today, discriminatory lending practices are subtler and tend to take different forms. While mortgage loans have become more readily available in lower and moderate income minority communities, some mortgage brokers pushed borrowers into higher-cost subprime mortgages that were not well suited to their needs and have led to financial problems. Although the recent tightening of credit markets has made this type of predatory lending less common, minority consumers continue to have less-than-equal access to loans at the best price and on the best terms that their credit history, income, and other individual financial considerations merit.

Legislative Protection

In the past, financial institutions did not always employ fair lending practices. Credit market distortions and other activities such as "redlining" were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending.

Community Reinvestment Act and Home Mortgage Disclosure Act

The CRA is intended to encourage regulated financial institutions to help meet the credit needs of their entire communities, including low and moderate income neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance.

CRA ratings are provided by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC). However, the CRA rating is an overall rating for an

institution and does not provide insights regarding the lending performance at specific locations by the institution.

Home Mortgage Disclosure Act

In tandem with the CRA, the Home Mortgage Disclosure Act (HMDA) requires lending institutions to make annual public disclosures of their home mortgage lending activity. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants. HMDA data provide some insight into the lending patterns that exist in a community. However, HMDA data are only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices due to the lack of detailed information on loan terms or specific reasons for denial.

Conventional versus Government-Backed Financing

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. To assist lower and moderate income 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 rate interests and are insured ("backed") by the agencies. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHA/FSA). Often government-backed loans are offered to the consumers through private lending institutions. Local programs such as first-time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements.

Financial Stability Act

The Financial Stability Act of 2009 established the Making Home Affordable Program, which assists eligible homeowners who can no longer afford their home with mortgage loan modifications and other options, including short sale or deed-in-lieu of foreclosure. The program is targeted specifically for homeowners facing foreclosure and homeowners who are unemployed or "underwater" (i.e., homeowners who owe more on their mortgage than their home is worth).

For homeowners who can no longer afford their homes but do not want to go into foreclosure, the Home Affordable Foreclosure Alternatives Program (HAFA) offers homeowners, their mortgage servicers, and investors incentives for completing a short sale or deed-in-lieu of foreclosure. HAFA enables homeowners to transition to more affordable housing while being released from their mortgage debt. The program also includes a "cash for keys" component whereby a homeowner receives financial assistance to help with relocation costs in return for vacating their property in good condition.

Helping Families Save Their Homes Act

The Helping Families Save Their Homes Act was passed by Congress in May 2009 and expands the Making Home Affordable Program. This Act includes provisions to make mortgage assistance and foreclosure prevention services more accessible to homeowners and increases protections for renters living in foreclosed homes. It also establishes the right of a homeowner

to know who owns their mortgage and provides over two billion dollars in funds to address homelessness. Under this bill, tenants also have the right to stay in their homes after foreclosure for 90 days or through the term of their lease. The bill also provides similar protections to housing voucher holders.

Fraud Enforcement and Recovery Act

The Fraud Enforcement and Recovery Act (FERA) enhances the criminal enforcement of federal fraud laws by strengthening the capacity of federal prosecutors and regulators to hold accountable those who have committed fraud. FERA amends the definition of a financial institution to include private mortgage brokers and non-bank lenders that are not directly regulated or insured by the Federal government, making them liable under federal bank fraud criminal statutes. The new law also makes it illegal to make a materially false statement or to willfully overvalue a property in order to manipulate the mortgage lending business.

B.Overall Lending Patterns

1. Data and Methodology

The availability of financing affects a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing.

HMDA data are submitted by lending institutions to the FFIEC. Certain data is available to the public via the FFIEC site either in raw data format or as pre-set printed reports. The analyses of HMDA data presented in this AI were conducted using Lending PatternsTM. Lending Patterns is a web-based data exploration tool that analyzes lending records to produce reports on various aspects of mortgage lending. It analyzes HMDA data to assess market share, approval rates, denial rates, low/moderate income lending, and high-cost lending, among other aspects.

Table 35 summarizes the disposition of loan applications submitted to financial institutions in the five year period between 2012 and 2017 (most recent HMDA data available that permits consistent comparisons) for home purchase, refinance, and home improvement loans in Pasadena. Included is information on loan applications that were approved, denied, and withdrawn or incomplete ("Other"). Between 2012 and 2017 there was a 53 percent decrease of applicants, primarily from home improvement and government-backed loan applications. The average loan approval among all loan types also decreased slightly from 59 percent in 2012 to 58 percent in 2017.

Total Applicants Percent Approved† **Percent Denied** Percent Other†† Loan Type % 2012 2012 2012 2017 2012 2017 2017 2017 Change Conventional 1,976 67% 9% 1,781 11% 64% 7% 13% 9% Purchase Gov't-Backed -74% 52% 333 88 50% 11% 8% 18% 10% Purchase Home Improvement 288 446 55% 60% 56% 20% 21% 18% 9% Refinancing 10,273 3460 -66% 59% 53% 13% 15% 22% 12% Total 12,675 5,970 -53% 59% 58% 12% 13% 12% 19%

Table 35: Disposition of Home Loans (2012 and 2017)

Source: www.lendingpatterns.com, 2019.

2. Home Purchase Loans

In 2017, a total of 1,976 households applied for conventional loans to purchase homes in the City, an 11 percent increase from 2012. This increase in lending activity is reflective of the overall increases in the country but lower than lending trends throughout the county (22 percent). The approval rate in 2017 for conventional home purchase loans was approximately 67 percent, while seven percent of applications were denied. In 2012, 64 percent of conventional home loan applications were approved and nine percent were denied.

Potential homeowners can also choose to apply for government-backed home purchase loans when buying their homes. In a conventional loan, the lender takes on the risk of losing money in the event a borrower defaults on a mortgage. For government-backed loans, the loan is insured, either completely or partially, by the government. The government does not provide the loan itself, but instead promises to repay some or all of the money in the event a borrower defaults. This reduces the risk for the lender when making a loan.

Government-backed loans generally have more lenient credit score requirements, lower down payment requirements, and are available to those with recent bankruptcies. However, these loans may also carry higher interest rates and most require homebuyers to purchase mortgage insurance. Furthermore, government-backed loans have strict limits on the amount a homebuyer can borrow for the purchase of a home. In 2017, 88 Pasadena households applied for government-backed loans, a significant decrease (74 percent) from the 333 applications in 2012. Approval rates for these loans were lower than for conventional home purchase loans in both 2012 and 2017. Of the 88 government-backed loan applications in 2017, approximately 52 percent were approved and seven percent were denied.

3. Home Improvement Loans

Reinvestment in the form of home improvement is critical to maintaining the supply of safe and adequate housing. Historically, home improvement loan applications have a higher rate of denial when compared to home purchase loans. Part of the reason is that an applicant's debt-to-

[†] Approved and Originated and Approved but Not Accepted by applicant

ttWithdrawn or Incomplete

income ratio may exceed underwriting guidelines when the first mortgage is considered with consumer credit balances. Another reason is that many lenders use the home improvement category to report both second mortgages and equity-based lines of credit, even if the applicant's intent is to do something other than improve the home (e.g., pay for a wedding or college). Loans that will not be used to improve the home are viewed less favorably since the owner is divesting in the property by withdrawing accumulated wealth. From a lender's point of view, the reduction in owner's equity represents a higher risk.

In 2017, 446 applications for home improvement loans were submitted by Pasadena households. Of these applications, 56 percent were approved and 21 percent were denied. Home improvement financing in the City was much more active in 2017 than 2012, when only 288 applications for home improvement loans were filed by Pasadena residents. Approval rates for this type of loan were similar in both 2012 and 2017.

4. Refinancing

Homebuyers will often refinance existing home loans for a number of reasons. Refinancing can allow homebuyers to take advantage of better interest rates, consolidate multiple debts into one loan, reduce monthly payments, alter risk (i.e. by switching from variable rate to fixed rate loans), or free up cash and capital.

The majority (58 percent) of loan applications submitted by Pasadena households in 2017 were for home refinancing (3,460 applications). About 53 percent of these applications were approved and 15 percent were denied. These approval rates are similar to those in 2012.

C. Lending Patterns by Race/Ethnicity and Income Level

The federal Fair Housing Act prohibits discrimination in mortgage lending based on race, color, national origin, religion, sex, familial status or handicap (disability). It is, therefore, important to look not just at overall approval and denial rates for a jurisdiction, but also whether or not these rates vary by other factors, such as race/ethnicity.

In an ideal situation, the applicant pool for mortgage lending should reflect the demographics of a community. When one racial/ethnic group is overrepresented or underrepresented in the total applicant pool, it could be an indicator of access to opportunities. Such a finding may be a sign that access to mortgage lending is not equal for all individuals. As shown in Table 36, White applicants were overrepresented in the loan applicant pool during 2017, while Hispanics and Blacks were noticeably underrepresented.

Table 36: Demographics of Loan Applicants vs. Total Population (2017)

	Percent of Applicant Pool	Percent of Total Population	Variation
White, Non-Hispanic	43%	37%	6%
Hispanic	8%	34%	-26%
Black	3%	10%	-7%
Asian	16%	16%	0%

Source: www.lendingpatterns.com, 2019.

In addition to looking at whether access to lending is equal, it is important to analyze lending outcomes for any signs of potential discrimination by race/ethnicity. Approval rates for loans tend to increase as household income increases; however, lending outcomes should not vary significantly by race/ethnicity among applicants of the same income level. Table 34 summarizes lending outcomes by race/ethnicity and income. In 2012 and 2017, approval rates were generally comparable among different races/ethnicities (around 60 percent) at the upper income level. However, for lower income households, approval rates varied by year and race/ethnicity. In 2012, approval rates for lower income Whites, Blacks, and Asian were similar but higher than approval rates for Hispanics. By 2017, approval rates had decreased for all races/ethnicities of lower income but White applicants had the highest approval rates (38 percent) followed by Hispanics and Asians, while Black applicants had the lowest approval rates (19 percent).

Table 37: Lending Patterns by Race/Ethnicity and Income Level (2012 and 2017)

	Аррі	oved	De	nied	Withdrawn	/ Incomplete
	2012	2017	2012	2017	2012	2017
White						
Low (0-49% AMI)	56%	38%	31%	41%	11%	18.03%
Moderate (50-79% AMI)	54%	47%	22%	29%	15%	21%
Middle (80-119% AMI)	62%	51%	14%	14%	12%	29%
Upper (≥120% AMI)	67%	67%	11%	9%	11%	17%
Black	•		•		•	
Low (0-49% AMI)	59%	19%	18%	44%	18%	19%
Moderate (50-79% AMI)	55%	42%	25%	42%	16%	17%
Middle (80-119% AMI)	57%	47%	24%	26%	18%	23%
Upper (≥120% AMI)	60%	60%	16%	15%	14%	20%
Hispanic	•					
Low (0-49% AMI)	40%	35%	38%	24%	17%	29%
Moderate (50-79% AMI)	47%	45%	27%	25%	15%	25%
Middle (80-119% AMI)	59%	48%	18%	21%	13%	25%
Upper (≥120% AMI)	62%	63%	14%	12%	13%	20%
Asian			•		•	
Low (0-49% AMI)	59%	29%	31%	41%	0%	24%
Moderate (50-79% AMI)	52%	43%	20%	29%	6%	29%
Middle (80-119% AMI)	63%	63%	12%	12%	9%	17%
Upper (≥120% AMI)	66%	65%	10%	11%	9%	17%

Source: www.lendingpatterns.com, 2019.

D. Lending Patterns by Census Tract Characteristics

1. Income Level

To identify potential geographic differences in mortgage lending activities, an analysis of the HMDA data was conducted by census tract. Based on the Census, HMDA defines the following income levels: ⁶

- Low-Income Tract Tract Median Income less than or equal to 49 percent AMI
- Moderate-Income Tract Tract Median Income between 50 and 79 percent AMI
- Middle-Income Tract Tract Median Income between 80 and 119 percent AMI
- Upper-Income Tract Tract Median Income equal to or greater than 120 percent AMI

In 2012 and 2017, there were zero applications from low income level census tracts in the City of Pasadena. The majority of loan applications were submitted by residents from the City's upper

These income definitions are different from those used by HUD to determine Low and Moderate Income Areas.

income tracts. Table 38 summarizes the loan approval and denial rates of census tracts by income level in 2012 and 2017. In general, in both 2012 and 2017 home loan approval rates increased as the income level of the census tract increased. Denial rates decreased as income level increased in 2012 but were similar for all income levels in 2017. Higher income households are more likely to qualify for and be approved for loans, so this trend is to be expected.

Table 38: Lending Patterns Based on Census Tract Income (2012 and 2017)

Tract Income Level	Total Ap	plicants	Appro	ved	Der	nied	Othe	er
Tract income Level	#	%	#	%	#	%	#	%
2012								
Low (0-49% of Median)	0	0	0	0	0	0	0	0
Moderate (50-79% of Median)	1260	10%	677	54%	212	17%	163	13%
Middle (80-119% of Median)	2,048	16%	1145	56%	290	14%	268	13%
Upper (>=120% of Median)	9,367	74%	5672	61%	1062	11%	1061	11%
Total	12,675	100%	7,494	59%	1,564	12%	1,492	12%
2017								
Low (0-49% of Median)	0	0%	0	0%	0	0%	0	0%
Moderate (50-79% of Median)	273	5%	145	53%	29	11%	55	20%
Middle (80-119% of Median)	1,263	21%	675	53%	165	13%	277	22%
Upper (>=120% of Median)	4,434	74%	2637	59%	555	13%	775	17%
Total	5,970	100%	3,457	58%	749	13%	1,107	19%

Source: www.lendingpatterns.com, 2019.

2. Minority Population

HMDA also provides the minority population percentage within each census tract. Table 39 summarizes the home loan approval and denial rates of census tracts in the City by the proportion of minority residents during 2012 and 2017. A census tract with more than 50 percent minority population is considered "substantially minority." In general, the approval rates are comparable in neighborhoods that were considered substantially minority versus those that were not.

Table 39: Approval and Denial Rates by Percentage of Tract Minority Population

Tract Description	Total App	Total Applications		proved	% Denied	
Tract Description	2012	2017	2012	2012	2017	2017
<10% Minority	0	0	0	0	0	0%
10 – 20% Minority	0	0	0	0	0	0%
20 – 50% Minority	7,217	2980	61%	7,217	2980	60%
50 – 80% Minority	3899	1974	58%	3899	1974	58%
>80% Minority	1559	1016	52%	1559	1016	52%
Total	12,675	5,970	59%	12,675	5,970	58%

Source: www.lendingpatterns.com, 2019.

E. Major Lenders

In 2017, the top ten mortgage lenders in Pasadena received 41 percent of all loan applications. The mortgage lending market was somewhat competitive; only one lender (Wells Fargo) received more than ten percent (10.3 percent) of the applications. In fact, four of the top ten lenders in 2012 no longer made the list in 2017. Table 37 summarizes the top lenders in the City as well as their underwriting outcomes in 2017.

Under current banking regulations, lenders are required to hold a given interest rate for a borrower for a period of 60 days. Borrowers, however, are under no obligation to actually follow through on the loan during this time and can withdraw their application. In mortgage lending, fallout refers to a loan application that is withdrawn by the borrower before the loan is finalized.

Closed applications refer to applications that are closed by the lender due to incompleteness. In instances where a loan application is incomplete, lenders are required to send written notification to the applicant and request the missing information be turned over within a designated timeframe. If this notice is given and the applicant does not comply within the specified time, the lender can close the application for incompleteness. A high rate of incomplete loans can indicate a lack of financial literacy on the part of the borrower. Several studies have correlated financial literacy with a borrower's income level. Specifically, lower income individuals were the least knowledgeable about finance. Insufficient lender assistance during the application process can also lead to high levels of incomplete applications.

Active lenders in the City in 2017 were very not different from those in the resale market (such as Wells Fargo, Bank of America, and Chase). Overall, the top lenders did not have higher approval rates than all lenders citywide. Approval rates ranged 22 to 81 percent but most lenders fell within an approval range of 44 to 68 percent in 2017. The low approval rates for some lenders Nationstar (22 percent) and Citi Bank (44 percent) were likely the result of their high rates of withdrawn and incomplete applications. However, Wells Fargo had a similar approval rate (46 percent) to Citibank despite having relatively low withdrawn or incomplete rate.

Often, different lenders focus on different markets/populations. In 2017, Wells Fargo was the top lender for Hispanic, Black, and Asian applicants (Table 41). JP Morgan Chase bank was also among the top three lenders for Hispanic and Asian applicants. Two lenders (Nationstar Mortgage and Shore Mortgage) were unique in providing the largest share of loans to Blacks not for other minorities.

Table 40: Top Lenders (2012 and 2017)

	Overall Market Share		Appr	oved	Deni	ied	Withdrawn or Closed	
	2012	2017	2012	2017	2012	2017	2012	2017
Wells Fargo Bank	22%	10%	44%	46%	10%	16%	14%	14%
JP Morgan Chase Bank	7%	7%	57%	59%	19%	8%	5%	10%
Bank Of America	5%	5%	62%	64%	21%	13%	16%	16%
Quicken Loans	2%	4%	75%	68%	17%	22%	8%	10%
Nationstar Mortgage	-	3%	-	22%	-	18%	-	57%
Flagstar Bank	4%	3%	70%	66%	6%	13%	7%	5%
Shore Mortgage	-	2%	-	81%	-	8%	-	11%
Citibank	4%	2%	40%	44%	12%	9%	29%	37%
MUFG Union Bank	-	2%	-	65%	-	12%	-	12%
Excel Mortgage Servicing	-	2%	-	54%	-	34%	-	11%
Greenlight Financial Services	3%	-	44%	-	16%	-	41%	-
Cash Call	2%	-	65%	-	16%	-	19%	-
Citi Mortgage	2%	-	0%	-	0%	-	0%	-
Ally Bank	2%	-	49%	-	20%	-	12%	-
Other lenders	47%	59%	61%	54%	12%	11%	18%	25%
Total	100%	100%	55.0%	55%	12%	13%	16%	22%

Source: www.lendingpatterns.com, 2019.

Table 41: Top Minority Lenders

	#	% Share
Hispanic		
Wells Fargo Bank	76	11%
JP Morgan Chase Bank	59	8%
Bank of America	36	5%
Black		
Wells Fargo Bank	29	9%
Nationstar Mortgage	25	8%
Shore Mortgage	15	5%
Asian		
Wells Fargo Bank	108	12%
Jpmorgan Chase Bank	69	8%
Fagstar Bank	55	6%

Source: www.lendingpatterns.com, 2019.

F. Subprime Lending

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

Subprime lenders generally offer interest rates that are higher than those in the prime market and often lack the regulatory oversight required for prime lenders because they are not owned by regulated financial institutions. In the recent past, however, many large and well-known banks became involved in the subprime market either through acquisitions of other firms or by initiating subprime loans directly. Though the subprime market usually follows the same guiding principles as the prime market, a number of specific risk factors are associated with this market.

Subprime lending can both impede and extend fair housing choice. On the one hand, subprime loans extend credit to borrowers who potentially could not otherwise finance housing. The increased access to credit by previously underserved consumers and communities contributed to record high levels of homeownership among minorities and lower income groups. On the other hand, these loans left many lower income and minority borrowers exposed to default and foreclosure risk. Since foreclosures destabilize neighborhoods and subprime borrowers are often from lower income and minority areas, mounting evidence suggests that classes protected by fair housing faced the brunt of the recent subprime and mortgage lending market collapse.

While HMDA data does not classify loans as subprime, it does track the interest rate spread on loans. An interest rate spread refers to the difference between two related interest rates. For HMDA data, spread specifically refers to the difference between the annual percentage rate (APR) for a loan and the yield on a comparable-maturity Treasury security.

The frequency of loans with reported spread has increased since 2012. While just one percent of loans in 2012 had a reported spread, 2.4 percent of loans reported a spread by 2017 (Table 41). Since 2012, the frequency of spread has increased for all racial/ethnic groups, but most notably for Hispanic and Asian applicants. However, the average spread did not increase significantly. In fact, average spread decreased for Black and Asian applicants by half a percent.

Table 42: Spread Profile on Loan by Race/Ethnicity (2012 and 2017)

	Lo	Loans		ns w/ Spread	Average Spread		
	2012	2017	2012	2017	2012	2017	
White	3,603	1,534	0.6%	1.6%	2.1	2.6	
Black	232	153	3.0%	4.6%	3.2	2.7	
Hispanic	639	385	1.9%	3.9%	2.9	3.0	
Asian	1,250	550	1.5%	4.2%	2.6	2.0	
Total	6,969	3,262	0.9%	2.4%	2.5	2.6	

Source: www.lendingpatterns.com, 2019.

Chapter 5: Public Policies

Public policies established at the federal, 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. Public policies refer to land use regulations, housing policies, transit accessibility, and other factors that impact housing in Pasadena. Fair housing laws are designed to encourage an inclusive living environment and thus require a community to analyze governmental regulations that may impede fair housing opportunity. This section reviews the City's General Plan, Housing Element, Zoning Code, Consolidated Plan, existing Fair Housing Plan, and other documents to analyze governmental regulations that may impact fair housing.

A. Policies and Programs Affecting Housing Development

The General Plan sets forth various policies regarding land uses in Pasadena, the need to provide appropriate infrastructure and public services (e.g., transportation, public safety, etc.), to ensure the economic vitality of the community, and preserve the unique living environment, particularly the diverse housing. Two of the seven State-mandated General Plan elements – Housing and Land Use Elements – have direct impact on the local housing market in terms of the amount and range of housing choice. The Zoning Code, which implements the Land Use Element, is another important document that influences the amount and type of housing available in a community – the availability of housing choice. The City also prepares a number of federal and State plans to address local housing needs. This section highlights aspects of these documents that affect the provision of housing in Pasadena.

3. Housing Element Law and Compliance

Pasadena's Housing Element is the seminal document governing housing policy in the City. The Housing Element is a five-year Plan that sets forth goals, policies and programs to encourage the maintenance, improvement, and production of housing. The Housing Element must be reviewed by the State Department of Housing and Community Development (HCD) for compliance with State laws.

Housing Element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for and do not unduly constrain housing development. Specifically, the Housing Element must:

- Identify adequate sites which will be made available through appropriate zoning and development standards and with 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 community's housing goals;
- Assist in the development of adequate housing to meet the needs of lower 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; and
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

Compliance Status

A Housing Element found by HCD to be in compliance with State law is presumed to have adequately addressed its policy constraints. The City of Pasadena's Housing Element 2014-2021 was found to be in compliance by HCD on February 24, 2014.

4. Land Use Element

The Land Use Element of a General Plan designates the general distribution, location, and extent of uses for land planned for housing, business, industry, open space, and public or community facilities. As it applies to housing, the Land Use Element establishes a range of residential land use categories, specifies densities (typically expressed as dwelling units per acre [du/ac]), and suggests the types of housing appropriate in a community. Residential development is implemented through the zoning districts and development standards specified in the jurisdiction's zoning code.

Residential Densities

The City's General Plan has six primary land use designations that permit residential uses and four mixed-use land uses that allow the intermixing of housing with non-residential uses. Together with implementation measures in the Zoning Code, the Land Use Element establishes the types of residential uses permitted in Pasadena. Table 43 describes the City's major land use designations, corresponding residential densities, and types of housing allowed in each district.

Table 43: Residential Land Use Classifications

	General Plan Land Use Designation	Density	Residential Type
	Low Density	0-6 UA	Single-family residential district typified by single-family detached homes within an established residential neighborhood setting. This density covers the majority of areas in Pasadena.
	Low-Medium Density	0-12 UA	Single-family residential district typified by single-family detached homes with some duplexes within an established neighborhood setting.
	Medium Density	0-16 UA	Lower density multiple-family complexes of one to three story buildings.
Housing/ Residential	Medium-High Density	0-32 UA	Medium-high density multi-family complexes and condominiums of one to three story buildings near major arterials, employment centers, or activity centers.
	High Density	0-48 UA	High density apartments and condominiums of two to three story buildings close to major arterials, freeways, and transit. Many are clustered in and around the Downtown Core.
	Urban Housing	0-87 UA	High-density multi-family complexes of four to seven stories. This density is often found adjacent to medium-density mixed housing in the Central District.
	Low Mixed-Use	0-32 UA 0.0-1.0 FAR	Live-work units or ground floor commercial use with residential uses above. Primarily commercial sites with some residential use.
	Low-Medium Mixed Use	0-48 UA 0.0-1.75 FAR	Live-work units or ground floor commercial with residential uses above. Mixed-use developments include amenities that improve quality of life (courtyard, recreation facilities). Street-facing developments enhance pedestrian activity and retail façades are see-through.
Mixed-Use	Medium Mixed- Use	0-87 UA 0.0-2.25 FAR	Multi-story buildings with shared open spaces and small to medium separation between them. Buildings may be exclusively residential or commercial or mixed-use. Mixed-use developments include amenities that improve quality of life (courtyard, recreation facilities. Street-facing developments enhance pedestrian activity and retail façades are see-through.
	High Mixed-Use	0-87 0.0-3.0 FAR	Multi-story buildings with shared open spaces and small to medium separation between them. Buildings may be exclusively residential or commercial or mixed-use. Mixed-use developments include amenities that improve quality of life (courtyard, recreation facilities. Street-facing developments enhance pedestrian activity and retail façades are see-through.

Source: City of Pasadena, Land Use Element, 2015. UA refer to Units per Acre; FAR refers to Floor Area Ratio.

A number of factors, governmental and non-governmental, affect the supply and cost of housing in a local housing market. The governmental factor that most directly influences these market conditions is the allowable density range of residentially designated land. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce developments costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing. Minimum required densities in multi-family zones ensure that land zoned for multi-family use, the supply of which is often limited, will be developed as efficiently as possible for multi-family uses.

Pasadena's Land Use Element includes several zones (Medium-High Density, High Density and Urban Housing) that allow for high-density residential uses (over 30 units per acre). The City has not established minimum required densities in these zones. However, the City's

development history shows that most residential projects in the City build at, or very near, the maximum density allowed, with the highest densities often achieved in the downtown area.

5. Zoning Code

The Zoning Code implements the General Plan by establishing zoning districts that correspond with General Plan land use designations. Development standards and permitted uses in each zoning district are specified to govern the density, type, and design of different land uses for the protection of public health, safety, and welfare (Government Code, Sections 65800-65863). Several aspects of the Zoning Code that may affect a person's access to housing or limit the range of housing choices available are described below.

Definition of Family

A community's Zoning Code can potentially restrict access to housing for households failing to qualify as a "family" by the definition specified in the Zoning Code. For instance, a landlord may refuse to rent to a "nontraditional" family based on the zoning definition of a family. A landlord may also use the definition of a family as an excuse for refusing to rent to a household based on other hidden reasons, such as household size. Even if the code provides a broad definition, deciding what constitutes a "family" should be avoided by jurisdictions to prevent confusion or give the impression of restrictiveness.

California court cases⁷ have ruled that a definition of "family" that: (1) limits the number of persons in a family; (2) specifies how members of the family are related (i.e. by blood, marriage or adoption, etc.), or (3) a group of not more than a certain number of unrelated persons as a single housekeeping unit, is invalid. Court rulings stated that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the jurisdiction, and therefore violates rights of privacy under the California Constitution. A Zoning Code also cannot regulate residency by discrimination between biologically related and unrelated persons. Furthermore, a zoning provision cannot regulate or enforce the number of persons constituting a family.

The City of Pasadena Zoning Code defines a "family" as "two or more persons living together as a single housekeeping unit in a dwelling unit. This term does not include a boarding house." The City's definition of family is not overly restrictive and does not represent an impediment to fair housing.

However, the Housing Code defines "family" as "an individual or 2 or more persons related by blood or marriage, or a group of not more than 5 persons (excluding servants), who need not be related by blood or marriage, living together in a dwelling unit" (Chapter 14.12.030 - Definitions). The Housing Code definition is overly restrictive as it specifies how members of the family are and limits the number of unrelated persons that may be considered a family. 14.12.030 - Definitions. The City will review its Zoning and Housing Codes for consistency and compliance with fair housing laws.

⁷ City of Santa Barbara v. Adamson (1980), City of Chula Vista v. Pagard (1981), among others.

Definition of Disability

Persons with disabilities may have restricted access to housing if a Zoning Code's definition for "disability" or "handicap" is inconsistent with the Federal Fair Housing Act (FFHA). The FFHA defines "handicap" as: "with respect to a person—

- A physical or mental impairment which substantially limits one or more of such person's major life activities;
- A record of having such an impairment; or
- Being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802))."

The Pasadena Zoning Code's definition of "disability" is identical to the FFHA definition of "handicap." Although the City chooses to use a different word, the Zoning Code as states that the term is defined is to be in a manner consistent with the same or similar terms set forth in federal law. The City's definition of "disability" does not represent an impediment to fair housing.

Density Bonus

California Government Code Section 65915 provides that a local government shall grant a density bonus of at least 20 percent (five percent for condominiums) and an additional incentive, or financially equivalent incentive(s), to a developer of a housing development agreeing to provide certain percent of affordable housing units. In recent years, the Density Bonus law has been amended multiple times to further facilitate affordable housing.

Pasadena has a strong history of residential projects utilizing density bonuses. Since adoption of the Inclusionary Housing Ordinance in 2001, numerous projects have taken advantage of density bonus incentives in conjunction with providing on-site affordable units. By 2017, the City's inclusionary housing ordinance had led to the construction of about 500 housing units for low- and moderate-income renters.

In October 2018, the City Council directed staff to study and prepare an ordinance to address an imbalance between increasing impacts of density bonus concessions and the public benefits received by the city. This was prompted by the concerns that existing local inclusionary unit trade-down credit provisions used conjunction with State density bonus law have resulted in a lesser overall number of affordable housing units being produced. On August 19, 2019, the City Council voted to amend the City's Inclusionary Housing Ordinance. The changes to the ordinance included:

- Raising the base inclusionary housing requirement for affordable units from 15 percent to 20 percent of the total number of proposed housing units.
- Raise inclusionary in-lieu fee for developers who opt out of providing lower-income units

- Eliminate trade-downs that allow developers to build fewer affordable units
- Create an Affordable Housing Concessions Menu to incentivize additional inclusionary housing (25 percent). Concession include increases to maximum allowable height, floor area ratio, and reduction of setbacks and minimum parking requirements.

City Council also allowed housing in-lieu fees collected by the City to be used for the acquisition, retention, and preservation of extremely low-income housing units and/or projects.

Parking Requirements

Parking standards are critical to encourage circulation by modes other than automobiles, prevent traffic congestion caused by shortage of parking spaces, to maximize efficiency, protect the public safety, provide for the special needs of the physically handicapped, and, where appropriate, insulate surrounding land uses from their impact. City parking standards are designed to ensure that sufficient on-site spaces are available to accommodate vehicle ownership rates of residents, the needs of the businesses, and the actual parking required for special needs housing, while encouraging use of other modes. Table 44Table 44: Parking Standards sets forth the general standards for off-site parking space requirements.

Table 44: Parking Standards

Residential Use	Basic Requirement	Regulatory Concessions
Single-Family	2 covered spaces in a garage or carport per unit	None
Multi-Family and Mixed-Use	2 covered spaces/ unit >650 sf; 1 covered space for smaller units; 1 guest space per 10 units	For the Allen, Lake, Memorial Park, Del Mar, and Fillmore Station TOO Areas and Central District Transit-Oriented Area, 1.5-1.75 spaces per unit for units larger than 650 square feet; 1 space limit for smaller units. For the Sierra Madre Villa Station TOD Area, 1.5-2 spaces per unit for units larger than 650 square feet; 1 space limit for smaller units.
Work-Live Units	3 parking spaces per 1,000 square feet	Shared parking with nonresidential uses allowed with minor conditional use permit
Emergency Shelter	1 space for every 4 beds	None
Student Housing & Boarding House	1 covered space for every 3 habitable rooms	None
Single-Room Occupancy	1 space per unit plus two spaces for resident manager	Reduce parking space requirement to 1 space per 4 units for affordable SROs
Transition Housing	Same parking requirements applicable to residential dwelling type in zone it occupies.	None
Senior Housing	2 covered spaces/unit >650 sf; 1 covered space for smaller units; 1 guest parking for each 10 units	Reductions to no less than 0.5 spaces/unit with minor conditional use permit

Source: City of Pasadena, Zoning Code 16.46.20, 2019.

Communities that require an especially high number of parking spaces per dwelling unit can negatively impact the feasibility of producing affordable housing or housing for special needs groups by reducing the achievable number of dwelling units per acre, increasing development costs, and thus restricting the range of housing types constructed in a community. Typically,

the concern for high parking requirements is limited to multi-family, affordable, or senior housing.

Pasadena's parking space requirements generally match the vehicle ownership patterns and parking needs of residents. The City's guest parking space requirement is very low when compared to other communities. Parking space reductions are also provided for uses that have lower parking needs, such as senior housing, special needs housing, and multi-family uses near light rail. Furthermore, at the request of the applicant and pursuant to compliance with state density bonus law, the City will permit an alternative parking ratio (inclusive of handicapped and guest parking) and other parking incentives. Because of this flexibility, parking is not considered an impediment to the development of housing and special needs housing.

Variety of Housing Opportunity

To ensure fair housing choice in a community, a Zoning Code should provide for a range of housing types, including single-family, multi-family, second dwelling units, mobile and manufactured homes, licensed residential care facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. Table 45 provides a summary of Pasadena's Zoning Code as it relates to ensuring a variety of housing opportunities.

The City facilitates development of a variety of housing types for its diverse residents. For example, student housing (including fraternities, sororities, and dormitories) is permitted in various districts to meet the housing needs of the large student population in Pasadena. Senior projects and life-care facilities are allowed in various residential and commercial districts. In addition to the residential land use categories, the City has adopted multiple Specific Plans that contain additional residential land use categories or districts.

Table 45: Variety of Housing Opportunity

Lond Hoo	Residential Zoning Districts				3	Commercial Zoning Districts				
Land Use	RS	RM-12	RM-16	RM-32	RM-48	PS	CO	CL	CG	IG
Conventional Housing	Conventional Housing									
Single-family	Р	P†	P†	₽†	P†		Р	Р		
Multi-family		Р	Р	Р	Р	С	Р	Р		
Factory Built/Mobile Homes	Р	Р	Р	Р	Р		Р	Р		
Mixed Use							Р	Р		
Work/Live									С	
TOD Housing							Р	Р	Р	Р
Dormitories/Fraternities/Sororities				Р	Р			Р		
Affordable Senior		Р	Р	Р	Р	С	Р	Р		
Accessory Dwelling Units	Р	Р	Р	Р	Р		Р	Р		
Special Needs Housing							•			
Residential Care, Limited	Р	Р	Р	Р	Р		Р	Р		
Residential Care, General			С	С	С	С	С	С		
Life-Care Facilities						С		С	С	
Boarding House				Р	Р			Р		
Emergency Shelter									MC	MC
Temporary Homeless Shelter with Religious Facility	С	С	С	С	С	С	С	Р	Р	
Transitional Housing		Р	Р	Р	Р		Р	Р		
Single Room Occupancy (SRO)								††	Р	

Source: City of Pasadena, Zoning Code, 2019 and Pasadena Housing Element, 2014-2021.

Single- and Multi-Family Uses

Single- and multi-family housing types include detached and attached single-family homes, duplexes or half-plexes, town homes, condominiums, and rental apartments. Zoning Codes should specify the zones in which each of these uses would be permitted by right. Pasadena can accommodate the range of residential uses described above without a use permit. Use permit requirements for multi-family uses within land use designations and zoning districts that have been identified as being suitable for higher density residential land uses may extend the time frame for project review and increase the uncertainty of project approval.

Zoning codes should also avoid "pyramid or cumulative zoning" (e.g. permitting lower-density single-family uses in zones intended for higher density multi-family uses). Pyramid or cumulative zoning schemes could limit the amount of lower-cost multi-family residential uses in a community and be a potential impediment to fair housing choice. Many jurisdictions have

P = Permitted by right, C = Conditional Use Permit, MC = Minor Conditional Use Permit

[†]Allowed subject to the development standards of the RS-6 district

^{††} Existing nonconforming single-room occupancy residential in the Limited Commercial (CL) zoning district may be altered to comply with the following single-room occupancy residential development standards without obtaining a Conditional Use Permit.

some form of pyramid zoning, with permitting single- family residential uses in multi-family zones being the most prevalent example. Pasadena does allow for single-family residential uses in its multi-family zones, but market pressures in the City effectively encourage developers to build at, or near, the maximum allowable density for each particular zone.

Accessory Dwelling Units (ADUs)

Accessory dwelling units (ADUs) are units that provide complete independent living facilities for one or more persons on the same parcel as a proposed or existing legal single-family residence. ADUs may be attached to the main dwelling unit or detached. ADUs offer several benefits. First, they typically rent for less than apartments of comparable size, and can offer affordable rental options for seniors, college students, single persons, and extended families. Second, the primary homeowner receives supplementary income by renting out a second unit, which can help many modest income and elderly homeowners remain in or afford their homes.

California law on ADUs has been amended numerous times in recent years in order to facilitate production. The City of Pasadena adopted Ordinance 7321 in April 2018 to comply with the State laws then. Since adoption of the City's new ADU provisions in April 2018, Pasadena has issued five permits for ADUs. However, these standards no longer comply with the new ADU bills passed in 2018 and 2019. Specifically, on October 9, 2019, Governor Newsom signed 18 bills to boost housing production, five of which futher eliminated barriers to building ADUs:

- SB 13: Addresses high development inpact fees by removing fees for ADUs under 750 square feet and creating a fee structure in proportion to the pimary home on the lot for larger ADUs.
- AB 68: Prohibits requirements for minimum lot size, rear and side setback more than 4' and replacement parking if converting a garage. AB 68 also allows for two ADUs on same property (a junior ADU and ADU on the same lot).
- AB 881: Streamlines approval for ADU permits if constructed in existing garages and elimitates owner-occupancy requirement for five years.
- AB 587: Provides affordable housing organizations the exemption to sell ADUs separately from the primary residence to eligible low-income homeowners.
- AB 671: Requires local jurisctions to provide incentive programs to homeowners for renting out their ADUs to very low- or low-income persons.

The City will have to take action to amend its Zoning Code to comply with this legislation.

Table 46: Development Standards for Converted and Newly Constructed ADUs

	Converted	Newly Constructed
Location requirement	All zoning districts that permit single-family residential uses	Permitted in all single-family (RS) and multi-family (RM) zoning districts that have an existing or proposed single-family dwelling. ADUs may be constructed on a legal paercel of at least 7,200 square feet in RS districtrist and on any legal parcel in RM districts. New ADUs are prohibited in the Hillside Overlay District and individually designated historic properties, or if visible from the public right-of-way in Historic Districts
Min/Max size	No min/max	150 sq. ft. min, 800 s.f. max or 50% existing living space (whichever is less) for parcel <10,000 s.f. or 1,200 s.f. or 50% of existing floor area (whichever is less) for parcels > 10,000 s.f. Max height of one story
Setback Requirements	No minimum required but must comply with fire safety standards	Minimum must comply with zoning district but minimum rear setback of at least 10 feet.
Building Separation	No minimum	At least 6 ft (eave to eave)
Separate Access	Separate exterior access from the main dwelling and cannot be on same façade as main entry door	Given.
Parking	None required	1 space per unit in any form with some exceptions

Mobile Home Parks

Mobile homes and factory-built housing are permitted in all residential districts and the requirements for such housing (e.g., planning, permitting, reviews) are the same as other residential units in the same district.

Residential Care Facilities

The Lanterman Developmental Disabilities Services Act and Community Care Facilities Act, both codified in the California Codes, state that mentally, physically, or developmentally disabled children and adults who require supervised care are entitled to live in normal residential settings. In an effort to facilitate adequate housing opportunities for people with disabilities, state law requires that licensed family care homes, foster homes, and group homes serving six or fewer persons be treated like single-family homes and be allowed by right in all residential districts. No local agency can impose stricter zoning or building and safety standards on these homes (commonly referred to as "group" homes) of six or fewer persons with disabilities than are required of the other permitted residential uses in the zone. The Lanterman Act covers only licensed residential care facilities.

There were a total of 171 licensed community care facilities in Pasadena with a capacity to serve 7,603 adults, seniors, and youth, as of July 2019. Table 31 provides a tabulation of licensed care capacity by type and Figure 11 illustrates the geographic distribution of these facilities. Concentrations of licensed care facilities can be seen in the northwest portion of the City and

much of Pasadena's larger community care facilities are located in the northern half of the City, north of the 210 Freeway.

The Pasadena Zoning Code designates two types of community care facilities – Residential Care Limited (serving six or fewer persons) and Residential Care General (serving seven or more persons). Residential Care Facilities are defined in the Zoning Code as state-licensed facilities providing 24-hour nonmedical care for persons in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. The Zoning Code permits Residential Care Limited homes by right in all residential districts in compliance with the Health and Safety Code and in the CO and CL commercial zoning districts. Residential Care General homes are conditionally permitted in residential and commercial districts. The Zoning Code does not subject Residential Care Limited facilities to a use permit, building standard, or regulation not otherwise required of single-family homes in the same district, and imposes no spacing requirements between such facilities. However, because of the high concentration of certain uses in Northwest Pasadena, the 2015 Land Use Element's Policy 40.2 prohibits new development of but allows for the improvement of: Single-Room Occupancy, Adult Day Care, General, Medical Services - Extended Care (i.e., Convalescent Facilities), Detention Facilities, Hospitals, Maintenance and Service Facilities, Residential Care, General, or a use classification that includes a use listed here with another use in Northwest Pasadena.

Emergency Shelters

The City defines emergency shelters as those that provide short-term lodging without a fee or rent on a first-come, first-served basis for people who must vacate the facility each morning and have no guaranteed lodging for the next night. An emergency shelter provides housing with minimal supportive services for homeless persons and is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay (Health and Safety Code Section 50801[e]). State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (Government Code Section 65583[c][1]). Changes to State law (SB 2) in 2008, require that local jurisdictions make provisions in the zoning code to permit emergency shelters by right and with a ministerial approval process in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish limited and objective standards to regulate the development of emergency shelters.

Emergency shelters may operate with a minor conditional use permit in the CG and IG districts, the Central District, and the CG and IG districts of the East Colorado, East Pasadena, and South Fair Oaks Specific Plans. Religious facilities may also operate a homeless shelter for temporary stays as a by-right use in the CL and CG districts and in portions of Central District. They may also operate a shelter in all residential districts, CO district, and parts of the Central District.

Under state law, the City had an unmet housing need for 318 beds for people who are homeless and not living in a shelter of any kind in 2014. The unmet need would be addressed by identifying and zoning sites to accommodate the construction of additional emergency shelters. The 2014-2021 Housing Element noted that the City had identified two zones—Light Industrial

SP-2 (IG) and Central District (CD-6)—within West and East Pasadena that provide appropriate and adequate locations for accommodating emergency shelters. These areas could accommodate 35 facilities and 420 beds for clients.

However, the Housing Element 2014-2021 noted that this determination did not reflect best practices nor is it consistent with the City's Ten Year Plan to End Homelessness. Recent years have seen a paradigm shift to a Housing First Approach, which suggests a different solution to housing homeless people. The Housing First Model can be more effective in addressing the needs of certain subgroups of homeless people. Under the Housing First Model, homeless people (particularly the chronically hard-to-serve homeless people) are moved directly into permanent supportive housing, where services can be immediately provided that stabilize their living situation. Using the Housing First Model, the unmet need for shelter is addressed through transitional or permanent supportive housing rather than emergency shelter beds.

Furthermore, recent changes to State law require additional changes to the City's Emergency Shelter Ordinance:

- AB 139 (Emergency and Transitional Housing) parking for shelter staff only; definition of sufficient capacity
- AB 101 (Low Barrier Navigation Center) housing for homeless or at-risk homeless while waiting to transition to permanent housing

The City will revise its Emergency Shelter Ordinance to comply with State law.

Transitional and Supportive Housing

State law (AB 2634 and SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, transitional housing is defined as buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months (California Health and Safety Code Section 50675.2).

Under the Housing Element law, supportive housing is defined as housing with no limit on length of stay that is occupied by a target population, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (California Health and Safety Code 50675.14 (b)). Target population includes adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act (Division 4.5, commencing with Section 4500, of the Welfare and Institutions Code) and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people (California Health and Safety Code 53260 (d)).

Pursuant to SB 2, transitional and supportive housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit).

Pasadena's Zoning Code defines transitional housing as a facility that provides housing at no cost for individuals in immediate need of housing in which residents stay longer than overnight. Such housing may include support services such as emergency medical care, and employment and housing counseling provided that the total area in the home dedicated to supportive services does not exceed 250 square feet. Transitional housing is treated as a residential use and is permitted by right in multi-family districts, several commercial districts, and specific plan areas (namely, the CO and CL districts, and Central District, East Colorado and East Pasadena Specific Plans). Furthermore, Pasadena allows permanent supportive housing as a residential use, provided supportive services are ancillary to the primary use and comprise no greater than 250 square feet.

However, recent changes to State law AB 139 would require supportive housing to be permitted by right in all zones where multi-family and mixed uses are permitted. The City will revise its Emergency Shelter Ordinance and provisions for supportive housing to comply with State law.

Single-Room Occupancy

AB 2634 mandates that local jurisdictions address the provision of housing options for extremely low income households, including Single Room Occupancy units (SRO). SRO units are one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other.

Pasadena's Zoning Code defines an SRO as "a facility where each unit has a minimum floor area of 150 square feet and a maximum floor area of 220 square feet. These dwelling units may have kitchen or bathroom facilities and shall be offered on a monthly basis or longer." Section 17.50.300 of the Zoning Code establishes standards for SROs and permits the use by right within the CG district. In addition, existing nonconforming SROs in the CL district are permitted to be altered to comply with the City's SRO development standards without obtaining a conditional use permit. Several of the City of Pasadena specific plans identify SROs as a permitted use.

The City's Zoning Code has facilitated the production or conversion of uses to SRO units that are affordable to Pasadena's very low and extremely low-income households. Key provisions include small unit sizes (150 to 200 square feet), and reduced parking at a ratio of one space per unit or one per four units for affordable SROs. One example is Centennial Place, an adaptive reuse of the City's historic YMCA that was converted into a 144-unit SRO in partnership with the Los Angeles Community Design Center. The project serves residents transitioning from or at risk of homelessness, and provides on-site supportive services. Other SRO projects are underway in the community.

B.Building, Occupancy, Health and Safety Codes

6. Building Codes

Building codes, such as the California Building Standards Code⁸ and the Uniform Housing Code are necessary to protect public health, safety, and welfare. However, local codes that require substantial improvements to a building might not be warranted and deter housing construction and/or neighborhood improvement. The California Building Standards Code is published every three years by order of the California legislature. The Code applies to all jurisdictions in the State of California unless otherwise annotated. Adoption of the triennial compilation of Codes is not only a legal mandate, it also ensures the highest available level of safety for citizens and that all construction and maintenance of structures meets the highest standards of quality.

The City of Pasadena has adopted the California Building Standards Code with local amendments. Local jurisdictions may approve local amendments necessary to address unique local climatic, geologic, and/or topographical conditions. The City of Pasadena coordinated with 88 cities in Los Angeles County through the Los Angeles Regional Uniform Code Program to minimize local variations to the Code and promote consistency among proposed amendments adopted by cities in the region. As a result of this regional effort, the City adopted the following local amendments to the California Building Standards Code to protect the public health and safety from hazards indigenous to the City.

- Restrictions on the use of wood as exterior wall and roof material in fire hazard areas, and requirements for Class A assembly for other materials.
- Requirements for fire sprinklers in all new construction, except one- and two-family dwellings outside brush hazard areas; townhomes less than three stories in height; and certain residential care facilities for six or fewer clients.
- More restrictive building standards for roof sheathing, diaphragms, suspended ceilings, footings and foundations, shear walls, and building separation to reduce risk of injury and property damage in the event of an earthquake.
- Additional amendments provide for carrying forward existing administrative provisions, such as establishment of the City Council as the Board of Appeals and other miscellaneous provisions.

Property maintenance and habitability are implemented through code enforcement. The City administers a program that inspects all multi-family projects every four years for building and property maintenance standards. Properties that receive citations or notices for correction are provided information on City loan programs and grants that can be applied for to facilitate and encourage the repair of code violations or rehabilitation of housing. Single-family residential

⁸ Also known as Title 24 of the California Code of Regulations, the California Building Standards Code, adopted by the a Building Standards Commission, is actually a set of uniform building, electrical, mechanical, and other codes adopted by professional associations such as the International Conference of Building Officials, and amended to include California-specific requirements.

properties are routinely inspected through normal code enforcement programs Citywide. Properties in violation of City codes are also given citations with specific time frames to remedy the code violations.

7. Occupancy Standards

Disputes over occupancy standards are typical tenant/landlord and fair housing issues. Families with children and large households are often discriminated in the housing market, particularly in the rental housing market, because landlords are reluctant or flatly refuse to rent to such households. Establishing a strict occupancy standard either by the local jurisdictions or by landlords on the rental agreements may be a violation of fair housing practices.

In general, no State or federal regulations govern occupancy standards. The State Department of Fair Employment and Housing (DFEH) uses the "two-plus-one" rule in considering the number of persons per housing unit – two persons per bedroom plus an additional person. Using this rule, a landlord cannot restrict occupancy to fewer than three persons for a one-bedroom unit or five persons for a two-bedroom unit, etc. Other issues such as lack of parking, gender of the children occupying one bedroom, should not be factors considered by the landlord when renting to a household. While DFEH also uses other factors, such as the age of the occupants and size of rooms, to consider the appropriate standard, the two-plus-one rule is generally followed. Other guidelines are also used as occupancy standards – the California Fire Code and the Uniform Housing Code. The Fire Code allows one person per 150 square feet of "habitable" space. The Uniform Housing Code (1997 edition) outlines a standard of one person for every 50 square feet of bedroom space. These standards are typically more liberal than the "two-plus-one" rule.

Furthermore, the definition used by some jurisdictions to define "family" as a household of not more than a certain number of individuals or a "reasonable" number of individuals could constitute an impediment to fair housing choice. Such a definition of family may be interpreted as an occupancy standard that in some cases could be more restrictive than that established in the Uniform Housing Code, California Fire Code, or DFEH guidelines. A review of occupancy standards for Pasadena revealed that the City's Municipal Code does not overtly limit the number of people who can occupy a housing unit. The City's definition of family does not specify or limit the number of persons in a "family," and is therefore not considered an impediment to fair housing.

C. Affordable Housing Development

In general, many minority and special needs households are disproportionately affected by a lack of adequate and affordable housing in a region. While affordability issues are not directly fair housing issues, expanding access to housing choices for these groups cannot ignore the affordability factor. Insofar as rent-restricted or non-restricted low-cost housing is concentrated in certain geographic locations, access to housing by lower income and minority groups in other areas is limited and can therefore be an indirect impediment to fair housing choice. Furthermore, various permit processing and development impact fees charged by local government results in increased housing costs and can be a barrier to the development of affordable housing. Other policies and programs, such as inclusionary housing and growth

management programs, can either facilitate or inhibit the production of affordable housing. These issues are examined in the subsections below.

8. Siting of Affordable Housing

Pasadena has a large inventory of affordable housing units. The distribution of these units, however, is uneven throughout the City, with dense clusters of affordable housing located in the western half of the City, near the 210 Freeway and west of Lake Avenue. The west side of the City, specifically Northwest Pasadena, also happens to have a substantial portion of the City's minority and lower and moderate income residents. There is a distinct lack of affordable housing available in the eastern half of the City (Figure 10).

9. Development Fees

New residential development imposes certain short- and long-term costs upon local government. These include the short-term cost of providing City planning services and inspections of new development. Long-term costs include the maintenance and improvement of the community's infrastructure, facilities, parks, streets, and other essential local services. Pasadena charges planning and development fees to recoup these costs and ensure that essential services and infrastructure are available when needed.

Planning and Building Fees

The City charges local fees to recover the cost for processing planning reviews and approvals, building permits, design reviews, and other services. Some of the primary fees involved include design review, zone changes, variances, conditional use permits, building permits, and plan checks. Fees range widely, depending on the hours required to provide these services. In accordance with the Government Code, the City is permitted to charge service fees to fully recover any costs incurred, but the fee amount cannot exceed the estimated reasonable cost of providing the service. Planning fees for the City of Pasadena are summarized in Table 47.

Table 47: Planning Fees

Fee Type	Amount
General Plan Amendment	\$17,387.00
Zoning Map Amendment	\$18,230.00
Conditional Use Permit	\$5,419.00
Minor Use Permit	\$2,679.00
Design Review	
Nine (9) units or fewer	\$2,469.00
Ten (10) units or more	\$3,819.00
Tentative Parcel /Tract Map	\$5,192.00

Source: City of Pasadena, Fiscal Year 2020 General Fee Schedule.

To reduce the impact of fees on development of affordable housing, Pasadena provides for a waiver of up to \$125,000 of plan check and building permit fees and construction tax on lower and moderate income units that are deed restricted as affordable for 30 years. Pasadena has a

strong history of providing affordable housing fee waivers to support affordable housing development.

Impact Fees

In addition to service fees directly associated with development processing, jurisdictions frequently charge impact fees to ensure that infrastructure, public services, and facilities have adequate capacity to accommodate the demands placed upon them by new residential development. Similar to service fees, the Government Code permits the City of Pasadena to charge such impact fees, provided the fee has a reasonable relationship to the infrastructure costs imposed on local government and the fee amount is structured to recover the marginal costs associated with each new development project.

As of August 2017, the City of Pasadena listed three New Development Impact Fees in its fee schedules: Residential Impact Fee (RIF), Traffic Reduction and Transportation Improvement Fee, and a Sewer Facility Charge.

Pasadena established the Residential Impact Fee (RIF) in 1988 to mitigate the impact of new residential development on City parks and park facilities. Significant incentives were built into the RIF to encourage the production of affordable housing:

- Affordable Units: Developers of on-site affordable housing are charged a significantly reduced fee of \$ 1,016.85 per affordable unit and the fee is reduced for all other units in the development by 30 percent.
- Senior and Student Housing: Student housing associated with post-secondary education and skilled nursing units are allowed to pay the same reduced rate as affordable units.
- Workforce Housing: The fee is reduced 50 percent for workforce units provided at 121–150 percent AMI, and reduced 35 percent for workforce units provided at 151-180 percent AMI.

Although planning and development fees contribute to housing development costs, the City's fees have not constrained the production or maintenance of housing in Pasadena and the significant reductions for affordable housing continue to serve as a financial incentive for the provision of on-site affordable housing.

10. Inclusionary Housing Ordinance

Inclusionary housing describes a local government requirement that a specified percentage of new housing units be reserved for, and affordable to, lower and moderate income households. The goal of inclusionary housing programs is to increase the supply of affordable housing commensurate with new market-rate development in a jurisdiction. This can result in improved regional jobs-housing balances and foster greater economic and racial integration within a community. The policy is most effective in areas experiencing rapid growth and a strong demand for housing.

In 2000, Pasadena adopted its Inclusionary Housing Ordinance (IHO). This program required 15 percent of all housing developed to be sold at prices or rented at rates affordable to lower and moderate income households. As an alternative to the on-site production of affordable housing units, the developer may pay in-lieu fees, dedicate land, or provide the housing units off-site. The IHO offered additional regulatory incentives that provide cost savings to the developer or increase potential rental/sales income. These include: (1) fee reductions or waivers; (2) density bonuses; (3) the modification of development standards; and (4) the expedited processing. In addition, if the developer provides a greater level of unit affordability (e.g., very low instead of low income), they receive a greater credit toward their IHO requirements. For example, if a developer provides very low income units in lieu of the required low income units, the project receives a credit of 1.5 affordable units for each unit actually provided

In October 2018, the City Council directed staff to study and prepare an ordinance to address an imbalance between increasing impacts of density bonus concessions and the public benefits received by the city. This was prompted by the concerns that existing local inclusionary unit trade-down credit provisions used conjunction with State density bonus law have resulted in a lesser overall number of affordable housing units being produced. On August 19, 2019, the City Council voted to amend the City's Inclusionary Housing Ordinance. The changes to the ordinance included:

- Raising the base inclusionary housing requirement for affordable units from 15 percent to 20 percent of the total number of proposed housing units.
- Raise inclusionary in-lieu fee for developers who opt out of providing lower-income units
- Eliminate trade-downs that allow developers to build fewer affordable units
- Create an Affordable Housing Concessions Menu to incentivize additional inclusionary housing (25 percent). Concession include increases to maximum allowable height, floor area ratio, and reduction of setbacks and minimum parking requirements.

City Council also allowed housing in-lieu fees collected by the City to be used for the acquisition, retention, and preservation of extremely low-income housing units and/or projects.

4. Article 34

Article 34 of the State Constitution requires a majority vote of the electorate to approve the development, construction, or acquisition by a public body of any "low rent housing project" within that jurisdiction. In other words, for any projects where at least 50 percent of the occupants are low income and rents are restricted to affordable levels, the jurisdiction must seek voter approval known as "Article 34 Authority" to authorize that number of units.

In the past, Article 34 may have prevented certain projects from being built. In practice, most public agencies have learned how to structure projects to avoid triggering Article 34, such as limiting public assistance to 49 percent of the units in the project. Furthermore, the State legislature has enacted Sections 37001, 37001.3, and 37001.5 of the Health and Safety Code to clarify ambiguities relating to the scope of the applicability of Article 34 which now exist.

Typically, the City of Pasadena has complied with Article 34 on a project-by-project basis by meeting one or more of the exemptions under Article 34.

D. Policies Causing Displacement or Affect Housing Choice of Minorities and Persons with Disabilities

Local government policies could result in displacement or affect representation of minorities or the disabled. Policy areas that could have these effects are summarized accordingly: building design, reasonable accommodations, housing opportunities, and relocation requirements.

Building Design

The American with Disabilities Act (ADA) mandates certain requirements for multifamily housing units to be accessible to people with disabilities. There are also techniques for improving the accessibility of housing through the adoption of principles of "universal design," "visitability," or "barrier free" housing. Features typically include zero-step entrances, wide enough doorways for wheelchairs, and other key features. According to the 2014-2021 Housing Element, Pasadena will explore ways to make these types of improvements where feasible.

Reasonable Accommodation

Under State and federal law, local governments are required to "reasonably accommodate" housing for persons with disabilities when exercising planning and zoning powers. Jurisdictions must grant variances and zoning changes if necessary to make new construction or rehabilitation of housing for persons with disabilities feasible, but are not required to fundamentally alter their zoning code.

Although most local governments are aware of State and Federal requirements to allow reasonable accommodations, if specific policies or procedures are not adopted by a jurisdiction or a jurisdiction requires a public hearing or discretionary decision, residents with disabilities residents may be unintentionally displaced or discriminated against. The City of Pasadena implements a Reasonable Accommodation Ordinance that is designed to offer flexibility in municipal code requirements to expand opportunities for people to build and rent housing that is accessible to people with disabilities. The City also offers housing rehabilitation assistance that can be used to modify the exterior and interior of housing units to allow greater access and mobility for residents. The MASH program also assists disabled residents modify their homes to increase accessibility.

The process for seeking a modification varies depending on whether the modification refers to zoning and development regulations, building codes, or land use changes. Table 48Table 48: Reasonable Accommodation Process summarizes the City's process for requesting a modification to accommodate a disability.

Table 48: Reasonable Accommodation Process

	Building Standard Modification	Land Use Classification	Zoning Standard Modification
Types of Requests	Application of building code to new housing	Appeal of determination of land use classification	All stabdards, except gross floor area, lot coverage, density
Process	California Building Code	Request for appeal of Zoning Code interpretation	Modification for people with disabilities
Decision Maker	Building Official	Board of Zoning Appeals	Hearing Officers
Public Hearing	No public hearing; not publicly noticed	Publicly-noticed meeting, but not a public hearing	Publicly-noticed; hearing if requested
Findings of Approval	California Building Code	No findings required – letter of determination	Findings related to the existence of a disability
Appeal Authority	California Building Code	City Council	Board of Zoning Appeals-City Council

Source: City of Pasadena Housing Element, 2014-2021.

Housing Opportunities

Expanding housing opportunities for people with disabilities (including developmental disabilities) is needed. The City supports the construction of housing and group quarters that is suitable for people with disabilities. The City allocates vouchers for people with disabilities to live in housing in an integrated setting with other nondisabled people.

Displacement and Relocation Requirements

The City of Pasadena adopted a Tenant Protection Oridance in 2004 which requires landlords of multifamily, rental unilts⁹ to:

- Provide tenants with Pasadena's Multi-lingual Landlord/Tenant Information Sheet
- Pay households in good standing who are at or below 140 percent of the median income
 for Los Angeles County a relocation allowance if the tenant is required to leave due to
 demolition, conversion to condominium, government order to vacate, or permanent
 removal of a unit from the rental market
- Pay a temporary relocation allowance to tenants who are required to relocate temporarily to comply with the housing, health, building and safety laws of the State of California, City of Pasadena or by any government officer or agency.

In July 2019, City Council strengthened the protections to include situations in which a change in property ownership has occurred within 18 months prior to the tenant being issued a notice of eviction, tenancy termination, or rent increase which exceeds five percent plus the percentage annual change in the Consumer Price Index. Additionally, the relocation was increased to account for market rent increases and for tenants with long term tenancies of more than 10 years. The changes expanding and enhancing the Ordinance were intended to provide more

⁹ Single-family residences and condominiums are exempt from the provisions

assistance to displaced tenants and to keep pace with the rapidly rising rental housing market as directed by the City Council.

Statewide, Assembly Bill 1482, the Tenant Protection Act of 2019 ("AB 1482") was passed by the California Legislature in September 2019, and was approved by the Governor on October 8, 2019 to address a key cause of California's affordable housing crisis by preventing rent gouging and arbitrary evictions¹⁰. AB 1482 enacted statewide rent control legislation in California beginning January 1, 2020 by capping rent increases statewide at 5% plus local inflation per year for the next 10 years. The legislation also prohibits evictions and non-renewals without "just cause" for tenants that have lived in a unit for at least one year. AB 1482 also included a provision that if a landlord converts rentals to condos or "substantially" remodels the property, they are responsible for pay relocation fees equal to one month of rent.

Following the adoption of AB 1482, the City was made aware of a surge of eviction notices without a stated reason in an attempt to evict tenants and implement rent increases for new tenants that would not be possible after the January 1, 2020 effective date of the Tenant Protection Act of 2019. In response, the City adopted an ordiance on November 5, 2019 to adopt the provisions of AB 1482 and protect renters from evictions without just cause through the end of December 2019, in advance of AB 1482's effective date of January 1, 2020.

E. Local Housing Authority

In Pasadena, the HUD Housing Choice Voucher (Section 8) program is administered by the Pasadena Housing Department. The Housing Department does not own or manage any public housing. The availability and use of Housing Choice Vouchers must adhere to fair housing laws. The Housing Department has adopted the following preferences for the vouchers:

- Residency preference for applicants in which the head of household or spouse lives in Pasadena.
- Applicants in which the head of household or spouse works full-time or attends school full-time (as defined by the school or institution) within the City.
- Disabled preference for applicants in which the head of household or spouse is disabled.
- Veteran preference in which the head of household is a current member of the military, a veteran, or the surviving spouse of a veteran.
- Applicants who have been involuntarily displaced.
- Applicants who are currently residing in substandard housing.
- An applicant is also given the benefit of the working preference if the head and spouse, or sole member is age 62 or older or is a person with disabilities.

The legislation only applies to apartments and other multi-family buildings containing two units or more, exempting: single-family homes and condos, unless owned by a corporation, real estate investment trust, or limited liability corporation in which at least one member is a corporation; duplexes, when one of the units is occupied by the owner; and buildings constructed within the past fifteen (15) years.

For Housing Choice Vouchers, the Housing Act mandates that not less than 75 percent of new admissions must have incomes at or below 30 percent of the AMI. The remaining balance of 25 percent may have incomes up to 50 percent of the AMI.

F. Community Participation

Adequate community involvement and representation are important to overcoming and identifying impediments to fair housing or other factors that may restrict access to housing. Decisions regarding housing development in a community are typically made by the City Council and Planning Commission. The Council members are elected officials and answer to the constituents. Planning Commissioners are residents often appointed by the Council or the Board of Supervisors and serve an advisory role to the elected officials. In addition to the City Council and Planning Commission, the City has a number of commissions, committees, and task forces to address specific issues:

- **Design Commission:** A nine-member commission whose purpose is to promote excellence in new construction and to apply adopted design guidelines to development projects throughout the City. The Commission reviews exterior alterations, new construction, and rehabilitations of historic properties in the Central District. Elsewhere it reviews new construction over certain thresholds (based on square footage of new construction and/or location of a project). The Design Commission consists of eight members, five nominated by the Mayor upon recommendation from the other six members of the City Council, and one each nominated by the Community Development Committee, the Historical Preservation Commission, and the Planning Commission.
- Historic Preservation Commission: A nine-member Commission that reviews exterior
 alterations and additions, relocations, and demolitions of: designated landmarks,
 properties listed in the National Register of Historic Places, buildings in landmark
 districts, and works of the architects Greene and Greene.
- **Human Services Commission:** The 13-member advises and makes recommendations to the Council regarding the human service needs of people of all ages in the community. This commission is established to respond to significant unmet human service needs and gaps in the City.
- Northwest Commission: An 11-member commission with the following functions: The commission shall have the following functions: 1) Serve as a monitoring body for the Northwest community; 2) Work with the City Manager and staff on updating and revising the Northwest Community Plan; 3) Provide ongoing oversight on the implementation of the plan; 4) Provide periodic advice to the Council on Northwest issues; and 5) Present an annual review of the implementation of the Plan's projects and programs to the City Council and the community.
- Pasadena Senior Commission: An eleven-member Commission whose purpose is to advise the City Council on the needs, concerns, and quality of life of all seniors. Each of the seven City Council members has the authority to nominate one member and the Mayor has the authority to nominate one member from a list of persons recommended

by any of the other seven Council members. Human service agencies providing services in Pasadena also have the authority to recommend two representatives for nomination.

Community participation can be limited or enhanced by actions or inaction by a public agency. Results of the resident fair housing survey (summarized in Chapter 2 of this AI) indicate that 19 percent of the respondents felt they had been discriminated against in a housing-related situation. Among those who felt they had been discriminated against, 17 percent alleged that they were discriminated against by a City or County staff person.

A broader range of residents may feel more comfortable approaching an agency with concerns or suggestions if that agency offers sensitivity or diversity training to its staff members that typically interface with the public. In addition, if there is a mismatch between the linguistic capabilities of staff members and the native languages of local residents, non-English speaking residents may be unintentionally excluded from the decision making process. Another factor that may affect community participation is the inadequacy of an agency or public facility to accommodate residents with various disabilities.

While providing fair housing education for the public and housing professionals is critical, ensuring City staff understand fair housing laws and are sensitive to the discrimination issues is equally important. It is the policy of the City of Pasadena to train and test every City employee on issues of discrimination, hostile work environment, violence in the workplace, protected class, retaliation, etc. The City provides full training for every new employee within 45 days of hire and re-trains every employee, both supervisory and non-supervisory, every two years. Furthermore, the City has the capability of accommodating the following languages: English and Spanish.

To accommodate the needs of its resident with disabilities, Pasadena City Hall and all of its Administration Buildings are ADA accessible.

Chapter 6: Fair Housing Practices

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

G. Fair Housing Practices in the Homeownership Market

Part of the American dream involves owning a home in the neighborhood of one's choice. Homeownership is believed to enhance one's sense of well-being, is a primary way to accumulate wealth, and is believed to strengthen neighborhoods, because residents with a greater stake in their community will be more active in decisions affecting the future of their community. Not all Americans, however, have always enjoyed equal access to homeownership due to credit market distortions, "redlining," steering, and predatory lending practices.

On December 5, 1996, HUD and the National Association of REALTORS® (NAR) entered into a Fair Housing Partnership. Article VII of the HUD/NAR Fair Housing Partnership Resolution provides that HUD and NAR develop a Model Affirmative Fair Housing Marketing Plan for use by members of the NAR to satisfy HUD's Affirmative Fair Housing Marketing regulations. Yet there is still much room for discrimination in the housing market. This section analyzes potential impediments to fair housing in the homeownership sector.

11. The Homeownership Process

The following discussions describe the process of homebuying and likely situations when a person/household may encounter housing discrimination. However, much of this process occurs in the private housing market over which local jurisdictions have little control or authority to regulate. The recourse lies in the ability of the contracted fair housing service providers in monitoring these activities, identifying the perpetrators, and taking appropriate reconciliation or legal actions.

Advertising

The first thing a potential buyer is likely to do when they consider buying a home is search advertisements either in magazines, newspapers, or the Internet to get a feel for what the market offers. Advertisements cannot include discriminatory references such as the use of words describing:

- Current or potential residents;
- Neighbors or the neighborhood in racial or ethnic terms;
- Adults preferred;

- Perfect for empty nesters;
- Conveniently located by a Catholic Church; or
- Ideal for married couples without kids.

In September 2019, approximately 421 homes were listed for sale. A random survey of about 20 percent of the listing indicates that close to 22 percent of advertisements included potentially discriminatory language. Of a total of 83 listings reviewed, 11 listings included references to something other than just the physical description of the available home and amenities and services included (Table 49). Eight of the advertisements were targeted specifically at families, and another 3 ads included potentially discriminatory income-related language.

Table 49: Potential Discrimination in Listings of For-Sale Homes

Discrimination Type	Number of Listings	Potentially Discriminatory Language*
No Discriminatory Language	65	n/a
Income Related	3	 2 bedroom 3 bath with 1754 sqft need work. Attention all First time buyers and Investors, if you know Pasadena then you know this is a diamond in the rough. This property has great future value and requires some TLC to bring it back to a home of true distinction!! This home requires TLC, it can be potentially redeveloped into a brand new home with an additional ADU (accessory dwelling unit),
Household Size/ Family Related	8	 Perfect for executives and celebrities that need privacy or even families with a teenager, this property offers two completely separate and private living spaces. Majestic Mediterranean Estate nestles in San Marino School district On the Border of Pasadena/ San Marino (CAN APPLY TO SAN MARINO SCHOOL DISTRICT) Stunning & luxurious Pasadena estate located on prestigious Lombardy Rd featuring Award Winning San Marino Schools

^{*}Examples are direct quotes from the listings (including punctuation and emphasis).

Source: www.trulia.com, accessed September 12, 2019.

Advertising has become a sensitive area in real estate. In some instances advertisements published in non-English languages may make those who speak English uncomfortable, yet when ads are only placed in English they place non-English speaking residents at a disadvantage. While real estate advertising can be published in other languages, by law an English version of the ad must also be published. However, monitoring this requirement is difficult, if not impossible.

Even if an agent does not intend to discriminate in an ad, it would still be considered a violation to suggest to a reader whether or not a particular group is preferred. Past litigation had set precedence for violations in advertisements that hold publishers, newspapers, Multiple Listing Services, real estate agents, and brokers accountable for discriminatory ads.

Lending

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information

including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA). However, analysis of lending data over the last decade has led many to conclude that lower income households and minorities have been targeted for predatory lending.

Lending discrimination can occur during advertising/outreach, pre-application inquiries, loan approval/denial and terms/conditions, and loan administration. Further areas of potential discrimination include: differences in the level of encouragement, financial assistance, types of loans recommended, amount of downpayment required, and level of customer service provided.

Appraisals

Banks order appraisal reports to determine whether or not a property is worth the amount of the loan they will be giving. Generally speaking, appraisals are based on the comparable sales of properties within the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made, location, general economic influences, etc. However, during the mortgage lending and refinancing frenzy prior to 2008, there have been reports of inflated home values in order to entice refinancing.

Real Estate Agents

Real estate professionals may act as agents of discrimination. Some unintentionally, or possibly intentionally, may steer a potential buyer to particular neighborhoods by encouraging the buyer to look into certain areas; others may choose not to show the buyer all choices available. Agents may also discriminate by who they agree to represent, who they turn away, and the comments they make about their clients.

The California Association of REALTORS® (CAR) has included language on many standard forms disclosing fair housing laws to those involved. Many REALTOR® Associations also host fair housing trainings/seminars to educate members on the provisions and liabilities of fair housing laws, and the Equal Opportunity Housing Symbol is also printed on all CAR forms as a reminder.

Covenants, Conditions, and Restrictions (CC&Rs)

Covenants, Conditions, and Restrictions (CC&Rs), are restrictive promises that involve voluntary agreements, which run with the land they are associated with and are listed in a recorded Declaration of Restrictions. The Statute of Frauds (Civil Code Section 1624) requires them to be in writing, because they involve real property. They must also be recorded in the County where the property is located in order to bind future owners. Owners of parcels may agree amongst themselves as to the restrictions on use, but in order to be enforceable they must be reasonable.

The California Department of Real Estate reviews CC&Rs for all subdivisions of five or more lots, or condominiums of five or more units. This review is authorized by the Subdivided

Lands Act and mandated by the Business Professions Code, Section 11000. The review includes a wide range of issues, including compliance with fair housing law. The review must be completed and approved before the Department of Real Estate will issue a final subdivision public report. This report is required before a real estate broker or anyone can sell the units, and each prospective buyer must be issued a copy of the report. If the CC&Rs are not approved, the Department of Real Estate will issue a "deficiency notice", requiring the CC&Rs be revised. CC&Rs are void if they are unlawful, impossible to perform or are in restraint on alienation (a clause that prohibits someone from selling or transferring his/her property). However, older subdivisions and condominium/townhome developments may contain illegal clauses which are enforced by the homeowners associations.

Homeowners Insurance Industry

Insurance is the cornerstone of credit. Without insurance, banks and other financial institutions lend less. Fewer loans leads to fewer new homes constructed and more existing homeowners will forgo repairs leaving buildings to deteriorate faster. Many traditional industry underwriting practices which may have some legitimate business purpose also adversely affect lower income and minority households and neighborhoods. For example, if a company excludes older homes from coverage, lower income and minority households who can only afford to buy in older neighborhoods may be disproportionately affected. Another example includes private mortgage insurance (PMI). PMI obtained by applicants from Community Reinvestment Act (CRA) protected neighborhoods is known to reduce lender risk. Redlining of lower income and minority neighborhoods can occur if otherwise qualified applicants are denied or encouraged to obtain PMI. Underwriting guidelines are usually not public information; however, consumers have begun to seek access to these underwriting guidelines to learn if certain companies have discriminatory policies.

The California Fair Access to Insurance Requirements (FAIR) Plan is designed to make property insurance more readily available to people who have difficulty obtaining it from private insurers because their property is considered "high risk."

The California Organized Investment Network (COIN) is a collaboration of the California Department of Insurance, the insurance industry, community economic development organizations, and community advocates. COIN is a voluntary program that facilitates insurance industry investments, which provide profitable returns to investors, and economic and social benefits to underserved communities.

National Association of REALTORS® (NAR)

The National Association of REALTORS® (NAR) has developed a Fair Housing Program to provide resources and guidance to REALTORS® in ensuring equal professional services for all people. The term REALTOR® identifies a licensed professional in real estate who is a member

National Advisory Panel on Insurance in Riot Affected Areas, 1968.

[&]quot;Borrower and Neighborhood Racial Characteristics and Financial Institution Financial Application Screening"; Mester, Loretta J; Journal of Real Estate Finance and Economics; 9 241-243; 1994

of the NAR; however, not all licensed real estate brokers and salespersons are members of the NAR.

Code of Ethics

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

A REALTOR® pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations 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.

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

Diversity Certification

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

California Department of Real Estate (DRE)

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

The DRE has adopted education requirements that include courses in ethics and in fair housing. To renew a real estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of the four mandated areas: Agency, Ethics, Trust

Fund, and Fair Housing. The fair housing course contains information that will enable an agent to identify and avoid discriminatory practices when providing real estate services to clients.

The law requires, as part of the 45 hours of continuing education, completion of five mandatory three-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing and Risk Management. These licensees will also be required to complete a minimum of 18 additional hours of courses related to consumer protection. The remaining hours required to fulfill the 45 hours of continuing education may be related to either consumer service or consumer protection, at the option of the licensee.

California Association of REALTORS® (CAR)

The California Association of Realtors (CAR) is a trade association of 92,000 realtors statewide. As members of organized real estate, realtors also subscribe to a strict code of ethics as noted above. CAR has recently created the position of Equal Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and the meetings typically include sessions on fair housing issues. Current outreach efforts in the Southern California area are directed to underserved communities and state-licensed brokers and sales persons who are not members of the CAR.

REALTOR® Associations Serving Pasadena

REALTOR® Associations are generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development, and other daily work necessities. The frequency and availability of courses varies amongst these associations, and local association membership is generally determined by the location of the broker for which an agent works. Complaints involving agents or brokers may be filed with these associations.

Monitoring of services by these associations is difficult as detailed statistics of the education/services the agencies provide or statistical information pertaining to the members is rarely available. The Pasadena Foothills Association of Realtors (PFAR) serves the City. Currently, PFAR uses the Internet Technology Multiple Listing Service (iTech MLS).

Complaints against members are handled by the associations as follows. First, all complaints must be in writing. Once a complaint is received, a grievance committee reviews the complaint to decide if it warrants further investigation. If further investigation is necessary, a professional standards hearing with all parties involved takes place. If the member is found guilty of a violation, the member may be expelled from the association, and the California Department of Real Estate is notified.

H. Fair Housing Practices in the Rental Housing Market

12. Rental Process

Advertising

Like with ad listings for for-sale homes, rental advertisements cannot include discriminatory references. In September 2019, 503 units (apartments, condos, townhomes, and houses) were listed for rent online on Trulia.com. A random survey of about 10 percent of the listings (50 listings) indicates that 42 percent of advertisements included potentially discriminatory language (Table 50Table 50: Potential Discrimination in Listings of Homes for Rent). A majority of the problematic language involves disability-related and income related references.

Under California's fair housing law, source of income is a protected class. It is, therefore, considered unlawful to prefer, limit, or discriminate against a specific income source for a potential homebuyer. Section 8 is now included as a part of this protected class and rental advertisements that specifically state Section 8 vouchers are not accepted are illegal. There was some indication of a prevalence of income-based discrimination in the rental listings for the City of Pasadena. Two listings specifically listed a minimum gross income required from rental applicants. A couple listings also noted that Section 8 would not be considered. While at the time when this survey was done, Section 8 protection had not yet become effective, outreach and education would be needed to ensure landlords and tenants understand their rights and responsibilities.

More common in Pasadena rental advertisements were references to pets. Persons with disabilities are one of the protected classes under fair housing law, and apartments must allow "service animals" and "companion animals," under certain conditions. Service animals are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks. Service animals are working animals, not pets. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living and as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment.

Persons with disabilities have the right to ask their housing provider to make a reasonable accommodation in a "no pets" policy in order to allow for the use of a companion or service animal. However, in the case of rental ads that specifically state "no pets," some disabled persons may not be aware of their right to ask for an exception to this rule. Because of this, a person with a disability may see themselves as limited in their housing options and a "no pets" policy could, therefore, be interpreted as potentially discriminatory. Of the 50 rental listings surveyed in September 2019, 15 ads (30 percent) included language to specifically ban pets.

Table 50: Potential Discrimination in Listings of Homes for Rent

Discrimination Type	Number of Listings	Potentially Discriminatory Language*
No Discriminatory Language	29	n/a
Disability Related	15	No Pets AllowedNO PETSNo Dogs Allowed
Income Related	8	 A 700 OR HIGHER FICO CREDIT SCORE IS REQUIRED FOR EACH ADULT Require about \$5200 gross monthly income Don't accepts section 8. \$1400 Security deposit is minimum subject to application review No Section 8 will be considered.
Household Size/ Family Related	2	 Max 2 people occupancy. In the Award Winning San Marino School District Close to school
Age Related	0	
Gender Related	0	
Miscellaneous	2	 no hables espanol, English only. About you - A responsible professional. Background and credit check required.

^{*}Examples are direct quotes from the listings (including punctuation and emphasis). SourcesTrulia.com, accessed September 16, 2019.

Responding to Ads

Differential treatment of those responding to advertisements is a growing fair housing concern. In a 2018 study conducted nationally, comprehensive audit-style experiments via email correspondence were used to test for discrimination of housing applicants in the rental housing market by landlords.¹³ This study was particularly unique because it tested for race, gender, religion, sexuality, and family status. By responding to online rental listings using names associated with a particular racial/ethnic group and varying message content grammatically to indicate differing levels of education and/or income (i.e. social class), researchers found that, Blacks, Arab males, Muslims, and single parents are treated unfavorably in the rental housing market, receiving the lowest response rates. This discrimination not more statistically pronounced when the housing inquiry was made to look like it originated from a lower social class.

Viewing the Unit

Viewing the unit is the most obvious place where the potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or may violate any of the rules.

[&]quot;Rental housing discrimination across protected classes: Evidence from a randomized experiment". Jason Murchie and Jindong Pang. Regional Science and Urban Economics. 2018.

Credit/Income Check

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history as an excuse when trying to exclude certain groups. Legislation provides for applicants to receive a copy of the report used to evaluate applications.

The Lease

Typically, the lease or rental agreement is a standard form completed for all units within the same building. However, the enforcement of the rules contained in the lease or agreement may not be standard for all tenants. A landlord may choose to strictly enforce the rules for certain tenants based on arbitrary factors, such as race, presence of children, or disability. In recent years, complaints regarding tenant harassment through strict enforcement of lease agreements as a means of evicting tenants have increased significantly.

Lease-related language barriers can impede fair housing choice if landlords and tenants do not speak the same language. In California, applicants <u>and</u> tenants have the right to negotiate lease terms primarily in Spanish, Chinese, Tagalog, Vietnamese or Korean. If a language barrier exists, the landlord must give the tenant a written translation of the proposed lease or rental agreement in the language used in the negotiation before the tenant signs it.¹⁴ This rule applies to lease terms of one month or longer and whether the negotiations are oral or in writing. Also, the landlord must provide the translation whether or not the tenant requests it. The translation must include every term and condition in the lease or rental agreement. A translation is not required if the tenant provides his or her own adult interpreter.

Security Deposit

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

During the Tenancy

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex, or disability. Usually this type of discrimination appears in the form of varying enforcement of rules, overly strict rules for children, excessive occupancy standards, refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction notices, illegal entry, rent increases, or harassment.

¹⁴ California Civil Code Section 1632(b).

These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

California Apartment Association

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

The California Apartment Association has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared towards improving the approach, attitude and professional skills of on-site property managers and other interested individuals. The CCRM program consists of 31.5 hours of training that includes fair housing and ethics along with the following nine course topics:

- Preparing the Property for Market
- Professional Leasing Skills and the Application Process
- The Move-in Process, Rent Collection and Notices
- Resident Issues and Ending the Tenancy
- Professional Skills for Supervisors
- Maintenance Management: Maintaining a Property
- Liability and Risk Management: Protecting the Investment
- Fair Housing: It's the Law
- Ethics in Property Management

In order to be certified one must successfully score 75 percent or higher on the comprehensive CCRM final exam.

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

Foothill Apartment Association

The Foothill Apartment Association (FAA) is a nonprofit trade organization providing information, education, advocacy and other member services to rental property owners in the San Gabriel Valley and Foothill Communities. The FAA works to promote individual private property rights in order to preserve the free enterprise system. The Association has adopted its own Code of Ethics and, as members of the California Apartment Association, abides by the Code for Equal Housing Opportunity.

The National Association of Residential Property Managers (NARPM)

The National Association of Residential Property Managers promotes a high standard of property management business ethics, professionalism and fair housing practices within the residential property management field. NARPM is an association of real estate professionals who are experienced in managing single-family and small residential properties. Members of the association adhere to a strict Code of Ethics to meet the needs of the community, which include the following duties:

- Protect the public from fraud, misrepresentation, and unethical practices of property managers.
- Adhere to the Federal Fair Housing statutes.
- Protect the fiduciary relationship of the client.
- Treat all tenants professionally and ethically.
- Manage the property in accordance with the safety and habitability standards of the community.
- Hold all funds received in compliance with state law with full disclosure to the client.

NARPM offers three designations to qualified property managers and property management firms:

- 1. Residential Management Professional, RMP®
- 2. Master Property Manager, MPM ®
- 3. Certified Residential Management Company, CRMC ®

Various educational courses are offered as part of attaining these designations including the following courses:

- Ethics (required for all members every four years)
- Habitability Standards and Maintenance
- Marketing
- Tenancy
- ADA Fair Housing
- Lead-Based Paint Law

Western Manufactured Housing Communities Association (WMA)

Western Manufactured Housing Communities Association (WMA) is a nonprofit organization created in 1945 for the exclusive purpose of promoting and protecting the interests of owners, operators and developers of manufactured home communities in California. WMA assists its members in the operations of successful manufactured home communities in today's complex business and regulatory environment. WMA has over 1,700 member parks located in all 58 counties of California.

WMA offers an award winning manager accreditation program as well as numerous continuing education opportunities. The Manufactured Home Community Manager (MCM) program is a

manager accreditation program that provides information on effective community operations. WMA's industry experts give managers intensive training on law affecting the industry, maintenance standards, HCD inspections, discrimination, mediation, disaster planning, and a full range of other vital subjects.

I. Fair Housing Services

In general, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords. This section reviews the fair housing services available in the City of Pasadena, the nature and extent of fair housing complaints, and results of fair housing testing/audits.

1. Housing Rights Center (HRC)

The Housing Rights Center (HRC) is a non-profit agency whose mission is to actively support and promote fair housing through education and advocacy. The services provided by HRC include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. The materials are made available free to the public in several different languages including English, Spanish, Korean, Mandarin, Armenian, Cantonese and Russian. Depending on the audience, the presentations can be translated by staff into Armenian, Mandarin, Spanish, or Russian. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords.

Overall Clients Served

Between FY 2014 and FY 2018, the HRC provided fair housing services to a total of 6,804 clients.

Table 51: Clients Served (FY 2014-2018)

	2014-15	2015-16	2017-18	2017-18	2018-19	Total
Pasadena	1,487	1,594	1,490	1,241	992	6,804

Source: HRC Annual Reports, 2014-2018.

Clients Served by Race and Ethnicity

Between FY 2014 and FY 2018, Blacks and African Americans represented the plurality (40 percent) of HRC clients from Pasadena, followed by "Other" races (33 percent) and Whites/Caucasians (20 percent). The "Other" category most likely includes those who are of Hispanic origin. Often Hispanic persons identify with their ethnicity (e.g., Mexican, Puerto

Rican) but generally do not identify a specific race. About 30 percent of HRC clients identified themselves as ethnically Hispanic.

The racial/ethnic distribution of HRC clients is not consistent with the City's demographics. According to 2013-2017 American Community Survey, Blacks made up 10 percent of Pasadena's population but 40 percent of the HRC clients in Pasadena. This may indicate a greater need for fair housing services for Blacks. Asians were underrepresented in the clientele of the HRC. While Asians made up 16 percent of the population in 2017, they only made up 3.5 percent of HRC clients. The share of Hispanics served by the HRC (30 percent) is consistent with the Hispanic share of Pasadena's population (34 percent).

Table 52: Clients Served by Race (FY 2014-2018)

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Black/African American	615	728	575	497	334	2749	40.4%
Other	460	409	521	438	416	2244	33.0%
Caucasian/White	327	298	299	222	190	1336	19.6%
Asian	54	50	58	38	36	236	3.5%
American Indian or Alaska Native	16	78	15	34	4	147	2.2%
Pacific Islander or Native Hawaiian	7	9	8	4	2	30	0.4%
Black/African American and White	4	13	5	2	5	29	0.4%
Am Ind or Alaska Native and Black/Afr Am	1	4	2	4	2	13	0.2%
Am Ind or Alaska Native and Black/White	1	4	4	0	1	10	0.1%
Asian and White	2	1	3	2	2	10	0.1%
Total	1,487	1,594	1,490	1,241	992	6,804	100.0%

Source: HRC Annual Reports, 2014-2018.

Table 53: Clients Served by Ethnicity (FY 2014-2018)

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Hispanic	439	446	480	377	320	2,062	30.3%
Not Hispanic	1,048	1,148	1,010	864	672	4,742	69.7%
Total	1,487	1,594	1,490	1,241	992	6,804	100.0%

Source: HRC Annual Reports, 2014-2018.

Clients Served by Income

As with most jurisdictions, statistics reported for the City of Pasadena indicate that lower income persons, regardless of race, are the most heavily impacted by fair housing issues. Between FY 2014 and FY 2018, 92 percent of those served by the HRC were lower income, with most clients falling in the extremely low-income category (73 percent).

Table 54: Clients Served by Income Level (FY 2014-2018)

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Extremely Low	1,080	1,172	1,058	945	729	4,984	73.3%
Very Low	194	230	217	160	60	861	12.7%
Low	87	91	98	69	48	393	5.8%
Moderate	126	101	117	67	155	566	8.3%
Total	1,487	1,594	1,490	1,241	992	6,804	100.0%

Source: HRC Annual Reports, 2014-2018.

Clients Served by Other Characteristics

Between FY 2014 and FY 2018, seniors comprised about 46 percent of HRC Pasadena clients, and persons with disabilities comprised about 27 percent. Also, approximately 15 percent of HRC clients were persons living in government subsidized housing. Each client may represent more than one special needs group though.

Table 55: Clients Served by Household Characteristics (FY 2014-2018)

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Persons with Disabilities	265	275	208	158	151	1,057	27.3%
Seniors	251	404	389	395	324	1,763	45.5%
Female Head of Household	99	99	124	73	58	453	11.7%
Government Subsidized	104	128	139	130	101	602	15.5%
Rent Stabilized	0	1	1	1	0	3	0.1%
Total	719	907	861	757	634	3,878	100.0%

Source: HRC Annual Reports, 2014-2018.

Housing Discrimination Complaints

Discrimination complaints from both in-place and prospective tenants that are filed with HRC (or screened from regular calls) are first referred to the HRC Counseling Department. The complaining party is asked to describe the events and issues that prompted the complaint. Complaints are then passed to the HRC Investigations Department and reviewed to see if the facts provided warrant an investigation.

Between FY 2014 and FY 2018, 398 complaints of housing discrimination were reported by Pasadena residents. Most allegations were related to physical disability (55 percent), but a significant number of complaints involved mental disability (18 percent), familial status (seven percent), and race (five percent).

It is important to note that not all allegations of discrimination evolve into actual fair housing cases. Of the 398 complaints of discrimination received between FY 2014 and FY 2018, 113 (28 percent) were deemed significant and turned into fair housing cases, and 60 percent of the cases opened had evidence to sustain the allegation of discrimination (Table 56).

Table 56: Discrimination Complaints by Protected Classification (FY 2014-2018)

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Physical Disability	35	35	43	53	51	217	54.5%
Mental Disability	9	13	16	12	22	72	18.1%
Discrim. General Information	2	10	12	4	1	29	7.3%
Familial Status	3	5	5	8	6	27	6.8%
Race	4	2	10	2	0	18	4.5%
National Origin	3	3	3	3	1	13	3.3%
Gender	2	0	5	2	2	11	2.8%
Age	0	2	0	0	2	4	1.0%
Sexual Orientation	1	0	1	0	1	3	0.8%
Arbitrary	0	0	1	1	0	2	0.5%
Religion	0	1	0	0	0	1	0.3%
Source of Income	0	0	0	1	0	1	0.3%
Total	59	71	96	86	86	398	100.0%

Source: HRC Annual Reports, 2014-2018.

Table 57: Findings and Dispositions (FY 2014-2018)

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Allegations	59	71	96	86	86	398	100.0%
Cases	24	24	25	23	17	113	28.4%
Status							
Allegation Sustained	18	17	9	14	10	68	60.2%
Inconclusive Evidence	4	2	7	2	3	18	15.9%
No Evidence of Discrim.	1	0	0	0	0	1	0.9%
Pending	1	5	9	7	3	25	22.1%
Outcome							
Successful Conciliation	13	13	5	9	7	47	41.6%
No enforcement possible	5	1	2	0	1	9	8.0%
Client withdrew allegation	3	5	8	5	2	23	20.4%
Pending	2	5	10	9	7	33	29.2%

Source: HRC Annual Reports, 2014-2018.

Note: Totals for each year may not match because not all possible findings and dispositions are listed in above table.

Tenant Landlord Counseling

A number of Pasadena residents contacted the HRC for assistance with landlord/tenant issues and complaints. From FY 2014 to FY 2018, the most common issue the HRC encountered was clients seeking housing and questions about notices. Questions concerning rent increases, repairs, and substandard conditions were also very common (Table 58).

Table 58: Summary of Housing Issues (FY 2014-2018)

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Seeking Housing	740	877	628	503	365	3,113	48.6%
Notices	208	199	235	183	168	993	15.5%
Rent Increase	62	77	67	84	50	340	5.3%
Repairs	64	72	87	62	34	319	5.0%
Substandard Conditions	39	50	62	67	81	299	4.7%
L/T General	68	59	41	48	42	258	4.0%
Lease Terms	63	30	58	40	22	213	3.3%
Security Deposit	47	49	38	37	39	210	3.3%
Eviction	27	27	51	34	20	159	2.5%
Other Issues	35	24	39	28	21	147	2.3%
Harrassment	20	9	20	17	17	83	1.3%
Section 8 Information	14	17	21	16	15	83	1.3%
Relocation	4	4	17	17	12	54	0.8%
Utilities	12	8	13	6	4	43	0.7%
Illegal Entry	9	4	7	5	4	29	0.5%
Parking	3	6	5	3	6	23	0.4%
Lockout	7	4	1	3	2	17	0.3%
Late Fees	1	2	2	1	3	9	0.1%
Pets	2	3	2	1	1	9	0.1%
Refusal to Rent	3	2	0	0	0	5	0.1%
Total	1,428	1,523	1,394	1,155	906	6,406	100.0%

Source: HRC Annual Reports, 2014-2018.

Education and Outreach Efforts

Education is one of the most important tools in ensuring that fair housing opportunities are provided, by giving citizens the knowledge to understand their rights and responsibilities, to recognize discrimination, locate resources if they need to file a complaint or need general assistance, and much more.

On an ongoing basis, HRC conducts various outreach, including information booths and presentations at professional and community events. During these events, counseling was available and literature was distributed, and other general information and services were provided.

2. California Department of Fair Employment and Housing (DFEH)

The mission of the Department of Fair Employment and Housing (DFEH) is to protect Californians from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, DFEH keeps track of and investigates complaints of housing

discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence.

Between May 2013 and and January 2018, a total of 38 persons from Pasadena filed fair housing complaints with DFEH. The majority of these complaints involved physical disability (three complaints) and other forms of discrimination (two complaints) (Table 59). A person can file fair housing complaints on multiple bases and multiple acts of discrimination. Therefore, the enumeration of complaint bases and acts of discrimination usually exceeds the number of persons filing complaints.

Table 59: Basis for Discrimination of Complaints filed with DFEH (2014-2018)

Basis of Complaints	# of Complaints
Disability	15
Marital/Familial Status	11
Race	8
Source of Income	4
National Origin	4
Gender/Gender Identity	4
Sexual Orientation	3
Other	3
Color	2
Religion	1
Total	55

Source: California Department of Fair Employment & Housing, 2019.

Note: Persons can file complaints on multiple bases.

A total of 64 acts of discrimination were recorded during this time period. The denial of rental/lease/sales was the most common act of discrimination reported (20 instances), followed by denial of a reasonable accommodation/modification (11 instances instances), and discriminatory statements and advertising (9 instances) (Table 60).

Table 60: Acts of Discrimination for Fair Housing Complaints Filed with DFEH (2014-2018)

Act of Discrimination	# of Acts
Denied rental/lease/sale	20
Denied reasonable accommodation/modification	11
Subjected to discriminatory statements/advertisement	9
Eviction	7
Harassed	6
Other	11
Total	64

Source: California Department of Fair Employment & Housing, 2019. Note: Persons can file complaints based on multiple acts of discrimination.

The majority of fair housing complaints in the City that were found to have insufficient evidence or no basis to proceed and were subsequently dismissed. Six cases were settled by mediation, enforcement, or legal, and one case was administratively dismissed (Table 61).

Table 61: Disposition of Fair Housing Complaints Filed with DFEH (2014-2018)

Closing Category	# of Cases
Not accepted	3
Investigated and dismissed	20
Administratively dismissed	1
Settled	6
No cause determination	8
Total	38

Source: California Department of Fair Employment & Housing, 2019.

Investigations begin with the intake of a complaint. Complainants are first interviewed to collect facts about possible discrimination. Interviews are normally conducted by telephone. If the complaint is accepted for investigation, the DGEH drafts a formal complaint that is signed by the complainant and served. If jurisdictional under federal law, the complaint is also filed with the United States Department of Housing and Urban Development (HUD). As a substantially equivalent agency, DFEH's findings are usually accepted by HUD. The recipient of the complaint (usually a landlord, seller, property manager, seller, or agent) is required to answer and has the opportunity to negotiate resolution with the complainant. If the case is not resolved voluntarily, the DFEH conducts a formal investigation.

If the investigative findings do not show a violation of the law, DFEH will close the case. If investigative findings show a violation of law, the DFEH schedules a formal conciliation conference. During the conciliation conference, the DFEH presents information supporting its belief that there has been a violation and explores options to resolve the complaint. If formal conciliation fails, the DFEH Housing Administrator may recommend litigation. If litigation is required, the case may be heard before the Fair Employment and Housing Commission (FEHC)

or in civil court. Potential remedies for cases settled by the FEHC include out-of-pocket losses, injunctive relief, access to the housing previously denied, additional damages for emotional distress, and civil penalties up to \$10,000 for the first violation. Court remedies are identical to FEHC remedies with one exception; instead of civil penalties, a court may award unlimited punitive damages.

3. U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) maintains a record of all housing discrimination complaints for jurisdictions, including the City of Pasadena. According to the HUD website, any person who feels their housing rights have been violated may submit a complaint to HUD via phone, mail or the Internet. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. HUD refers complains to the California DEFH, which has 30 days to address the complaint. As a substantially equivalent agency, DFEH's findings are usually accepted by HUD. Thereafter, HUD tracks the complaint and its issues and outcomes as a "dually filed" complaint.

From 2014 to 2018, 15 fair housing cases were recorded by HUD in Pasadena. In the City as a whole, disability and familial status related cases were the most common, comprising 13 of the 22 reported basis for discrimination (Table 61). Cases concerning race (eight complaints), sex (eight complaints), and national origin (six complaints) were also regularly reported. The highest numbers of cases was recorded in 2005, with the number of cases decreasing regularly over the subsequent five years.

Table 62: Basis for Discrimination of Cases filed with HUD (2014-2018)

Year	Race	National Origin	Sex	Disability	Religion	Familial/ Marital Status	Retaliation	Total
2014			2		-	2	1	5
2015		1		1		3		5
2016						1		1
2017	2	1		4				7
2018	1			1	1	1		4
Total	3	2	2	6	1	7	1	22

Source: Department of Housing and Urban Development (HUD), 2019. Note: Persons can file complaints based on multiple acts of discrimination.

Of the 15 cases reported to HUD between 2014 and 2018, the majority (10 cases) were found to have no probable cause and subsequently closed. An additional three cases were closed after successful conciliation or resolution and two cases were dismissed or withdrawn (Table 62).

Table 63. Closing Categories for Fair Housing Cases Filed with HUD (2014-2018)

Closing Category	No Cause	Complaint Withdrawn	Dismissed	Conciliated or Resolved	Total
2014	1			2	3
2015	3		1		4
2016				1	1
2017	4	1			5
2018	2				2
Total	10	1	1	3	15

Source: Department of Housing and Urban Development (HUD), 2019.

J. Hate Crimes

Hate crimes are crimes that are committed because of a bias against race, religion, disability, ethnicity, or sexual orientation. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents.

To a certain degree, hate crimes are an indicator of the environmental context of discrimination. These crimes should be reported to the Police or Sheriff's department. On the other hand, a hate incident is an action or behavior that is motivated by hate but is protected by the First Amendment right to freedom of expression. Examples of hate incidents can include name calling, epithets, distribution of hate material in public places, and the display of offensive hatemotivated material on one's property. The freedom guaranteed by the U.S. Constitution, such as the freedom of speech, allows hateful rhetoric as long as it does not interfere with the civil rights of others. Only when these incidents escalate can they be considered an actual crime.

Hate crime statistics compiled for the City of Pasadena show that 14 hate crimes were committed in the City over a five-year period. Ethnicity and race based hate crimes were the most frequent types of hate crimes recorded (Table 63). In Los Angeles County as a whole, race based hate crimes were also the most prevalent.

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Table 64. Hate Crimes (2014-2018)

Basis of Complaints	Race/Ethnicity/ Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
Pasadena							
2014	3	0	1	0	0	0	4
2015	0	0	2	0	0	0	2
2016	1	1	0	0	0	0	2
2017	1	1	0	0	0	1	3
2018	1	2	0	0	0	0	3
Total	6	4	3	0	0	1	14
Los Angeles Co	ounty						
2014	12	3	3	0	0	0	18
2015	16	2	9	1	0	0	28
2016	17	3	6	0	0	0	26
2017	6	5	4	0	0	0	15
2018	9	1	7	0	0	2	19
Total	60	14	29	1	0	2	106

Source: U.S. Department of Justice Federal Bureau of Investigation, 2005-2009.

Chapter 7: Impediments and Recommendations

The previous chapters evaluate the conditions in the public and private market that may impede fair housing choice. This chapter builds upon the previous analysis, summarizes conclusions and presents a list of recommendations to help address the potential impediments. When identifying recommendations, this AI focuses on actions that are directly related to fair housing issues and can be implemented within the resources and authority of the participating jurisdictions.

Impediment 1: Land Use and Zoning

• A review of the Zoning Code revealed several additional items, which need to be amended to comply with State laws.

		2013 AI Recommendations	Actions Undertaken		
•	em rea	nend the Zoning Code to address the provision of dergency shelters for homeless, second units, and asonable accommodation for persons with sabilities.	The City amended its Zoning Code to provide for emergency shelter zoning, Accessory Dwelling Units (ADUs) and		
			reasonable accommodation to comply with existing laws at the time of Zoning Code amendments.		
		2020 AI Recommendations	Timeframe, Funding, and Responsible Agency		
•	An	nend the City's Housing Code to be consistent with	Timeframe: By the end of 2021		
	the	e Zoning Code regarding the definition of family.	Funding: Departmental budget		
•	An o	nend the Zoning Code to address the following: Low Barrier Navigation Center (AB 101)	Agency: Planning Department		
	0	Supportive Housing (AB 2162)			
	0	Emergency and Transitional Housing (AB 139)			
	0	Density Bonus for 100% Affordable Housing (AB 1763)			
	0	Accessory Dwelling Units (ABs 68, 671, 881, and 587, and SB 13, and others)			

Impediment 2: Development Standards

• The City should periodically assess the effects of the residential development standards (e.g., particularly height limits and setbacks) on the costs and types of housing development.

2013 AI Recommendations	Actions Undertaken
• Facilitate affordable housing by enhancing the City Inclusionary Housing Ordinance, providing flexible development standards and other incentives for affordable housing, and removing constraints to development.	In 2015, the City adopted a new Land Use Element that offers increased capacity for residential growth and variety of housing types.
	In 2019, the City amended the Inclusionary Housing Ordinance to increase the requirement for affordable housing.
2020 AI Recommendations	Timeframe, Funding, and Responsible Agency
Pursuant to SB 330, evaluate the City's development and design standards to ensure objective standards are established.	Timeframe: By the end of 2020 Funding: Departmental budget Agencies: Planning and Housing Departments
 Provide outreach and education to developers, contractors, architects, and business owners to provide information on how to incorporate sustainability in project design. Continue to provide options for reduced parking as an incentive for development of affordable, special needs, and transit-oriented housing. 	Timeframe: Ongoing Funding: Departmental budget Agencies: Planning and Housing Departments
Continue to implement the Affordable Housing Density Bonus program.	
• Continue to facilitate and encourage the broadest range of housing types.	

Impediment 3: Transit Accessibility

• Seniors and disabled persons are transit-dependent. Housing opportunities for these groups should also consider transit accessibility.

2013 AI Recommendations	Actions Undertaken
Continue to expand transit services for all, including	The City continued to operate its
seniors and disabled.	transit system, now known as
	Pasadena Transit.
2020 AI Recommendations	Timeframe, Funding, and Responsible Agency
The City's transit services are not identified as an	Not applicable
impediment to fair housing in 2020.	

Impediment 4: Housing Conditions

• Residents participated in the Fair Housing Survey commented on the non-responsiveness of landlords regarding requests for repairs.

2013 AI Recommendations	Actions Undertaken
• Continue to conduct housing inspections and LBP	Multi-family housing structures
testing, as well as outreach and education regarding	with three or more units are
LBP hazards.	subject to inspection every four
	years. For single-family units and
	duplexes, the City no longers
	requires inspection upon sale but
	replaced it with the Pre-sale Self-
	Certification due to the improved
	housing conditions in the City.
2020 AI Recommendations	Timeframe, Funding, and
2020 At Recommendations	Responsible Agency
The City's housing condition is not identified as an issue.	Not applicable.
Residents' complaints of non-responsiveness of landlords	
is addressed under fair housing services.	

Impediment 5: Housing Accessibility

- Persons with disabilities have particular difficulties finding affordable housing.
 Pasadena is an older and mature community with the majority of its housing stock built
 well before federal accessibility (ADA) requirements were in place. Thus, a large
 portion of the multi-family housing stock is less accessible to disabled persons.
- Most people who contacted the Housing Rights Center for fair housing services allege
 housing discrimination on the bases of physical and mental disabilities. Most of the acts
 of discrimination occurred during house searching.
- Rental listings continue to omit information on reasonable accommodation for service and companion animals.
- Housing discrimination against persons with disabilities is the most frequent basis for discriminatory acts.

2013 AI Recommendations	Actions Undertaken
• Continue to expand accessible housing opportunities for seniors and persons with disabilities through new construction, education and outreach on reasonable accommodation.	Efforts are ongoing.
2020 AI Recommendations	Timeframe, Funding, and Responsible Agency
 Continue to provide options for reduced parking as an incentive for development of affordable, special needs, and transit-oriented housing. Implement the Reasonable Accommodation ordinance. Periodically analyze the City's process to identify any constraints to the development, maintenance, and improvement of housing for persons with disabilities and take corrective measures. Continue to promote unit listings by landlords at www.pasadenahousingsearch.com, which includes information about accessibility, and expand public awareness of the free site. 	Timeframe: Ongoing Funding: Departmental budget Agency: Planning and Housing Departments
 Amend the Zoning Code to address the following: Supportive Housing (AB 2162) Emergency and Transitional Housing (AB 139) 	Timeframe: By the end of 2021 Funding: Departmental budget Agency: Planning Department
Work with the Housing Rights Center to conduct educational outreach to landlords regarding disability and fair housing.	Timeframe: Ongoing Funding: Departmental budget Agencies: Housing Department; Disability Commission

Impediment 6: Racial Concentration and Linguistic Isolation

- Patterns of racial and ethnic concentration are present within particular areas of the City. Figure 1 (on page 18) illustrates concentrations of minority households by Census block group in Pasadena. A "concentration" is defined as a block group whose proportion of minority households is greater than the overall Los Angeles County average of 72.2 percent. As shown in Figure 1, concentrations of minorities can be found in the northwest portions of the City, north of Interstate 210 and west of Lake Avenue.
- In 2017, approximately 45 percent of all Pasadena residents over age five spoke languages other than English at home and approximately 40 percent of those residents spoke English less than "very well." The prevalence of limited English proficiency appears to be greatest among Hispanic households. Approximately 27 percent of Pasadena residents spoke Spanish at home and 41 percent of these persons spoke English "less than very well."

A significant correlation can also be seen between the Low and Moderate Income (LMI) areas of Pasadena and the portions of the City where a minority concentration exist (Figure 1 on page 18). Generally, Census data shows that the City's LMI areas encompass Northwest Pasadena and a narrow strip parallel to Interstate 210 extending southward to Colorado Boulevard. These areas also have the highest concentrations of African American, Hispanic, and Native American households.

2013 AI Recommendations	Actions Undertaken
• Continue to implement efforts to promote and provide City services and programs in a manner that outreach to all groups, especially those who are linguistically isolated.	Efforts are ongoing.
2020 AI Recommendations	Timeframe, Funding, and Responsible Agency
Continue to require affirmative marketing of available	Timeframe: Ongoing
 affordable housing, especially for inclusionary housing units and affordable housing projects that received City funding or incentives. The City should continue to expand its housing stock to accommodate a range of housing options and income levels. 	Funding: Departmental budget Agencies: Planning and Housing Departments
 Currently, the City has multi-lingual capabilities to serve English-, Spanish-, Mandarin-, and Armenia-speaking residents. The City should continue bilingual efforts and strive for expanding the number of languages offered. Information on housing services and programs should be made available in multiple languages to the extent feasible. 	Timeframe: Ongoing Funding: Departmental budget; CDBG; HOME Agency: Housing Department

Impediment 7: Fair Housing Outreach

- Housing discrimination activities persist in Pasadena, with discrimination against persons with disabilities (physical and mental) as the leading basis for discrimination, followed by familial status.
- A large portion of listings for for-rent and for-sale ads contain discriminatory language, primarily expressing preference for families, no-pet policy, and explicitly requiring minimum income levels or rejecting Section 8 assistance.
- Many residents are unclear on where to look for assistance with fair housing issues.
 Other residents feel that reporting their fair housing issues may result in retaliation and often do not result in satisfactory resolutions.
- Participation in fair housing activities and programs has been mostly limited despite extensive outreach efforts.

2013 AI Recommendations	Actions Undertaken
• Continue to provide a variety of outreach activities using a qualified fair housing service provider (Housing Rights Center) to promote fair housing and education.	Efforts are ongoing.
2020 AI Recommendations	Timeframe, Funding, and Responsible Agency
Publicize fair housing events and program information more prominently on City website and at public locations.	Timeframe: Ongoing Funding: Departmental budget; CDBG
Publicize outcomes of fair housing lawsuits and complaints to promote the positive outcomes and resolutions.	Agencies: Housing Department; Housing Rights Center
Expand methods of outreach and education, especially through social media.	
 Update the 2013-2021 Housing Element to comply with the new Housing Element requirement - Affirmatively Furthering Fair Housing (AB 686) Incorporate findings of this AI in the Housing Element. 	Timeframe: By October 15, 2021 Funding: Departmental budget Agencies: Planning and Housing Departments
- Include a program in to address fair housing issues identified.	

Impediment 8: Outreach to Homeowners Associations

Homeowners Associations may not be aware that condominium/townhome developments are also subject to fair housing laws, and rules and regulations must be applied equally to all tenants and homeowners with respect to all protected classes.

2013 AI Recommendations	Actions Undertaken
Outreach to homeowners associations regarding fair	Efforts are ongoing.
housing laws.	
2020 AI Recommendations	Timeframe, Funding, and Responsible Agency
This is not specifically identified as an issue in the 2020	Not applicable.
A.I. Overall fair housing services cover both renters and	
homeowners.	

Impediment 9: Access to Financing

- Compared to other racial/ethnic groups, Hispanic households had lower approval rates for home mortgage financing.
- In 2012 and 2017, approval rates were generally comparable among different races/ethnicities (around 60 percent) at the upper income level. However, for lower

income households, approval rates varied by year and race/ethnicity. In 2012, approval rates for lower income Whites, Blacks, and Asian were similar but higher than approval rates for Hispanics. By 2017, approval rates had decreased for all races/ethnicities of lower income but White applicants had the highest approval rates (38 percent) followed by Hispanics and Asians, while Black applicants had the lowest approval rates (19 percent).

2013 AI Recommendations	Actions Undertaken
• Continue to monitor lending activities for	Efforts are ongoing.
discriminatory practices.	
2020 AI Recommendations	Timeframe, Funding, and
	Responsible Agency
Periodically monitor mortgage lending data to identify	Timeframe: Ongoing
potential issues with fair lending.	Funding: CDBG; HOME;
	Departmental budget
	Agencies: Housing Rights Center; Housing Department

Impediment 10: Persons with Disabilities

• Confusion about the reasonable accommodations process is common among both tenants and landlords. Residents are uncertain about the types of requests they are able to make under fair housing laws. Similarly, landlords have expressed uncertainty in determining what is reasonable under the reasonable accommodations process.

2013 AI Recommendations	Actions Undertaken
 Incentivize the development of housing for persons with disabilities. Continue to provide fair housing outreach and education services. 	Efforts are ongoing. In 2016, the City completed a 70-unit affordable housing for seniors, which can accommodate seniors with disabilities.
2020 AI Recommendations	Timeframe, Funding, and Responsible Agency
Amend the Zoning Code to address the following:	Timeframe: By the end of 2021
o Supportive Housing (AB 2162)	Funding: Departmental budget
o Emergency and Transitional Housing (AB 139)	Agency: Planning Department
Work with the fair housing service providers to	Timeframe: Ongoing
educate landlords and tenants on the reasonable accommodations process in order to reduce the	Funding: CDBG
confusion surrounding this issue.	Agency: Housing Rights Center

Impediment 11: Housing for the Previously Homeless

• Previously homeless persons, regardless of their current ability to pay, have difficulty getting into permanent housing.

2013 AI Recommendations	Actions Undertaken
• Continue to provide Rapid-Rehousing to prevent	Efforts are ongoing.
homelessness	
2020 AI Recommendations	Timeframe, Funding, and
	Responsible Agency
This is not identified as an impediment in the 2020 AI;	Not applicable.
however, homeless prevention activities are ongoing.	

Appendices: Public Outreach

A. Community Meetings

Mailing List

Flintridge Center Lisa Wlison, Project Manager 236 W. Mountain Street #106 Pasadena, Ca 91103

Southern California Housing Rights Center Chancela Al'Mansour, Executive Director 3255 Wilshire Blvd. #1150 Los Angeles, Ca 90010

Pasadena Unified School District Ann Rector, Director of Health Services 351 S. Hudson Ave. Pasadena, Ca 91109

> Rose Bowl Aquatics Center Kurt Knop, Executive Director 360 N. Arroyo Blvd. Pasadena, CA 91103

YWCA Pasadena-Foothill Christina Lisotto, Director of Advancement 50 N. Hill #301 Pasadena, Ca 91106

> Boys & Girls Club of Pasadena 3230 E. Del Mar Blvd. Pasadena, Ca 91107

Community Health Alliance of Pasadena Steven Abramson, Director of Development 455 W. Montana Street Pasadena, CA 91103

> FVO Solutions, Inc. 789 N Fair Oaks Ave. Pasadena, CA 91103

Moving Families Forward, Inc. Martha Spangler, Office Manager 980 N. Fair Oaks Ave. Pasadena, CA 91103

> Fertig & Gordon Companies, Inc. Attn: Peter Fertig 7 N. Fifth Avenue Arcadia CA 91006

Neighborhood Housing Services of Los Angeles County Attn: Lori R. Gay 3926 Wilshire Blvd., Suite 200

Los Angeles, CA 90010

Affordable Housing Services Attn: Michelle White 1074 Prospect Blvd. Pasadena, CA 91103

Heritage Housing Partners Attn: Charles Loveman, Jr. 608 N Fair Oaks Ave., Unit 126 Pasadena, CA 91103

San Gabriel Valley Habitat for Humanity Attn: Mark Van Lue 400 South Irwindale Ave. Azusa, CA 91702

> BRIDGE Housing Corp. Attn: Anna Slaby 1301 Dove St., Suite 920 Newport Beach, CA

Priscila Davila & Associates, Inc. Attn: Priscila Davila 1501 N. Harbor Blvd., Suite 209 Fullerton, CA 92835

Foothill Apartment Association Attn: Leon Khachooni 2500 E. Foothill Blvd. #209 Pasadena CA 91107

Pasadena-Foothills Association of Realtors Attn: Laura Ohasso 1070 E Green St., #100 Pasadena, CA 91106

Greater Pasadena Affordable Housing Group Attn: Michelle White 1074 Prospect Blvd. Pasadena, CA 91103

> Pasadena Tenants Union Attn: Allison Henry PO Box 2264 Pasadena, CA 91102

Pasadenans Organizing for Progress Attn: Edward Washtka 599 Eldora Road Pasadena, CA 91104

> Abode Communities Attn: Robin Hughes 1149 S Hill St. Los Angeles, CA 90015

National Community Renaissance Attn: 9421 Haven Ave. Rancho Cucamonga, CA 91730

Villa Los Robles Partners, LP Attn: Perla Eston 3460 S. Broadway Los Angeles, CA 90007

Homes for Life Foundation Attn: Carol Liess 8939 S. Sepulveda Blvd., Suite 460 Los Angeles, CA 90045

TELACU Housing-Pasadena, Inc. Attn: Tom Provencio 1248 Goodrich Blvd. Los Angeles, CA 90022

The Salvation Army Pasadena Residences, Inc. Attn: Susan Lawrence 975 E. Union St. Pasadena, CA 91106

East Arroyo Resident's Association

Merilynne Kennedy 1146 Wotkyns Dr. Pasadena CA 91103

Elizabeth Street Neighbors Lindy Russell 495 Elizabeth Street Pasadena CA 91104

NATHA
Patricia Tucker
456 W. Montana St.
Pasadena, CA 91103

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Organ Grove Village #1 Homeowners Daniel Ryan 367 W. Walnut St. Pasadena CA 91103

Normandie Heights Dale Trader 548 Rio Grande Pasadena CA 91104 LOWER HASTINGS RANCH ASSOCIATION Diane Kirby and Jim Brennan 3755 New Haven Rd. Pasadena CA 91107

Seco Neighborhood Association Millard Murphy 545 Ridgewood Lane Pasadena CA 91103

Garfield Heights Lisa Mann P.O. Box 90322 Pasadena CA 91109 MICHILLINDA PARK ASSOCIATION, INC. Jerry Brennan P.O. Box 70272 Pasadena CA 91117

Dundee Heights Neighborhood Association Eric Doehne 1689 Walworth Ave. Pasadena CA 91104

Craftsman Heights Phillip Blum Cybele Garcia Kohel 520 Prescott St. Pasadena CA 91104 SIERRA MADRE VILLA NEIGHBORHOOD ASSOCIATION Carol Mispagel 3480 Fairpoint St. Pasadena CA 91107

Flowers of Marengo Margaret Baxter 1777 N. Marengo Ave. Pasadena CA 91103

CALIFORNIA ROSE COURT Roman Esparza P.O. Box 7029 Pasadena CA 91109

UPPER HASTINGS RANCH ASSOCIATION PO Box 5131 Pasadena, CA 91117

Monk's Hill Jane Melton 278 E. Howard St. Pasadena CA 91104 CHAPMAN WOODS ASSOCIATION Carter Freeman P.O. Box 70524 Pasadena CA 91117

VICTORY ROSE NEIGHBORHOOD ASSOCIATION Carl Vail 1135 N. Vinedo Ave. Pasadena CA 91107

Bungalow Heaven Neighborhood Association Peggy Renner

DAISY-VILLA NEIGHBORHOOD ASSOCIATION Tim Price P.O. Box 40812 471 N. Sunnyslope Ave. Pasadena CA 91107 Pasadena CA 91104

HOMEOWNER'S ASSOCIATION Sherrill Pinkston 587 N. Garfield Ave. #3 Pasadena CA 91101

DOWNTOWN PASADENA NEIGHBORHOOD ASSOCIATION Jonathan Edwards 161 S Madison Ave #12

Pasadena CA 91101

EAST ORANGE GROVE NEIGHBORHOOD ASSOCIATION Jill Fosselman 2120 Lambert Sr. Pasadena CA 91107

DOWNTOWN PASADENA NEIGHBORHOOD ASSOCIATION Jonathan Edwards 161 S Madison Ave #12 Pasadena CA 91101

Sunset Avenue Susana Porras 784 Sunset Ave. Pasadena CA 91103 EATON BLANCHE PARK NEIGHBORHOOD ASSOCIATION Lin Martinez 3006 Millicent Way Pasadena CA 91107

ORANGE HEIGHTS NEIGHBORHOOD ASSOCIATION Cindy Schnuelle 952 N. Madison Ave. Pasadena CA 91104

W.D. Edson Carmela Landucci 795 Brooks Ave. Pasadena CA 91103 EATON CANYON WASH HOMES ASSOCIATION Jim Hartley 762 Canyon Wash Drive Pasadena CA 91107

FRIENDS OF WASHINGTON PARK WASHINGTON SQUARE NEIGHBORHOOD ASSOCIATION Betty Sword 1155 Heather Square Pasadena CA 91104

Sunset Oaks Joan Chin Juliet Cabiges 1009 Eucalyptus Ln. Pasadena CA 91103

FORT OUTPOST HOMEOWNER'S ASSOCIATION Joyce Foster 1719 Outpost Lane Pasadena CA 91107

DOWNTOWN PASADENA NEIGHBORHOOD ASSOCIATION Jonathan Edwards 161 S Madison Ave #12 Pasadena CA 91101

DRAFT

WEST PASADENA RESIDENTS' ASSOCIATION

Dan Beal P.O. Box 50252 Pasadena CA 91105 OAK KNOLL NEIGHBORHOOD ASSOCIATION

Tammy Silver 820 Oak Knoll Circle Pasadena CA 91106

SINGER PARK NEIGHBORHOOD ASSOCIATION Pete Ewing

515 S. Figueroa St. Suite 1200 Pasadena CA 90071 MADISON HEIGHTS NEIGHBORHOOD

ASSOCIATION
John Latta
783 S. Oakland Avenue
Pasadena CA 91106

SAN RAFAEL NEIGHBORHOOD ASSOCIATION

Mary Romney P.O. Box 92617 Pasadena CA 91109 GREENWOOD/ALLEN NEIGHBORHOOD

ASSOCIATION Al Cullen 385 S. Greenwood Ave. Pasadena CA 91107

PUTNEY AREA NEIGHBORS

Sharon Scull 1722 Putney Rd. Pasadena CA 91103 FRIENDS & NEIGHBORS OF GRANT PARK

Susan Miles 1270 Cordova #10 Pasadena CA 91106

LINDA VISTA/ANNANDALE NEIGHBORHOOD

ASSOCIATION Nina Chomsky P.O. Box 94364 Pasadena, CA 91109 DOWNTOWN PASADENA NEIGHBORHOOD

ASSOCIATION Jonathan Edwards 161 S Madison Ave #12 Pasadena CA 91101

BROOKMERE ASSOCIATION

Henry Reed 1240 Clubhouse Dr. Pasadena CA 91105 HUNTINGTON CIRCLE NEIGHBORHOOD

GROUP Carol Chua 388 S. Lake Ave. Pasadena CA 91101

PLEASANT AND EUCLID RESIDENTS

Mary Sands 264 E. Bellevue Dr. Pasadena CA 91101-3108 7 STREETS EAST NEIGHBORHOOD ASSOCIATION

Marilyn Duff 1540 San Pasqual St. Pasadena CA 91106

ALTA SAN RAFAEL Nina Kelly 66 Los Altos Dr.

Pasadena CA 91105

SOUTH ALLEN NEIGHBORHOOD ASSOCIATION

Barbara Kaleta and James DePietro 420 S. Allen Ave. Pasadena CA 91106

OAKDALE/ROSE VILLA/SIERRA BONITA

ASSOCIATION
Julianne Worrell
1469 Rose Villa St.
Pasadena CA 91106

Community Meeting Postcard



Please join community members, housing professionals, and service providers to discuss the needs of the low and moderate income community and to explore the issue of fair housing in the City of Pasadena. Your input will help identify any impediments to fair housing choice.

Also, check out our online resident survey by scanning the QR code with your smartphone camera!



For additional information, please contact Randy M. Mabson at mabson@cityofpasadena.net or by phone (626) 744-8321

WEDNESDAY

September 25

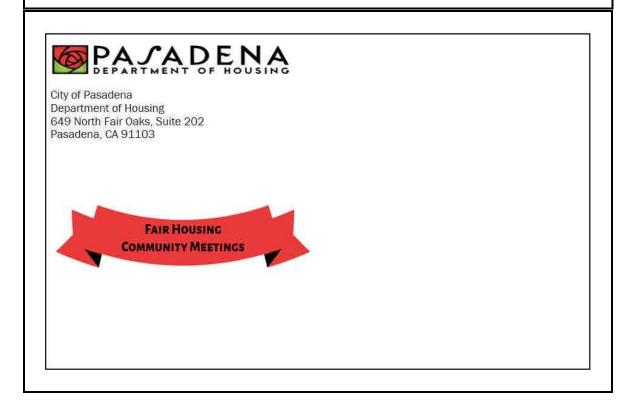
9:30 AM

FAIR OAKS RENAISSANCE PLAZA
COMMUNITY ROOM
649 N. Fair Oaks Ave. #203

TUESDAY
October 1
6:30 PM

Pasadena, CA 91103

ROBINSON PARK RECREATION CENTER 1081 N. Fair Oaks Ave. Pasadena, CA 91103





FAIR HOUSING COMMUNITY MEETINGS

WEDNESDAY

September 25 9:30 AM

FAIR OAKS RENAISSANCE PLAZA COMMUNITY ROOM

649 N. Fair Oaks Ave. #203 Pasadena. CA 91103 **TUESDAY**

October 1 6:30 PM

ROBINSON PARK RECREATION CENTER

1081 N. Fair Oaks Ave. Pasadena, CA 91103

The City of Pasadena wants to hear from you!

Please join community members, housing professionals, and service providers to discuss the needs of the low and moderate income community and to explore the issue of fair housing in the City of Pasadena. Your input will help identify any impediments to fair housing choice.

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REUNIONES COMUNITARIAS SOBRE LA VIVIENDA JUSTA

MIÉRCOLES

SEPTIEMBRE 25 9:30 AM

FAIR OAKS RENAISSANCE PLAZA COMMUNITY ROOM

649 N. Fair Oaks Ave. #203 Pasadena. CA 91103 **MARTES**

OCTUBRE 1 6:30 PM

ROBINSON PARK RECREATION CENTER

1081 N. Fair Oaks Ave. Pasadena, CA 91103

¡La Ciudad de Pasadena quiere escuchar de usted!

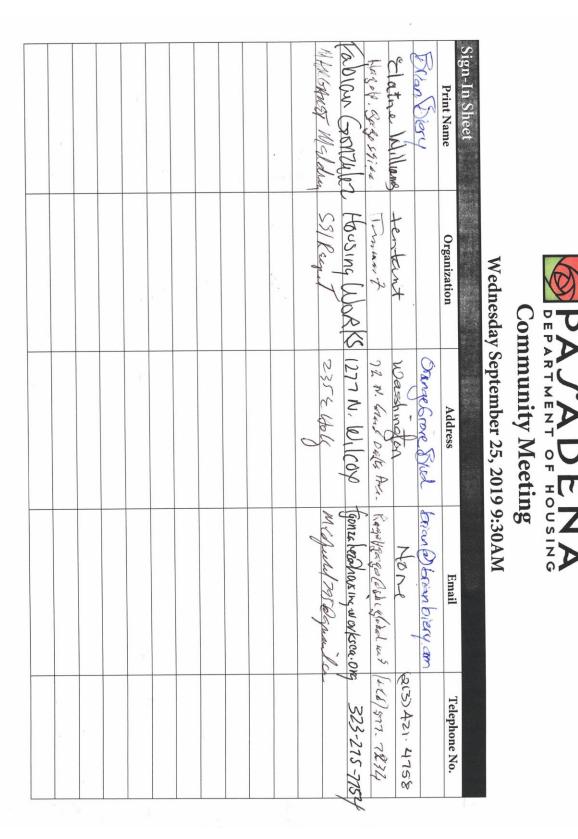
Únase a miembros de la comunidad, profesionales de vivienda y proveedores de servicios para analizar las necesidades de la comunidad de ingresos bajos y moderados y explorar el tema de la vivienda justa en la Ciudad de Pasadena. Su aporte ayudará a identificar cualquier impedimento a la vivienda justa.

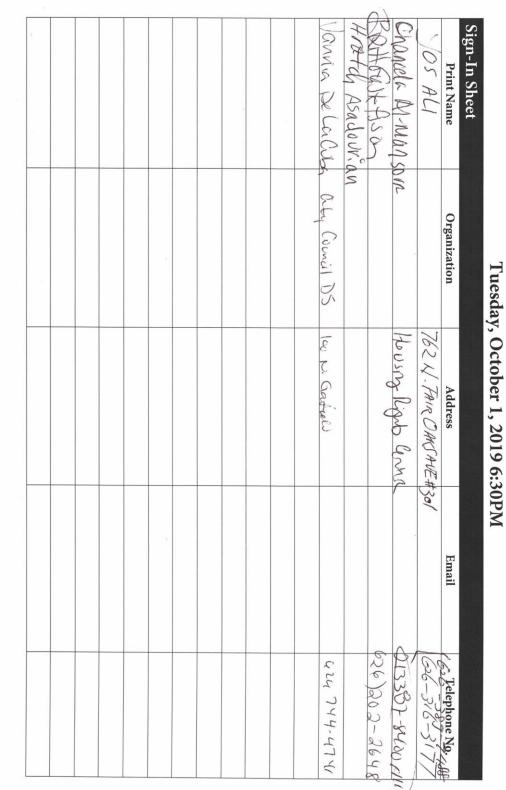
También responda nuestra encuesta de residentes en línea escaneando el código QR con la cámara de su teléfono inteligente!



Para obtener información adicional, contacte a Randy M. Mabson en rmabson@cityofpasadena.net o por teléfono (626) 744-8321.







PASADENA DEPARTMENT OF HOUSING Community Meeting

Community Meeting Comments

Pasadena Fair Housing Meeting 9/25/2019 9:30 AM

5 residents attended

- How can residents afford to continue to live in Pasadena?
- Rental increases are skyrocketing from year to year
 - o Can there be a grace period where a resident will not be given an increase?
- Big companies are exploiting residents by charging high rents
 - o How can the city implement new policy to discourage big developers from hiking up rent prices?
- New ways of contacting landlords or affordable housing need to be available
 - Most of the time the landlords or landowners do not respond to inquiries of applicants wanting affordable housing
 - O What can the city do to help facilitate action between landowners and potential residents?
- Ideas to help further fair housing in the community:
 - o Provide landlord education
 - Tenant education
 - Know your rights as a tenant
 - Protection from retaliation
 - More funding for organizations promoting fair housing
 - Legal AID could benefit from extra money to assist residents with fair housing issues
 - The Housing Rights Center could use extra funds to keep more staff instead of having only one person working at a time one day a week
 - Could money fund a caseworker at an organization to do door to door outreach regarding fair housing issues?
 - The city needs a system to keep developers and landowners accountable for renting their affordable units to low income households
 - There must be a way that can identify the affordable units in the city and check that they are actually being rented to low income households
 - Developers need to held accountable
 - New policy to set regulations on rent based on square footage
 - o New policy to provide tenants with relocation funds if their unit is being remodeled

One resident in attendance provided a list of organizations he thinks should be reached out to during this process.

 Day one, Boys and Girls Club, AD Commission, Pasadena Tenants Union, PACTL, Y + H, NAACP, Head Start, PUSD, STARS, Families Forward, Comm Job Cen, Partnership to End Homelessness, MPYD, OBA, Disability ADC, Housing Rights Center

The resident also provided written comments on FH issues:

- Housing discrimination/retaliation-how to prevent it.
- Landlord education/training, demonstrate effectiveness, build trust, efficient enforcement, fair-housing court, education of tenants via: churches, schools, apt buildings, libraries, NPOs/orgs, Spanish, Senior Center
- Funding for Housing Rights Programs, investigators
- Tenant/landlord issues: retaliation for reporting

Pasadena Fair Housing Meeting 10/1/2019 6:30 PM

5 residents attended

- 2 residents- Senior Housing tenants 2 residents; 1 landlord
- Senior Housing tenants commented they were happy with their housing accommodations. Their housing complex is mixed-race and everyone gets along. (Heritage Square Sr Housing)
- A resident commented they came to meeting to learn more about Fair Housing and was thought that
 affordability should be included as a fair housing issue because it is a human right.
- Moderators clarified that affordability was not a fair housing rights issue, unless it disproportionately
 affects a protected class.
- There was a discussion of the difference between ability to pay and source of income.
- A resident asked why the City was conducting this Fair Housing Workshop. Moderators clarified that this workshop was a requirement for the City to be eligible for CDBG funds. The City must demonstrate it is "affirmatively furthering fair housing" and the Al is the first step to do so.

B.Fair Housing Survey

English Survey



City of Pasadena - RESIDENT SURVEY

As part of the Community Development Block Grant (CDBG) program, the City is required to address fair housing concerns. Please provide input on your <u>experience</u> of fair housing issues in Pasadena. The sole purpose of this survey is to gauge the overall <u>experience</u> of fair housing in the community so that the City can develop a plan of actions to further fair housing.

Federal and State Fair Housing laws prohibit discrimination in all aspects of housing, including home sales, rentals, housing policies and financing. Each resident is entitled to equal access to housing opportunities regardless of race, color, religion, sex, national origin, disability/medical conditions, familial status, marital status, age, ancestry, sexual orientation, gender identity, gender expression, source of income, or any other arbitrary reason.

TELL US SOMETHING ABOUT YOURSELF (These questions are optional; however, your response will allow us to better devise a plan of action).

Ple	ease enter your ZIP Code:									
1.	Do you re	nt or own your	home? □ Rer	nt	□ Ow	'n				
2.	Do you cu	ırrently reside i	n a subsidized	housing	g unit?	□ YES	□ NO			
3.	What is y	our gender?								
	□ Female	e	□ Male		□ Tra	nsgend	er			
	□ Prefer	not to say	□ Other							
4.	Age:	□ 18-24	□ 25-34	□ 35-	44	□ 45-	54	□ 55-64	□ 65+	
5.	Ethnic ca	tegories (select	one)	☐ His	panic o	r Latino		□ Not Hispa	nic or Latino	
6.	Racial ca	tegories (select	one or more)							
	□ Americ	an Indian or Al	aska Native		□ Asi	an	□ Bla	ck or African	American	
	□ Native	Hawaiian or O	ther Pacific Isla	ander	□ Wh	ite	□ Oth	er		
7.	Do you ha	ave a disability	? 🗆 YES	□ NO						
8.	Do you ha	ave children un	der the age of	18 years	s old in	your ho	me?	□ YES	□ NO	

FAIR HOUSING SURVEY

9.	Ha	ve <u>you</u> personally ever experienced	discrimination in housing? □	YES DNO				
10.	lf y	ou believe you have been discrimina	ted against:					
a) Who do you believe discriminated against you? (check all that apply)								
		☐ Landlord/Property Manager	☐ Real Estate Agent	☐ Insurance Broker/ Company				
		☐ Mortgage lender	☐ Government Staff Person	□ Other				
	b)	Where did the act of discrimination	occur? (check all that apply)					
		☐ Apartment Complex	☐ Condo/Townhome Develo	pment DOther				
		☐ Single-Family Neighborhood	☐ Public or Subsidized Hous	sing Project				
		☐ Mobile Home Park	☐ When Applying for City/Co	ounty Programs				
	c)	On what basis do you believe you w	vere discriminated against? (ch	neck all that apply)				
		□ Race □ Color	☐ Religion	☐ National Origin ☐ Age				
		☐ Gender ☐ Ancestry	☐ Marital Status	☐ Sexual Orientation				
		☐ Family Status (e.g. single-parent w	ith children, family with children o	r expecting a child)				
		☐ Source of Income (e.g. welfare, un	employment insurance)					
		☐ Disability/Medical Conditions (eith	ner you or someone close to you)					
		Other (please explain):						
9	d)	How were you discriminated against? (check all that apply)						
		☐ Not Shown Apartment	☐ Higher Rent	than Advertised				
		☐ Higher Security Deposit than Industr	y Standard	ferent Housing Services or Facilities				
		□ Other						
11. Reasonable modifications and reasonable accommodations allow for certain changes or fle the rules, policies, or procedures set by housing providers. This allows a resident with a disceptual opportunity to use and enjoy a housing unit. A reasonable modification is a change made to the premises while a reasonable accommodation is a change, exceeding adjustment to a rule, policy, practice or service. For example, installing a ramp for an individuates a wheelchair or grab bars in the bathroom are reasonable modifications. A reasonable accommodation would include making an exception to an existing 'no pet' rule to permit a dog.								
		Have you ever been denied a: □ "F	Reasonable Modification" (struc	ctural changes to a unit)				
		□ "F	Reasonable Accommodation" ((flexibility in rules and policies)				
			/A					
		a) If YES, what was your request?						

2. If	you believe you h	nave been discrin	ninated against, have you repo	rted the incident?
	JYES □ N	0		
а) If NO – Why?			
	□ Don't Know	Where to Report	☐ Don't Believe it Ma	kes Any Difference
	☐ Afraid of Ret	aliation	☐ Too Much Trouble	
	☐ Other			
b) If YES, how did	l you report the in	cident?	
С) If you reported	the complaint, wh	nat is the status?	
	☐ Unresolved	□ Unr	esolved/Pending Resolution	☐ Resolved via Mediation
	☐ In Litigation	□ Oth	er	
d) If the incident v	vas reported to th	e Housing Rights Center, was	it handled satisfactory?
	☐ YES	□ NO	☐ Did not report incident/no i	ncident to report
А	re you aware of a □ YES	hate crime havir □ NO	ng been committed in your neig □ Don't Know	phborhood?
	a) If YES, in w	hat neighborhoo	d did the hate crime occur?	
	b) What was t	he basis of discri	mination? (check all that apply))
	□ Race		☐ Ancestry	□ Age
	☐ National (☐ Sexual Orientation	☐ Disability/Medical Conditions
	☐ Marital St		☐ Religion	☐ Gender Identity
	☐ Family St	atus	☐ Source of Income	☐ Gender Information
	☐ Color		□ Sex	☐ Other (please explain):
Н	lave you ever atte	nded a Fair Hous	sing Training? □ YES	□NO
а) If YES, was it fi	ee or was there a	a fee? □ Free □ Req	uired a Fee
b) If YES, where v	vas the training?		
	☐ Home ☐ V	Vork □ City	of	
	☐ Other			
				uncement (PSA) on TV/ Radio/
C	Online/ Flyer? ☐ \	∕ES □ NO		

Please provide any additional comments you may have on fair housing:

THANK YOU!

Please return surveys to: Housing Department, City of Pasadena Attn: Randy Mabson 649 N. Fair Oaks Ave. Suite 202 Pasadena, CA 91103

This Survey is also available online at:

https://www.surveymonkey.com/r/PasadenaEnglish





Ciudad de Pasadena – ENCUESTA PARA RESIDENTES

Como parte del Programa de Subvención en Bloque para el Desarrollo Comunitario (con siglas en ingles CDBG), se requiere que la Ciudad atienda los problemas de vivienda justa. Por favor, proporcione información sobre su <u>experiencia</u> en temas de vivienda justa en Pasadena. El único propósito de esta encuesta es evaluar la <u>experiencia</u> general de vivienda justa en la comunidad para que la Ciudad pueda desarrollar un plan de acciones para promover la vivienda justa.

Las leyes Federales y Estatales de Vivienda Justa prohíben la discriminación en todos los aspectos de la vivienda, incluidas las ventas de viviendas, alquileres, políticas de vivienda y financiamiento. Cada residente tiene derecho a un acceso equitativo a oportunidades de vivienda independientemente de su raza, color, religión, sexo, origen nacional, discapacidad/condiciones médicas, estado familiar, estado civil, edad, ascendencia, orientación sexual, identidad de género, expresión de género, fuente de ingresos, o cualquier otra razón arbitraria.

DÍGANOS ALGO ACERCA DE USTED (Estas preguntas son opcionales; Sin embargo, su respuesta nos permitirá diseñar mejor un plan de acción).

Po	r favor es	criba su códig	o postal:				
1.	¿Usted re	enta o es dueño	de su casa?	□ Renta	□ Dueño		
2.	¿Reside a	actualmente en	una unidad de	e vivienda subs	idiada? □ SI	□ NO	
3.	¿Cuál es	su género?					
	□ Mujer		☐ Hombre	□ Tra	ansgénero		
	☐ Prefier	o no decirlo	□ Otro				
4.	Edad:	□ 18-24	□ 25-34	□ 35-44	□ 45-54	□ 55-64	□ 65+
5.	Categoría	s étnicas (sele	ccione una)	□ His	pano o Latino		o Hispano o Latino
6.	Categoría	s raciales (sele	eccione una o i	más)			
	□ Amerir	ndio o Nativo de	e Alaska	☐ Asiático	☐ Afroamerio	cano	
	□ Nativo	de Hawái o de	Otra Isla del F	Pacífico 🗆 Bla	inco 🗆 Otr	a raza	
7.	¿Tiene al	guna discapaci	idad? □ SI	□ NO			
8.	¿Tiene ni	ños menores d	e 18 años en s	su hogar?	□ SI	□ NO	

ENCUESTA DE VIVIENDA JUSTA

).	ijΗ	a <u>usted</u> sufrido persor	nalmente discriminac	ión en la vivienda? □	SI 🗆 NO		
0.	0. Si cree que ha sido discriminado:						
	a)	¿Quién cree que disc	riminó contra usted?	(Seleccione todas las q	ue apliquen)		
	150	☐ Proprietario/Gerent				a de Seguros	
		☐ Prestamista Hipote		Personal del Gobierno			
	b)	¿Dónde ocurrió el act	o de discriminación?	(Seleccione todas las c	ue apliquen)	-3	
	186	☐ Edificio de Apartam	nentos 🛘 Desarrolo	de Condominios/Towr	nhomes 🗆 Otro		
		☐ Vecindario Unifami	liar □ Proyecto I	De Vivienda Pública O	r Subsidiada		
		☐ Parque de Casas N	/lóviles □ Al Aplicar	para Programas de la	Ciudad/el Condado		
	c)	¿Sobre qué base cree					
		□ Raza	□ Color	☐ Religión	☐ Origen Nacional	□ Edad	
		□ Género	☐ Ascendencia	☐ Estado Civil	☐ Orientación Sexu	al	
		☐ Estado Familiar (ej.	Padre/madre soltero/a	con hijos, familia con hi	jos o esperando un hijo)		
		☐ Fuente de Ingreso	(ej. Asistencia social, s	eguro de desempleo)			
		☐ Discapacidad/Cond	diciones Médicas (ya	sea usted o alguien cerd	ano a usted)		
		☐ Otra Razon (por fav	or explique)				
	d)	¿Como fue discrimina	do? (Seleccione toda	s las que apliquen)			
		☐ No Le Mostraron el A	partamento	☐ Renta Más Alta Qu	e La Anunciada		
		☐ Mayor Depósito De G	Sarantía	☐ Le Proporcionaron	Diferentes Servicios O Ir	nstalaciones	
		□ Otro					
	1. Las modificaciones razonables y las adaptaciones razonables permiten ciertos cambios o flexibilidad en las reglas, políticas o procedimientos establecidos por los proveedores de vivienda. Esto permite que un residente con una discapacidad tenga la misma oportunidad de usar y disfrutar una unidad de vivienda. Una modificación razonable es un cambio estructural realizado en las instalaciones, mientras que una adaptación razonable es un cambio, una excepción o un ajuste a una regla, política, práctica o servicio. Por ejemplo, la instalación de una rampa para una persona que usa una silla de ruedas o barras de apoyo en el baño son modificaciones razonables. Un ajuste razonable incluiría hacer una excepción a una regla existente de "no mascotas" para permitir un perro de servicio.						
	Alg	una vez le han negado	o una: □ "Modifica	ación Razonable " (cam	bios estructurales a una	unidad)	
			□ "Adapta	c <mark>ión Razonable</mark> " (Flexil	oilidad en las normas y p	ooliticas)	
			□ N/A				
		 a) Si respondió SI, 	¿Cuál fue su petición	?			
		15				<u> </u>	
		-					

12 . S	i cree	e que ha sido discriminado, ¿	Ha denunci	ado el incidente?	
		SI 🗆 NO			
	a)	Si respondió NO, ¿Por qué?	>		
		☐ No Sabe Dónde Reportar	rlo	☐ No Cree Que Har	ía Alguna Diferencia
		☐ Miedo A Las Represalias		☐ Demasiada Mole	stia
		☐ Otra Razon		<u> </u>	
	b)	Si respondió SI, ¿Cómo rep	ortó el incid	ente?	
	c)	Si reportó la queja, ¿en qué	estado de a	avance se encuentra	?
		☐ Sin Resolver ☐	Pendiente	De Resolución □ Se	Resolvió A Través De Mediación
		☐ En Litigo ☐	Otro		- .
	d)	Si el incidente fue reportado al	Centro de D	erechos de Vivienda, ¿	Fue manejado satisfactoriamente?
		□SI □NO	□ No	reportó el incidente /	ningún incidente que reportar
in e:	idividi stado		ido a su raz ad Estado fa	a, color, religión, orig miliar, fuente de ingre	
Ü		SI□NO □NOSI			
		a) Si respondió SI, ¿En que		io ocurrió el crimen de	e odio?
		b) ¿Cuál fue la base de la d □ Raza □ Origen Nacional □ Estado Civil □ Estado Familiar □ Color		ón? <i>(Seleccione toda</i> Ascendencia Orientación Sexual Religión Fuente de Ingreso Género	s las que apliquen) □ Edad □ Discapacidad/Condiciones Médicas □ Identidad de género □ Expesión de género □ Otra razon
14. ,	¿Ha a	sistido alguna vez una instru	ıcción sobre	Vivienda Justa?	□ SI □ NO
	a)	Si respondió SI, ¿fue gratis	o requirió pa	ago? □ Gratis	□ Requirió pago
	b)	Si respondió SI, ¿dónde fue	la instrucci	ón?	
		□ Casa □ Trabajo □	Cuidad		
		□ Otro lugar:			
15. ,	¿Algu	na vez ha visto o escuchado	un anuncio	de servicio público (PSA) sobre el tema de Vivienda
Jı	usta e	en la televisión / radio / en lín	ea / folleto?	□SI □NO	

Por favor, proporcione cualquier comentario adicional que pueda tener sobre vivienda justa:	

GRACIAS!

Por favor regrese encuestas a: Housing Department, City of Pasadena Attn: Randy Mabson 649 N. Fair Oaks Ave. Suite 202 Pasadena, CA 91103

Esta encuesta también está disponible en:

https://www.surveymonkey.com/r/PasadenaSpanish



Survey Results

Fair Housing Survey Results

1. Please enter your ZIP Code:

	English	Spanish	Total
Answered	517	4	521
Skipped	17	2	19
Total	534	6	540

	Combin	ned	
91001	9	91104	108
91007	1	91105	51
91011	2	91106	80
91016	1	91107	86
91024	4	91108	1
91030	1	91114	1
91101	89	91741	1
91102	1	91802	1
91103	84	Total	521

2. Do you rent or own your home?

Answer Choices	Responses	
Rent	55.73%	292
Own	44.27%	232
	Answered	524
	Skipped	16

3. Do you currently reside in a subsidized housing unit?

Answer Choices	Responses	
Yes	5.32%	28
No	94.68%	498
	Answered	526
	Skipped	14

4. What is your gender?

Answer Choices	Responses	
Female	70.91%	373
Male	26.81%	141
Transgender	0.19%	1
Prefer not to say	1.90%	10
Other	0.19%	1
	Answered	526
	Skipped	14

5. Age

Answer Choices	Responses	
18-24	1.34%	7
25-34	17.43%	91
35-44	24.33%	127
45-54	20.50%	107
55-64	19.35%	101
65+	17.05%	89
	Answered	522
	Skinned	18

6. Ethnic Categories (select one):

Answer Choices	Responses	
Hispanic or Latino	23.74%	122
Non-Hispanic or Latino	76.26%	392
	Answered	514
	Skipped	26

7. Racial Categories (select one or more):

Answer Choices		Responses
American Indian or Alaska Native	3.07%	15
Native Hawaiian or Other Pacific Islander	1.02%	5
Asian	10.04%	49
White	71.72%	350
Black or African-American	13.32%	65
Other (please specify)	6.97%	34
	Answered	488
	Skipped	52

8. Do you have a disability?

Answer Choices	Responses	
Yes	10.10%	53
No	89.90%	472
	Answered	525
	Skipped	15

9. Do you have children under the age of 18 years old in your home?

Answer Choices	Responses	
Yes	24.19%	127
No	75.81%	398
	Answered	525
	Skipped	15

10. Have you personally ever experienced discrimination in accessing housing?

Answer Choices	Responses	
Yes	18.57%	99
No	81.43%	434
	Answered	533
	Skipped	7

11. Who do you believe discriminated against you? (Check all that apply.)

	_		
Answer Choices		Responses	
Landlord/Property Manager		79.31%	69
Mortgage lender		5.75%	5
Real Estate Agent		16.09%	14
Government Staff Person		12.64%	11
Insurance Broker/ Company		3.45%	3
Other (please specify)		8.05%	7
		Answered	87
		Skipped	453

12. Where did the act of discrimination occur? (Check all that apply.)

		11
Answer Choices	Responses	
Apartment Complex	57.47%	50
Single-Family Neighborhood	37.93%	33
Mobile Home Park	2.30%	2
Condo/Townhome Development	10.34%	9
Public or Subsidized Housing Project	11.49%	10
When Applying for City/County Programs	17.24%	15
Other (please specify)	6.90%	6
	Answered	87
	Skipped	453

13. On what basis do you believer you were discriminated against? (Check all that apply)

15. On what basis do you believer you were discriminated	against (oneck an that apply)	
Answer Choices	Respons	ses
Race	48.28%	42
Gender	13.79%	12
Color	17.24%	15
Ancestry	4.60%	4
Religion	2.30%	2
Marital Status	13.79%	12
National Origin	5.75%	5
Sexual Orientation	4.60%	4
Age	25.29%	22
Family Status (e.g. single-parent with children, family with children or expecting a child)	29.89%	26
Source of Income (e.g. welfare, unemployment insurance)	24.14%	21
Disability/Medical Conditions (either you or someone close to you)	12.64%	11
Other (please explain)	14.94%	13
	Answered	87
	Skipped	453

14. How were you discriminated against? (Check all that apply.)

Answer Choices	Responses	
Not Shown Apartment	33.33%	29
Higher Security Deposit than Industry Standard	31.40%	27
Higher Rent than Advertised	26.74%	23
Provided Different Housing Services or Facilities	15.12%	13
Other (please specify)	45.35%	40
	Answered	87
	Skipped	453

15. Have you ever been denied:

Answer Choices	Responses	Responses	
A "Reasonable Modification" (structural changes to unit)	6.98%		
A "Reasonable Accommodation" (flexibility in rules and policies)	15.12%	13	
N/A	77.91%	67	
	Answered	86	
	Skipped	454	

16. If YES, what was your request?

Answered 18 Skipped 516

Respondents	Responses
1	For Another Doctor to service A per the housing facility continu place the other one left
3	To live with my emotional support animal without housing fees or additional fees added because of having a pet I was denied a new lock on my door even though I had attempted break-ins and the person had the master key they stole from one of the employees. Modification of my unit, although they did this to every other tenant.
4	Repair damaged floor to prevent possible fall
5	parking areas on property denied
6	New owner refuses to make repairs. Almost all of the previous tenants moved due to massive rent increases of 30% or more.
7	To not have dirt and dog shit in front of my unit
8	Old Carpet change
9	Emotional support animal (small, well trained, non-shedding). I received multiple denials to even see properties based on this criteria, even when not specified in listings.
10	Updating the old carpet, updating the wall paint, fixing old bathroom hardware (leaking faucets and old rusty pipes lead to frequent dogged drains) only the dog was removed, everything else has not after years of request.
11	instead of receiving an estimate which was requested I got a statement of how expensive the services are
12	1111111111111111
13	Repairs, upgrades and improvements to rental unit delayed or denied.
14	Requested an accommodation when employed for Pasadena Unified School District and denied. This happened in 2017.
15	Medical Treatment appointment for Cancer to not be evicted.
16	To be allowed to have my service dog. I have a service dog because I have PTSD.
17	Would check off both if I could. Speaking for my current place, but this has happened everywhere. If I show paperwork for my ESA (a cat) who is legit, I'll suddenly be denied housing or told "laws" that the landlord or manager clearly made up on the spot (as if I wouldn't know the laws regarding this). I've seen similar happen with an old roommate who had a service dog (not an ESA). Also currently live in a building that's falling apart. There's mold, the ACs don't really work at all (which I know isn't required by law but in 100degree heat it's dangerous that it isn't required), and there's so much water damage to this building that the floors are sloping. I've asked for AC repairs and asked to get out of my lease when I found the black mold and when I found out the unit never had an inspection done before me moving in. It's not safe for me to live here but my landord was clear that they will continue to charge rent if I try to leavebut they don't lift a finger to make repairs or make this place safe to live in so I'm stuck just getting sicker and sicker and putting my life at risk (spinal cord injury, I can't regulate my body temperature as well as normal people so especially in the summer life without AC is asking for a heat stroke). The one other unit that was open when I looked for apartments last year, with a different landlord, was maybe better maintained and maybe a better option, but during the walkthrough when I mentioned I use a wheelchair part time and if I moved in the place seemed great, but could I get a small ramp at the entryway because there was one or two stairs. I know they make simple portable ramps for this purpose and I know they're not too expensive for the landlord, but got a flat no. The unit was otherwise great and I would've moved in just needed a ramp.
18	Ramp at entrance for wheelchair.

17. If you believe you have been discriminated against, have you reported the incident?

Answer Choices	Responses	
Yes	8.24%	7
No	91.76%	78
	Answered	85
	Skipped	455

18. If No -- Why?

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Answer Choices	Responses	
Don't Know Where to Report	18.42%	14
Afraid of Retaliation	6.58%	5
Don't Believe it Makes Any Difference	46.05%	35
Too Much Trouble	10.53%	8
Other (please specify)	18.42%	14
	Answered	76
	Skipped 4	164

Respondents	Other (please specify)		
1	could be bad outcome for me		
2	It was a long time ago, but the question was have you "ever" I ONLY reported it 2 the landlord/property management 2 assist with ANY discrepancies,		
3	concerning this matter.		
4	Incident occurred in another state.		
5	At that time there it was legal		
6	Don't Believe it Makes Any Difference, Afraid of Retaliation.		
7	I was young and it seemed only an inconvenience		
8	I found another neighborhood,		
9	Too much trouble via the app I was most likely discriminated against.		
10	A friend's attorney husband advised me against reporting this.		
11	Not really any standing against personal homeowners renting a space		
12	I was too humiliated		
13	Long time ago. We just fought with the lender until the property was reassessed		

19. If YES, how did you report the incident?

Answered 20 Skipped 514

Respondents	Responses
1.	N/A
2	N/A
3	Via telephone, as I have/had stated above.
4	Incident was not reported since it happened in another state.
5	I reported it to Fair Housing, the Mayor or Pasadena office.
6	Did not report
7	I filed suit and won
8	Currently 7 tenants are suing the new owner.
9	N/A
10	i didn't; I just looked for other rentals.

- 11 N/A
- I did not report it. I usually do through other websites in which offers ways to report. In this case, there is no easy way to report- via Nextdoor app.
- 13 222222222222222222222
- 14 This was not reported.

Called and reported the incidents to the Caltrans offices in Sacramento whom are are

- 15 Landlords
- 16 N/a
- 17 Los Angeles Fair Housing Office
- 18 No, I did not report.

There was a link someone gave me ages ago that I now notice is impossible to find that was for reports to the city. Did pasadena get rid of this site or do they just make it deliberately hard to find now?

As far as the current apartment I've reported everything to my landlord, asked neighbors if they've had similar issues (they've had worse it turns out), tried to get a city inspection done but no one ever came out and the inspector just checked off on the site they did their job when they didn't, AND I even went to city hall last week to speak up...but my comment card was never called and the owner of my building showed up to harass me (they got word I was asking neighbors if they have similar issues I guess and instead of making this building at all

- 19 habitable they decided to make my life hell at and outside city hall).
- 20 Fought with lender

20. If you reported the complaint, what is the status?

Answer Choices	Responses	
Unresolved	66.67%	12
Unresolved/Pending Resolution	5.56%	1
Resolved via Mediation	16.67%	3
In Litigation	11.11%	2
Other (please specify)		12
[2]	Answered	18
	Skipped	522

Respondents	Other (please specify)
1	Not applicable to when it happened to me It has been resolved but it may have the tendency 2 'stick-up -its-ugly-head' again,
2	depending upon the issues, so-2-speak.9
3	Not reported
4	Mayor ignored my complaint.
5	did not report
6	I didn't report the incident but your form apparently doesn't accept that answer.
7	N/a
8	This was not reported.
9	They offered no reslove.
10	Did not report
11	No formal complaint. Resolved

21. If the incident was reported to the Housing Rights Center, was it handled satisfactory?

Answer Choices	Responses	
Yes	11.11%	
No	16.67%	3
Did not report incident/no incident to report	72.22%	13
	Answered	18
	Skipped	522

22. Are you aware of a hate crime having been committed in your neighborhood?

Answer Choices	Responses	
Yes	7.88%	35
No	69.14%	307
Don't know	22.97%	102
	Answered	444
	Skipped	96

23. If YES, in what neighborhood did the hate crime occur?

Answered 26 Skipped 508

Respondents	Responses
1	Near Orange Grove and Fair Oaks Ave.
2	OldTown
3	Pasadena - on Los Robles, near walnut
4	In the Old Town Pasadena area.
5	91103
6	Pass
7	At Villa Parke park, the villa Boys used to harrass African American residents. Fewereports lately.
8	Villa Parke
9	June 2018
10	91107 N parkwood
11	Rio Grande in between El Molino & Los Robles
12	Pasadena near Union and Michigan or Chester?
13	Bungalow Heaven
14	Orange Grove and Summit area
15	Near City Hall
16	Comments made in many parts of Pasadena
17	north of Pasadena High School
18	Memorial Park
19	Pasadena
20	Washington Park area
21	Northwest Pasadena

22 Madison Heights and Old Town Pasadena

23 bungalow heaven

24 Downtown Pasadena

25 Downtown Pasadena

26 Washington Square

24. What was the basis of discrimination? (check all that apply)

Answer Choices	Responses	
Race	74.19%	23
National Origin	16.13%	5
Marital Status	6.45%	2
Family Status	6.45%	2
Color	29.03%	9
Ancestry	16.13%	5
Sexual Orientation	16.13%	5
Religion	6.45%	2
Source of Income	19.35%	6
Sex	3.23%	1
Age	16.13%	5
Disability/Medical Conditions	16.13%	5
Gender Identity	9.68%	3
Gender Information	3.23%	1
Other (please specify)	6.45%	2
	Answered	31
	Skipped	503

25. Have you ever attended a Fair Housing Training?

Answer Choices	Responses	
Yes	8.51%	43
No	91.49%	462
	Answered	505
	Skipped	35

26. If YES, was it free or was there a fee?

Answer Choices	Responses	
Free	81.82%	36
Required a Fee	18.18%	8
	Answered	44
	Skipped	

27. If YES, where was the training?

Answer Choices	Responses	
Home	4.76%	2
Work	35.71%	15
City of:	59.52%	25
	Answered	42
	Skipped	498

Respondents	City of:
1	Pasadena
2	LA with LA Voice, a federation of PICA CA
3	Pasadena
4	Pasadena
5	Many cities.
6	Los Angeles
7	Pasadena
8	Pasadena/ Housing Department
9	Pasadena
10	LA
11	Los Angeles
12	Pasadena
13	Long Beach
14	Pasadena
15	pasadena
16	San Diego
17	Pasadena
18	Pasadena
19	pasadenayears ago
20	Los Angeles
21	Pasadena
22	Pasadena
23	Los Angeles
24	Chicago

28. Have you ever seen or heard a Fair Housing Public Service Announcement (PSA) on TV/ Radio/ Online/ Flyer?

Answer Choices	Responses	
Yes	23.66%	119
No	76.34%	384
	Answered	503
	Skipped	37

English Survey Flyer



The City of Pasadena wants to hear from you!

As part of the Community Development Block Grant (CDBG) program, the City is required to address fair housing concerns. The City invites you to provide your experience of fair housing issues in Pasadena by taking an online survey.

The sole purpose of this survey is to gauge the overall experience of fair housing in the community so that the City can develop a plan of actions to further fair housing.

Please visit one of the links below or scan the QR code with your phone camera to participate:

FOR THE SURVEY IN ENGLISH

https://www.surveymonkey.com/r/PasadenaEnglish



FOR THE SURVEY IN SPANISH

https://www.surveymonkey.com/r/PasadenaSpanish



To scan QR codes on iPhone/Android:

- Open the Camera App on your device.
- 2. Hold device so that QR code appears in viewfinder and you see a notification with a link.
- 3. Click on the notification to open the link associated with the QR code.

For additional information, please contact Randy M. Mabson at rmabson@cityofpasadena.net or by phone (626) 744-8321.



La Ciudad de Pasadena quiere oir de usted!

Como parte del Programa de Subvención en Bloque para el Desarrollo Comunitario (con siglas en ingles CDBG), se requiere que la Ciudad atienda los problemas de vivienda justa. La Ciudad lo invita a aportar su experiencia sobre los problemas de vivienda justa en Pasadena mediante una encuesta en línea.

El único propósito de esta encuesta es evaluar la experiencia general de vivienda justa en la comunidad para que la Ciudad pueda desarrollar un plan de acciones para promover la vivienda justa.

Por favor, visite uno de los enlaces a continuación o escanee el código QR con la cámara de su teléfono para participar:

PARA LA ENCUESTA EN ESPAÑOL

https://www.surveymonkev.com/r/PasadenaSpanish



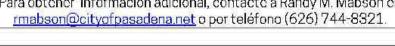
PARA LA ENCUESTA EN INGLÉS

https://www.surveymonkey.com/r/PasadenaEnglish

Para escanear códigos QR en iPhone / Android:

- Abra la aplicación de la cámara en su dispositivo.
- Sostenga el dispositivo para que el código QR aparezca en el visor y vea una notificación con un enlace.
- Haga clic en la notificación para abrir el enlace asociado con el código QR.

Para obtener información adicional, contacte a Randy M. Mabson en rmabson@cityofpasadena.net o por teléfono (626) 744-8321.



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C. Public Notices