THE CITY OF DELANO'S

Analysis of Impediments to Fair Housing Choice

Illustration contest winner of the City of Delano's First Annual Fair Housing Fair

City of Delano

Analysis of Impediments to Fair Housing Choice

City of Delano

Economic Development
and Redevelopment Department
1015 11th Avenue
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Chapter 1
INTRODUCTION

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

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

Historical First United Methodist Church Delano California

What Is Fair Housing?

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

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

Fair Housing Legal Framework

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

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

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

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

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

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing.

The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act are not allowed for speech alone unless that speech itself threatened violence. In addition to these acts, Government Code Sections 111135, 65008, and 65589.5 prohibit discrimination in programs funded by the State and in any land use decisions[1]

Housing Issues, Affordability and Fair Housing

The U.S. Department of Housing and Urban Development (HUD) Fair Housing and Equal Opportunity Division draw 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 treatment, would fair housing concerns arise.

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either 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.

What Is an Impediment to Fair Housing Choice?

According to the HUD Fair Housing Planning Guide, and based within the legal framework of Federal and State laws, impediments to fair housing choice are:

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

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

[1] Fair Housing Hotline Project, Legal Services of Northern California. "Fair Housing in California: Families with Children: A Manual for Housing Providers, Tenants and Advocates." March 2004.

- 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. Specifically, to receive HUD Community Planning and Development (CPD) formula grants, a jurisdiction must:

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

Purpose of Report

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

- A comprehensive review of Delano's laws, regulations, and administrative policies, procedures, and practices, and an assessment of how they affect the location, availability, and accessibility of housing; and

- An assessment of conditions, both public and private, affecting fair housing choice.

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

Organization of Report

The AI is divided into six chapters:

Chapter 1: Introduction defines "fair housing" and explains the purpose of this report.

Chapter 2: Community Profile presents the demographic, housing, and income characteristics in Delano. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed.

Chapter 3: Mortgage Lending Practices analyzes private activities that may impede fair housing in Delano.

Chapter 4: Public Policies evaluate various public policies and actions that may impede fair housing choice in Delano.

Chapter 5: Assessment of Fair Housing Practices evaluates the fair housing services available to residents and identifies fair housing complaints and violations in Delano.

Chapter 6: Findings, Recommendations, and Actions provide conclusions and recommendations about fair housing issues in Delano.

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

Preparers of Report and Data Sources

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

The following data sources were used to complete this AI. Sources of specific information are identified in the text, tables, and figures.

- 1990 and 2000 Censuses
- 2007 State Department of Finance Population and Housing Estimates
- City of Delano General Plan
- Delano's Consolidated Plan 2008-2011
- Delano Transportation Development Plan (2005)
- Home Mortgage Disclosure Act (HMDA) data regarding lending patterns in 2007
- Dataquick Housing Activity Data
- American Community Survey

Public Participation

This 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, development of the AI includes a community outreach program consisting of a community advisory committee, a resident survey, service provider interviews, and City Council and Planning Commission public hearings.

Citizen Advisory Meeting:
City Staff, Local Realtor, Housing Authority

Citizen Advisory Meetings

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

1. Delano City Hall
   Council Chambers
   When: January 29, 2009
   Time: 6:00p.m – 8:00pm

2. Delano Regional Medical Center
   Administration Building
   Laurel Oak Conference Room
   When: February 26, 2009
   Time: 6:00p.m.-8:00p.m

3. Delano Regional Medical Center
   Administration Building
   Scarlet Oak Conference Room
   When: March 19, 2009
   Time: 6:00p.m.-8:00p.m

4. Delano Regional Medical Center
   Administration Building
   Scarlet Oak Conference Room
   When: April 23, 2009
   Time: 6:00p.m.-8:00p.m

The meetings provided the opportunity for the Delano community to gain awareness of fair housing laws, and for resident and service agencies to share fair housing issues and concerns. To ensure that the fair housing concerns of low- and moderate-income and special needs residents were addressed, individual invitation letters were distributed via mail and email if available, to agencies and organizations that serve the low- and moderate-income and special needs community. Agencies and organizations included in the invitations were and contributed directly to this report:

- Kern County Housing Authorities
- Delano Pastor Association
- Delano Community Development Department
- Delano Economic Development and Redevelopment Department
- Delano Planning Commission
- Kern County Realtor Association
- Greater Bakersfield Legal Assistance, Inc. and Seniors Law Center

Meeting times and dates were also placed in Delano's newspaper (the Delano Record) and posted conspicuously in City Hall and Kern County Housing Authorities. Due to extensive outreach efforts, attendance at the public meeting included several services providers and citizen groups that work with residents considered as protective class under HUD's definition. Community members and service providers attended the meeting and provided first-hand insight into fair housing issues and concerns. The following themes emerged from community members as important in the City of Delano:

- The importance of assisting the homeless;
- Better response to the housing and community access needs of the physically disabled;
- More information to the general public regarding fair housing laws;
- New first time homebuyers assistance guidelines and policies;
- Policies to respond to the saturation of foreclosures in the Delano market.

Resident Survey

To supplement the citizen advisory meetings, a Fair Housing Survey was made available to Delano residents at City Hall, Delano's Public Library, Kern County

Housing Authority and the City's website. In addition, surveys were administered at strategic locations (i.e. grocery stores, Laundromats, social service organizations) throughout the City by community organizers. Translated versions of the survey were provided in Spanish to reflect the diversity of Delano residents. During the four-week survey period, completed surveys were submitted by 34 Delano residents.

The survey consisted of 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 and written responses to the survey are included in the Appendix.

Service Provider Interviews

In addition, interviews were conducted with the Kern County Housing Authority, Kern County Fair Housing and The State of California Department of Fair Employment and Housing. The interviews provided an opportunity for in-depth context and insight into housing conditions and fair housing issues for residents in Delano.

Public Review

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

- Delano City Hall
- Delano Public Library
- Delano City website at www.cityofdelano.org

Notice of the public review was published in the Delano Record on June 15th. In addition, all persons that attended the Advisory Meetings were emailed and/or faxed the location of the Public Review document on the City's website, and asked to provide any further comments for incorporation.

During the public review period, no comments were received on the document.

Key Issues Identified

Key issues identified from public outreach efforts including the resident survey, advisory meeting, and interviews with service providers provided insight into the following issues and recent trends related to fair housing in Delano:

- Outreach efforts for the AI indicate that the majority of Delano residents and property owners/managers are not intimately aware of the laws and regulations that govern fair housing choice. They tend to be vaguely aware of some aspects, but may perceive some acts to be housing discrimination that is not actually covered under fair housing law.

- Seventy-three percent of surveyed residents stated that they would report housing discrimination if experienced. However, 40 percent did not know where to report it.

- Fair housing issues affecting the disabled was a concern voiced by many Delano residents. The concern ranged from reasonable accommodations to the improvement of City sidewalks to allow better wheelchair access.

- Outreach and education activities by fair housing advocates are vital to educate residents and property/owners. Currently, there is no local fair housing program or agency targeting the City of Delano for fair housing education.

- During a presentation to the City of Delano's Planning Commission, a comment was made that the issue of homelessness is an impediment to fair housing and should be further studied, as well as resources sought to help reduce the problem within the community.

CHAPTER 2
JURISDICTIONAL BACKGROUND DATA

The City of Delano (Diamond of the Golden Empire) is located in the Kern County Bakersfield metropolitan area; the third largest California county covering more than 8,000 square miles. The City itself consists of approximately 11 square miles. Delano is located in closest proximity to McFarland, Earlimart, Richgrove, Wasco, Pixley, Ducor, Alpaugh and Shafter. Delano is strategically located along State Highway 99; one of California's primary north/south arterial.

Delano was initially founded in July of 1873 as a railroad town and later incorporated in April of 1915. Delano came to be known, as we know it today, one of the top five most productive agricultural areas in the nation.

The City is a culturally diverse community and has long been regarded as an international community. Though the population consists of multiple origins, the residents have many things in common, including a strong sense of community and family.

Demographic Data

The demographic data used to prepare the Analysis to Impediments to Fair Housing Choice were the 2000 U.S. Census Bureau data, California Department of Finance information, and the Kern County Council of Government information data.

Table 2-1 shows the population changes from 1990 to 2008 and population projections from 2010 to the year 2020. The greatest increases in City population were in 2005 with 6,043 persons and 2006 with 4,778 persons. According the data source, the City is projected to grow to 112,750 by the year 2020.

Table 2-1
Population
History and Projections

Year	Population	Change
1990	23,467	------
1991	24,150	683
1992	25,800	1,650
1993	27,000	1,200
1994	31,350	4,350
1995	32,850	1,500
1996	33,800	950
1997	35,250	1,450
1998	37,150	1,900
1999	37,850	700
2000	39,489	1,639
2005	45,532	6,043
2006	50,310	4,778
2008	53,855	3,545
2010	75,188	21,333
2020	112,750	37,562

Source: U.S. Census Bureau, State of California Department of Finance, Kern Council of Governments – Regional Transportation Plan (2000).

Table 2-2 provides a prospective of the City's population by age distribution. The two largest age group categories were the in the 25-34 and 35-44 age groups with 17.2 percent and 15.5 percent, respectively. These age groups are consistent with the County's largest age group category of the 35-44 age groups.

The two smallest age groups were the 75-84 and 85 & over age group categories with 2.6 percent and 0.8 percent. These age group category percents were also consistent with the County's in that its smallest age groups were also the 75-84 and 85 & over age groups. However, the County had two age groups that ranked at 3.2 percent; the 75-84 and 60-64 age group categories.

Analyzing the age distribution is important because it affects the future need for jobs and housing and other social services. Since the City represented a larger population of young adults, future growth may need to include additional school, entry level jobs, and starter homes.

Table 2-2
Age Distribution Profile

Age	City of Delano		County	
Group	Number	Percent	Number	Percent
Under 5	3,537	9.1	55,707	8.4
5-9	3,711	9.6	61,659	9.3
10-14	3,396	8.7	59,544	9.0
15-19	3,321	8.6	55,224	8.3
20-24	3,481	9.0	46,811	7.1
25-34	6,689	17.2	93,251	14.1
35-44	6,010	15.5	103,676	15.7
45-54	3,617	9.3	76,557	11.6
55-59	1,144	2.9	26,239	4.0
60-64	1,019	2.6	20,923	3.2
65-74	1,578	4.1	34,287	5.2
75-84	997	2.6	21,310	3.2
85&over	324	0.8	6,457	1.0
Total	**38,824**	**100.0**	**661,645**	**100.0**

Source: 2000 U.S. Census Bureau

In summary, and according to the U.S. Census data, the City appeared to have had a relatively young population. Even those age groups that fell between the Under 5 through 20-24 age categories were much larger percentage wise than those age groups in the 55-59 through 65-74 categories.

As further evidence of the younger population statistics, Table 2-3 shows that the 18 and over age category represented a much larger portion of the population than did the 60 and Over or 65 and Over, categories.

Table 2-3
Population 18 and Over

Total Population	18 and Over		60 and Over		65 and Over	
	Number	Percent	Number	Percent	Number	Percent
38,824	26,206	67.5	3,918	10.1	2,899	7.5

Source: 2000 U.S. Census Bureau

The analysis is consistent with the City's General Plan in that it is projected to accommodate young families for the next 20 years.

Income Data

Although the income categories were taken from 1999 statistics and reported in the 2000 U.S. Census, they are good indicators of population incomes on average. As shown in Table 2-4, the largest income category was the $15,000 to $24,999 income group. This is relatively low considering the City's median income in 1999 was $28,143. During the same period, median household income for Kern County was $35,446. State wide, the median household income in 1999 was $47,493.

Table 2-4
1999 Household Income

Income	Number	Percent
$00.00-$9,999	1,213	14.3
$10,000-$14,999	868	10.2
$15,000-$24,999	1,679	19.8
$25,000-$34,999	1,386	16.3
$35,000-$49,999	1,419	16.7
$50,000-$74,999	1,116	13.2
$75,000-$99,999	372	4.4
$100,000-$149,999	273	3.2
$150,000-$199,999	74	0.9
$200,000-or more	85	1.0
Total	**8,485**	**100.0**

Source: 2000 U.S. Census Bureau

It is important to recognize that education has been known to significantly impact the earning capacity of individuals. According the Census data for those over 25, only 48.7 percent graduated from high school and only 5.5 percent had a Bachelor's degree or higher.

Table 2-5 shows the number of households in low-income categories. There were a significant number of very low-income households within the population.

Table 2-5
Income by Household

Income	City of Delano	
Level	Number	Percent
Very Low Income	2,598	30.6
Low Income	1,673	19.7
Moderate Income	1,694	20.0
Above Moderate	2,520	29.7
Total	**8,485**	**100**

Source: 2000 U.S. Census

Figure 1 below shows that of these very-low income households, there is a significant concentration within the south west areas of Delano's City limits.

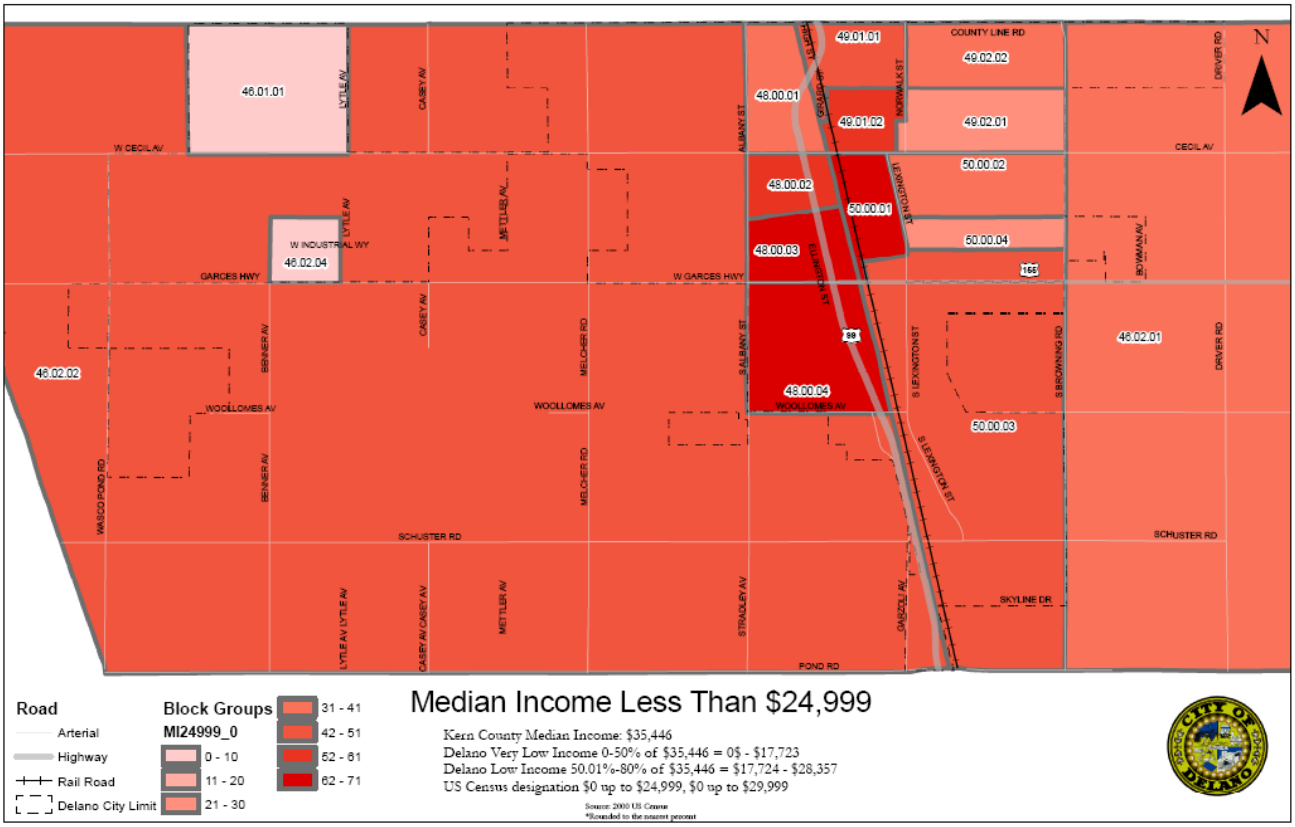


Figure 1

The most pressing problem for those households in the low and very low-income categories is affordable housing in both rental and ownership units. Many cities use Federal and/or State financial assistance to increase the supply of affordable housing for low-income families.

Although assistance is offered and available, the amount is a mere fraction of what is truly needed to accommodate housing for extremely low, very low, and low-income households.

Often, lower income households are forced to live in multi-family dwelling units due to housing cost and availability. This pattern is consistent within the City of Delano. Figure 1 below shows high renter occupied housing in south west Delano, up to 73% in certain block groups. This same block group also has up to 71% of its residents with a median family income less than $24,999, as mentioned earlier in Figure 2.

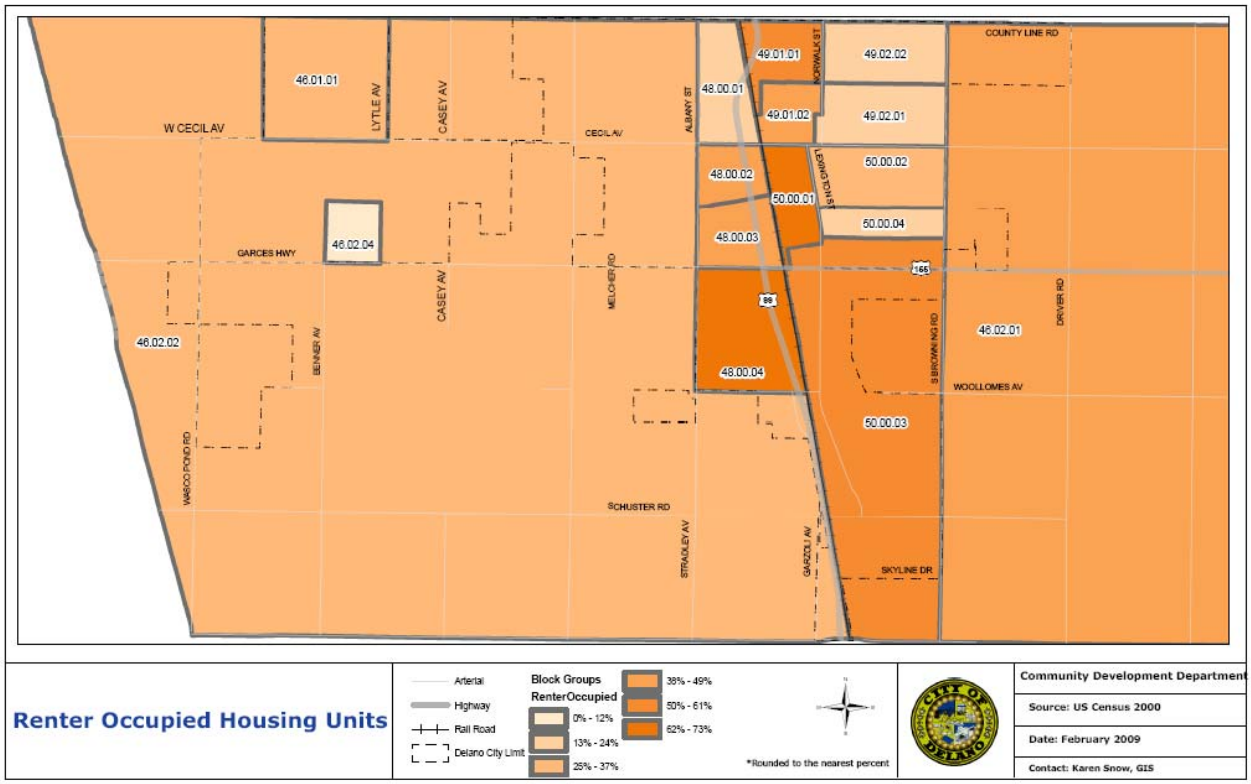


Figure2

State Housing Element Law requires cities and counties to address housing for all segment of the population including those that are lower income. The Regional Housing Needs Allocation development by the cities' or county's respective council of governments details in income category the new construction needs for all income categories. The City of Delano's projected new construction need for lower income housing is 1,817. A total of 442 units will be needed for the City's very low-income and a total of 300 will be needed for the City's low-income. The balance of units will be in the moderate to above moderate-income category.

The terms low, very low and moderate-income are most often associated with the State definition as outlined in the Health and Safety Code or by the U.S. Department of Housing and Urban Development (HUD). The State's low-income levels tend to be slightly higher than that of the HUD. In either case, the income levels set the assistance threshold for many of the housing programs offered by the State or HUD.

Employment Data

Table 2-6 provides an overview of the County's employment industry. The top two employment sectors are government representing 20.7 percent and agriculture representing 16.1 percent of the job market industries. The two smallest employment sectors are information at 0.9 percent and other services at 2.5 percent.

Table 2-6
2006 County Employment by Industry

Industry	Percentage
Agriculture	16.1
Construction	7.2
Education & Health	8.3
Financial Activities	3.2
Government	20.7
Information	0.9
Leisure & Hospitality	7.5
Manufacturing	4.7
Natural Resources & Mining	3.4
Other Services	2.5
Professional & Business	9.0
Trade, Transportation & Utilities	16.6

Source: State of California Employment Development Department 2006

In 2006, the State unemployment rate was reported at 4.9, while the County as a whole was reported at 7.6, which is quite high in comparison. As with all jurisdictions that rank high in agriculture employment, high unemployment during off-production seasons are not uncommon and tend to skew reported unemployment trend data. According to 2008 DataPlace.org, Delano ranked 22nd as having the highest unemployment rate than any other place in California.

Also, according to the State's Employment Development Department, the largest employment changes in Kern County were in trade, transportation and utilities, and construction and agriculture.

The 2000 Census show slightly different employment categories, however, agriculture consistently ranks among the top two occupations.

Housing Profile

The City of Delano's housing stock consists of a variety of housing types. Table 2-7 shows the type and number of units in comparison to that of the County. A majority of the housing types are single-family units at 6,322 and some multi-family units at 1,958.

Table 2-7
Composition of Housing Stock

Housing Type Units/Percent	City of Delano Number of Units/Percent		Kern County Number of	
Single-Family, Detached	6,065	70.0	154,615	65.9
Single-Family, Attached	257	3.0	7,850	3.3
2 to 4 Unit Structure	735	8.5	21,061	9.0
5 or More Unit Structure	1,223	14.1	23,935	10.2
Mobile Home	387	4.5	27,026	11.6
Total	**8,667**	**100.0**	**234,487**	**100.0**

Source: California Department of Finance, January 2000.

Although not specified, the 2 to 4 unit structures could also be owner-occupied units such triplexes, duplex, and condominium type housing.

Housing Inventory, as reported by the California Department of Finance, in 2000 reflected 8,667 dwelling units within the City. A total of 70 percent of the dwelling units were single family homes. Over 14 percent were located in structures of five or more.

Typical Home in Delano, California 1

Housing Conditions – In March of 2000, a housing condition analysis was prepared for the City and indicated approximately 37 percent of the housing structures were classified as needing some form of repair. Another 37 percent of the housing structures were reported to need very minor repairs. Structures needing moderate to major repairs comprised of approximately 20 percent. Units that required extensive repairs or had viable structure problems represented 5 percent. Dilapidated or uninhabitable structures accounted for less than 1 percent of the total units analyzed.

Future housing needs – By Article 10.6 of the Government Code Section 65580-65590, all California localities are required to adopt a Housing Element as part of their general plans. The Kern Council of Governments is

responsible for providing the City of Delano with an adopted Regional Housing Needs Allocation Plan for incorporation into the City Housing Element. The Housing Element serves as a planning document for public official and community residents. The Housing Element which is part of the City's General Plan, incorporates existing and projected housing needs assessment, sites inventory and analysis, an analysis on constraints to housing development, housing programs to be implemented during the planning period, and quantified objective to be met during the planning period.

Special Needs

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

Table 2-8 show that there were many more males than females with various disabilities. Also there were far more males with employment disabilities (784) than females (579) with employment disabilities.

According to the U.S Census, the greatest number of physical and mental disabilities for both male and female were in the 21 to 64 years of age category. The second greatest number for these categories were for those 65 years and older.

Table 2-8
Person with Disabilities

Disability	Male	Female
Sensory	171	137
Physical	268	217
Mental	166	142
Self-Care	15	62
Employment	784	579
Total	**1,404**	**1,137**

Source: 2000 U.S. Census

Although the 2000 Census provides disability categories, it does not provide the extent or duration of the disability. However, the statistics are a good indicator or the housing needs for those with disabilities.

HUD refers to special needs as those with a disabling condition, primarily the existence of a mental or physical challenge, which requires some form of special housing accommodations in order to live an independent life style.

Elderly and frail persons also fall into this category as well as those with a severe mental disability, developmentally disabled, physical disability, person with drug or alcohol addiction, persons with HIV/AIDS, and homeless individuals. Many cities also include large families and farm worker housing in the special needs category.

Supportive housing also falls into the special needs housing category. The term supportive housing refers to housing units and housing group quarters that provide a supportive environment and consists of some form of a planned social service component that enables individuals to transition into traditional housing.

Housing Poverty

Table 2-9 shows units that lack some form of traditional housing amenity. A total of 158 units lack complete plumbing and a total 88 lack a complete kitchen facility. Keep in mind these are statistics from the 2000 Census Bureau so the numbers may have changed over the past nine years. However, no matter the number reported, any amount of housing units in this condition is unacceptable. Although a unit having no telephone is listed in the substandard category, there are currently many available sources and access to communication services and devices.

Table 2-9
Substandard Housing

Lacking	Number	Percent
Complete Plumbing	158	1.9
Complete Kitchen	88	1.0
Telephone	325	3.9

Source: 2000 Census

Table 2-10 shows the number of renters and owners that fall into one of the low income categories.

Table 2-10
Low Income Households

Income	Renters	Owners
Less Than or Equal to 30%	1,003	493
Greater Than 30% to Less or Equal to 50%	833	769
Less Than or Equal to 50%	1,830	1,262
Greater Than 50% to Less or Equal to 80%	795	1,231

Source: U.S. Department of Housing and Urban Development, Community Housing Affordability Strategy

According to the data provided, there were a large number of both renters and owners in the Less Than or Equal to 50% category. Typically this range represents the extremely low and very low-income groups.

Overcrowded Housing

As defined by the state and HUD, overcrowding occurs when there is more than one person per room (excluding kitchens, bathrooms and hallways). Occupancy by more than 1.5 persons per room is considered severe overcrowding. The incidence of overcrowding was significant in Delano, in 1990, with 42.3 percent of renter households and 25.1 percent of owner households defined as overcrowded. The 2000 Census states that the average household size is 4.02 and the average family size is 4.27[2]. Factors that contribute to the overcrowded rate include housing costs, an increasing number of large families, and an inadequate supply of rental and ownership units for large families.

In the current economic market, more and more lower-income families are cutting back on basic necessities just to pay housing costs. According to the 2002 Comprehensive Housing Affordability Strategy (CHAS), 1,647 renters and 786 owners were overpaying for housing within the very low-income household group.

Although overcrowding is usually concentrated in areas where the area median income is the lowest, overcrowding seems to be a City wide problem as illustrated in Figure 3 below. This could be explained in three ways. First, over 50% of Delano's population is considered low or very low income. Low income families often share housing in order to minimize expenses. Second, there is a large migrant farm worker population. Nearly 35% of Delano's workforce was employed as farm workers[3]. According to the California Agricultural Workers Health Survey (CAWHS), nearly half of dwellings occupied by California hired farm workers are overcrowded, and a quarter are extremely overcrowded[4]. Lastly, many recent immigrants are young adults of childbearing age, from a country with a tradition of large families. Combination of families often come together to share living quarters, which seems to occur in both urban and rural areas, as well as multigenerational family households.

[2] Delano's 2003 Housing Element
[3] Ibid
[4] *Environmental Health Policy and California's Farm Labor Housing*, John Muir Institute on the Environment University of California, Davis October 1, 2006

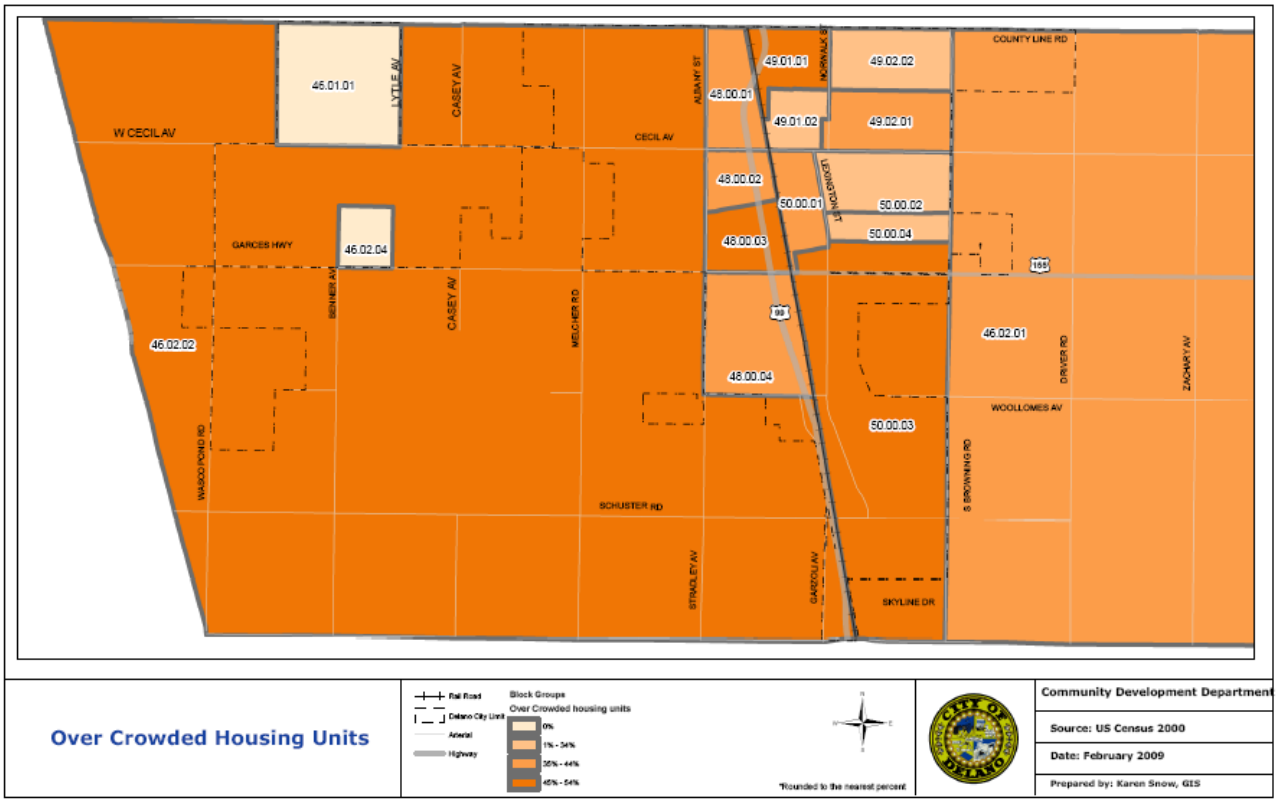


Figure 3

Household Size

There is not a significant contrast between households (Table 2-11) that are owner-occupied and households that are renter-occupied. What is significant though is the household size in the 6 to 7 or more category that are renting. This may be of concern considering that a typical multi-family dwelling unit usually consists of two to three bedrooms.

Table 2-11
Household size by Tenure

Household Size	Owner Occupied	Renter Occupied	Total Households	Percent of Total Households
1	432	480	912	10.8
2	905	558	1,463	17.4
3	722	614	1,336	15.9
4	932	641	1,573	18.7
5	797	496	1,293	15.4
6	552	282	834	9.9
7 or more	653	345	998	11.9
Total	**4,993**	**3,416**	**8,409**	**100**

Source: 2000 U.S. Census Bureau

The 2000 Census reported that there were 8,409 households in the City with an average size of 4.02 persons. It was estimated that 7,245 or 86.2 percent

were family households, with only 912 households or 10.8 percent represented individuals living alone. The population per household of 4.02 persons is relatively high in comparison to that of the County at 3.03 percent.

Housing Occupancy

The U.S. Census reported a total 8,409 occupied units during 2000 and a total of 421 vacant units during the same time period. Of the 8,409 occupied units, 4,993 were owner-occupied and 3,416 were renter occupied. As illustrated in Figure 4, the highest number of owner occupied units within Delano is primarily located in the north-east part of the City, with certain block groups having up to 83% of owner occupied housing. Conversely, in certain south-west Delano block groups, the highest owner occupied housing is only 17%.

Of the 8,830 available dwelling units, 8,409 were occupied and 421 were reported as vacant. Of the reported vacant units: 204 were listed as for rent, 57 were listed at for sale only, 30 were rented or sold (not occupied), 27 were listed as seasonal, recreational, or occasional use, 17 were reported as for migratory workers only, and 86 were reported as other vacancy.

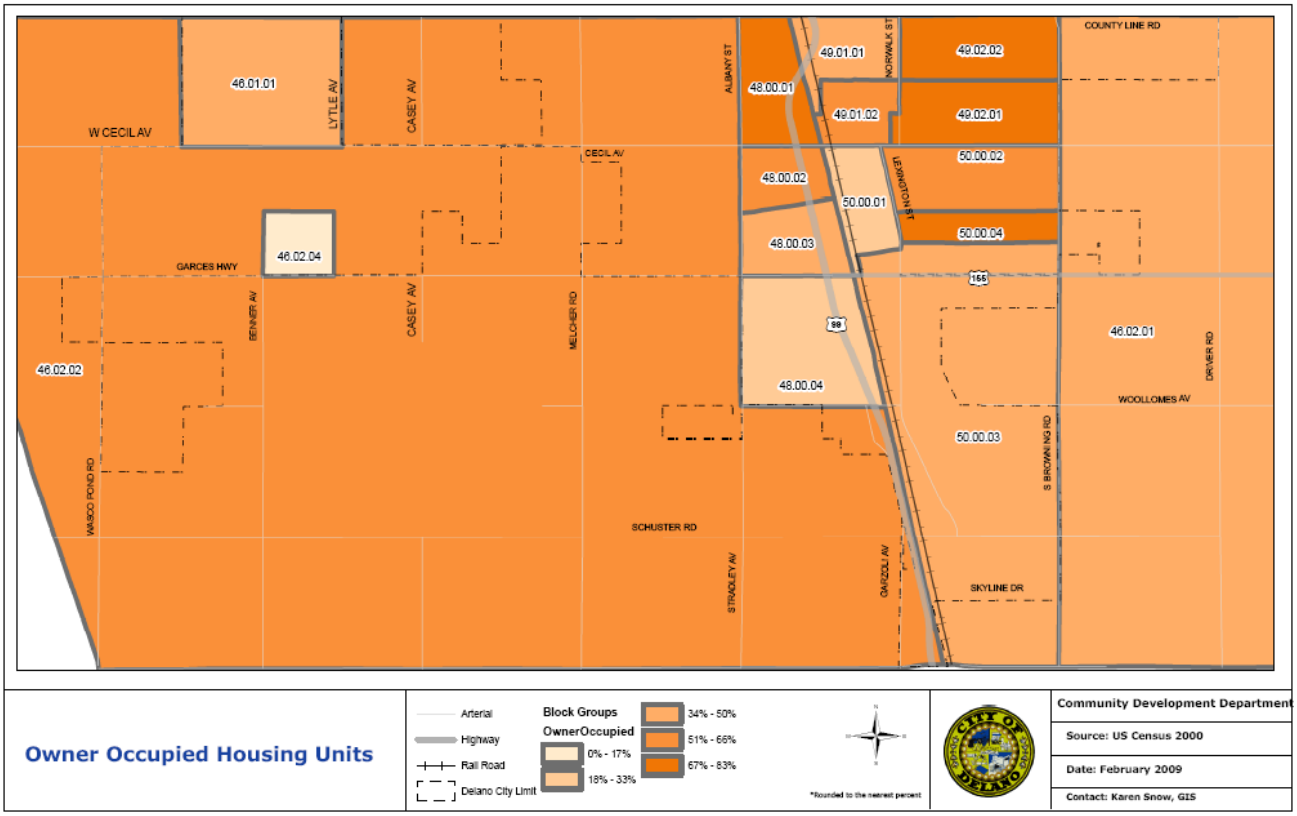


Figure 4

Fair Market Rent

The 2009 income limits (Table 2-12) are based on HUD's fiscal year Fair Market Rate areas. In 2009, Kern County area median income is $52,200.

Table 2-12
Kern County

Kern County, California										
FY 2009 Income Limit Area	**Median Income**	**FY 2009 Income Limit Category**	**1 Person**	**2 Person**	**3 Person**	**4 Person**	**5 Person**	**6 Person**	**7 Person**	**8 Person**
Kern County	$52,200	**Very Low (50%) Income Limits**	$19,550	$22,300	$25,100	***$27,900***	$30,150	$32,350	$34,600	$36,850
		Extremely Low (30%) Income Limits	$11,750	$13,400	$15,100	***$16,750***	$18,100	$19,450	$20,750	$22,100
		Low (80%) Income Limits	$31,250	$35,700	$40,200	***$44,650***	$48,200	$51,800	$55,350	$58

Source: 2009 U.S. Department of Housing and Urban Development Income Limits Summary for Kern County

Gender and Family Status

Table 2-13 shows the male/female households with children and female head-of-household with children.

Table 2-13
Household Status

Male/Female		**Number**
With related children under	18	3,868
With related children under	5	2,045
Female/no Husband		
With related children under	18	1,188
With related children under	5	472

Source: 2000 U.S. Census

Table 2-14 show the age of individual households. Consistent with other reporting data, the age groups for the 25 to 34 and 35 to 44 age categories represent the largest number of the population occupying housing.

Table 2-14
Age of Householders

Age	Number	Percent
15 to 24	491	5.8
25 to 34	1,815	21.6
35 to 44	2,155	25.6
45 to 54	1,522	18.1
55 to 64	1,012	12.0
65 and over	1,414	16.8
Total	**8,409**	**100.0**

Source: 2000 U.S. Census (SF 1)

Race Ethnicity and Minority Concentration

Table 2-15 provides a breakdown of the 1980, 1990, and 2000 racial and ethnicity distribution of the City by number and percent. As show in table 2-15, there are varying methods by which data is being reported. In the 1980 and 1990 Census data available, the Hispanics were included in either one of the following groups: White, Black, Native American, Asian, or other race. The 2000 Census data provides only White, Black, Native American, Asian, and Other Race as an ethnicity category. Hispanics were not categorized by race.

Table 2-15
Ethnicity

Ethnicity	**1980 Number/Percent**		**1990 Number/Percent**		**2000 Number/Percent**	
White	6,750	40.9	5,521	24.3	10,157	26.2
Hispanic	N/A	N/A	N/A	N/A	18,198	49.9
Black	505	3.1	534	2.3	2,193	5.6
Native American	134	0.8	134	0.6	352	1.0
Asian/Pacific Islander	2,418	14.7	4,903	21.5	6,187	15.9
[5]Other Race	6,684	40.5	11,670	51.3	-----	------
Two or More Races	-------	------	------	------	1,73	4.4
Total	**16,491**	**100**	**22,762**	**100**	**38,824**	**100**
Hispanic Origin Any Race	9,464	57.4	14,214	59.3	N/A	N/A

Source: 1980, 1990, and 2000 Census

[5] In the 1980 and 1990 Census Hispanics were categorized under "Other Race"

The race and Hispanic origin categories were used by the Census Bureau and were mandated by the Office of Management and Budget Directive. As of the 2000 Census, there were eight race-ethnicity categories that also fell into the non-Hispanic or Hispanic category. This revised method treats race and ethnicity as to separate and distinct categories.

The White category represented a majority of the overall population during 1980 and 1990. In 2000, the Hispanic category was reported as representing a majority of the population with 18,198 persons or 49.9 percent of the population. Of notable change is the Asian/Pacific Islander category that shows a steady increase since 1980.

Public Transit System

Public transit information is important to the analysis of impediments to fair housing, as access to public transit is of paramount importance to households affected by low incomes and rising housing prices. Public transit should link lower 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.

Delano offers both a fixed route service and a demand response service for local area residents. The primary fixed route system is known as Delano Area Rapid Transit (DART). The demand-response service is known as Dial-a-Ride (DAR). Both of these services are maintained and operated within City limits by the City's transit division.

Delano Area Rapid Transit

DART was initiated in 1995, as recommended by the Final Transportation Development Plan for the City of Delano (Max P. Bacerra & Associates, June 1991). The DART system is comprised of four fixed routes covering the entire City. The service offers 30-minute headways and includes an average of 12

bus stops per route. Each fixed route begins and ends at the newly constructed Transit Center.

DART operates from 6:30am to 5:26pm Monday through Friday, and from 8:30AM to 4:30PM on Saturdays and select holidays. Service is not offered on Sundays. The DART system is designed to accommodate several types of riders. As a reflection of this, the fare structure has special rates for senior citizens, persons with disabilities and children. Table 2-16 shows the current fare structure used by the system:

Table 2-16
DART Fare Structure

DART Fixed Route Fares	
Fare Category	**New Fare - Effective 04-08-08**
Adult 19-64 Years Old	$1.00
Youth 6-18 Years Old	75 cents
Seniors (age 65 years old or older)/ Persons with Disabilities/ Medicare Card Holders/Certified ADA Paratransit Rider	50 cents
Personal Care Attendant	FREE
Children Under 6 (Up to 2)	FREE
Additional Children (More than 2)	75 cents
Transfers between other DART Routes	FREE
Special Service Fares	$1.00

Source: DART Customer Brochure

Dial-A-Ride (DAR)

The DAR service has been operated by the City of Delano since 1988. Prior to 1988, the service was operated by Gilbert Transportation. The DAR system's fleet consists of five ADA compliant vans. DAR service is principally provided for ADA compliant persons and those aged 60 and over. However, the general public can also access the service. DAR serves both the entire City of Delano and the nearby surrounding county areas.

The DAR service features both a demand response service and a reservation service. For the reservation service, patrons can call and request a ride up to two weeks in advance with notice up to 24 hours in advance. For either service, patrons call the main dispatch phone number to get an immediate ride, or to reserve a ride; depending on the availability of drivers and vehicles, dispatch sends a unit to the patron's address.

Similar to DART, the DAR system is designed to accommodate several types of riders. The DAR service offers special fare rates for senior citizens, persons with disabilities, students, and children. Table 2-17 illustrates the fare structure used by the DAR system.

Table 2-17
DAR Fare Structure

Fare Category for City of Delano & Unincorporated County Area	Fare Amount
General Fare 6-64 years old	$1.75
Seniors (age 65+, persons w/ disabilities, Medicare card holder Certified ADA Paratransit Rider	$1.00
Personal Care Attendant	FREE
Seniors traveling to & from the Senior Nutrition Program	FREE
2 Children under the age of 6	FREE
Additional Children (more than 2)	$1.75
Transfers from Delano Area Dail-A-Ride to DART Routes	FREE

Impact on Fair Housing Choice

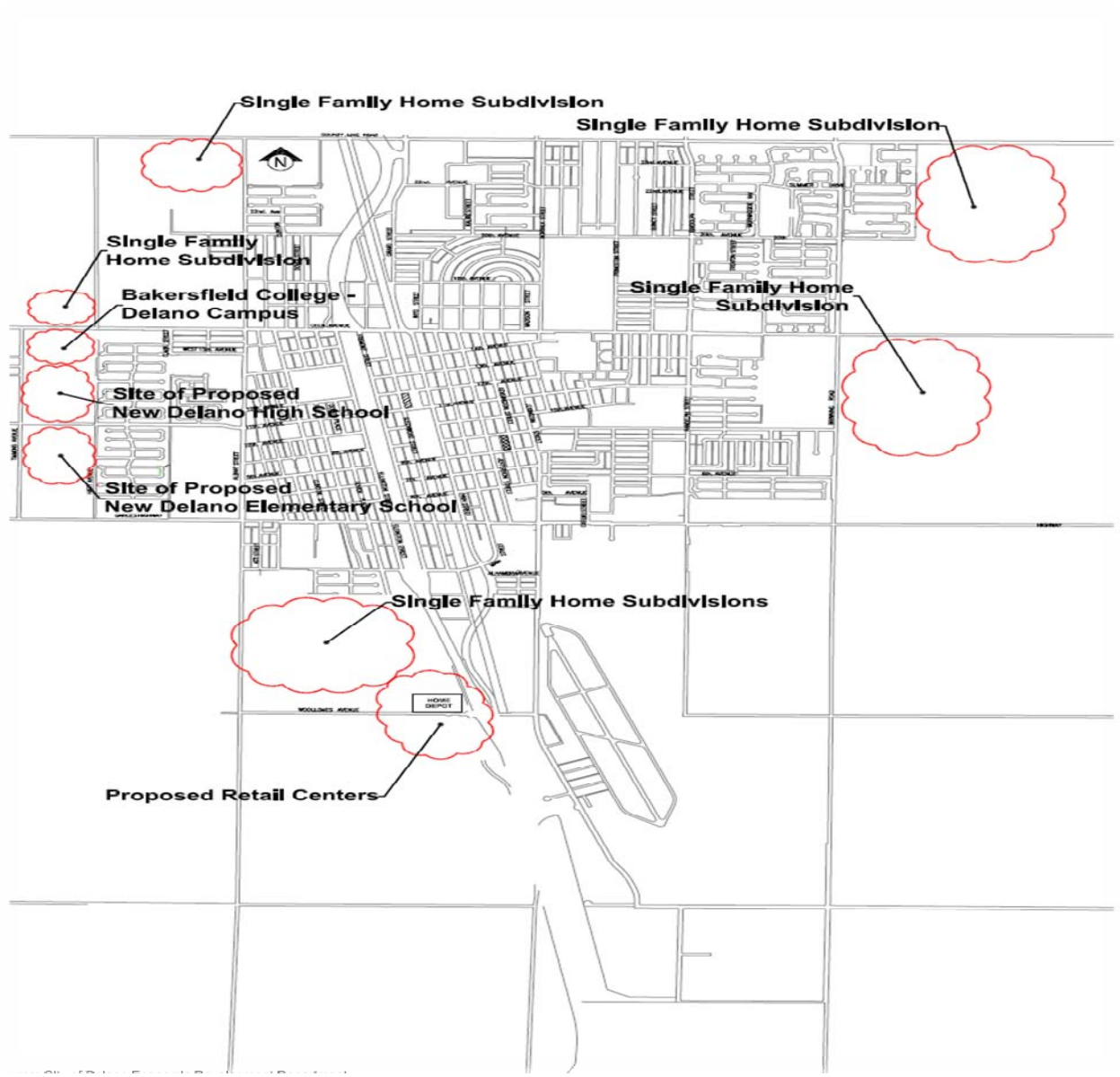
While DART does extend pass the City of Delano's' urban core into some outer-lying areas, it does not adequately cover all communities within the City. For example, DART does not currently cover new growth areas on the northern and southern most fringes of the City. This is evidence in a recent survey conducted for the City of Delano's 5 Year Transportation Plan which 13 percent of riders indicated that they walk more than 2 miles as their final destination after leaving the bus[6].

DART's limited transportation service market could have a negative impact on lower income residents throughout the region. The restricted service market limits opportunities in three ways. First, it limits the ability of those who don't have cars and who live in the urban core to access jobs, services and amenities that exist in the suburban areas. For example, someone living in central Delano who did not have transportation could not access good-paying jobs at Home Depot and surrounding planned retail centers (Wollomes & Ellington Avenue). Second, people who reside in communities with no DART service are unable to travel without their own transportation. This means that persons who do not or cannot drive have limited access to the jobs, services and amenities in their communities or in other communities throughout the region. Third, businesses lose the benefit of the entire community as an employee or customer pool source. This is particularly

[6] **Transportation Development Plan for the City of Delano- 2005-2010**

crippling for businesses located in suburban or new developed area who would like to diversify their employee base. The lack of available public transportation restricts the potential employee market. However, it is important to note that, according to DART representatives, there is a planned bus route to cover this new growth area as well as a recently added fourth route to mitigated higher usage.

Figure 5
City of Delano Planned New Residential and Commercial Developments[7]



[7] Delano Transportation Development Plan (2005)

DAR transit allows individuals greater travel flexibility than DART. The large passenger vans go from door to door anywhere within the greater City of Delano area. To prevent duplication of services, DAR only covers transit routes not covered by DART. According to an interview with representatives, riders can schedule pick-ups months in advance. This is particularly helpful for riders who have automobiles under extended repair, and need a ride to and from work.

However, DAR is an ADA para-transit service that gives priority to riders with a disability. In the event of a capacity issue, DAR cannot guarantee pick-up to a non disable rider. Another potential problem to very lower income riders is the cost of fare. DAR can be more than twice the fare of DART. DART riders could pay up to $1.00 (with transfer) for a round trip. DAR roundtrip cost can be as much as $3.50 or $72 dollars more a month.

A final impact on fair housing choice is the scheduled hours of operation for transit services within the City of Delano. As stated earlier, public transit should ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs. Many riders may have trouble accessing certain jobs due to the limited transit schedule offered by both DART and DAR. Both transit systems stop service before 6pm and do not operate on Sundays. This is inconsistent with hours of operation for the City of Delano's top employers such as the Regional Medical Center, Kmart, Home Depot and Save Mart.

Public Assisted Housing

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

Section 8 Housing Programs

The Housing Authority of the County of Kern administers the Section 8 housing choice voucher and subsidized public housing programs for the City of Delano. The Section 8 Housing Choice Voucher Program provides rental subsidies to low-income families which spend more than 30 percent of their gross income on housing costs. The program pays the difference between 30 percent of the recipients' monthly income and the federally approved payment standard. According to the Housing Authority of the Kern, there are

107 Delano residents in receipt of a Section 8 Housing Choice Voucher. Recipients of Housing Choice Vouchers are able to find their own housing, including single-family homes, townhouses and apartments. Participants are free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.

The Section 8 Public Housing Program provides decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single family houses to high-rise apartments for elderly families. The program has the same income requirement as the Housing Choice Program. According to the Housing Authorities of the County of Kern, all public housing units are currently occupied or committed, leaving 372 Delano residents on the waiting list. Table 2-18 provides a wait-list distribution by race/ ethnicity. This distribution is consistent with the overall population distribution in the City, with Hispanics comprising the largest population group, followed by Whites. However, Whites and Asians are heavily underrepresented in the Section 8 public housing program in Delano, while American Indians are only slight overrepresented. African Americans are slightly underrepresented.

Table 2-18
Section 8 Public Housing Wait List Versus Delano Population by Race

Race/Ethnicity	% of Total Applications	% of Total Population
American Indian or Alaska Native	2.4%	1%
Asian	1.7%	15.9%
Black or African American	2.4%	5.6%
Hispanic	90%	49.9%
Whites	3.5%	26.2%
Total	**100%**	**100%**

Source: US Census 2000 and HMDA data, 2007

Affordable Housing Projects

Sunny View Phase 1
Low Income Housing Tax Credit Project -City of Delano

Apartment projects can receive housing assistance from a variety of sources to ensure that rents are affordable to lower-income households. In exchange for public assistance, owners are typically required to reserve a portion or all of the units as housing affordable to lower-income households. The length of use restrictions is dependent upon the funding program. The types of public assistance commonly used by owners when partnering with local jurisdictions are Home Partnership Investment Program (HOME) and Community Development Block Grant Program (CDBG). These funds are typically used in concert with Low Income Housing Tax Credits (LIHTC) to reduce the debt associated with a project, therefore maximizing affordability. Currently, the City of Delano does not have a partnership with private owners in use of their HOME/ CDBG funds. However there are several LIHTC projects located in the City.

The Low Income Housing Tax Credit Program (LIHTC) creates an incentive for private investment in low-income housing development by giving federal tax credits to investors. Private investors, such as banks and corporations, buy the tax credits from the affordable housing developer. The owner/ developer use these proceeds from the sale of tax credits, known as “equity,” to construct or rehabilitate housing. Investors receive a federal tax credit over a ten-year term. Currently, there are 10 LIHTC rental housing developments in the City of Delano, providing 529 affordable units to lower-income households, as illustrated in Table 2-19 below.

Table 2-19
Low Income Housing Tax Credits Location and Number of Units

Apartment	# of units	affordable units	Location
Sunny View	70	69	North 18th ave
Villas Santa Fe	81	80	Garces Hwy/ Main Street
Belmont Meadows	70	69	150 Belmont Street
Villas Del Sol	43	42	2020 Girard Street
Quincy Street Apt[8].	33	7	1626 Quincy Street
Jasmine Heights	128	128	851 22nd Avenue
Casa Hernandez Apartments	80	79	South Albany Ave
Casas del Valle / Housing Authority of Kern	35	35	Austin Street, Delano Court, and Belmont Street, South of First Avenue
Maganda Park	20	20	Balboa Street between First Avenue and Diaz Street
Total	**560**	**529**	

Source: California State Treasure

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, there are 17 State-licensed community care facilities located in Delano. The locations of these facilities are shown in Table 2-20.

[8] The Housing Authority has in escrow Quincy Street Apartments. The development just ended its 20-year compliance period under the HUD Housing Development Grant Program, and the Agency intends to preserve the property with affordable rents for families.

Table 2-20 Locations of Community Care Facilities in Delano

Facility Name	Street Address	Type
ADC 1	600 JEFFERSON ST	Adult Day Care
ADULT DEVELOPMENT CENTER II	612 MAIN STREET	
DELANO ASSN. FOR THE DEVELOPMENTALLY DISABLED #2	531 HIGH STREET	
POSITIVE SUPPORTS	618 MAIN STREET	
GUERRA FAMILY CARE HOME	1022 ALBANY	Adult Residential Care
MOORE SMALL FAMILY HOME	1101 AUSTIN STREET	
TERREL'S RESIDENCE	1818 - 7TH AVENUE	
TERREL'S RESIDENCE #2	1823 5TH PLACE	
TERREL'S RESIDENCE #3	2039 5TH PLACE	
TERREL'S RESIDENCE #6	918 BALBOA	
CASCADE VIEW CARE HOME	1834 CASCADE AVENUE	Residential Care for the Elderly
DELANO MANOR	2120 18TH AVENUE	
JVMA GUEST HOME	1960 BOREL STREET	
POSITIVE DIRECTIONS #9	329 EL CAMINO DRIVE	
RASAY CARE HOME	2308 VISTA COURT	
SANTA BARBARA MANOR	2239 SANTA BARBARA CIRCLE	
TERREL'S RESIDENCE #1	1610 5TH PLACE	

Source: State of California Community Care Licensing Division, 2009

Table 2-21 summarizes the facilities by type and capacity. Delano currently contains three types of facilities: adult day care, adult residential care, and residential care for the elderly. These facilities have a total capacity for 82 persons in 24-hour care and 259 adults in day care programs.

Table 2-21
Community Care Facilities

Type Facility	Description	Facilities	
		No.	Capacity
Adult Day Care	Day care programs for frail elderly or developmentally/mentally disabled adults	4	259
Adult Residential Care	Facilities that provide 24-hour non-medical care for disabled adults ages 18 through 59, who are unable to provide for their daily needs	6	34
Residential Care Elderly	Provides care, supervision, and assistance with activities of daily living for persons older than 60 years of age	7	48

Source: State of California Community Care Licensing Division, 2009
Note: Categories are not mutually exclusive

CHAPTER 3
MORTGAGE LENDING PRACTICES

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

Background

Discriminatory practices in home mortgage lending have evolved in 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 more subtle. While mortgage loans are readily available in low-income minority communities, by employing high pressure sales practices and deceptive tactics, some mortgage brokers push minority borrowers into higher-cost subprime mortgages that are not well suited to their needs and can lead to financial problems. Consequently, 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, fair lending practices were not always employed by financial institutions. Credit market distortions and other activities such as redlining prevented some groups from equal access to credit. The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community. The CRA is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low- and moderate-income neighborhoods. The CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That

record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions.

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

Detailed HMDA data for conventional and government-backed home purchase and home improvement loans in Delano are presented in Tables 3-18 through 3-19. HMDA data provides some insights regarding the lending patterns that exist in a community. However, the data are only an indicator of potential problems; the data lack the financial details of the loan terms to conclude definite redlining or discrimination exists.

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.

Conventional Home Loans

Home Purchase Loans

According to the 2007 HMDA data, 3032 households (Table 3-22) applied for conventional or government backed home loans in the City of Delano that year. Of this number, 2399 loans were approved, an approval rate of nearly 80 percent. This rate was higher than the 75% percent rate of approval in the Bakersfield Metropolitan Statistical area at large, of which Delano is a part.

Table 3-22
Disposition of Home Purchase Loan Applications by Race of Applicant: 2007

Race/ Ethnicity	Total Applications	Approved	Amount*	Denied	Amount
American Indian or Alaska Native	67	53	$ 8,608	14	$2,286
Asian	372	278	$ 49,310	94	$16,472
Black or African American	19	15	$ 2,776	4	$977
Hispanic	1736	1356	$ 217,508	378	$61,567
Native Hawaiian or Other Pacific Islander	118	93	$ 16,759	25	$4,780
White	220	186	$ 31,919	34	$6,604
Not Applicable/ Not Provided	500	418	$74,988	82	$14,592
Totals	**3032**	**2399**	**$401,868**	**585**	**$113,873**

Source: 2007 Data- Home Mortgage Disposition Act (HMDA)
*Amounts are in millions

Among ethnic groups, Hispanics had the highest proportion of loan applications, with more than 57 percent, followed by Asians with 12 percent, and Whites with 7 percent. The high proportion of applications from Hispanics is consistent with the large Hispanic population in the community. Similarly, the percentage of applications from Asian households is proportional to the City's population of Asian households. However, White households comprised nearly 26 percent of the City's population in 2000 but only 7 percent of loan applications in 2007.

The majority (88 percent) of loan applications were received from households earning 120 percent or more than the median income. However, approval rates were actually higher for households earning incomes between 50 and 120 percent of the median income. Households earning less than 50 percent of the median income had the lowest approval rates and the highest rates of denial.

The HMDA data reveals a drastic shift since 1999, when nearly half of the applications for conventional home purchase loans were received from low-income and moderate-income applicants. The sharply increasing housing prices that occurred in the first part of the decade priced many lower-income applicants out of the housing market.

Table 3-23
Percent of Disposition Home Purchase Loans by Race Versus Delano Population by Race

Race/Ethnicity	% of Total Applications	% of Total Population
American Indian or Alaska Native	2.2%	1%
Asian	12%	15.9%
Black or African American	0.6%	5.6%
Hispanic	57%	49.9%
Native Hawaiian or Other Pacific Islander	3.9%	--------
Whites	7%	26.2%
Not applicable/	17.84	1.4%
Total	**100%**	**100%**

Source: US Census 2000 and HMDA data, 2007

According to Table 3-23, there is no significant under-representation amongst African – Americans, Asians and American Indians' in the homeownership market within the City of Delano, varying not more or less than 7 percent. Conversely, Whites are significantly under-represented in the homeownership market with a percentage difference of 19.2 percent less than their total population, the highest amongst all Race/ Ethnic groups.

An analysis of differences in loan approval rates by race/ethnicity and income separately does not always reveal important differences among groups. In fact, all ethnic/ race applicants within the City of Delano had a significantly high approval rate (73 percent). For this reason, an analysis of lending patterns for both race/ethnicity and income together helps reveal differences among applicants of different races/ethnicities of the same income levels. While this analysis provides a more in-depth look at lending patterns, it still cannot provide a reason for any discrepancy. Aside from income, many other factors can contribute to the availability of financing, including credit history, the availability and amount of a down payment, and knowledge of the home buying process, among others. The HMDA data does not provide insight into

these and many other factors. However, the City should continue to monitor the approval rates among racial and ethnic groups, and continue to take appropriate actions to remove barriers to financing, including credit counseling, down payment assistance, and home buyer education programs.

Conventional versus Government-Backed Home Loans

Usually, low-income households have a much better chance of getting a government-assisted loan than a conventional loan. However, the recent lending market offered sub-prime loan options such as zero percent down, interest-only, and adjustable loans. As a result, government-backed loans have been a less attractive option for many households. According to 2007 HMDA data, 99 percent of all home purchase loans were conventional within the City of Delano. With the recent difficulties in the sub-prime housing market, however, this option is no longer available, and many households are facing foreclosure. In response, the federal government in September 2007 created a government-insured foreclosure avoidance initiative, FHASecure, to assist tens of thousands of borrowers nation-wide in refinancing their sub-prime home loans.

According to 2007 HMDA data, less than 1 percent (18) of all home purchase applications that year within the City of Delano were government- backed loans. Of this percentage, only 61 percent were approved, which is a lower than the 80 percent approval rate of all home purchase applications that year. As government-backed loans are again publicized and subprime loans are less of an option to borrowers, the increased use of government-backed loan applications is likely. However, expanded marketing to assist potential homeowners in understanding the requirements and benefits of these loans may be necessary.

Sub-prime 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. “Sub-prime” loans are loans to borrowers who have less-than-perfect credit history, poor employment history, or other factors such as limited income. By providing loans to those who do not meet the credit standards for borrowers in the prime market, sub-prime 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 credit sources, may be otherwise unable to purchase a home. The sub-prime loan market

offers these borrowers opportunities to obtain loans that they would be unable to realize in the prime loan market.

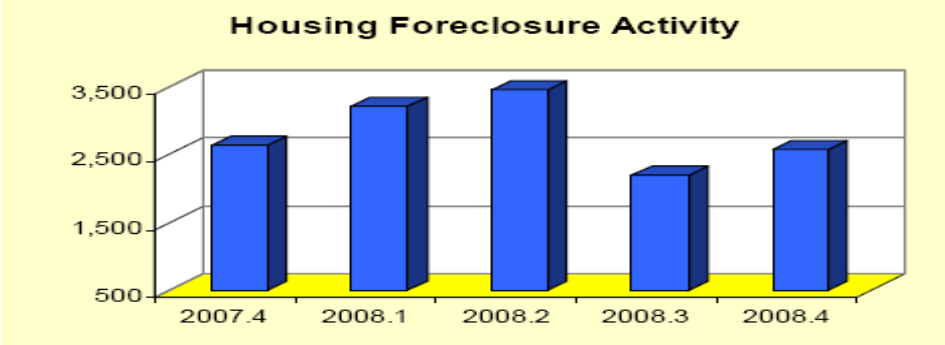
Sub-prime lenders generally have interest rates that are higher than those in the prime market, and often lack the regulatory oversight required for prime lenders because they are not owned by regulated financial institutions. In the recent past, however, many large and well-known banks became involved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

While sub-prime lending cannot in and of itself be equated with predatory lending, studies have shown a high incidence of predatory lending in the sub-prime market[9]. Unlike in the prime lending market, overly high approval rates in the sub-prime market is a potential cause for concern when the target clients are considered high risk. Many large banks have also been involved in the subprime market but are not identified as subprime lenders exclusively. The HMDA data does not provide information on which loans were sub-prime loans. As such, analysis on this topic is difficult. However, the high approval rate of any lending institution within the City of Delano may indicate a concern related to overly aggressive lending practice.

Beginning in 2006, increases in interest rates resulted in an increased number of foreclosures for households with sub-prime loans when a significant number of subprime loans with variable rates began to convert to fixed-rate loans at much higher interest rates. The number of mortgage default notices filed against homeowners reveals foreclosure rates in specific areas. In the fourth quarter of 2008, Kern County's foreclosure activity accelerated from 2,196 to 2,566. As a result, 370 (or 16.8 percent) more homeowners received notices of loan default from their mortgage bankers. Of those receiving default notices, 1,512 (or 58.9 percent) lost their homes. Compared with four quarters ago, the foreclosure activity was slowed 2.5 percent (Figure 6).

[9] *Stolen Wealth, Inequities in California's Subprime Mortgage Market*. California Reinvestment Committee. November 2001.

Figure 6 -Kern County Housing Foreclosure Activity 2007-2008



According to a City of Delano Realtor participating in the Citizen Advisory Committee, the foreclosure market is the "only" market in Delano. In support of this statement, as of April 20th, 2009 there were 322 foreclosed homes advertised for sale versus only 61 resales. There were no new homes listed[10].

Predatory Lending

With an active housing market, potential predatory lending practices by financial institutions may arise. Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. The predatory practices typically include high fees, hidden costs, and unnecessary insurance and larger repayments due in later years. One of the most common predatory lending practices is placing borrowers into higher interest rate loans than called for by their credit status. Although the borrowers may be eligible for a loan in the "prime" market, they are directed into more expensive and higher fee loans in the "sub-prime" market. In other cases, fraudulent appraisal data is used to mislead homebuyers into purchasing over-valued homes, or fraudulent or misrepresented financial data is used to encourage homebuyers into assuming a larger loan than can be afforded. Both cases almost inevitably result in foreclosure.

In recent years, predatory lending has also penetrated the home improvement financing market. Seniors and minority homeowners are the usual targets. In general, home improvement financing is more difficult to obtain than home purchase financing. Many homeowners have a debt-to-income ratio that is too high to qualify for home improvement loans in the prime market and become targets of predatory lending in the sub-prime market. Seniors are often swindled into installing unnecessary devices or

[10] Delano, CA Real Estate Market Snapshot- Yahoo Real Estate Research

making unnecessary improvements that are bundled with unreasonable financing terms.

Predatory lending is a growing fair housing issue. Predatory lenders who discriminate get some scrutiny under the Fair Housing Act of 1968, which requires equal treatment in terms and conditions of housing opportunities and credit regardless of race, religion, color, national origin, family status, or disability. This applies to loan originators as well as the secondary market. The Equal Credit Opportunity Act of 1972 requires equal treatment in loan terms and availability of credit for all of the above categories, as well as age, sex, and marital status. Lenders that engage in predatory lending would violate these Acts, if they target minority or elderly households to buy higher priced and unequal loan products; treat loans for protected classes differently than those of comparably credit- worthy White applicants; or have policies or practices that have a disproportionate effect on the protected classes.

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

The State of California has enacted additional measures designed to stem the tide of predatory lending practices. A law (Senate Bill 537) signed by Governor Gray Davis provided a new funding mechanism for local district attorneys' offices to establish special units to investigate and prosecute real estate fraud cases. The law enabled county governments to establish real estate fraud prosecution units[11]. Furthermore, Governor Davis signed AB 489 in October 2001, a predatory lending reform bill. The law prevents a lender from basing the loan strictly on the borrower's home equity as opposed to the ability to repay the loan. The law also outlaws some balloon payments and prevents refinancing unless it results in an identifiable benefit to the borrower.[12]

Predatory lending and unsound investment practices, central to the current home foreclosure crisis, are resulting in a credit crunch that is spreading well beyond the housing market, now impacting the cost of credit for local government borrowing, as well as local property tax revenues. In response, the U.S. House passed legislation, HR3915, which would prohibit certain

[11] Consumers Union, *The Hard Sell: Combating Home Equity Lending Fraud in California Part I*, 1998.
[12] Consumers Union, "Governor Davis Signs Predatory Lending Reform, October 11, 2001.

predatory lending practices and make it easier for consumers to renegotiate predatory mortgage loans. The Senate introduced similar legislation in late 2007 (S2452).

Chapter 4
PUBLIC POLICIES AND PRACTICES

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

City Policies and Programs Affecting Housing Development

The Delano General Plan Housing Element and other elements, Zoning Code, Consolidated Plan, and other documents have been reviewed to evaluate the following potential impediments to fair housing choice and affordable housing development:

- Local zoning, building, occupancy, and health and safety codes
- Public policies and building approvals that add to the cost of housing development
- Moratoriums or growth management plans
- Residential development fees
- Administrative policies affecting housing activities or community development resources for areas of minority concentration, or policies that inhibit employment of minorities or individuals with disabilities
- Community representation on planning and zoning boards and commissions

Zoning, Building, Occupancy, and Health and Safety Codes

General Plan and Zoning Ordinance

Higher-density housing reduces land costs on a per-unit basis and thus facilitates the development of affordable housing. Restrictive zoning that requires unusually large lots and building size can substantially increase housing costs and impede housing production. While housing affordability alone is not a fair housing issue, many low- and moderate-income households are disproportionately concentrated in groups protected under the fair housing laws, such as persons with disabilities and persons of color. When the availability of affordable housing is limited, indirectly affecting the housing

choices available to groups protected by fair housing laws, fair housing concerns may arise.

The General Plan Land Use Element provides a range of residential development opportunities that are implemented through the City's existing R-1, R-2, and R-3 zones, as shown in Table 4-24. Housing supply and costs are affected by the amount of land designated for residential use and the density at which development is permitted. Two-thirds of the acreage in Delano is designated for residential use.

Table 4-24
Residential Land Use Designations

General Plan Land Use Category	Corresponding Zone Districts	Typical Residential Types
Low Density Residential	R1	Single-family detached residential development
Medium Density Residential	R2	Attached or detached units, often single-family residences, duplexes, triplexes, and four-plexes
High Density Residential (HDR)	R3- CPD	A variety of multi-family housing types, including garden style units, townhouses, apartments, and condominiums

Source: City of Delano General Plan Land Use Element 2007

The Zoning Ordinance establishes lot dimension and setback requirements for structures in each residential zoning district. The required front setback is 20 feet to the garage and 25 feet to the front of the house in R1 zoned districts. Table 4-25 shows the Zoning District Development Standards for Residential Zones in the City. Table 4-26 shows the Zoning District Development Standards for Commercial Zones in the City. Delano's requirements for on-site improvements as expressed in the Zoning Ordinance are typical of California communities, and are not considered to be unusually restrictive as a constraint on the development of housing.

Table 4-25 - Zoning District Development Standards (Residential Zones)

		R-A	R-1	R-2	R-3
1. Minimum lot area (Net area in sq ft)	a. interior b. corner	108,900 108,900	6,000 6,500	9,000 9,500	12,000 12,500
2. Minimum lot width	a. interior lot b. corner lot	200' 200"	60' 65'	75' 80'	90' 100'
3. Minimum lot depth		400'	100'	100'	100'
4. Minimum front yard set-back a. Lot adjacent to a straight street b. Cul-de-sac lot or knuckle lot		 40' 40'	 25' 20'	 20' 20'	 20' 20'
5. Minimum interior side yard setback a. 1 story b. Any portion of a structure exceeding 1 story c. Cul-de-sac lot or knuckle lot		 25' 25' 25'	 5' 5' 5'	 5' 10' 5'	 5' 10' 5'
6. Minimum street side yard setback: a. corner lot b. reverse corner lot		 30' 30'	 10' 15'	 15' 10'	 15 15
7. Minimum rear yard setback: a. Lot with alley b. Lot with no alley		 N/A 40'	 5' 10'	 5' 10'	 5' 10'
8. Maximum lot coverage		25%	40%	50%	60%
9. Maximum height for buildings and structures		50'	35'	35'	35'
10. Minimum distance between buildings		10'	10'	10'	10'
11. Minimum dwelling unit size (square feet) For Apts. See Notes below		1,450	1,100	650	650

Source: City of Delano Municipal Code Title 20- Chapter 20.4

Table 4-26 Zoning District Development Standards (Commercial Zones)

REQUIREMENT	GC	NC	DC
1. Minimum site area (square feet, net)	6,500	6,500	5,000
2. Minimum site width (in feet)	65	65	50
3. Minimum site depth (in feet)	100	100	100
4. Front building setback (in feet)	0	0	0
5. Side street building setback (in feet)	0	0	0
6. Rear setback (in feet)	0	0	0
7. Maximum Floor Area Ratio	0.50	0.50	0.50
8. Maximum building height (in feet)	45	35	35

Source: City of Delano Municipal Code Title 20- Chapter 20.4

Family Definition

A City's zoning ordinance can restrict access to housing for relations failing to qualify as a "family" by the definition specified in the document. Even if the ordinance provides a broad definition, deciding what constitutes a "family" should be avoided by cities to prevent confusion or give the impression of restrictiveness. Particularly, when the zoning ordinance uses terms such as "single family homes, defining "family" in too-detailed terms may restrict access to housing for certain segments of the population.

California court cases have ruled that an ordinance that defines a "family" as (a) an individual, (b) two or more persons related by blood, marriage or adoption, or (c) 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 a jurisdiction, and therefore violates rights of privacy under the California Constitution. A zoning ordinance also cannot regulate residency by discrimination between biologically related and unrelated persons.

The Delano Zoning Ordinance defines a family as "A *household* consisting of two or more persons who are related by blood or marriage or who constitute

a single bona fide housekeeping unit". This definition does not violate any fair housing laws.

Density Bonuses

A density bonus can be an important tool to encourage a diversity of housing types and prices, particularly affordable housing for families and seniors. The California Government Code Section 65915 requires that cities grant density bonuses of 20 to 35 percent, depending on the amount and type of affordable housing provided. The density bonus regulations allow for exceptions to applicable zoning and other development standards to further encourage development of affordable housing.

Developers may seek a waiver or modification of development standards that have the effect of precluding the construction of a housing development meeting the density bonus criteria. The developer must show that the waiver or modification is necessary to make the housing units economically feasible.

The State density bonus regulations also include incentives and concessions. A developer can receive an incentive or concession based on the proportion of affordable units for target groups. Incentives or concessions may include, but are not limited to, a reduction in setback and square footage requirements or a reduction in the ratio of vehicular parking spaces that would otherwise be required, which results in identifiable, financially sufficient, and actual cost reductions.

The City of Delano in 1990 adopted a density bonus ordinance in accordance with the existing provisions of State law. The ordinance provides for a 25 percent density bonus for housing development that will meet one of the following qualifications:

- Housing Development for Lower Income Households: At least 20 percent of the units must be for lower income households.

- Housing Development for Very Low Income Households: At least 10 percent of the units must be for very low-income households.

- Housing Developments for Senior Citizens: At least 50 percent of the units must be for qualifying senior citizen residents.

The ordinance states that a development will be given either a density bonus of 25 percent over the otherwise maximum allowable residential density under the General Plan and zoning ordinance or the City will provide other

incentives of equivalent financial value based upon the land cost per dwelling unit. Density bonuses are negotiated on a case-by-case basis between the City of Delano and the developer. Where a development meets these qualifications, the ordinance requires the City to provide at least one other regulatory concession and/or incentive, unless a finding is made that the additional concession and/or incentive is not required to provide the affordable housing.[13]

Parking Requirements

When parking requirements are high, housing development costs tend to increase, restricting the range of housing types available in a community. Typically, the concern for high parking requirements relates only to multi-family housing. For single-family developments, the Zoning Ordinance requires two parking spaces within an enclosed garage. Multi-family residential parking requirements vary depending on number of bedrooms. One bedroom units require 1.5 parking spaces while 2 bedroom units require 2 parking spaces. Table 4-27 provides further details regarding parking for residential development.

Table 4-27 - Residential Off-Street Parking Standards

[13] Source: City of Delano General Plan Land Use Element 2003

Use	Minimum Off-Street Parking Requirements	Maximum % Compact Uses	Notes
A. RESIDENTIAL USES			
1. Single Family Dwelling	2 spaces per unit[1,2]	None	[1] Must be provided within an enclosed garage. [2] Units which meet State requirements for 2nd units shall provide an additional parking space.
2. Multi-Family Dwelling			
a. Resident Parking[3,4,5,6]	Studio: 1 space per unit 1 bedroom: 1.5 spaces per unit 2 or more bedrooms: 2 spaces per unit	None None None	[3] All parking spaces shall be assigned to a specific unit. [4] Enclosed garage may be required if project qualifies as a discretionary permit.
b. Guest Parking	0.25 spaces per unit for 11 or more units; no guest parking for 10 or less units	50%	[5] All spaces shall be located within 150 feet of the unit being served. [6] The parking requirement shall be reduced to 1 space per unit pursuant to a Density Bonus granted for a Qualifying Residents Project in accordance with the provisions of section 20.10.80.
3. Senior Housing: Independent Living			
a. Resident Parking	1 space per unit[7]	None	[7] Spaces shall be covered, and may be either a carport or garage.
b. Guest Parking	0.25 spaces per unit[8]	50%	[8] Guest spaces may be uncovered.
4. Senior Housing: Congregate Care			
a. Resident Parking	0.5 spaces per unit or as determined by the Planning Agency.[9, 10]	50%	[9] Applicant shall submit a parking study pursuant to the requirements of section 20.13.20. [10] For multiple family units, the parking shall be within 150 feet of the dwelling it is serving.
b. Guest Parking	0.25 spaces per unit.	50%	

Source: City of Delano General Plan Land Use Element 2003

Table 4-27 continued

Use	Minimum Off-Street Parking Requirements	Maximum % Compact Uses	Notes
5. Mobilehome Parks and Subdivisions			
a. Resident Parking	2 spaces per unit[11]	None	[11] Tandem spaces may be permitted to meet parking requirements for a mobilehome park.
b. Guest Parking	1 space per five (5) units.	None	
6. Model Home Complexes	3 spaces per model home plus 1 space per salesperson[12, 13]	None	[12] On-street parking adjacent to the model homes may be counted toward the parking requirement if it is found that such parking will not impact other residential parking and will not obstruct traffic flow. [13] Spaces for salespersons may be provided in vacant garages of model homes.

Building Codes

Building codes are not a serious constraint to residential development. Building inspections in Delano are conducted by the City's building inspectors,

for approval of new construction for occupancy, and to respond to specific complaints. New construction is required to meet the standards of the Uniform Building Code, which was last revised in 1997.

Minimum Size Requirements for Dwelling Units and Rooms

The City of Delano maintains minimum size requirements for dwelling units. There are no local amendments added to the Uniform Building Code. The minimum size for dwelling units is measured on the outside of walls, and excludes basements, garages, carports, exterior courtyards, and porches. These are modest requirements and are substantially smaller than what is currently being produced in market rate housing. Minimum dwelling unit sizes are as follows:

Single-family detached Homes:.....1150 square feet

Dwelling units within a multifamily structure:
1 Bedroom.....650 square feet
2 Bedrooms.....800 square feet
For each additional Bedroom in excess of 2.....120 square feet

"Efficiency" apartments (450 square feet) are permitted in areas designated in the General Plan for "Medium," "Medium High," and "High" density residential development.

The City's minimum room size standards are as follows:

Room Minimum Room Size
Bedroom.....100 square feet
Full bath (tub, toilet, and lavatory).....50 square feet
Three-quarter bath (stall shower toilet, and lavatory).....35 square feet
Half bath (toilet and lavatory).....25 square feet

These standards are modest, and do not unreasonably add to the cost of housing within the City.

Variety of Housing Opportunity

To ensure fair housing choice in a community, a zoning ordinance should provide for a range of housing types, including single-family, multi-family, second dwelling units, mobile homes, licensed community care facilities, assisted living facilities, emergency shelters, and transitional housing.

Mobile Home and Manufactured Housing Development Standards

The City of Delano permits manufactured dwellings to be used as single-family residences outside of designated mobile home parks if the home is certified under the National Mobile Home Construction and Safety Act of 1974, and if it meets the following standards:

Cypress Gardens Mobile Home
1 of 4 mobile Home Parks in Delano

- Front yard. No building structure or vehicle, except a recreation building, erected on or moved onto a lot shall have a height greater than one story or which exceeds 15 feet.

- Rear yard. There shall be a rear yard depth of not less than 5 feet, or 15 feet when adjacent to any residential zone.

- Roofed area. The total roofed area including mobile home and accessory buildings or structures shall not exceed 60 percent of the net area of the lot.

- Side yard. There shall be a side yard of at least five feet on either sides, or 15 feet when adjacent to any residential zone.

- Access. The subdivision shall have at least two means of ingress or egress leading to a public street.

These standards permit the placement of mobile homes that comply with federal HUD standards to be sited on single-family lots upon permanent foundations. The intent of the ordinance is to ensure that mobile home units are structurally safe and conform to (but not to exceed) the design standards of the neighborhood.

Second Dwelling Units

Within R1, R2 and R3 density residential zoning districts, the City permits an additional dwelling unit to be sited on a parcel subject to approval of a Conditional Use Permit and the following standards:

- The conversion of a portion of a single-family unit whereby cooking facilities are not shared in common.

- The addition of a separate unit onto the existing single-family unit.
- The creation of a separate detached unit on the lot or parcel in addition to the existing single-family unit.
- A detached mobile home or manufactured housing unit may be used as a second unit provided it is placed on a permanent foundation and meets all the requirements of Division 3, Chapter 7 of the Delano Zoning Ordinance.
- The second unit shall clearly be a subordinate part or accessory to the existing single-family dwelling located on the lot or parcel. The second unit shall not be more than 60 percent of the existing single-family dwelling nor shall it ever exceed 1,200 square feet in size or contain more than 2 bedrooms. The minimum size for a second dwelling unit is 300 square feet of living area.
- The second unit must maintain the scale of adjoining residences and blend into the existing setting by use of appropriate building form, height, materials, colors and landscaping appropriate to that setting.
- No more than one second unit may be created within a single-family dwelling.
- One additional paved off-street parking space shall be provided for the second unit, which is in addition to the off-street parking requirements for the principal single-family home.
- The additional dwelling is required to be metered separately from the main unit for gas, electricity, and water/sewer services.

Emergency and Transitional Housing

Emergency shelters provide short-term shelter (usually for up to six months of stay) for homeless persons or persons facing other difficulties, such as domestic violence. The Zoning Ordinance does not currently contain provisions for emergency housing. Transitional housing provides longer-term housing (up to two years), coupled with supportive services such as job training and counseling, to individuals and families who are transitioning to permanent housing.

Recent revisions to State law require jurisdictions to identify adequate sites for housing that 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 (Section 65583(c)(1) of the Government Code). State HCD and subsequent court decisions have interpreted this as a requirement for local governments to specify which zone(s) permit such facilities, and implement permit processes that both facilitate and encourage the development of such housing. To facilitate the development of emergency housing and comply with State law[14], the City will amend the Zoning Ordinance to permit emergency shelters by right in a specific zone. The City will continue to allow the establishment of transitional and supportive housing that function as residential uses in residential zones, with processes consistent with those of similar residential uses.

Supportive Housing

Consistent with State law, the City facilitates the development of supportive housing in the form of residential care facilities by treating licensed facilities that serve six or fewer persons as standard residential uses. In addition, the City conditionally permits small residential care facilities (six or fewer persons) in some commercial zones. Large residential care facilities serving seven or more persons and nursing homes are conditionally permitted in the R-3 zone, as well as a number of commercial zones.

Public Policies and Programs Concerning Community Development and Housing Activities

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

The City of Delano prepared the existing Housing Element in 2003, and HCD found that the element was in compliance with State housing element law. The City is currently updating the Housing Element, and anticipates that a draft will be completed by September 2009. According to the 2003 Housing

[14] On October 15, 2007, Governor Arnold Schwarzenegger signed into law SB 2 which amends Government Code Sections 65582, 65583, and 65589.5 of State Housing Element Law. This legislation requires local jurisdictions to strengthen provisions for addressing the housing needs of the homeless, including the identification a zone or zones where emergency shelters are allowed as a permitted use without a conditional use permit. This legislation took effect January 1, 2008 and will apply to jurisdictions with housing elements due June 30, 2008 and after.

Element, the Delano City Council has identified several goals and programs relating to housing in the community:

Goals	Programs
Goal 1 Provide a diversity of housing opportunities to enhance the City's living environment and to satisfy the shelter needs of Delano residents	• **Biennial Evaluation:** Conduct a biennial update of the City's inventory of available sites, and take appropriate action to ensure an ongoing supply of available sites at appropriate densities to meet projected housing needs. Actions to ensure an adequate supply of housing sites include changing the zoning on vacant parcels that are zoned non-residential. • **Second Unit/Accessory Units:** Actively encourage the use of second units in single-family residential areas in meeting the City's low- and moderate-income housing objectives where such second units would neither adversely affect nor alter the character of the surrounding single-family neighborhood. • **Monitor At-Risk Projects:** One year prior to each required Housing Element update, determine the status of financial incentives for assisted housing projects to determine whether income restrictions on such projects are "at risk" of being lifted, thereby terminating the "affordability" of the project. • **Housing Rehabilitation Program:** Assist applicants in accessing home rehabilitation loans for low- and moderate-income housing, and self-help housing projects. • **Community Education Regarding the Availability of Rehabilitation Programs:** Provide information to very low- and low-income households and other special needs groups regarding the availability of rehabilitation programs through neighborhood and community organizations, and through the media. • **Housing Condition Survey:** Maintain a current housing condition survey of all housing units within the City. This survey should include the number of units in need of rehabilitation or replacement. • **Rental Rehabilitation Program:** Provide financial assistance to owners of rental property to rehabilitate substandard units to enable such units to remain affordable following rehabilitation. • **Energy Conservation Program:** In concert with Southern California Edison and The Gas Company, implement an energy conservation program.

Goal 2 Provide housing that is affordable to all economic segments of the community	• **Affordable Housing Program Inventory; Pursue Available Projects.** Explore and inventory the variety of potential financial assistance programs from both the public and private sectors to provide more affordable housing units. • **Partnership Program:** The City will meet regularly with non-profit, private and other public entities to examine opportunities for cooperative efforts to expand the City's supply of affordable housing. • **Support Non-Profit Housing Sponsors:** Support non-profit corporations in their efforts to make housing more affordable to very low and low-income households. • **Maintain a Streamlined Application Process:** Continue efforts to streamline and improve the development review process, as well as eliminate any unnecessary delays and restrictions in the processing of development applications. • **Density Bonus Ordinance:** Monitor statutory requirements for municipal density bonus requirements. • **Use of Density Bonuses:** Grant density bonuses for the provision of affordable housing units as required by State law as needed to meet the quantified objectives of the Housing Element. • **Priority Building Inspections for Affordable Housing Projects:** The City will give priority to low, very low-income, and large rental unit housing projects meeting identified housing needs for the building inspections that are carried out during various stages of the construction process. • **Community Information:** Undertake a program to provide information to the community about annual incomes for typical occupations and the equivalent "buying power" of these incomes in today's housing market, including the annual income ranges of "very low," "low," and "moderate" incomes, and of the typical occupations that fall into these categories. • **Marketing Materials:** Prepare marketing materials to be provided to the building industry, outlining opportunities for the development of new above moderate-income single-family housing within Delano. • **Meet with Potential Developers:** Actively seek out, prepare and distribute informational materials and conduct an annual meeting with potential developers of downtown infill sites, as well as potential developers of above moderate-income housing as a means of generating interest on their part to undertake residential projects within the City. • **Housing for Existing Very Low- and Low-Income Residents:** Utilize CDBG funds for infrastructure improvements and available Federal, State, and local housing development programs to undertake development of housing project for Delano's existing very low- and low-income households who are living in dwellings that are in need of replacement**.**

Goal 3
Provide equal housing opportunities for all residents of Delano.

- **Cooperative Association:** Continue to refer cases and questions to HACK for enforcement of prohibitions on discrimination in lending practices and in the sale or rental of housing. Additionally, the City will create a brochure for submitting complaints and will be available at City Hall in the Community Development Department.
- **Housing Opportunities for Special Needs Groups**: Provide housing opportunities to meet the special housing needs of farm workers (see also Program 3.2.4), elderly, disabled, large families, and the homeless (see also Program 2.1.1) by giving priority funding to development projects that include a component for special needs groups in addition to other lower-income households.
- **Coordination with Agencies serving the Homeless**: The City shall cooperate with public and private agencies to develop housing (including transitional housing), family counseling, transportation programs and employment programs/job referrals for the homeless.
- **Remove Constraints on the Production of Housing for Disabled Residents**: The City will analyze and determine whether its development policies and ordinances create any constraints on the development, maintenance and improvement of housing intended for persons with disabilities, consistent with Senate Bill 520, which was enacted January 1, 2002
- **Coordination with Agencies serving the Farm workers**: The City shall cooperate with public and private agencies to develop housing (including transitional housing), family counseling, transportation programs, and employment programs/job referrals for the farm workers (permanent and migrant).
- **Remove Constraints on the Production of Housing for Multifamily Residential:** The City will complete an ordinance text amendment to replace the Conditional Use Permit approval requirement for development of multiple family dwellings in R-2, R-3, and R-4 zones by a staff-administered Site Plan Review process, whereby development standards contained that are contained in the ordinance and those that are normally applied through the conditional use permit process will be applied by staff though a ministerial process.

Moratoriums/Growth Management

Delano does not have any building moratoriums or growth management plans that limit housing construction.

Development Fees/Assessments

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

State law requires that locally imposed fees not exceed the estimated reasonable costs of providing the service. The fees and exactions required of a development to pay for the public facilities associated with the residential development pose a potential constraint to housing production. Development impact fees and planning processing fees are two types of fees charged by the City of Delano and discussed in Table 4-28 below.

Table 4-28 Residential Development (as of 2009)

PROJECT	FEE	REMARKS
COMBINED DEVELOPMENT PROJECT If a project involves two or more entitlements, they shall be processed as a Combined Development Project. A Combined Development Project requires an initial deposit of $5,000. This would allow for recovery of costs related to Planning, Engineering, Public Works, Police; Transit; Community Services, and City Attorney. Work beyond the initial deposit would be on a Time and Materials basis. Should work on a CDP not require the funds deposited, the difference shall be refunded to the applicant. A monthly report will be supplied to the applicant so that funds will be replenished on a timely basis. Any outside services that may be required will be charged at the City's cost. Examples of Combined Development Projects: Annexation with Prezoning and Tentative Tract Map General Plan Amendment with Zoning Amendment Williamson Act Cancellation and Tentative Tract Map.		
ADVANCED PLANNING		
Annexations	$3,500	However, if the annexation is combined with a Williamson Act Contract cancellation, General Plan Amendment, prezoning, tentative map, etc. it will be treated as a Combined Development Project.
General Plan Amendment	$1,500 + $50 per acre	If the GPA is combined with a rezoning, it will be treated as a Combined Development Project.
General Plan Maintenance Fee	$100 per dwelling unit for new residential construction. $0.01 per square foot for new commercial and industrial construction	Fees collected are reserved for maintaining the General Plan and its elements. Permits for remodels, electrical, plumbing, roofing, and mechanical for existing construction are excluded from this Maintenance Fee.

Table 4-28 continued

PROJECT	FEE	REMARKS
STUFF WITH MAPS		
Tentative Parcel Map (not more than four parcels with a designated remainder)	$2,000	
Final Parcel Map	$500	
Parcel Map Waiver	$750	
Tentative Tract	$2,000 +$25 per lot (up to 150 lots) $5,000 deposit (if more than 150 lots)	
Tract Map – Final	$1,750	
Lot Line Adjustment	$500	
Certificate of Compliance	$400	
Time Extensions – Tentative Maps, Final Maps	$750	
Revisions of approved Tentative Parcel Map and Tentative Tract Map (includes design or conditions)	$1,100	Revisions need to be taken back through the approval process.
Request for map exemption(s)	$950	
Reversion to Acreage	$550	
Review of Improvement Plans for Final Maps	Three (3) percent of the cost of the public improvements	For example, if the engineering estimate for the public improvements is $500,000, the deposit would be $15,000.
WILLIAMSON ACT		
Notice of Non-Renewal (includes partial nonrenewals)	$275	

Table 4-28 continued

PROJECT	FEE	REMARKS
Cancellation	$3,000	However, Cancellations are frequently combined with other project entitlements making it a Combined Development Project
Exchange Property	$350	Exchanging land that is under a contract by placing an Agricultural Easement on other land.
ZONING/CURRENT PLANNING		
Zoning Amendment (map) (includes prezoning)	$1,250 if less than 10 acres $1,750 if more than 10 acres	However, if the ZA is combined with another entitlement (Annexation, GPA, CUP, etc.) it becomes a CDP.
Zoning Amendment (text)	$1,750	
Specific Plan (also PUD)	Cost	An initial deposit and a Reimbursement Agreement are required.
Site Plan Review – Class I (Note: at present, there is no distinction as to the size or type of project)	$50	A Class I SPR would be for single family homes, second residence, swimming pools, and other similar uses and/or structures. Ministerial Approval is appropriate.
Site Plan Review – Class II	$250	A Class II SPR would be for property that is already developed, but is changing to a different use class or adding a structure; or, for projects that are less than five acres in area that are consistent with the General Plan and Zoning. Typically, no public hearing would be required.
Site Plan Review – Class III	$575	A Class III SPR would be for new projects that are greater than five acres but less than 10. A public hearing is usually required. Additional CEQA work is usually required.
Site Plan Review – Class IV	Deposit of $2,000	A Class III SPR would be for projects greater than 10 acres in area. This fee would be applied only if there is no other entitlement such as a Conditional Use Permit.
Variances	~~$750~~ $171	Public Hearing required (as amended by City Council 12/17/07)

Table 4-28 continued

PROJECT	FEE	REMARKS
EIR	City's Direct Costs to review and certify.	Does not include Kern County Clerk's filing fee nor the Fish and Game Fee.
Compliance Monitoring Fee for projects that have been approved by CUP or other entitlement or had a ND or EIR prepared	$275	Allows for monitoring of project for the first year for compliance with conditions of approval and mitigation measures. Fee to be paid at time application is filed.
MISCELLANEOUS/OTHER PERMITS		
Home Occupation	$80	
Sign Permits	$55	
Oil and Gas Well Drilling	Class II CUP - $1,750	
Flood Development Permit	$150	
Change in Street Name	$350	
Change of a Street Address	$100	
Abandonment of Road, alley, or Public Utility Easement	$1,500	
Development Agreement	-0-	D.A.'s are typically associated with larger, more complex projects, such as a Combined Development Project, GPA, Annexation, Tentative Tract Map, etc. City Attorney's time is now included in the project's filing fees and cost reimbursements.
Annual review of D.A.	$300	Includes review time by the City Attorney. May require public hearing.
Request that City's real property be declared as Surplus	$1,000	
Family Day Care	$80	Ministerial permit.
Temporary Occupancy Permit	$165	A Temp. Occupancy Permit is approved by the Community Development Director. No public hearing is required.
Temporary Use Permit	$500	A Temporary Use Permit is approved by the City Council. A public hearing is required.

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

Community Representation

An important strategy for expanding housing choices for all residents is to ensure that residents' concerns are heard. A jurisdiction must create avenues through which residents can voice concerns and participate in the decision making process. The City values citizen input, and has established a number of commissions/committees with representation from the community. The role of each of these bodies is discussed below.

City Council

City residents elect the City Council to guide the policy affairs of the community. The City Council must provide an environment that stimulates participation in the governing processes and must conduct the affairs of the City openly and responsively. The Council consists of five members selected at-large and are elected for four-year terms. General municipal elections are held every two years, resulting in an overlap in the terms of office on the City Council. The City Council also acts as the Board of Directors of the Redevelopment Agency of the City of Delano, pursuant to the Community Redevelopment Law of the State of California.

Planning Commission

The Delano City Planning Commission guides the City's planning processes; their work includes identification of planning-related problems and opportunities, review of plans for projects requiring zoning changes, variances, or subdivision approval, as well as public-supported projects such as those initiated by the Delano's Redevelopment Agency. The Commission consists of 7 individuals appointed by the City Council from the community.

Chapter 5
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, 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.

Fair Housing Practices in the Homeownership Market

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 of Affirmative Fair Housing Marketing Plan for use by members of the NAR to satisfy HUD's Affirmative Fair Housing Marketing regulations. Even so, there is still room for discrimination in the housing market.

Newer Home Development in Northeast Delano

The Homeownership Process

One of the main challenges in owning a home versus renting a home is the process. Buying a house takes considerably more time and effort than finding a home to rent. The major legal and financial implications surrounding the process also intimidate potential buyers. Typically, people are overwhelmed by the unique terminology, number of steps required, and financial considerations involved. The process is costly and fair housing issues may surface at any time during this process.

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. Language in advertising has recently become an issue within the realm of real estate. Advertisements cannot include discriminatory references such as the use of words describing current or potential residents or the neighbors or the neighborhood in racial or ethnic terms. Some commonly used statements that are discriminatory include:

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

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

Lending

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, and an analysis of 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 it does not guarantee that individual loan officers or

underwriters will not misuse the information. A report on mortgage lending discrimination by the Urban Land Institute[15] illustrates four basic stages in which discrimination can occur:

1. Advertising and outreach
2. Pre-application inquiries
3. Loan approval/denial and terms/conditions
4. Loan administration

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

Real Estate Agents

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

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

[15] The Urban Land Institute, *Mortgage Lending Discrimination: A Review of Existing Evidence.* June 1999. Turner, Margery
Austin and Skidmore, FeliCity, Editors.

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 surrounding the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made, location, etc. Some neighborhoods with higher concentrations of minorities may appraise lower than like properties in neighborhoods with lower concentrations. Unfortunately, this practice is geared toward a neighborhood and not an applicant, and therefore is not a direct violation of fair housing law that can easily be addressed. One effect of this practice, however, is that it tends to keep property values lower in a given neighborhood, thereby restricting the amount of equity and capital available to those residents. Individual appraisers are the ones making the decisions on the amounts; thus, there is room for flexibility in the numbers. As each appraiser is individually licensed, similar to real estate agents, they risk losing their license for unfair practices.

Sellers

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

Covenants, Conditions, and Restrictions

Covenants, Conditions, and Restrictions (CC&Rs) in the past, were used to exclude certain groups such as minorities from equal access to housing in a community. Today, 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 else 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.

Insurance

Insurance agents are provided with underwriting guidelines for the companies they work for to determine whether or not a company will sell insurance to a particular applicant. Currently, underwriting guidelines are not public information; however, consumers have begun to seek access to these underwriting guidelines in order to learn if certain companies have discriminatory policies. Some states are being more responsive than others to this demand and have recently begun to require that companies file their underwriting guidelines with the state department of insurance, which would then make the information public. Texas is one state that has mandated this reporting, and its office has made some significant findings regarding discriminatory insurance underwriting guidelines.
Many insurance companies have applied strict guidelines, such as not insuring older homes, that disproportionately affect lower income and minority families that can only afford to buy in older neighborhoods. A California Department of Insurance (CDI) survey found that less than one percent of homeowners insurance available in California is currently offered free from tight restrictions. CDI has also found that many urban areas are underserved by insurance agencies.

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. This collaboration was formed in 1996 at the request of the insurance industry as an alternative to State legislation that would have required insurance companies to invest in underserved communities, similar to the federal Community Reinvestment Act (CRA) that applies to the banking industry. COIN is a voluntary program that facilitates insurance industry investments that provide profitable returns to investors and economic and social benefits to underserved communities.

The California Fair Access to Insurance Requirements (FAIR) Plan was created by the Legislature in 1968 after the brush fires and riots of the 1960s made it difficult for some people to purchase fire insurance due to hazards beyond their control. The 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."

Credit and FICO Scores

Credit history is one of the most important factors in obtaining a home purchase loan. Credit scores determine loan approval, interest rates associated with the loan, as well as the type of loan an applicant will be given. Applicants with high credit scores are generally given conventional loans, while those with lower and moderate range scores often utilize government-backed loans or subprime loans. Applicants with lower scores also receive higher interest rates on the loans as a result of being perceived as a higher risk to the lender, and may even be required to pay points depending on the type of lending institution used.

Fair Isaac and Company (FICO), which is the company used by the Experian (formerly TRW) credit bureau to calculate credit scores, has set the standard for the scoring of credit history. Trans-Union and Equifax are two other credit bureaus that also provide credit scores, though they are typically used to a lesser degree.

In short, points are awarded or deducted based on certain items such as how long one has had credit cards, whether one makes payments on time, if credit balances are near maximum, etc. Typically, the scores range from the 300s to around 850, with higher scores demonstrating lower risk. Lower credit scores require a more thorough review than higher scores and mortgage lenders will often not even consider a score below 600.

FICO scores became more heavily relied upon by lenders when studies conducted showed that borrowers with scores above 680 almost always make payments on time, while borrowers with scores below 600 seemed fairly certain to develop problems. Credit scores also made it easier to develop computer programs (electronic underwriting) that can make a “yes” decision for loans that should obviously be approved. Some of the factors that affect a FICO score are:

- Delinquencies
- New accounts (opened within the last 12 months)
- Length of credit history (a longer history of established credit is better than a short history)
- Balances on revolving credit accounts
- Public records, such as tax liens, judgments, or bankruptcies
- Credit card balances
- Number of inquiries
- Number and types of revolving accounts

There has been some debate recently regarding the accuracy of the credit scoring software used by lenders. In particular, soon after its release, the *Los Angeles Times* Real Estate section featured articles suggesting the NextGen software model, designed by Fair Isaac & Company, was not being used by lenders due to the high cost of the software, even though it is a more fair and accurate version. The new model is said to increase scores by 50 to 100 points and has been on the market for several years. However, research performed by the research and consulting firm TowerGroup found that, for many lenders, the higher price for the NextGen software, including the evaluation, implementation, systems and training costs, and the embedded mortgage industry commitment to Classic FICO did not warrant switching from the Classic FICO standard. In March 2006, Experian introduced yet another credit score system, VantageScore, which is similar to that of FICO's NextGen. VantageScore is likely to face the same challenges as NextGen, but may have more success depending on ease of use and cost.

National Association of Realtors

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

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."

Realtor Fair Housing Declaration

In accordance with the Code of Ethics, each realtor signs the following pledge, developed in 1996 as a result of the HUD-NAR agreement.
I agree to:

- Provide equal professional service without regard to race, color, religion, sex, handicap, familial status, or national origin of any prospective client, customer, or of the residents of any community.

- Keep informed about fair housing law and practices, improving my clients' and customers' opportunities and my business.

- Develop advertising that indicates that everyone is welcome and no one is excluded, expanding my client's and customer's opportunities to see, buy, or lease property.

- Inform my clients and customers about their rights and responsibilities under the Fair Housing Laws by providing brochures and other information.

- Document my efforts to provide professional service, which will assist me in becoming a more responsive and successful Realtor.

- Refuse to tolerate non-compliance.

- Learn about those who are different from me, and celebrate those differences.

- Take a positive approach to fair housing practices and aspire to follow the spirit as well as the letter of the law.

- Develop and implement fair housing practices for my firm to carry out the spirit of this declaration.

California Association of Realtors (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.

Realtor Associations Serving Delano

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

Complaints involving agents or brokers may be filed with these associations. Monitoring of services by these associations is difficult as statistics of the education/services the agencies provide or statistical information pertaining to the members is rarely available. Bakersfield Realtor association services the City of Delano. Contact information is:

4800 Stockdale Hwy. Suite 100
Bakersfield, CA 93309
Phone: 661.635.2300
Fax: 661.635.2317

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.

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

On or after January 1, 1996, a real estate salesperson renewing their license for the first time must complete separate 3-hour courses in Agency, Ethics, Trust Fund Handling, and Fair Housing to qualify for renewal. All licensees, with the exception of those renewing for the first time, are required to complete a full 45 hours of continuing education for each license renewal.

For the initial renewal on or after January 1, 1996, the law requires, as part of the 45 hours of continuing education, completion of four mandatory 3-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing. These licensees will also be required to complete a minimum of 18 additional hours of courses related to consumer protection. The remaining hours required to fulfill the 45 hours of continuing education may be related to either customer service or consumer protection, at the option of the licensee.

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

1. An applicant provides proof that he/she is 70 years of age or older

2. An applicant provides proof that he/she has been licensed for 30 consecutive years

Fair Housing Practices in the Rental Housing Market

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

The Apartment Rental Process

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

Advertising

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

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

Viewing the Unit

Viewing the unit is the most obvious place where potential renters 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. For example, there have been cases where a manager tries to deter a family by indicating strict occupancy standards or frowning on the presence of young children accompanying a viewer. Further, discrimination against families with children and people with disabilities are even more prevalent than racial discrimination.

Credit/Income Check

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

The Lease

Most apartments are rented under either a lease agreement or a month-to-month rental agreement. A lease is favorable from a tenant's point of view for two reasons: the tenant is assured the right to live there for a specific period of time and the tenant has an established rent during that period. Most other provisions of a lease protect the landlord. Information written in a lease or rental agreement includes the rental rate, required deposit, length of occupancy, apartment rules, and termination requirements.
In a tight housing market, when a landlord can "financially afford" to choose tenants, the tendency is to offer shorter lease terms. In this case, a landlord may simply ask the "not-so-desirable" tenant to leave with a 60-day Notice to Vacate. Short-term leases also allow the landlord to raise rent more frequently.

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

Security Deposit

A security deposit is typically required to rent a housing unit. To deter "less-than-desirable" tenants, a landlord may ask for a security deposit higher than usual. Tenants may also face differential 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 require that persons with disabilities with service animals pay an additional pet rent, a monthly surcharge for pets, or a deposit, which is also a discriminatory act[16].

During the Tenancy

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex, or disability. Usually these types of discrimination appear in differential enforcement of rules,

[16] Okeon, Molly R. "Keeping the house in order: Watchdog organization has fought discrimination for three decades." Pasadena Star-News January 21, 2008.

overly strict rules for children, excessive occupancy standards, and refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction, notices, illegal entry, rent increases, or harassment. These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

Apartment Association

The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. The CAA was incorporated in 1941 to serve rental property owners and managers throughout California. 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 trainings on fair housing and ethics issues.

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

- *We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;*

- *We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our residents' tenancy;*

- *We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and*

- *We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.*

The Income Association of Kern County serves the Delano communities. The Association is the local Chapter of the *California Apartment Association (CAA)* providing members with information and trainings on such topics as ethics, credit checks, addressing code enforcement violations, property management, and pre-inspection training.

Fair Housing Services

In general, fair housing services include investigating and resolving housing discrimination complaints, discrimination auditing and testing, education and outreach, such as disseminating fair housing information through written material, workshops, and seminars. Landlord/tenant counseling services involve informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislation and mediating disputes between landlords and tenants.

Currently, there are no fair housing advocates providing services in the City of Delano. Calls and visitations regarding complaints are directed to the State Department of Fair Employment and Housing. In interviewing agencies serving other metropolitan statistical area cities, representatives stated that a formal agreement with the City would be needed in order for services to be provided.

Fair Housing Survey

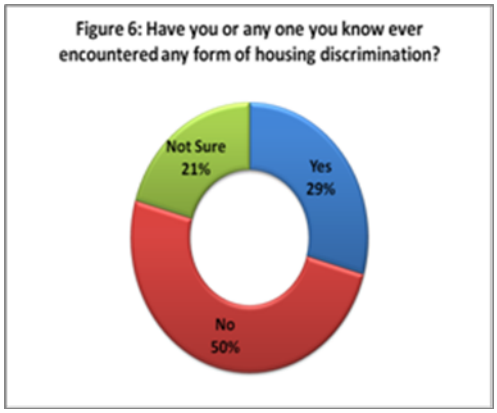
Through the month of March 2009, a Fair Housing Survey was available for residents to provide feedback on their fair housing experiences and the importance of a variety of services. The survey was available at City Hall, the public library and the City of Delano's website. The Kern County Housing Authority also agreed to administer surveys to their respective clients. In

Ranch Market- Delano California

addition, community organizers were hired to administer the surveys throughout the community. To maximize community exposure, organizers went to the following "high foot traffic" locations within the City:

- Kmart
- Vallarta (grocery store)
- Ranch Market (grocery store)
- McDonalds
- Local Laundromats

The survey was available in English and Spanish and kept relatively short (5 questions) to maximize participation. Thirty-four complete surveys were returned to the City. Of these, 17 surveys were completed in Spanish. Although race/ ethnicity were not asked as a question on the survey, community organizers identified nearly all of respondents as Hispanic. A copy of the survey is attached as Appendix A. The 34 surveys represent a very small sample size, thus no City-wide conclusions can be drawn from the survey results. However, The City of Delano perceives the results of the survey as valuable insight in enhancing its Fair Choice Housing programs and services.



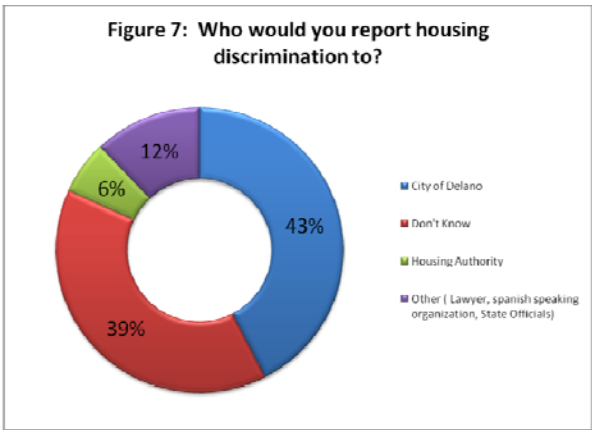
The first question was designed to determine perceived housing discrimination for survey respondents. Ten of 34 respondents felt that they have encountered housing discrimination. A significant number of survey respondents (71 percent) felt that they either never experienced housing discrimination or could not identify discriminatory behavior/ practices towards them. This high lack of experience with discrimination is consistent with the near homogenous population of Delano. The California Department of Finance 2007 population estimate has Hispanics approximately 70 percent of the City's population. An assumption can be drawn that most survey participants work, live, rent or purchased a home from someone that look like them. This condition could conceivably reduce the probability of discrimination based on race/ ethnicity, which is the most common form of housing discrimination reported[17]. However, a more in-depth study should be done on housing discriminated experiences of seasonal farm workers in the City of Delano. According to a report completed by the Chicano Studies Department at the

[17] HUDS Fair Housing Report- April 2007

University of California Santa Barbara, farm workers are routinely discrimination against for the economic benefit of a neighborhood, City or region. According to the report, seasonal farm workers are often incorrectly associated with "unsightly" housing units or large extended families, reducing the value of surrounding housing, often denying farm workers access to quality affordable housing[18].

Of those survey respondents that have experienced housing discrimination, the majority (8) reported race and having children as reasons for discrimination against them. Only one respondent reported feeling that they were discouraged from living were they wanted to live during their housing search experience.

The same survey also asked respondents if they felt that they were well informed about the issue of housing discrimination. Approximately 44 percent responded that they were not. Thirty-six percent felt that they were either well informed or somewhat informed. However, one in every five respondent (20 percent) felt that did not know anything about the issue of housing discrimination.



According to figure 7, no respondent stated that they would ignore an experience with housing discrimination. However, nearly 1 out of every 3 (27 percent) respondents did not know what to do in the event of it happening to them. An even higher percentage (39 percent) of respondents did not know where to report housing discrimination. Although 43 percent of surveyed respondents stated that they would report housing discrimination to the City of Delano, community organizers felt that this response was likely skewed due to the City's administration of the survey. Therefore, it is likely that the respondents lack of knowledge as to where to report housing discrimination is likely higher. In response to these perceived impediments, the City of Delano will initiate a Fair Housing Program beginning in 2009 which is detailed in Chapter 6.

[18] "*WE WANT OUR TOWN BACK!":HOUSING DISCRIMINATION AND EXCLUSION*- Brian Haley Department of Anthropology and Center for Chicano Studies, University of California, Santa Barbara

Chapter 6
CONCLUSIONS, IMPEDIMENTS, AND ACTIONS

Main Street, Delano California

The earlier chapters of this AI identify common problems and barriers to fair housing in the City of Delano. This chapter builds upon the previous analysis, summarizes conclusions, and outlines the City's commitment to actions for addressing the impediments to fair housing. Certain households and individuals may be more susceptible to discrimination due to special circumstances, needs, or personal attributes.

Conclusions and Impediments

The following is a list of key conclusions and potential impediments that may exist in the City of Delano.

Delano Demographics

Race and Ethnicity: The population growth of Delano has increased significantly since the 1990's census count of 23,467. In July 2007, the population size grew to 52,409, nearly a 45 percent increase. Hispanics represent the largest percentage of the population, followed by Whites. Currently the foreign-born population is 14,893, representing nearly one third of the City's population. Among foreign-born residents, 26.7 emigrated from Latin America, with most other foreign-born residents coming from Asia. According to the 2000 census, approximately 72 percent of Delano residents speak languages other than English at home, and 41 percent speak English "less than very well." Foreign-born residents may have difficulty accessing housing due to language barriers or an apartment owner's reluctance to rent housing to an immigrant. In addition, a fair housing concern could arise if a foreign-born resident owns an apartment building and advertises only in his

or her native language, thus limiting access only to persons speaking that language.

Racial/Ethnic and Income Concentrations: Hispanic residents tend to concentrate in the western part of the City, while Whites residents tend to concentrate in the eastern part of Delano. Whereas the separation of different race and ethnic groups has historically been associated with segregation, people's choice of residence today is complex. The quality of local schools, housing prices, access to transportation, and affiliation with people or friends of similar values are all important factors guiding people's housing choices. The City's low and moderate-income areas (census block groups with 51 percent or more low- and moderate-income populations) are concentrated in the center of the City. This area generally has the most convenient access to social services and public transportation.

Large Households: According to both California and Federal standards, a housing unit is considered overcrowded if it is occupied by more than one person per room (excluding kitchens, bathrooms and halls). Occupancy by more than 1.5 persons per room constitutes "severe" overcrowding. The incidence of overcrowding was significant in Delano, in 1990, with 42.3 percent of renter households and 25.1 percent of owner households defined as overcrowded. The 2000 Census states that the average household size is 4.02 and the average family size is 4.27. These are both much higher than the Kern County and regional averages. Factors contributing to the rate of overcrowding in Delano include housing costs, an increase in the number and proportion of large family households, and an inadequate supply of large family rental and ownership units. Overpayment of housing is an additional problem within the City. According to the 2002 Comprehensive Housing Affordability Strategy Report (CHAS Report), 1,647 renters and 786 owners overpay for housing within the very low-income household needs group[19]. Large households often face discrimination in the housing market, particularly in the rental housing market. Landlords may discriminate against large families for fear of excessive wear and tear or liability issues related to children.

Housing Affordability: The median household income in Delano was $37, 248 in 2000, lower than the County median of $49,210. Fifty (50) percent of the households in Delano were considered lower- and moderate-income (earning less than 80 percent of the Median Family Income). The 2000 Census demonstrates that 35.7 percent of home owners and 44 percent of renters within the City of Delano are paying more than 30 percent of their gross income on housing costs. Most of the housing affordability problems in

[19] City of Delano Housing Element- 2003-2008

Delano are the result of housing costs outpacing medium family income, which as mentioned earlier is nearly 25 percent lower than the County of Kern. Without an adequate supply of affordable housing to accommodate lower income Delano residents, housing affordability will continue to be an issue. While housing affordability per se is not a fair housing issue, the lack of affordable housing can create a market condition that offers financial incentives for housing discrimination, and makes discrimination more likely to occur because of the large applicant pool. Also, housing affordability tends to disproportionately affect minority populations. In Delano, Hispanics had the highest proportion of extremely low-income households. In this regard, housing affordability is a fair housing concern.

Public Transit Accessibility: 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. Delano is generally well served by public transit. Nearly all of the major employers are located within one-quarter mile of a transit route. Many of the major employers in the City provide public services and are easily accessible by transit, including the Delano City Hall, the Delano City Schools, and Delano Hospital.

However in a recent survey conducted for the City of Delano's 5 Year Transportation Plan which 13 percent of riders indicated that they walk more than 2 miles as their final destination after leaving the public transit. In addition, the City of Delano has experienced both housing and commercial growth to its City fringes which currently are not served by public transit. Although an alternative transit is available to Delano residents that extend beyond municipal routes, the alternative system is potentially less reliable and a cost burden to lower income riders dependent on public transit.

Housing Conditions

Tenure: The 2007 housing stock in Delano was comprised of 76 percent single-family units and 24 percent multi-family units. Approximately 44 percent of all households in the community were renters, and 56 percent were owners. The declining vacancy rate in the City indicates that finding housing in the rental market is likely a challenge for many households, particularly for large families. In general, housing discrimination issues are more prevalent in the rental housing market since renters are more likely to be subject to conditions in the housing market that are beyond their control.

Housing Stock: Very strong housing growth has occurred in the City since 1990. However, the City has an aging housing stock, with a majority (more

than 62 percent) of the units over 30 years of age. Ongoing repair and maintenance are necessary to keep the units in sound condition.

Assisted Housing: With 10.3 percent of the population aged 60 years or older, the vast majority of assisted housing projects recently built and proposed are senior units. While housing affordability is not a fair housing concern per se, providing opportunities for a variety of housing choice can help lessen the likelihood of housing discrimination by increasing the supply.

Access to Financing

Conventional Home Loan Financing: Whites are the only racial or ethnic group heavily under-represented in the homeownership market. Hispanics are heavily over-represented, with a market share of nearly 60 percent. According to the 2007 HMDA data, 3032 households (Table 3-16) applied for conventional or government backed home loans in the City of Delano that year. Of this number, 2399 loans were approved, an approval rate of nearly 80 percent. This rate was higher than the 75 percent rate of approval in the Bakersfield Metropolitan Statistical area at large, of which Delano is a part. Lower-income applicants generally received higher approval rates than did households earning more than 120 percent of median income. The ability of lower-income households to access financing is an ongoing housing affordability issue, but is not a fair housing issue.

Sub-prime Lending Activity: Conventional home purchase loans were the sole loan source for Delano households. Only 11 households were approved for a government-backed loan. The HMDA data available do not provide information on which loans were actually prime or sub-prime mortgage loan applications among conventional home purchase loans. It is likely that a number of households that in the past would have opted for government-backed loans were able to receive conventional loans through the sub-prime market. Sub-prime lenders generally have interest rates that are higher than those in the prime market. While sub-prime lending cannot in and of itself be equated with predatory lending, studies have shown a high incidence of predatory lending in the sub-prime market is a potential cause for concern when the target clients are considered high-risk.

Fair Housing Complaints

In an interview with Beth Rosen-Prince, Deputy Director for State the Department of Fair Employment and Housing, the most common fair housing complaints received by her agency from the City of Delano related to physical disability followed by familial status. She explained that the majority of these

cases involved either "reasonable accommodations" such as a renter being allowed to have pets in a "no pets allowed" complex, or being provided grab bars in showers. A common misconception by most managers/ owners is that these same requirements apply to the mentally handicap as well.

Actions

Proposed actions to address the impediments to fair housing choice are organized by type.

Expanding Affordable Housing Opportunities

1. Rental Assistance

Action 1.1: The City will conduct outreach efforts, particularly among White and Asian households, who are under-represented in the Section 8 housing program, regarding the availability of Section 8 Rental assistance through the Housing Authority of the County of Kern and the availability of affordable housing within the City. Information will be provided in multiple languages on brochures and on the City website.

Time Frame: Ongoing

2. Affordable Housing Resources

Action 2.1: The City will focus efforts on providing assisted housing projects that are available to low-income households and are designated as family units to offer housing choices for household types other than seniors.

Time Frame: Ongoing

Action 2.2: The City will work with the Housing Authority of the County of Kern increase outreach and education on the Section 8 rental assistance program to encourage property owners and managers to accept Section 8 vouchers.

Time Frame: Ongoing

Action 2.3 The City will make available to residents, upon request, a list of affordable resources in the City. This list will include nonprofits active in the City developing affordable housing, units listed as

affordable in the 2008 Housing Element, and contact information for the City's First-Time Homebuyer Program.

Time Frame: By 2009

3. Homeownership Assistance

Action 3.1: The City will work to provide and expand homeownership opportunities for low and moderate-income households. The City will continue to explore avenues such as partnering with local realtor and lending institutions, conducting community workshops, and distributing flyers regarding private and City-sponsored first-time homebuyer programs.

Time Frame: Ongoing

Action 3.2: The City will work to provide and expand homeownership opportunities for those who speak languages other than English. Flyers regarding first-time homebuyer programs will be printed in English and Spanish. The City will amplify its effort to reach Delano residents through increased marketing.

Time Frame: Ongoing

4. Emergency Shelters, Transitional Housing, and Supportive Housing

Action 4.1: The City will amend the zoning ordinance to address revised State law that requires cities to expand opportunities for the sitting of emergency homeless shelters. The City will continue to allow the establishment of transitional and supportive housing that functions as residential uses in residential zones consistent with similar residential uses.

Time Frame: By June 2010

Access to Financing

1. Outreach to Lenders

Action 5.1: The City will work with local lenders to provide information on government-backed financing for low- and moderate-income residents. The City will encourage local lenders to provide information in English and Spanish.

Time Frame: Ongoing

Action 5.2: The City will work with local lenders to promote the City's First-Time Homebuyer Program. The City will provide information on the program in English and Spanish.

Time Frame: Ongoing

2. Education and Resources

Action 5.3: The City will encourage workshops to be held in Delano by local lending institutions regarding the home-buying process and the resources available to low- and moderate-income homebuyers. The City will encourage local lenders to hold workshops in English and Spanish languages.

Time Frame: Conduct homebuyer workshops periodically

Action 5.4: The City will provide brochures or information on homeownership, rental assistance, and rehabilitation assistance programs in English and Spanish. Information on the City's First-Time Homebuyer Program will be made available at City Hall, the public library and community events promoting fair housing choice held by the City.

Time Frame: Ongoing

Action 5.5: The City will consider partnering with agencies to provide credit and financial counseling services, including assisting potential homebuyers build up credit and equity, clear bad credit, and providing education on affordability and financial responsibility of homeownership.

Time Frame: 2010

Action 5.6: As funding permits, the City will work with other fair housing advocates to conduct additional fair housing workshops in Delano to educate about fair housing rights.

Time Frame: At least two workshops will be held each year, with separate workshop for residents and property owners/managers.

Action 5.7: In addition to addressing the fair housing complaints of residents through the City's new Fair Housing Program, the City will draft and post educational flyers regarding housing rights and examples of fair housing violations to better educate residents and property managers about fair housing. The City will provide fair housing information in English and Spanish. The information will also be made available through the City's website.

3. Unfair Lending and Insurance Practices

Action 6.1: The City will monitor complaints regarding unfair/predatory lending, and will assess lending patterns using the data collected under the Home Mortgage Disclosure Act (HMDA) and CRA, and other data sources.

Time Frame: Monitor HMDA and other data at least once a year to identify potential issues with unfair lending practice.

Action 6.2: The City will participate with HUD in efforts to improve access to homeowner's insurance, and to investigate predatory lending in the home purchase, home improvement, and mortgage refinancing markets.

Time Frame: Ongoing

Fair Housing Services

1. Apartment Owners/Managers

Action 7.1: The City will work in conjunction with apartment owners/manager associations to outreach to owners of small rental properties regarding fair housing laws.

Time Frame: Ongoing

Action 7.2: The City will work with agencies and property managers of affordable housing to ensure that fair housing laws are abided by in the selection of residents and that information of housing availability is appropriately advertised. The City will increase advertisement and outreach related to affordable housing opportunities through advertisements and literature available in English and Spanish. The City will periodically track income and demographic data related to affordable housing participants and evaluate additional strategies, if

needed, to increase access to and knowledge of affordable housing opportunities in the City.

Time Frame: By 2010

2. Fair Housing Testing and Audits

Action 8.1: The City will explore applying for federal Fair Housing Initiative Program (FHIP) grants and conduct testing and audits as a means to affirming the nature and extent of fair housing issues in the community.

Time Frame: Every other year

3. Reasonable Accommodation

Action 9.1: The City will explore the adoption of a reasonable accommodation ordinance to further fair housing choice for persons with disabilities.

Time Frame: By 2010

Action 9.2: The City will provide information on reasonable accommodation and on often utilized disability adjustments to housing units. Information will be available at City Hall and at the Regional Medical Center in English and Spanish languages.

Time Frame: By 2010

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

City Manager _____ Date_____
City of Delano

APPENDIX A

Analysis of Impediments to Fair Housing Choice
2009 Rental Audit Report to the City of Delano

Intent on determining the extent and nature of discrimination present in the Delano's housing market, the City of Delano contracted with the Ramsay Group LLC to conduct testing in the City. The Ramsay Group commends the City for seeking this depth of analysis and for including private market considerations in the Analysis of Impediments to Fair Housing Choice. This report presents a summary of the methods used in conducting the investigations; describes the laws and regulations relevant to the investigations; details the findings with information on the occurrences of discrimination and examples of the types of discriminatory behavior encountered by testers; and offer a series of recommendations for further action.

Applicable laws

Housing discrimination is defined largely by the Fair Housing Act of 1968 (Title VIII) and the Fair Housing Act Amendments of 1988 (42 USC § 3601 et seq.). According to the law, it is illegal to discriminate against someone because of their race or color, national origin, sex, religion, familial status (families with children) and disability. In California, as in many other states, housing discrimination is also prohibited under state law. The agency responsible for enforcement federal and state law is the Department of Fair Employment and Housing (DFEH). Laws enforced by DFEH are designed to protect against illegal discrimination and harassment in housing based on:

- Race
- Color
- Religion
- Sex (gender)
- Sexual orientation
- Marital status
- National origin (including language use restrictions)
- Ancestry
- Familial status (households with children under age 18)
- Source of income
- Disability (mental and physical, including HIV and AIDS)
- Medical condition (cancer/genetic characteristics)
- Age

Testing Protocol

Testing is an objective process that is used to determine if a housing provider is treating people equally, or is discriminating based on a protected class. The Supreme Court has upheld the process of testing as a legitimate, and often the only way to uncover discriminatory behavior. Testing involves simulating a housing search in order to observe a provider's ordinary business practices. However, results of this particular test should not be viewed as "standard rental practices" within the City of Delano. More extensive testing involving a longer duration, larger number of test sites and an evaluation of all discrimination and harassment categories mentioned above.

Three testers African-American, Hispanic and Caucasian, two of which are members of a protected class, and the other a control tester were sent to a site to inquire about housing. The testers were assigned similar personal and housing seeking characteristics, so the only difference between them was their protected class status. By comparing the experiences of three testers, the test coordinator determined if the housing provider is treating them differently.

In the case of this audit, after an ad was selected, the test coordinator made an advance phone call to the site to verify the availability of the unit advertised. Tester's profiles were single with no children and non-disabled. Test pairs were assigned the same desired move-in date and similar occupations and financial information. Testers made contact with the housing provider by phone to arrange an appointment. During the phone call and site visit, testers gathered information about the availability of the advertised unit, availability of similar housing, rental price, security deposit, utilities, other fees, application process, and date the housing will be available. Testers completed the report forms that included the above information and additional information regarding questions that may be asked by the agent, condition of the unit, etc. In addition, testers completed narratives that documented their experience of the test.

Evaluation of Tests

After the testers completed their reports, tests were evaluated to determine if differential treatment had occurred. Tests were determined to contain differential treatment if they contained one or more of the following:

- Misrepresentation of unit availability.
- Different terms (different price, security deposit, application process, or qualification criteria than the white tester or control tester).

- Steering to different complexes or buildings, or discouraged from renting the unit.

- Level of service- inferior service from the housing provider or more extensive questioning than white tester.

Results of Rental Audit Findings

The rental audit was designed to reveal whether their rental practices show any signs of discrimination against prospective tenants. The rental audit consisted of 5 paired tests conducted in the City of Delano over a two week period (March 16 -31, 2009). Testing conducted focused on discrimination in the rental market against African- Americans and Hispanics. Sites were chosen randomly to ensure that the results were representative of actual market practices. Overall, the test did not find housing discrimination as a significant issue in the 5 tests conducted. This conclusion is consistent with the Fair Choice Housing survey conducted by the City of Delano which demonstrated that 71 percent of respondents felt that they never experienced or could not identify discriminatory practices as it related to their housing experience in the free market.

However, both the White tester and African- American tester was informed by two separate apartment managers of the high number of Hispanic residents residing within their respective complex. Under normal analysis, this statement would be evaluated as "steering" or discouraging from renting", which is one the evaluations to determine discriminatory practices. Neither tester felt discriminated against, but they did feel that the statements provided a disparaging characterization of the apartment residents. Whether or not these statements were discriminatory towards the testers is inconclusive. However, it does highlight the effects of the Fair Choice Housing issue of persistent concentration of race/ ethnic groups within the City of Delano, which is addressed later on in this report.

Advertisements: Initial Barrier to Free Choice

Even though there were no significant findings in treatment between protected class and control testers, the Ramsay Group did encounter several possible barriers to housing choice in rental advertisements. These issues can create additional difficulties for members of protected classes in finding rental housing.

First, it was discovered that much of the rental housing advertised in the newspaper was concentrated in the areas of southeast and southwest Delano and tended to rent for under $750. For example, in a recent edition of the Delano Record, it was discovered that of the ads for rentals in Delano, 13 were located in these parts of the county, while only 1 was located in other

parts of the City. Although these areas do contain a disproportionate amount of Delano's rental housing, we suspect that there may be additional rental housing available that is advertised in different ways, such as through real estate agencies. In addition, many of the same ads appeared week after week, suggesting that most of the widely advertised housing is in larger complexes rather than privately owned. Unfortunately, rental housing that is advertised through less accessible means or by word of mouth often serves a discriminatory purpose by limiting the number of people who will inquire about the available housing.

Secondly we found that of the ads that were in the newspapers, a large proportion were very difficult or impossible to contact. Approximately one third of the housing providers that we attempted to contact was unavailable and/or did not return phone calls. Again, we found that the housing providers that were easiest to contact were the larger complexes rather than the smaller providers.

Finally, our audit discovered several advertisements with discriminatory language used by landlords or apartment managers. One complex stated in its advertisement that it “is NOT a Low Income Complex”, suggesting an effort to exclude “undesirable elements”. It is also important to note that this complex was not located in southwest or southeast Delano where a high concentration of low-income housing is located. Another complex advertisement stated that their housing is “best suited for income restricted families”. Although most low-income families may see this advertisement as helpful in their housing search, the complex is still practicing discriminatory marketing by discouraging higher income families from applying. This type of advertisement can also prevent the creation of mix- income housing, a strategy used by many jurisdictions to improve the economic and physical assets of neighborhoods.

Recommendations

State and Federal fair housing laws protect all of us from discrimination that keeps us from accessing the housing of our choice. The laws are intended, among other things, to permit everyone to enjoy the social and economic benefits of living in integrated communities. Discrimination in housing not only takes away our freedom to choose where we live, it also limits the variety of people with whom we can interact and the opportunities available to us in our own neighborhoods. Where we live often determines the quality of our children’s education and our access to jobs, as well as other aspects of our health and well-being. Many people are not aware that housing discrimination continues to be present in our region and nation. Nor are they aware of their rights and responsibilities as home seekers and as housing providers.

Unfortunately, enforcement of anti-discrimination laws is complaint-driven and relies upon individuals to file complaints when they suspect they have encountered discrimination. Individuals cannot always know that they have been subjected to discriminatory practices, and even if they know, they may feel too busy with their housing searches to file complaints. Housing discrimination is under-reported and therefore, often unaddressed. Thus, larger patterns of community segregation remain unchanged, and residents of good will throughout the region interpret the lack of overt evidence of discrimination to mean that discrimination does not occur within their communities. One of the purposes of this report is to initiate and inform a dialogue to work for change. Toward this end, we make the following recommendations based on the audit findings:

- The City should provide or contract for comprehensive fair housing training for real estate agencies to ensure that they are aware of their responsibilities under the fair housing laws. Training should emphasize that real estate agents are responsible to provide the same information about available homes regardless of the home seeker's race, national origin, familial status, source of income, or membership in any of the protected classes under federal and state fair housing laws.

- Training for real estate agencies should include strategies for how to deal with landlords and sellers who make discriminatory requests to agents. Agents are liable for acting upon owners' requests that are in violation of fair housing laws, and may have standing to file complaints themselves when discriminatory practices hinder their work.

- Real estate agencies should create, adopt, implement, and monitor formal policies to ensure consistent practices within a real estate office and/or brokerage.

- The City should periodically contract for further testing of real estate practices, including private brokerages and publicly funded properties.

- The City should encourage real estate agencies and management companies to conduct and/or contract for self-compliance testing of their agents and brokers.

- The City should initiate outreach programs for the owners of rental properties to educate large and small property owners about their

obligations under fair housing laws. Such outreach programs could take the form of seminars, forums, and/or literature.

- The City should provide agencies doing business within the City with brochures or other literature containing information about the fair housing laws to distribute to all prospective tenants.

- The City should dedicate staff time to field calls for assistance and information about possible discriminatory acts within the City. Staff should be trained to provide information and assistance to home seekers and housing providers about their rights and responsibilities under the law and means for resolving discrimination complaints. The contact information for this office should be made widely available through publisher's notices in local papers, fair housing posters in real estate offices, and other materials.

- The City should establish a complaint referral protocol to provide training for staff on how to recognize possible discrimination and a mechanism to refer to the California State Department of Fair Employment and Housing for investigation including testing where appropriate, and representation through mediation and/or filing a complaint.

- The City should create a Fair Housing Task Force to sponsor public education forums on housing discrimination and diversity. The Task Force can educate local residents and real estate professionals on fair housing laws, create opportunities for dialogue on diversity to proactively promote Delano as an open and welcoming community, and dispel the common assumption that affordability is the sole factor limiting diversity.

APPENDIX B

HOUSING IMPEDIMENT SURVEY DATA and SURVEYS

Question 1: Have you ever encountered any form of housing discrimination or known someone who has?[20]

Yes	10
No	17
Not Sure	7
Total Responses	**34**

Question 2: If you believe or think that you or someone you know encountered housing discrimination, what type was it?

Refusing, discouraging, or charging more to rent.	2
Discouraging a person from living where they want to live.	1
Refusing, discouraging, making it difficult or charging more on a home loan.	2
Refusing, discouraging or charging more for home insurance.	0
Refusing or not modifying an apartment for a person with a disability.	2
Unfair, misleading and deceptive loan practices.	2
Other (Race, Children)	8
No Response	17
Total Responses	**34**

Question 3: Do you feel that you are well-informed on Housing Discrimination?

Yes	6
No	15
Somewhat	6
Not enough	7
Total Responses	**34**

Question 4: What would you do if you encountered housing discrimination?

Ignore It	0
Report It	24
Don't Know	9
No Response	1
Total Responses	34

Question 5: If you were to report housing discrimination, who would you report it to?

City of Delano	14
Don't Know	13

[20] Some responses are provide as exact wording by survey respondents

Housing Authority	2
Other (Lawyer, Spanish speaking organization, State Officials)	4
No Response	1
Total Responses	**34**

Question 6: If you think that housing discrimination is occurring, what types of discrimination do you think are the largest problems in Delano?

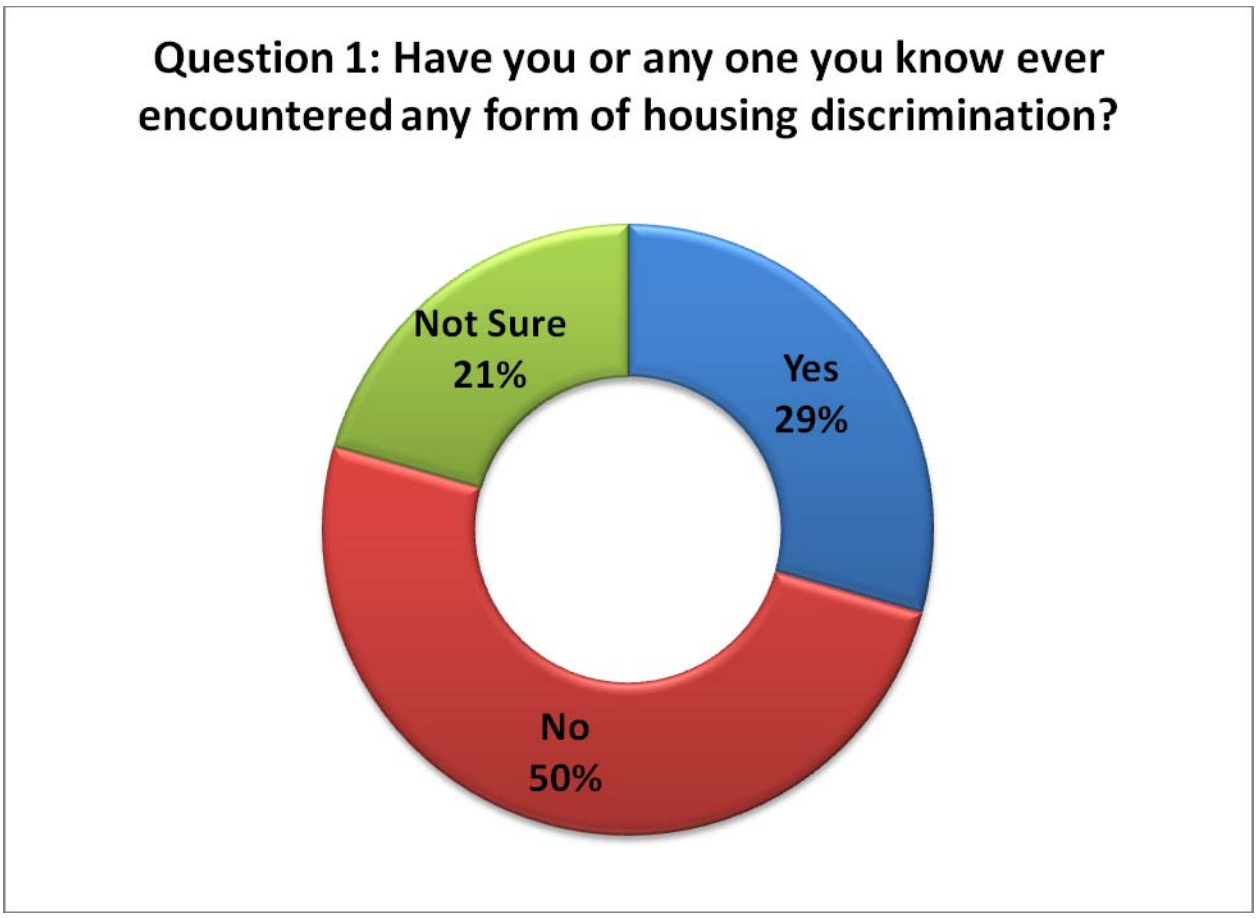
- Apartment needs to be attention, carpet has never been changed.
- Property not kept up for the price that is charged
- It would be gang related.
- job, gang, more programs for youth (6)
- I think it is with some apartments rarely renting places for cheap for the low income people and them not allowing them to apply for the low-income places. Also they need to realize that just because the family works doesn't mean they still make enough but yet they still charge extra which makes it even more difficult.
- New City council
- I would have to say race (3).
- There are big families (2)
- Just because some of us work in the fields they raise the money deposit, unfair practice.
- Credit checks (3)
- Large families
- Lack of jobs, there's a lot of housing, but people live together for lack of income.
- People don't fight discrimination
- Landlords need to be fair in taking care of houses, apt
- We move a lot because of work.
- People don't' treat farm labors right, but contribute to the community and in the economy.
- Housing Authority needs to help more.
- Jobs are needed, educated move away; don't know how people can stop discrimination.
- I think the biggest problem is ignorance, people are unaware.
- Jobs are needed, for families, to live in their own apt, houses.
- No jobs to pay for rent.
- Owners, landlords afraid to rent for lack of jobs in Delano.
- Many Gangs monopolize location

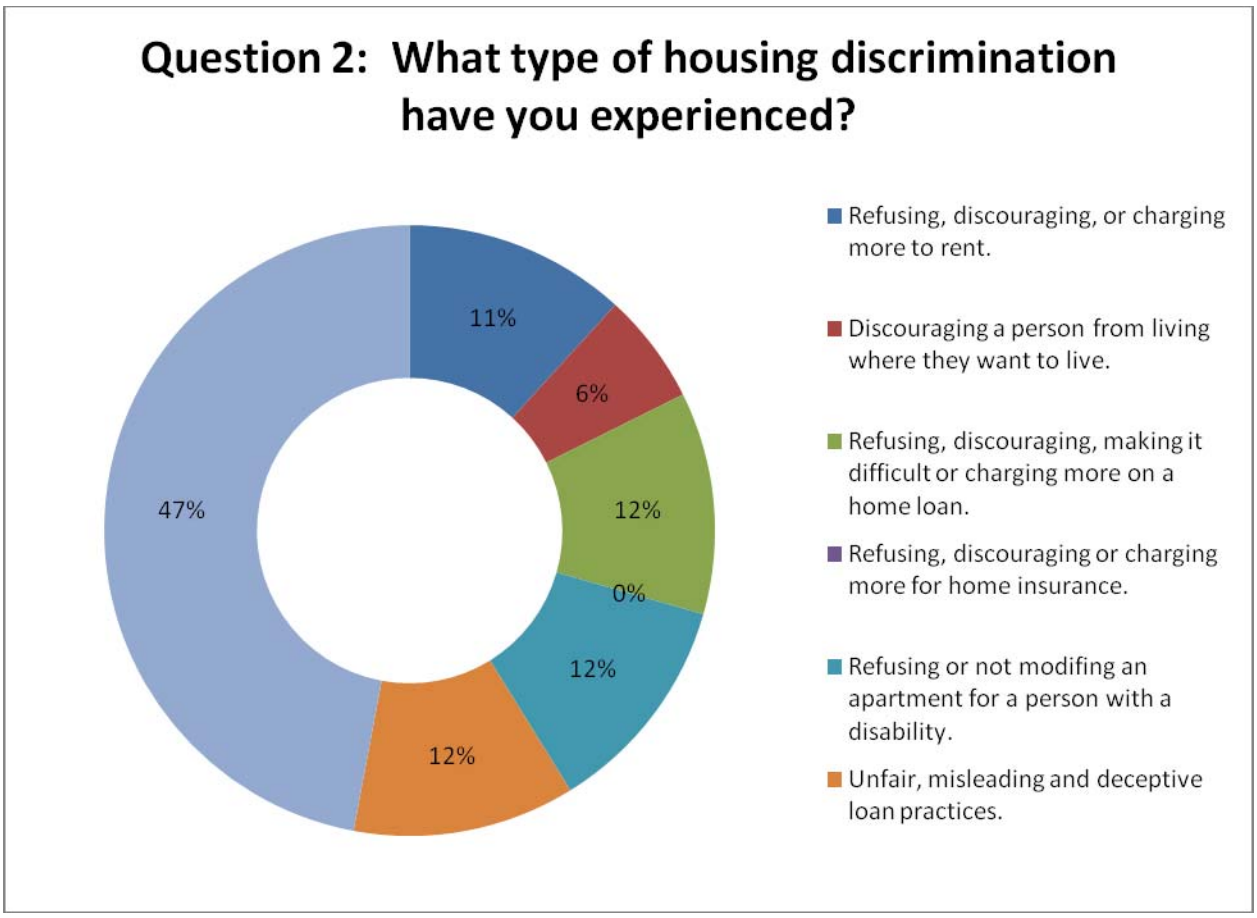
Question 7: What can be done to prevent housing discrimination in Delano?

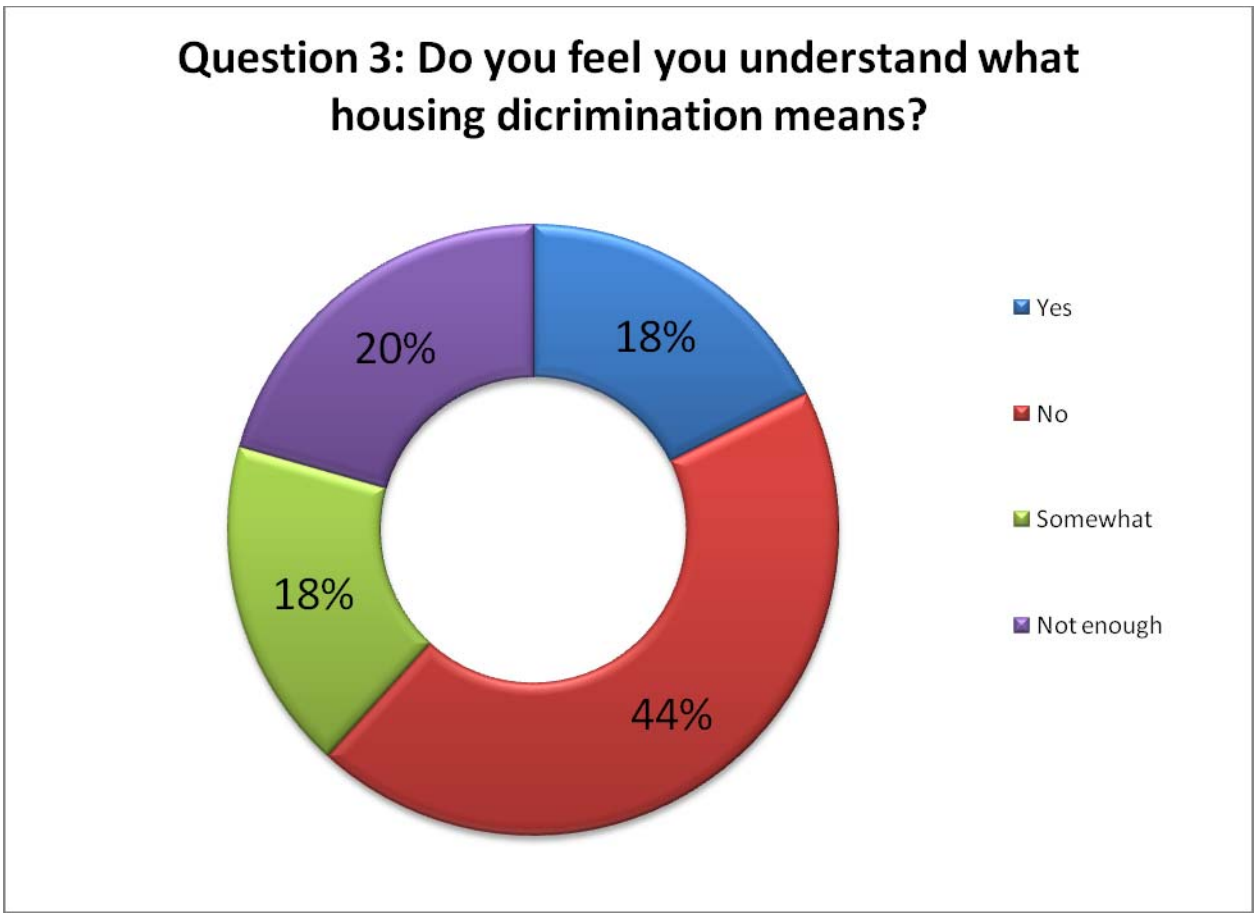
- Have some place to call for information.
- City officials to go out and fine apt. owners if they don't take care of

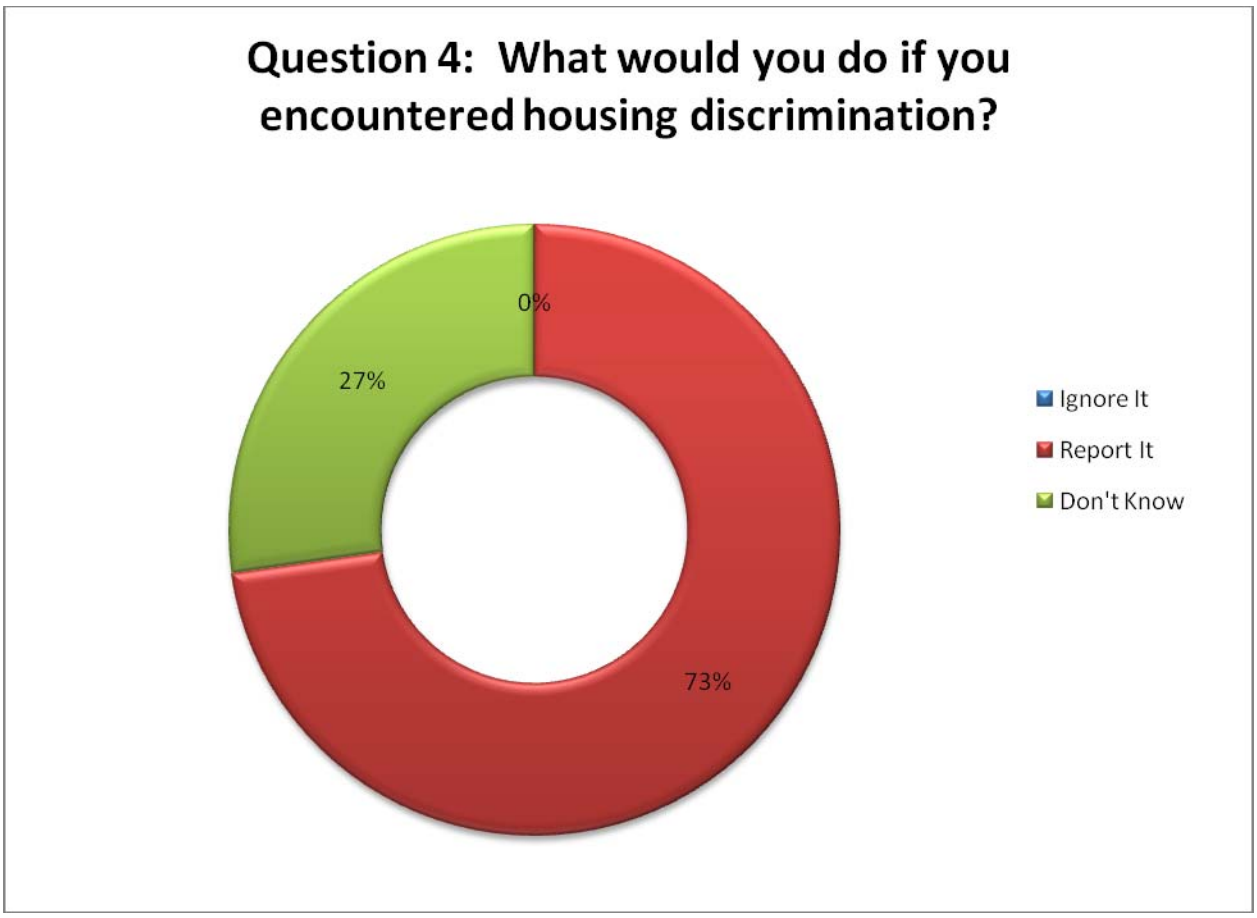
property.

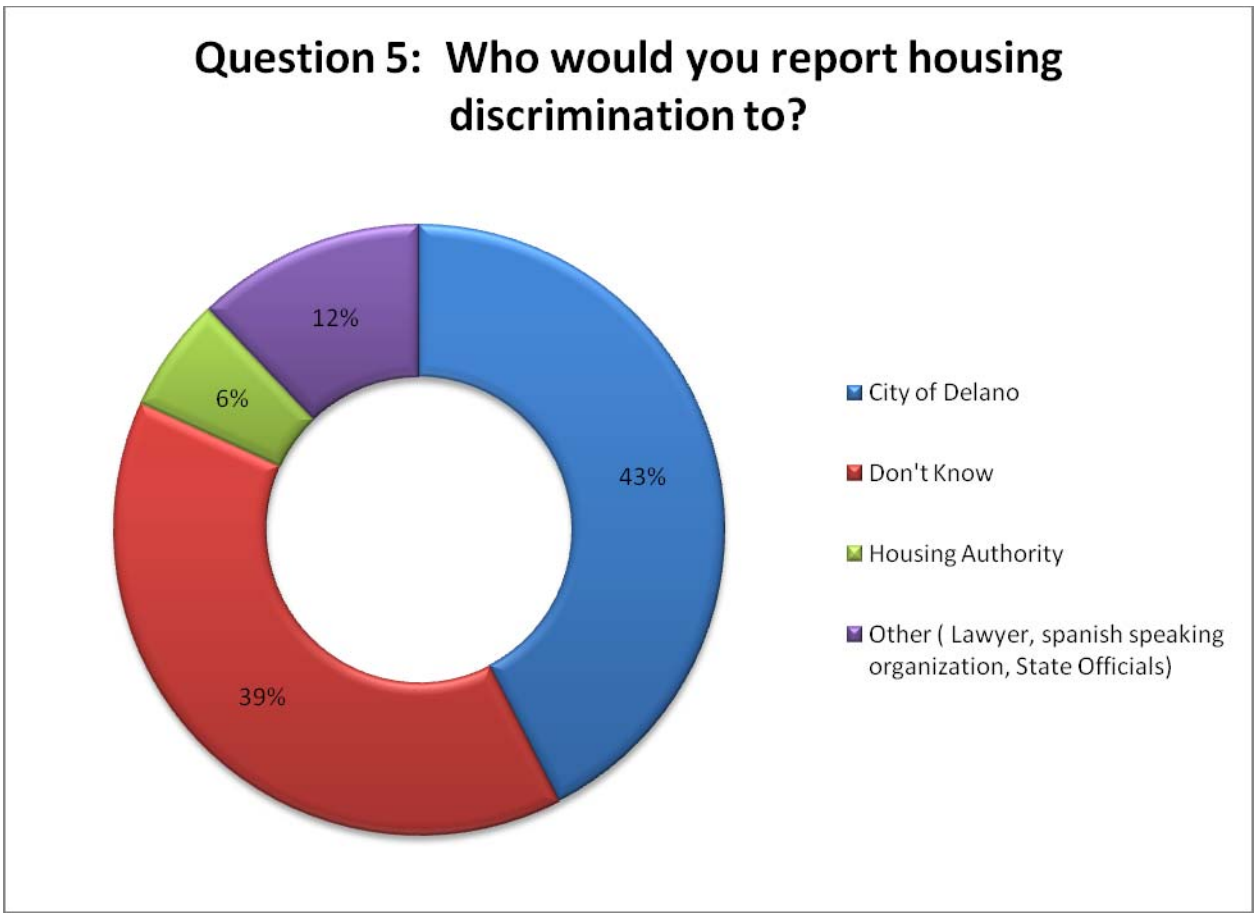
- There should be more things for the kids to do (2).
- Give people the tools to live in prospering neighborhoods.
- More people with low income.
- New management.
- Build more homes and more activities for youth.
- New and more City council (3).
- Build more houses (2)
- There should be more things for the kids to do.
- penalty, fines, bring it to local officials, state officials
- More jobs
- Would like to see more affordable housing. Building neighborhoods more family friend.
- More information
- Give us representative to talk to.
- More education towards human rights.
- Give people jobs so they can pay rent or mortgage.
- Look at people in the community, they care others move away.
- Holding owners, landlords accountable.
- Start teaching to our high school youth so they could be aware early in life.
- Educate through local newspapers and town hall meetings.
- Keep an open mind, ask officials to investigate, penalize.
- More jobs, lack of credit.
- More police presence, gang task force needed


Question 1: Have you or any one you know ever encountered any form of housing discrimination?
Not Sure
21%
Yes
29%
No
50%


Question 2: What type of housing discrimination have you experienced?
11%
6%
12%
0%
12%
12%
47%
Refusing, discouraging, or charging more to rent.
Discouraging a person from living where they want to live.
Refusing, discouraging, making it difficult or charging more on a home loan.
Refusing, discouraging or charging more for home insurance.
Refusing or not modifing an apartment for a person with a disability.
Unfair, misleading and deceptive loan practices.


Question 3: Do you feel you understand what housing dicrimination means?
18%
44%
18%
20%
Yes
No
Somewhat
Not enough


Question 4: What would you do if you encountered housing discrimination?
0%
27%
73%
Ignore It
Report It
Don't Know


Question 5: Who would you report housing discrimination to?
12%
6%
43%
39%
City of Delano
Don't Know
Housing Authority
Other (Lawyer, spanish speaking organization, State Officials)

Housing Impediment Survey

The City of Delano and the Ramsay Group are administrating this housing survey to review the opportunities and problems associated with people's ability to attain housing within the City of Delano. Please take a few minutes to fill out this survey and your answers will be kept confidential. Your participation will assist the City of Delano establish a plan for improving opportunities for fair housing choice. Thank You.

Have you ever encountered any forms of housing discrimination or known someone who has?

○ Yes ○ No ○ Not Sure

If you believe or think that you or someone you know encountered housing discrimination, what type was it?

- ○ Refusing, discouraging, or charging more to rent an apartment or buy a home.
- ○ Discouraging a person from living where they want to live. Steering them to another apartment, complex or neighborhood.
- ○ Refusing, discouraging, making it difficult or charging more or providing less favorable terms on a home loan to buy, refinance, fix up or use the equity in a home.
- ○ Refusing, discouraging or charging more for home insurance.
- ○ Refusing to make a reasonable accommodation or not allowing a modification to be made to make an apartment more accessible for a person with a disability.
- ○ Predatory lending: unfair, misleading and deceptive loan practices.
- ○ Other _____ _____ _____

Do you feel that you are well-informed on Housing Discrimination?

○ Yes ○ No ○ Somewhat ○ Not enough

What would you do if you encountered Housing Discrimination?

○ Ignore it ○ Report it ○ Don't Know

If you were to report Housing Discrimination, who would you report it to?

○ City of Delano ○ Don't Know ○ Other_____

If you think that Housing Discrimination is occurring, what types of discrimination do you think are the largest problems in Delano?

_____
_____
_____

What can be done to prevent housing discrimination in Delano?

_____
_____
_____
_____

Thank you for taking the time to fill out our survey. We rely on your feedback to help us improve our City services. For questions regarding this survey, please contact:

Sumeet K. Batth
Housing Specialist
City of Delano
Economic Development
and Redevelopment Department
1015 11th Avenue
P.O. Box 3010
Delano, CA 93216-3010
(661) 720-2249

OR

Darrell Stamps
Managing Partner
The Ramsay Group LLC
9477 N. Fort Washington #105
Fresno CA. 93720
(559) 441-9441

Your input is greatly appreciated!

Vivienda Impedimento Encuesta

La ciudad de Delano y The Ramsay Group están administrando esta encuesta sobre la cubierta para repasar las oportunidades y los problemas asociados a la capacidad de la gente de lograr la cubierta dentro de la ciudad de Delano. Por favor, tome unos minutos para llenar esta encuesta y sus respuestas se mantendrán confidenciales. Su participación ayudará a la ciudad de Delano establecer un plan para mejorar las oportunidades de vivienda justa elección. Gracias.

1. **¿Alguna vez ha encontrado las formas de discriminación en la vivienda o alguien que ha conocido?**

○ Si ○ No ○ No estoy seguro

2. **Si usted cree o piensa que usted o alguien que usted conoce ha tropezado la discriminación en la vivienda, ¿qué tipo era?**

○ Negarse, desalentar, o de carga más para alquilar un apartamento o comprar una casa.

○ Desalentar a una persona de vivir donde quiero vivir. Directivo a otro apartamento, complejo o barrio.

○ Negarse desalentador, lo que hace difícil o de carga más o menos ofrecer condiciones favorables en un préstamo hipotecario para comprar, refinanciar, fijar o la utilización de la equidad en un hogar.

○ Negarse desalentar o carga para el hogar más seguro.

○ Negarse a hacer arreglos razonables o no permitir que una modificación que se hizo para hacer un apartamento más accesible para una persona con discapacidad.

○ Préstamos abusivos: desleal, engañosa y las prácticas de préstamo engañosas.

○ Otros _____
_____
_____

3. **¿Piensa usted que están bien informados sobre la discriminación en la vivienda?**

○ Si ○ No ○ Poco ○ No basta

4. ¿Qué haría usted si usted ha tropezado la discriminación en la vivienda?

○ Ignóralo ○ Informe ○ No sé

5. ¿Si usted se informe a la discriminación en la vivienda, que usted informe a?

○ Ciudad de Delano ○ No sé ○ Otros_____

6. Si usted piensa que la discriminación en la vivienda que está ocurriendo, qué tipos de discriminación cree usted que son los mayores problemas en Delano?

_____
_____
_____

7. ¿Qué se puede hacer para prevenir la discriminación en la vivienda Delano?

_____
_____
_____
_____

Gracias por tomarse el tiempo para llenar nuestra encuesta. Contamos con tus comentarios para ayudarnos a mejorar nuestros servicios de la Ciudad. Para preguntas sobre esta encuesta, póngase en contacto con:

Sumeet K. Batth
Housing Specialist
City of Delano
Economic Development
and Redevelopment Department
1015 11th Avenue
P.O. Box 3010
Delano, CA 93216-3010
(661) 720-2249

OR

Darrell Stamps
Managing Partner
The Ramsay Group LLC
9477 N. Fort Washington #105
Fresno CA. 93720
(559) 441-9441

Su aportación es muy apreciado!

APPENDIX C

Local Fair Housing Agencies and Advocates

- **City of Bakersfield Fair Housing Program:** 1600 Truxtun Ave., Suite 300, 634-9245 (call 661-862-5299 outside of Bakersfield). Operates a hotline for fair housing issues, mediates complaints of discrimination in housing and provides training for property managers.
- **Franchise Tax Board homeowner and renter assistance program:** 800-868-4171, www.ftb.ca.gov. Program offers an annual payment on a portion of property taxes for homeowners and renters who qualify.
- **Greater Bakersfield Legal Assistance, Inc. and Seniors Law Center:** 615 California Ave., Bakersfield, 661-325-5943, www.gbla.org. Provides free civil legal advice and counsel on a wide variety of landlord-tenant disputes for low-income clients and seniors over the age of 60 who meet federal guidelines. Files suits to improve habitability, provides information about health care, elder abuse and neglect, and domestic violence.
- **Housing Authority of the County of Kern:** 601 24th St., Bakersfield, 661-631-8500, www.kernha.org. Public housing authority funded by HUD offers low-income housing assistance and affordable housing programs.
- **Housing and Urban Development Department:** 855 M St., Suite 970, Fresno, 93721, 559-487-5033, www.hud.gov.
- **Kern County Fair Housing:** 2700 M St., Suite 250, Bakersfield, 661-862-5299, www.co.kern.ca.us/cd/cdfh.asp. Takes housing discrimination complaints from outside Bakersfield City limits.
- **The NEEDS Center:** 110 Asher St., Taft, 661-763-4888. Provides food, rental and utility payment assistance.
- **Department of Fair Employment and Housing** , Bakersfield District Office, 4800 Stockdale Hwy, Suite 215 Bakersfield, CA 93309 Telephone: (800) 233-3212

APPENDIX D

City of Delano
PUBLIC NOTICE

To provide an opportunity for citizen participation, the City of Delano will hold a Public Meeting to accept and approve the Analysis of Impediment to Fair and Affordable Housing.

PUBLIC MEETING

DATE: Monday, June 15, 2009
TIME: 6:30 p.m.
PLACE: City Council Chambers
1015 11th Avenue, Delano, CA 93215

The Analysis focuses on actions, omissions and decisions made because of race, color, religion, sex, disability, familial status or national origin, which restrict, or have the affect of restricting, housing choices or the availability of housing choices in the City of Delano. This document is available for public review at City Hall and the Delano Library.

PUBLIC COMMENT

Any individual, group, or agency may submit written comment to the City of Delano. All comments received by June 15, 2009 will be considered in the Analysis.

If you need a translator or special assistance to participate in this meeting, please contact the City Clerk's Office at (661) 720-2208 to make reasonable arrangements to ensure accessibility to this meeting. Telephone No. (661) 720-2208; or via California Relay Service (Hearing Impaired Only)

Type of Call	MCI California Relay Service	Sprint California Relay Service
TTY	1-800-735-2929	1-888-877-5378
Voice	1-800-735-2922	1-888-877-5379
Spanish	1-800-855-3000	1-888-877-5381
Speech to Speech		1-800-854-7784

Published: June 11, 2009, in The Delano Record

Ciudad de Delano
NOTICIA PÚBLICA

Para proporcionar una oportunidad para la participación del ciudadano, la Ciudad de Delano celebrará una audiencia pública para identificar las necesidades actuales de vivienda; recursos disponibles; limitaciones; y ayudar en el desarrollo de metas comunitarias, pólizas y acciones necesarias para actualizar el Elemento de Vivienda y preparar un Análisis de Impedimento para Vivienda Justa y Comprable.

JUNTA PÚBLICA

FECHA: Lunes, 15 de Junio del 2009
TIEMPO: 6:30 p.m.
LUGAR: Concilio de la Ciudad
1015 11th Avenue, Delano, CA 93215

El análisis se enfoca en acciones, omisiones, y decisiones hechas a base de raza, color, religión, sexo, disabilidad, posición o estado familiar, origen de nacionalidad que limita o afecta decisiones de vivienda en la Ciudad De Delano.

COMMENTARIO PUBLICO

Cualquier Persona, grupo, o agencia puede someter comentarios por escrito a la Ciudad De Delano. Todos los comentarios recibidos antes del día 15 de Junio, 2009 serán considerados en el Análisis.

Si necesita un traductor, o ayuda especial para participar en esta junta, favor de ponerse en contacto con la oficina de la secretaria municipal al (661) 720-2208 para hacer arreglos razonables para asegurar accesibilidad a esta junta. Numero telefónico (661) 720-2208; vía servicio de retransmisión de California (Audición Deteriorada Solamente)

Tipo de Llamada	MCI Servicio de Retransmisión de California	Sprint Servicio de Retransmision de California
TTY	1-800-735-2929	1-888-877-5378
Voz	1-800-735-2922	1-888-877-5379
Espanol	1-800-855-3000	1-888-877-5381
Discurso a Discurso		1-800-854-7784

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