



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



Adopted May 2015



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EXECUTIVE SUMMARY

PURPOSE AND INTENT

An Analysis of Impediments to Fair Housing Choice or “AI” is a requirement imposed on recipients of certain federal grants from the U.S. Department of Housing and Urban Development (HUD). The City of Roseville (City) receives an annual entitlement of Community Development Block Grant (CDBG) funds from HUD.

The regulations that govern these grants (Title 24 Code of Federal Regulations, Part 91) require that each HUD grantee certify as a condition of its grant that the grantee is “affirmatively furthering fair housing.” This includes (1) conducting an analysis of impediments to fair housing choice; (2) taking appropriate actions to overcome the effects of impediments identified through that analysis; and (3) maintaining records reflecting the analysis and actions.

This document is the City’s fourth AI. This AI adheres to the recommended scope of analysis and format in the *Fair Housing Planning Guide* developed by the U.S. Department of Housing and Urban Development (1996).

HUD defines the AI as, “a comprehensive review of a state’s or entitlement jurisdiction’s laws, regulations and administrative policies, procedures and practices. The AI involves an assessment of how these laws, regulations, policies and procedures affect the location, availability, and accessibility of housing, and how conditions, both private and public, affect fair housing choice.”¹

This review and assessment is used to identify actions the grantee will take to improve fair housing. The format of the AI is such that each action is associated with a concern or issue. These are described as “impediments.” HUD formally defines an impediment to fair housing as “... any action, omission, or decision that is intended to or has the effect of restricting a person’s choice of housing on the basis of race, color, religion, sex, disability, familial status, or national origin.”²

The framework of impediments and actions is to be used by the grantee to plan its annual actions and to report on actions taken to improve fair housing. This work is accomplished in the Annual Action Plan and in the Consolidated Annual Performance and Evaluation Report (CAPER), respectively.

Although the AI is not required as part of the annual submission to HUD, HUD recommends that each grantee regularly update its AI. HUD has suggested that the AI be conducted at least as often as the Consolidated Plan, which is required every five years. The City’s current Consolidated Plan was updated in 2010 and is valid through June of 2015.

¹ HUD Memorandum, “Analysis of Impediments to Fair Housing Choice Reissuance,” September 8, 2004.

² U.S. Department of Housing and Urban Development, *Fair Housing Planning Guide*, March 1996.

PREPARATION OF THE AI

City staff commissioned PMC to conduct and draft this AI; PMC is a private consulting firm. PMC has successfully prepared various other City and County AIs.

The research, analysis, and consultations required to complete the AI commenced in November 2014. The project was substantially complete by the end of February 2015.

On February 25, 2015 the City published the draft AI for public review and comment. On February 25, 2015, the City held a public meeting to discuss the AI process and to gather public comment on the state of fair housing and possible impediments. No public comments were received; the public meeting notice from the workshop is provided as an attachment to the AI.

On May 20, 2015, the City Council held a public hearing to consider the final AI. On May 20, 2015, the City Council adopted the final AI.

No public comments were received; the public meeting notice from the workshop is provided as an attachment to the AI.

IMPEDIMENTS IDENTIFIED

The AI identified the following impediments, on page 3. The Conclusions and Recommendations section of this AI provides detail regarding the impediments identified and describes the planned actions to address those impediments.

It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, this analysis is stating the nature of a problem that the actions will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

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

Affordable Housing

1. Impediment: Lack of sufficient affordable housing supply
2. Impediment: Need for rental subsidy for lower-income households

Mortgage Lending

3. Impediment: Differential rates of mortgage credit request in the private lending market based on ethnicity
4. Impediment: Lower rates of loan origination in the private lending market based on neighborhood income characteristics

Fair Housing Education and Enforcement

5. Impediment: Knowledge of fair housing rights is limited
6. Impediment: Lack of information on the nature and basis of housing discrimination

Government Barriers

7. Impediment: Lack of formal policies and procedures regarding exceptions and variances requested by disabled persons

INTRODUCTION

HISTORY OF THE CITY OF ROSEVILLE

Roseville is a diverse, full service City and retains and celebrates its rich historical railroad roots. Located in Placer County along the eastern edge of the Sacramento Valley at the base of the Sierra Nevada foothills, Roseville is sixteen miles from Sacramento, the State Capital. Typical of other California cities, Roseville's climate ranges from hot, dry summers to mild winters. The original town was developed by miners from the famed Gold Rush in California. Roseville was incorporated on April 10, 1909 and is a Charter City operating under a City Manager-City Council form of government.

The strength and balance of the City's diverse economy provides an environment in which the City can thrive. Business ventures in the City include those in technology, advanced manufacturing, medical and health, healthcare, agriculture and financial and IT services. Top business employers in the City include Kaiser Permanente, Hewlett-Packard, Sutter Roseville Medical Center, Union Pacific Railroad, TSI Semiconductors (formerly NEC Electronics) and PRIDE Industries. The City's retail economy is thriving. Roseville ranks 13th in retail sales in the State out of 562 cities; accounting for more than \$3 billion dollars in retail sales annually. Top retail sale sites include the Westfield Galleria, Fountains, Creekside and the Roseville Auto mall.

A large variety of culture and entertainment venues are located in and around the City. In addition, the City's parks and recreation programs as well as educational systems make the City an inviting place to raise a family. Abundant recreational programs, numerous neighborhood parks, golf courses, state-of-the-art fitness centers and thousands of acres of open space provide a great way for residents to enjoy the climate and environment. Several schools have received "California Distinguished School Awards" from the California Department of Education; the City is within driving distance of Sierra and American River Community Colleges, California State University, Sacramento and University of California, Davis.

WHAT IS FAIR HOUSING?

Equal access to housing is fundamental to each person being able to meet essential needs and to the pursuit of personal, educational, employment, and other goals. In recognition of equal housing access as a fundamental right, the governments of the United States and the State of California have both established fair housing as a right protected by law.

Federal fair housing laws prohibit discrimination in the sale, rental, lease, or negotiation for real property based on race, color, religion, sex, national origin, familial status, and disability. The California fair housing laws are built on the federal laws and add marital status, ancestry, source of income, sexual orientation, and "any arbitrary factor" as protected categories under the laws.

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

Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, 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, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.*³

To affirmatively promote equal housing opportunity, a community must work to remove or to mitigate impediments to fair housing choice. The City is dedicated to providing fair housing opportunities to all residents, to assuring compliance with all applicable laws throughout the City, and to conducting its business fairly and impartially.

WHAT IS AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)?

The AI is an assessment of how laws, governmental policies, real estate practices, and local conditions may affect the location, availability, and accessibility of housing. The analysis of their impact on housing choice can highlight areas where corrective actions might broaden the housing options of persons protected by fair housing laws. The analysis includes examining impediments and barriers to fair housing choice:

An impediment to fair housing choice is any action, omission, or decision that is intended to or has the effect of restricting a person's choice of housing on the basis of race, color, religion, sex, disability, familial status, or national origin. Such a limitation to fair housing choice constitutes housing discrimination.

*This AI defines barriers to housing choice as factors, such as income level and housing supply that limit a person's choice of housing.*⁴

This AI adheres to the recommended scope of analysis and format in the *Fair Housing Planning Guide* developed by the U.S. Department of Housing and Urban Development (1996).

PURPOSE OF THE ANALYSIS OF IMPEDIMENTS

The purpose of an AI is to review conditions in the jurisdiction that may impact the ability of households to freely choose housing and to be treated without regard to race, ethnicity, religion, gender, national origin, source of income, age, disability, or other protected status. The AI reviews the general state of fair housing, the enforcement of fair housing law, efforts to promote fair housing, access to credit for the purpose of housing, and general constraints to the availability of a full range of housing types.

An AI examines the affordability of housing in the jurisdiction with an emphasis on housing affordable to households with annual incomes classified as low-income. (Low-income is defined as equal to or less than 80% of the adjusted area median family income as most recently published by the U.S. Department of Housing and Urban Development.)

³ U.S. Department of Housing and Urban Development, *Fair Housing Planning Guide*, March 1996.

⁴ U.S. Department of Housing and Urban Development, *Fair Housing Planning Guide*, March 1996.

The document has three major goals:

To provide an overview of the City and current conditions as they may impact fair housing choice.

To review the policies and practices of the City as they may impact fair housing choice and the provision of housing, specifically affordable housing and housing for special needs households.

To identify impediments to fair housing choice and actions the City will take to remove those impediments or to mitigate the impact those impediments have on fair housing choice.

Fulfilling these goals includes the following:

A review of the laws, regulations, and administrative policies, procedures, and practices of the City.

An assessment of how those laws affect the location, availability, and accessibility of housing.

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

ORGANIZATION OF THE REPORT

This report is divided into eight sections, including the executive summary and this introduction.

Executive Summary – Identifies the intent and purpose of the report, provides a brief description of the process, and summarizes the key findings.

Introduction – Explains the purpose of the analysis of impediments to fair housing, defines fair housing, lists the data and funding sources for the report, and describes the public participation process.

Community Profile – Describes the housing and population characteristics of the City. Population characteristics include income, age, race, ethnicity, familial status, and disability; employment characteristics are also included. Housing characteristics include unit type and tenure, housing cost, and overcrowding. The geographic distribution of households by income, race, and ethnicity is also examined.

Private Sector Practices – Assesses the general level of fair housing and housing rights awareness in the private sector. Specifically, rental housing, residential real estate sales, and mortgage lending are evaluated. The analysis relies on an array of tools including interviews with stakeholders and the review of local advertisements, published data on mortgage lending, and reports of unfair housing practices.

Public Policies – Reviews public policies and practices to determine the potential impact on fair housing and the provision of an adequate number and appropriate types of housing.

Assessment of Fair Housing Practices – Evaluates existing public and private programs, services, practices and activities that aim to assure fair housing in the City. This section describes the City’s recent actions to promote fair housing, provide affordable housing, and remove barriers to affordable housing. In order to identify actions taken to affirmatively further fair housing, this section reviews the City’s most recent Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports (CAPERs).

Community Participation – Describes the community outreach and consultation process. This section also summarizes the results of that process, including comments regarding housing discrimination, housing impediments, and housing needs.

Conclusions and Recommendations – Summarizes the findings regarding fair housing issues in the City and provides recommendations for furthering fair housing. In this section, the reader can find the impediments identified and the actions proposed to address those impediments.

FUNDING SOURCE

Preparation of this report was funded with general funds.

DATA SOURCES

To prepare this Analysis of Impediments to Fair Housing Choice (AI), many data sources were consulted, as listed below.

American Community Survey (ACS) 2007-2011 - 5-Year Estimates, U.S. Census Bureau. ACS data are obtained from a nationwide survey on demographic, social, economic, and housing information conditions. The 5-Year Estimate includes 60 months of collected data for all population size areas. It utilizes the largest sample size of all of the Survey forms (1-Year, 3-Year and 5-Year Estimates) and is the most reliable. It is, however, the least current of the Survey forms. The 5-Year Estimate is best utilized when precision is more important than currency and when examining tracts and other smaller geographies.

2010 Decennial Census, U.S. Census Bureau. The Decennial Census provides comprehensive data describing demographic and housing characteristics.

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

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

Comprehensive Housing Affordability Strategy (CHAS). Developed by the Census Bureau for HUD, the CHAS database contains information on low- and moderate-income households, as well as housing problems, (i.e., cost burden, overcrowding, and substandard conditions). On May 28, 2014 HUD posted new CHAS data based on the 2007-2011 and 2009-2011 ACS. CHAS data from the 2007-2011 ACS are available for a variety of summary levels, from states down to

split census tracts. CHAS data from the 2009-2011 ACS are available for states, counties, minor civil divisions, and places.

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

COMMUNITY PROFILE

Within the same housing market household and individual characteristics may affect the range of housing choices available and the specific housing needs. This chapter of the AI presents and discusses the housing and population characteristics of the City.

POPULATION CHARACTERISTICS

The type and amount of housing needed in a community is largely determined by population growth and the characteristics of the population. Factors such as age, occupation, and income combine to influence the type of housing needed in a community and the affordability of housing provided.

Information in this section is primarily based on housing and population data provided by the California Department of Finance (DOF) and the U.S. Census Bureau. The most current data available have been used; more current data sources may not always provide the level of detail or the specific characteristic desired.

Population

According to the DOF, in 2013 the City had a population of 124,673. This represented an increase of 5% (5,885 persons) from 2010 to 2013 (**Table 1**), exceeding that of Placer County (unincorporated area) (3.6%) and more than double that of the region (1.7%).⁵

**TABLE 1
POPULATION**

Jurisdiction	2010	2013	Change (2010–2013)	
			Number	Percentage
City of Roseville	118,788	124,673	5,885	5.0%
Placer County	348,432	360,802	12,370	3.6%
Sacramento Region	2,461,780	2,503,367	41,587	1.7%

Source: 2010 U.S. Decennial Census and California Department of Finance 2013 E-5 Report

Age Distribution

The age of persons in a community is a determining factor of a community’s housing needs. Different age groups have distinct family types, sizes, and income levels, all of which correspond to different housing needs. Younger adults tend to seek apartments, condominiums, and single-family units that are proportionate to their typically smaller household sizes and more constrained finances. Adults with children may seek larger single-family homes. However, as grown children begin to leave home, older adults and seniors often seek to trade their larger homes for smaller single-family homes and condominiums that are typically easier to maintain and afford.

⁵ The region is defined as the Sacramento–Arden-Arcade-Yuba City, CA-NV Combined Statistical Area. The Combined Statistical Area includes the counties of El Dorado, Placer, Sacramento, Sutter, Yuba, Nevada, Yolo, and Douglas County, Nevada.

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According to the 2007-2011 American Community Survey (ACS) –5 Year Estimates, children (age 14 and under) accounted for almost a quarter (21.5%) of the total population in Roseville, while the 15 to 19 age group represented 7.2% of the total population (**Table 2**). The largest age group for the City was the 35-44 age group, which represented 15.1% of the total City population, followed by the 45-54 age group (14.1%) and the 25-34 age group (13.1%).

When compared to 2010 U.S. Decennial Census numbers, the breakdown is similar.

TABLE 2
AGE CHARACTERISTICS

Age Group	Roseville 2010		Roseville 2007-2011	
	Number	Percentage	Number	Percentage
Under 5	8,044	6.8 %	7,472	6.4 %
5 to 9	8,950	7.5 %	9,019	7.7 %
10 to 14	8,931	7.5 %	8,634	7.4 %
15 to 19	8,227	6.9 %	8,383	7.2 %
20 to 24	6,455	5.4 %	6,788	5.8 %
25 to 34	15,755	13.2 %	15,300	13.1 %
35 to 44	17,607	14.8 %	17,652	15.1 %
45 to 54	17,006	14.3 %	16,433	14.1 %
55 to 59	6,467	5.4 %	6,210	5.3 %
60 to 64	5,479	4.6 %	5,159	4.4 %
65 to 74	7,576	6.4 %	7,998	6.9 %
75 to 84	5,728	4.8 %	5,720	4.9 %
85 and over	2,563	2.2 %	1,845	1.6 %
Total	118,788	100.0%	116,613	100.0%

Source: 2010 U.S. Decennial Census and 2007-2011 American Community Survey- 5 Year Estimates

**Percentages may not add up due to rounding.*

Language Spoken

The 2007-2011 American Community Survey – 5 Year Estimates shows that 83% of the City’s population speaks English and 17% speak another language. The majority of Hispanic persons in Roseville speak only English (59.5%) and the majority is native born (76.2%), (**Table 4**). Just over 16% (16.6%) of Hispanic persons speak English “less than very well.”

**TABLE 3
LANGUAGE, ALL PERSONS 5 YEARS AND OLDER**

Language	Persons	Percentage
Persons		
English language	90,587	83%
Other language	18,554	17%
All persons	109,141	100.0%

Source: 2007-2011 American Community Survey-5 Year Estimates

**TABLE 4
HISPANIC PERSONS 5 YEARS AND OLDER, NATIVITY AND LANGUAGE SPOKEN AT HOME**

Nativity and Language	Persons	Percentage
Nativity		
Native born	12,125	76.2%
Foreign born	3,800	23.8%
Language		
Speak only English	9,480	59.5%
Speak another language, speak English "very well"	3,804	23.9%
Speak another language, speak English less than "very well"	2,641	16.6%
Total Hispanic persons, 5 years and older	15,925	100.0%

Source: 2007-2011 American Community Survey- 5 Year Estimates

**Percentages may not add up due to rounding.*

Race and Ethnicity

According to the 2007-2011 ACS, White persons were the largest racial group in the City, representing 81.4% of the population (**Table 5**). Overall, the racial composition of the City remained more or less unchanged from 2010 to 2007-2011.

**TABLE 5
RACE AND ETHNICITY**

Race/Ethnicity	Roseville 2010		Roseville 2007-2011	
	Number	Percentage	Number	Percentage
White	94,199	79.3%	94,901	81.4%
Black or African American	2,329	2.0%	1,944	1.7%
American Indian and Alaska Native	885	0.7%	619	0.5%
Asian	10,026	8.4%	9,783	8.4%
Native Hawaiian or Pacific Islander	346	0.3%	352	0.3%
Some other race	5,087	4.3%	4,822	4.1%
Two or more races	5,916	5.0%	4,192	3.6%
Total population	118,788	100.0%	116,613	100.0%
Hispanic Origin, all races	17,359	14.6%	17,565	15.1%

*Source: 2010 U.S. Decennial Census; 2007-2011 American Community Survey- 5 Year Estimates
* Percentages may not add up due to rounding.*

Minority Concentration

Based on 2010 Decennial Census data by block group, there are several areas of racial and ethnic concentration in the City.⁶ Groups representing less than 1% of the population are not considered as a concentration.

- An “area of concentration” is defined as an area where the percentage of a particular racial or ethnic sub-group is greater than that sub-group’s overall percentage in Placer County.⁷
- An “area of high concentration” is defined as defined as an area where the percentage of a particular racial or ethnic sub-group is at least two times greater than that sub-group’s overall percentage in Placer County.⁸

Following is County and City-wide overall race and ethnicity data for Placer County and Roseville, (not at block group level).

⁶ Data on racial concentration was taken solely from the 2010 U.S. Census because the 2007-2011 ACS does not provide data at the block group level of geography.

⁷ Rounded to a whole percentage point.

⁸ Rounded to a whole percentage point.

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Race and Ethnicity	Placer County	Roseville
Black or African American	1.28%	2.0%
Asian	5.69%	8.4%
Hispanic , all races	10.83%	14.6%
Some other race	.15%	<1.0%
Two or more races	2.11%	5.0%

Source: 2010 Decennial Census, Placer County 2014 ESRI/GIS

The following observations were made based on the maps:

- Areas of Black or African concentration are distributed throughout the City with several areas of high concentration in the north and south portions of the City.
- Areas of Asian concentration are also distributed throughout the City with several areas of high concentration, the largest of which is the northwestern portion of the City.
- Persons of “some other race” represent less than 1% of the population, are not considered a concentration, and are dispersed throughout the City.
- Persons of two or more races are distributed across the City with no areas of high concentration.
- Hispanic persons (all races) are distributed throughout the City with two areas of high concentration in the southern portion of the City.

It should be noted that where there is a very low percentage of persons in a sub-group, a relatively small number of persons could result in an area of concentration or high concentration. In general, the City does not show patterns of residential segregation.

HOUSEHOLD CHARACTERISTICS

A household is defined as all persons occupying a single housing unit. A household can be a family, a person living alone, or unrelated persons living together. The type, size, and composition of a household can affect the type of housing and services that are needed. Families typically need single-family homes or large apartments with sufficient bedrooms for children; whereas single-person households, especially those headed by seniors, may desire smaller, easier-to-maintain housing units such as condominiums or apartments.

Household Type

According to the 2007-2011 ACS, the City was estimated to contain 44,217 households in 2007-2011, of which 67.9% were family households. Family households are those comprising individuals related by blood or marriage. They are enumerated as married couples, single-parent households (female-headed and male-headed), and families with or without children. Non-family households, including singles and households comprising nonrelated individuals, made up the remaining 32.1% of households in the City.

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The percentages are similar to those in 2010, with 68.9% family households and 35.1% non-family households.

The proportion of family versus non-family households in 2010 and 2007-2011 was relatively unchanged (Table 6).

**TABLE 6
HOUSEHOLD TYPE**

Household Type	Roseville 2010		Roseville 2007-2011	
	Number	Percentage	Number	Percentage
All Households	45,059	100.0%	44,217	100.0%
Family Households	31,039	68.9%	30,037	67.9%
<i>with children</i>	15,836	35.1%	15,280	34.6%
Married couple families	24,050	53.4%	23,686	53.6%
<i>with children</i>	11,788	26.2%	11,410	25.8%
Male households, no wife	2,088	4.6%	1,778	4.0%
<i>with children</i>	1,211	2.7%	837	1.9%
Female householder, no husband	4,901	10.9%	4,573	10.3%
<i>with children</i>	2,837	6.3%	3,033	6.9%
Non-Family Households	14,020	31.1%	14,180	32.1%
Living alone	11,042	24.5%	11,244	25.4%
<i>65 and over</i>	4,502	9.9%	4,450	10.1%

Source: 2010 U.S. Decennial Census; 2007-2011 American Community Survey- 5 Year Estimates

FIGURE 1 AREAS OF BLACK OR AFRICAN AMERICAN CONCENTRATION

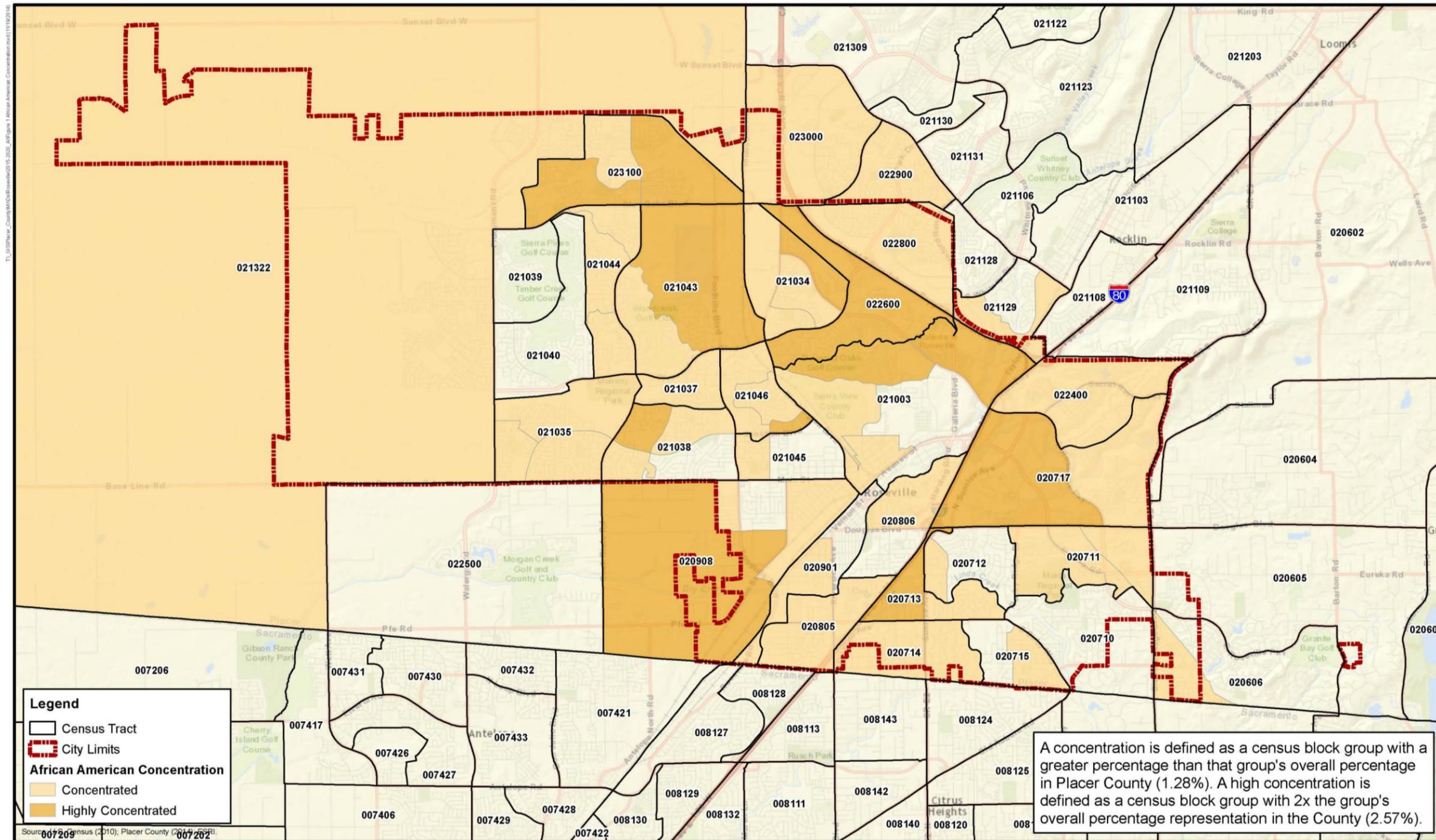


Figure 1
Areas of Black or African American Concentration



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FIGURE 2 AREAS OF ASIAN CONCENTRATION

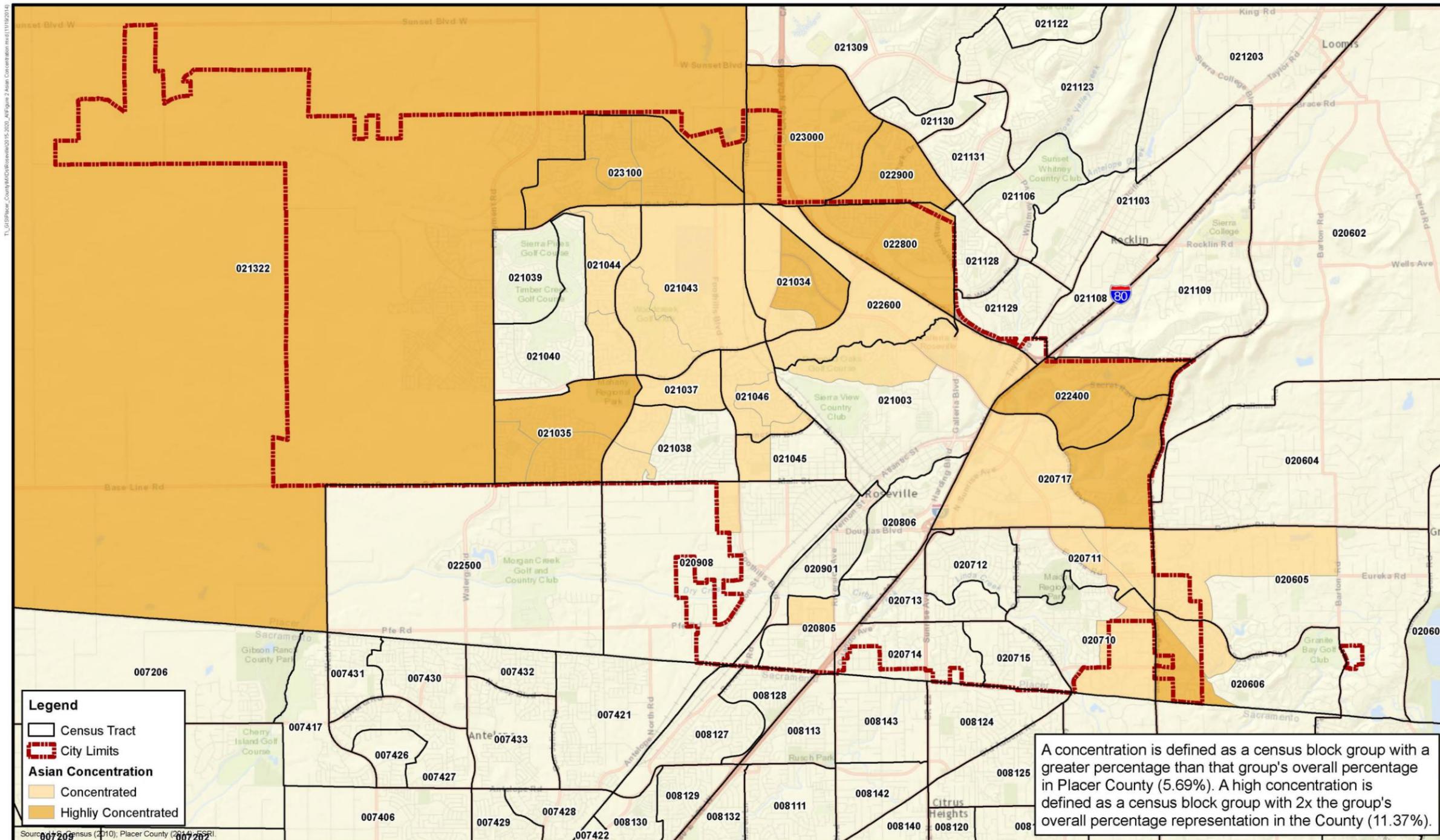


Figure 2
Areas of Asian Concentration



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FIGURE 3 AREAS OF "SOME OTHER" CONCENTRATION

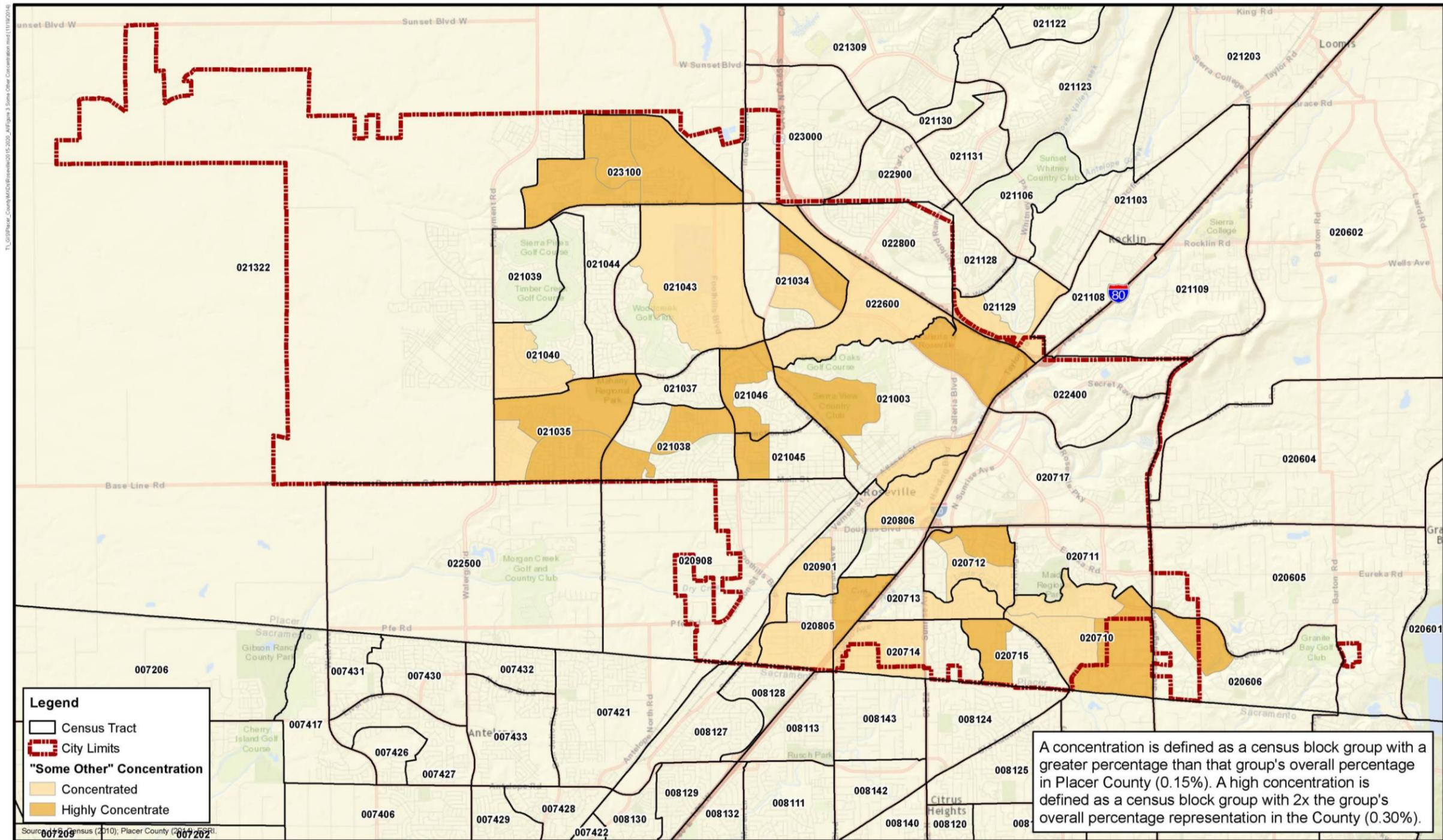


Figure 3
Areas of "Some Other" Concentration



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FIGURE 4 AREAS OF "MULTIPLE RACE" CONCENTRATION

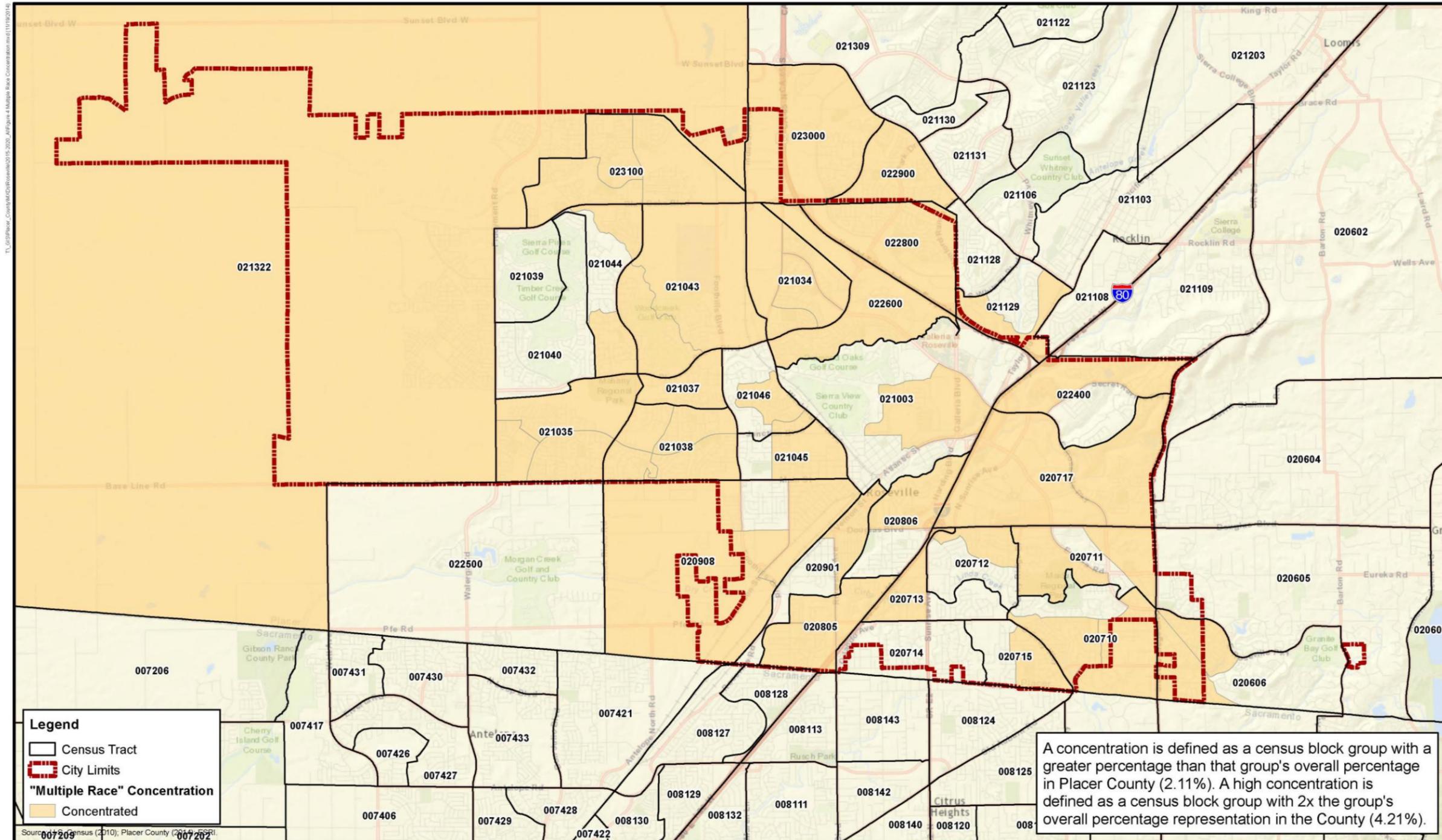


Figure 4
Areas of "Multiple Race" Concentration



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FIGURE 5 AREAS OF HISPANIC CONCENTRATION

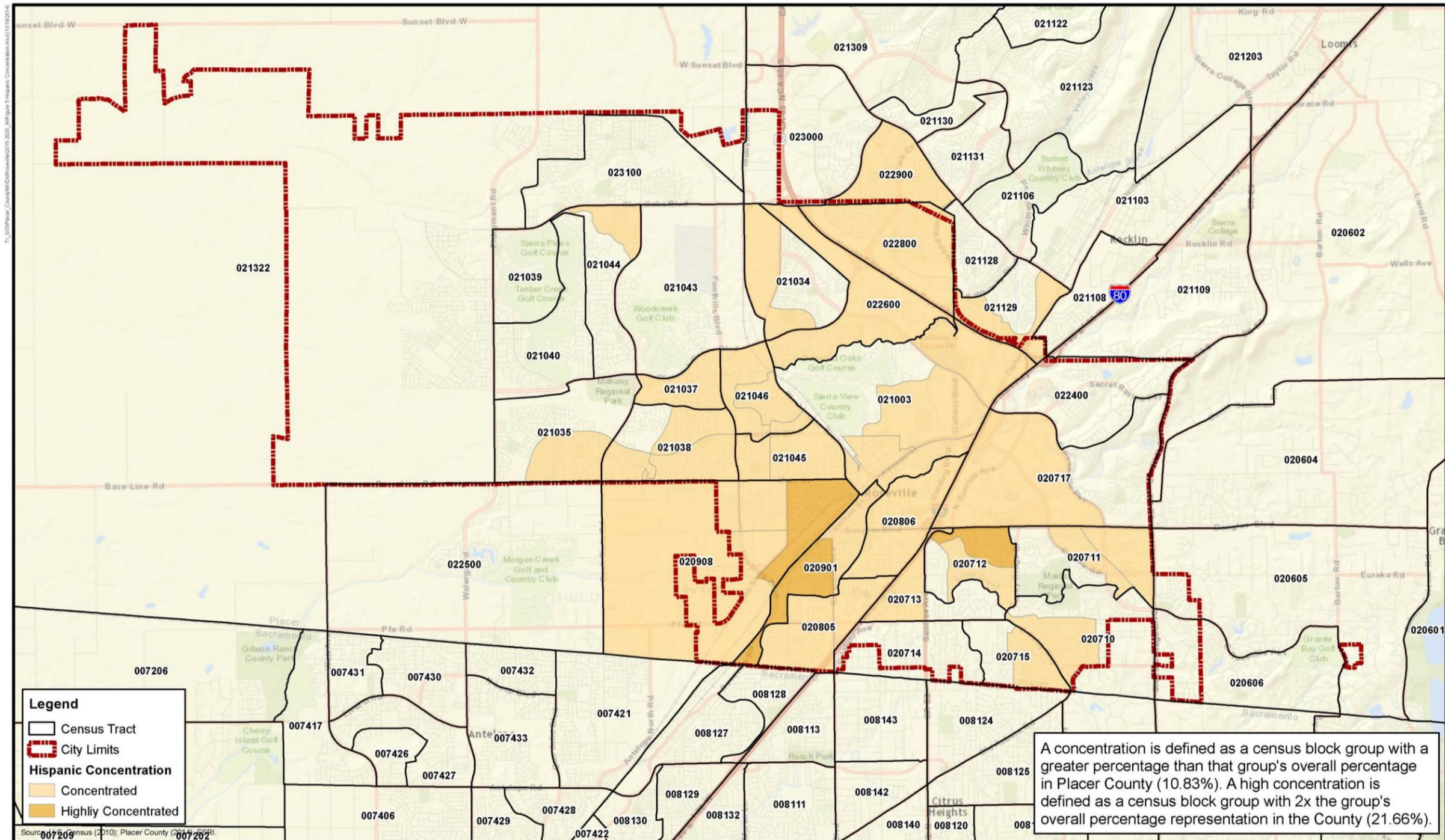


Figure 5
Areas of Hispanic Concentration



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Household Size

Typically, the higher a community's average household size, the greater the need for larger-sized homes to avoid overcrowding. The California Department of Finance reported the average household size in the City to be 2.68 persons in 2013, the second highest among Placer County jurisdictions following Loomis and Rocklin. When compared to the 2010 U.S. Decennial Census, which reported 2.62 persons per household, average household size remained about the same.

SPECIAL NEEDS POPULATIONS

Certain groups may have more difficulty finding housing and may require specialized services or assistance. Owing to their special circumstances, they are more likely to have lower incomes and often have a relatively higher cost of living. These groups include the elderly, large households, single-parent-headed (female and male) households, persons with disabilities (mental, physical, and developmental), persons with HIV/AIDS, and homeless persons.

Elderly

Elderly persons (those aged 65 years or older) often have special housing needs for three main reasons: fixed relatively low income, high health care costs, and physical disabilities. According to the 2007-2011 ACS, approximately 15,563 elderly persons lived in Roseville, comprising 13.3% of the population. For persons age 65 and over, 8.2% fell below the poverty line. According to the 2010 U.S. Decennial Census, there were 15,867 elderly persons in Roseville, comprising about 13.4% of the population in 2010. Of these, 15.9% rented and 25.7% owned their homes.

Large Households

Large households are defined as having five or more members. These households are usually families with two or more children or extended families with family members such as in-laws or grandparents. Large households are a special needs group because the availability of adequately sized, affordable housing units is often limited. In order to save for necessities such as food, clothing, and medical care, very low- and low-income large households may reside in smaller units, resulting in overcrowding.

Furthermore, families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children or confine them to a specific location, limit the time children can play outdoors, or refuse to rent to families with children.

The 2007-2011 ACS identified 4,525 households in Roseville with five or more persons, representing 10.1% of all households. According to the 2010 U.S. Decennial Census, 21% of all households in the City had five or more persons in 2010; double that in 2007-2011.

Single-Parent Households

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

headed families have more limited opportunities to find affordable, decent, and safe housing. Female-headed families may also be discriminated against in the rental housing market because some landlords are concerned about the ability of these households to make regular rent payments. Consequently, the landlords may require more stringent credit checks for women, which is a violation of fair housing law. According to the 2007-2011 ACS, 8.8% of all households (3,870) in the City were headed by single parents with children under the age of 18. Of those households, 78.4% were female-headed households and 21.6% were male-headed households.

According to the 2010 U.S. Decennial Census, 9.0% of all City households were headed by single parents with children. Of those, 70% were female-headed households and 30% were male-headed households.

Disabled Persons

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

Data on disabilities was taken solely from the 2009-2011 ACS 3 Year Estimates because the 2007-2011 ACS 5 Year Estimates does not enumerate disability. According to the 2009-2011 ACS 3 Year Estimates, 8.0% of the population age 18 to 64 (9,523 individuals) who lived in Roseville reported a disability. As age increases, the incidence of disability increases. More than one-third (31.8%; 4,792 persons) of the population 65 and older reported having a disability. Persons with disabilities often face limited earning potential as the result of their disabilities, their status as retired seniors, and the reluctance of some employers to hire persons with disabilities. In addition to affordability problems, people with disabilities experience other difficulty obtaining adequate housing because of discrimination and a lack of housing with accessibility features and adequate support services.

Persons with HIV/AIDS

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

The primary organization that assists this segment of the population in Placer County is the Sierra Foothills AIDS Foundation, a nonprofit organization that provides support services as well as education and prevention services. Their target population includes people living with HIV or AIDS and their families. Conversations with staff at Sierra Foothills AIDS Foundation have indicated that most persons with HIV or AIDS do not encounter fair housing issues based on their disability because they do not disclose what their specific disability is.⁹

⁹ Email correspondence, Susan Farrington, Sierra Foothills AIDS Foundation, Placer County, CA; January 30, 2015.

As of December 31, 2014, Placer County reported 114 people living with HIV/AIDS. The State of California Office of AIDS estimates an additional 18% of the reported cases are living with HIV/AIDS but are not aware of their infection, increasing the number of cases to an estimated 135. Of the diagnosed cases, 25 individuals, or 22%, reside in the City of Roseville.

People living with HIV/AIDS are among the poorest residents of the County with 95% reporting incomes of less than 30% of the median income and 80% with incomes below the Federal poverty line. Thirty percent of the HIV/AIDS population is age 60 or over, 30% are between the ages of 40 – 60 and the rest are under 40.

It is important to note that the emerging trend that is occurring is a dramatic increase in new infections for persons between the ages of 18 – 30. This is based on a history of childhood trauma such as foster care (transition age youth), domestic violence, and sexual molestation.

The biggest challenges faced by people living with HIV/AIDS are access to affordable housing, the lack of adequate transportation and food security. There are currently no HIV specialists accepting new patients in Placer County; as a result, this forces people living with HIV/AIDS to seek their medical care in Sacramento County.

Homeless Persons

The Placer Consortium on Homelessness (PCOH) conducted counts of homeless persons throughout Placer County on January 24, 2011 and January 23, 2013. Both counts included a survey and were a collaborative effort of community volunteers and PCOH member agencies.

A point-in-time count is only a snapshot reflecting those persons identified as homeless on the day of the count and is not necessarily an accurate reflection of year-round conditions. Many individuals and families move in and out of homelessness over the course of a year.

The January 2011 point-in-time count enumerated a total of 631 homeless persons comprising 451 distinct homeless households, (a household may be one person).

The January 2013 point-in-time count enumerated a total of 594 homeless persons; 475 homeless households were surveyed.

It should be noted that many individuals and families move in and out of homelessness over the course of a year.

INCOME DATA

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

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Income levels are defined as a percentage of the area median family income (MFI). HUD produces annual estimates of MFI for all metropolitan areas and rural counties in the nation; the estimates are adjusted based on household size but are commonly quoted for a four-person household. The 2014 MFI for Placer County was \$67,990 for a household of four.¹⁰ (2014 MFI is calculated based on 2007-2011 ACS 1 and 5 Year Estimates)

HUD has defined the following income categories for Placer County, based on the median income for a household of four persons in 2014:

- Extremely-low income: 30% of MFI and below (\$0 to \$23,850)
- Very-low income: >30 to 50% of MFI (\$23,851 to \$34,350)
- Low-income: >50 to 80% of MFI (\$34,351 to \$55,050)

Table 7 provides information on income characteristics for the City of Roseville.

**TABLE 7
INCOME CHARACTERISTICS**

	Roseville 2010	Roseville 2007-2011
Median Household Income	69,932	75,245
Median Family Income	84,213	92,433
Percentage of Families Below Poverty Level	5.4%	5.0%
Percentage of Families with Children Below the Poverty Level	9.0%	7.2%
Percentage of Persons 65 Years and Older Below Poverty Level	8.8%	8.2%

Source: 2010 American Community Survey 1 Year Estimates; 2007-2011 American Community Survey

Areas of Low- and Moderate-Income Household Concentration

Figure 6 shows areas of low- and moderate-income household concentration. These areas are determined using custom tabulations of U.S. 2010 Decennial Census data provided by HUD.¹¹ The HUD definition of an area of low- and moderate-income household concentration is a block group area that has 51% or more low- and moderate-income households within it. This determination is used primarily to target the use of Community Development Block Grant (CDBG) funds. In cities such as Roseville where there are few to no areas of low- and moderate-income household concentration, HUD allows areas of low- and moderate-income household concentration to be defined as the upper quartile of concentration. HUD calculates and releases these figures. For the City, areas with at least 41.4% low- and moderate-income households are considered areas of low- and moderate-income household concentration.

¹⁰ Placer County is part of the Sacramento--Arden-Arcade--Roseville, CA, HUD Metro FMR Area.

¹¹ 2010 U.S. Decennial Census Low- and Moderate-Income Summary Data

FIGURE 6 AREAS OF LOW- AND MODERATE-INCOME CONCENTRATION

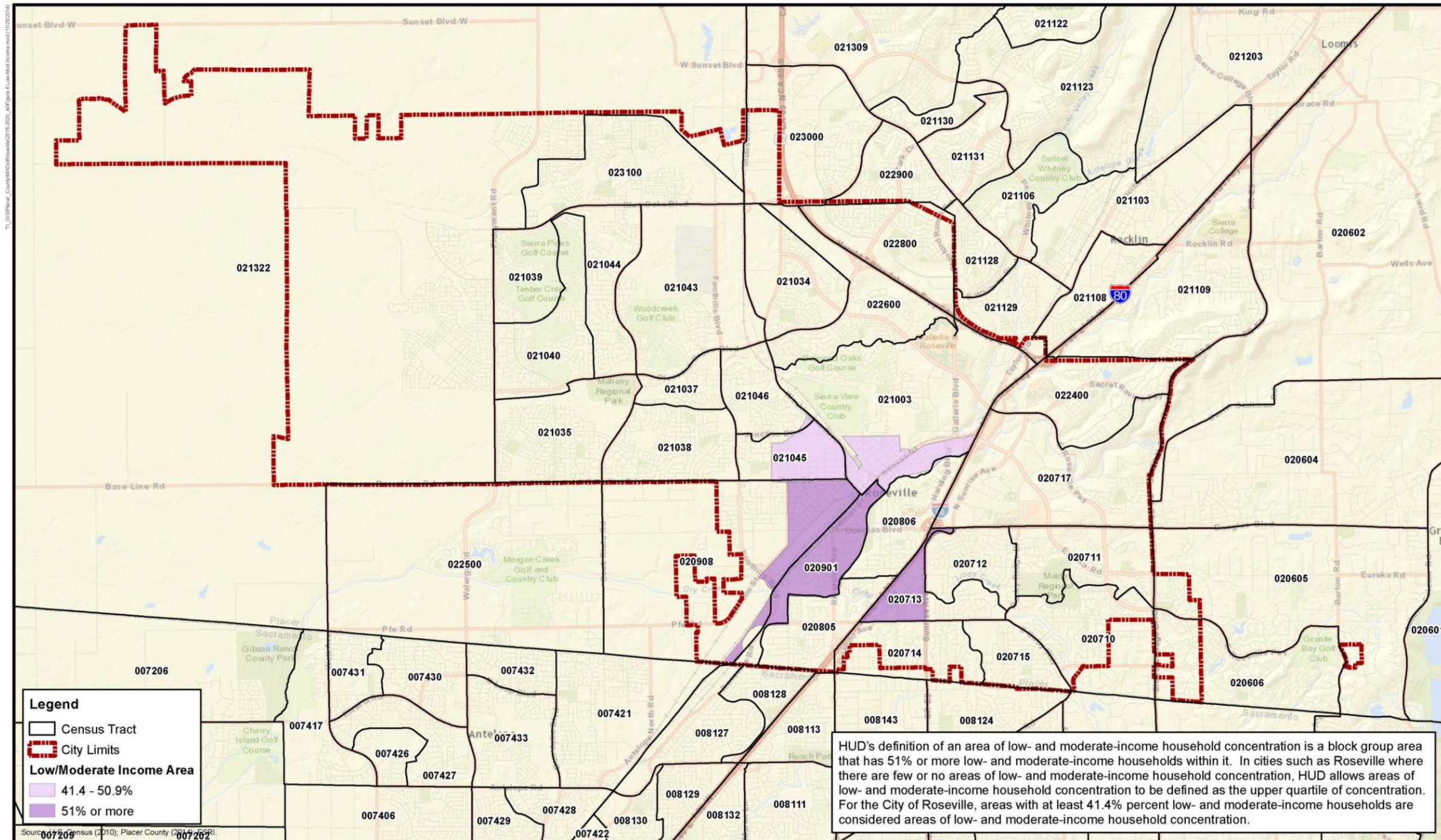


Figure 6
Areas of Low and Moderate Income Concentration



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EMPLOYMENT

Labor Force

Table 8 provides a summary of the civilian labor force, employment (the number employed), unemployment (the number unemployed). The table also shows the unemployment rates for 2011, 2012 and 2013 for the City and Placer County. The data is provided by the Employment Development Department. The three years of data are annual averages. When comparing the 2011 data to the 2013 data for the City, the unemployment rate decreased from 10.8% in 2011 to 7.6% in 2013 (a decrease of 3.2%). This decreased unemployment rate is also the trend in Placer County, with a 3.2% decrease in unemployment from 2011 to 2013.

**TABLE 8
LABOR FORCE DATA**

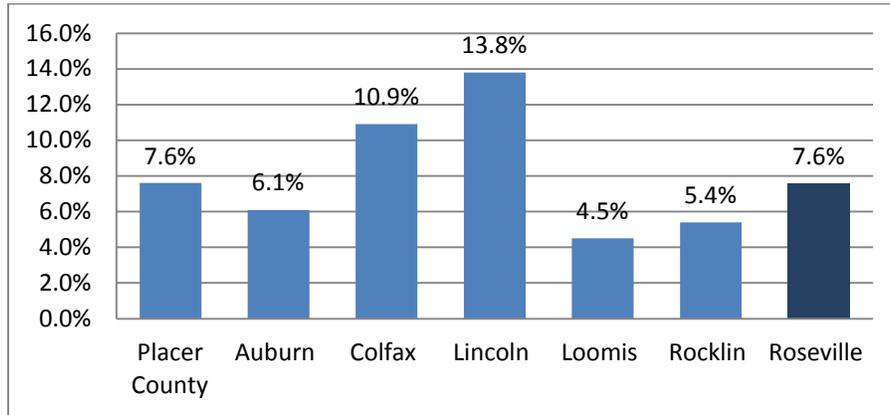
Labor Force	Roseville			Placer County		
	2011	2012	2013	2011	2012	2013
Total Labor Force	56,000	56,200	56,400	177,900	178,800	179,200
Employment	49,900	50,900	52,000	158,800	162,000	165,600
Unemployment	6,100 (10.8%)	5,300 (9.5%)	4,300 (7.6%)	19,100 (10.8%)	16,800 (9.4%)	13,600 (7.6%)

Source: Employment Development Department, Monthly Labor Force Data for Cities and Census Designated Places, 2011, 2012, 2013

Note: Data is not seasonally adjusted and therefore the employment and unemployment numbers may not add up to the total labor force number.

When looking at other cities in Placer County, as of 2013, Roseville had the fourth lowest unemployment rate in the county. The highest unemployment rate, almost double the rate of Roseville, was in Lincoln, with an unemployment rate of 13.8% (see **Figure 7**).

**FIGURE 7
PLACER COUNTY UNEMPLOYMENT RATES**



Source: Employment Development Department, Monthly Labor Force Data for Cities and Census Designated Places, 2013

Major Employers

Table 9 identifies major employers in the Roseville area. Major employers are concentrated in technology services, health care, education, commercial, and retail. As is typical in a number of communities in the Sacramento area, larger employers in the Roseville area include technology and health care firms. With over 3,231 employees, Kaiser Permanente is the largest employer in the Roseville area.

**TABLE 9
MAJOR EMPLOYERS IN THE ROSEVILLE AREA**

Employers	Number of Employees
Kaiser Permanente	3,231
Hewlett Packard	2,548
Sutter Roseville Medical Group	1,654
Roseville Joint Union High School District	1,434
Union Pacific Railroad Co.	1,180
City of Roseville	1,097
Adventist Health Systems West	1,019
Roseville City School District	1,000
PRIDE Industries	550
Solar City	475

Source: City of Roseville, Office of Economic Development, May 2015

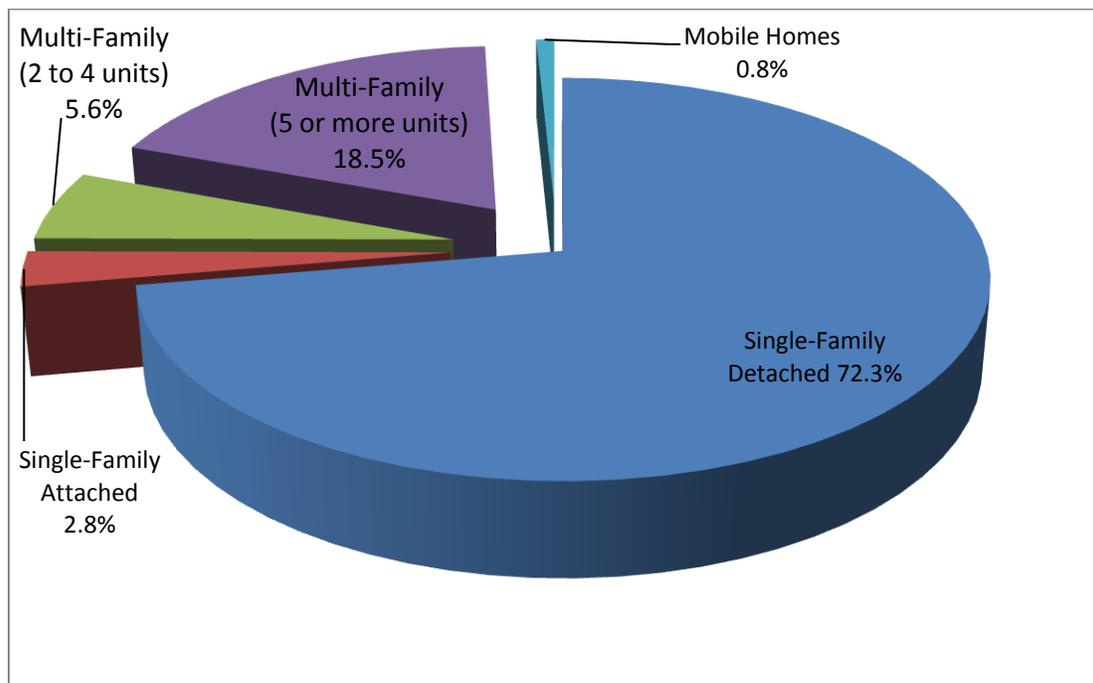
HOUSING PROFILE

A discussion of fair housing choice must be preceded by an assessment of the housing market in question. This section provides an overview of the characteristics of the local and regional housing markets. A housing unit is defined by the U.S. Census Bureau as a house, an apartment, or a single room occupied as a separate living quarter or, if vacant, intended for occupancy as a separate living quarter. Separate living quarters are those in which the occupants live and eat separately from any other persons in the building and which have direct access from the outside of the building or through a common hall.¹² The housing stock consists of all housing units located in a community.

Housing Type

The DOF annual estimates of the number of housing units by type for each jurisdiction are based on reported building and demolition permits. As of 2014, the City had a total of 50,322 housing units.¹³ Three-quarters of the units in the City were single-family (2.8% attached and 72.3% detached), 24.1% were multi-family, of which 18.5% had more than 5 units; the remaining 0.8% were mobile homes (Figure 8).

FIGURE 8
HOUSING TYPE



Source: Department of Finance, 2014 E-5 Report

¹² U.S. Census Bureau

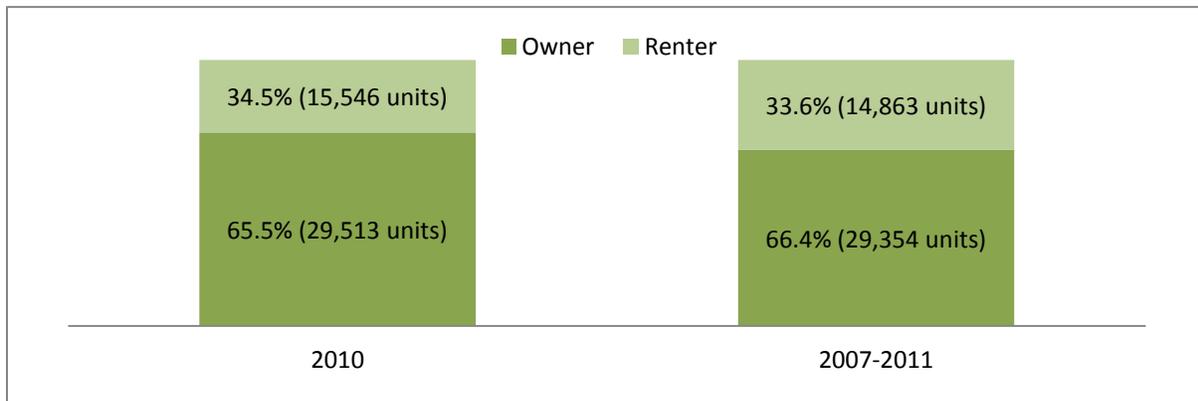
¹³ Department of Finance, 2014 E-5 Report

Housing Tenure

Housing tenure refers to whether a unit is owner-occupied or renter-occupied. The tenure distribution of a community’s housing stock influences several aspects of the local housing market. Residential mobility is influenced by tenure, with ownership housing evidencing a much lower turnover rate than rental housing. A high relative housing cost is generally more prevalent among renters than among owners. Tenure preferences are primarily related to household income, composition and age of head of household.

According to the 2007-2011 ACS, Roseville had a total of 44,217 occupied housing units. More than half of those units were owner-occupied (29,354 units, or 66.4%) and 14,863 units, or 33.6%, were renter-occupied (see **Figure 9**).

**FIGURE 9
HOUSING TENURE**



Source: 2010 U.S. Decennial Census; 2007-2011 American Community Survey

Overcrowding

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

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

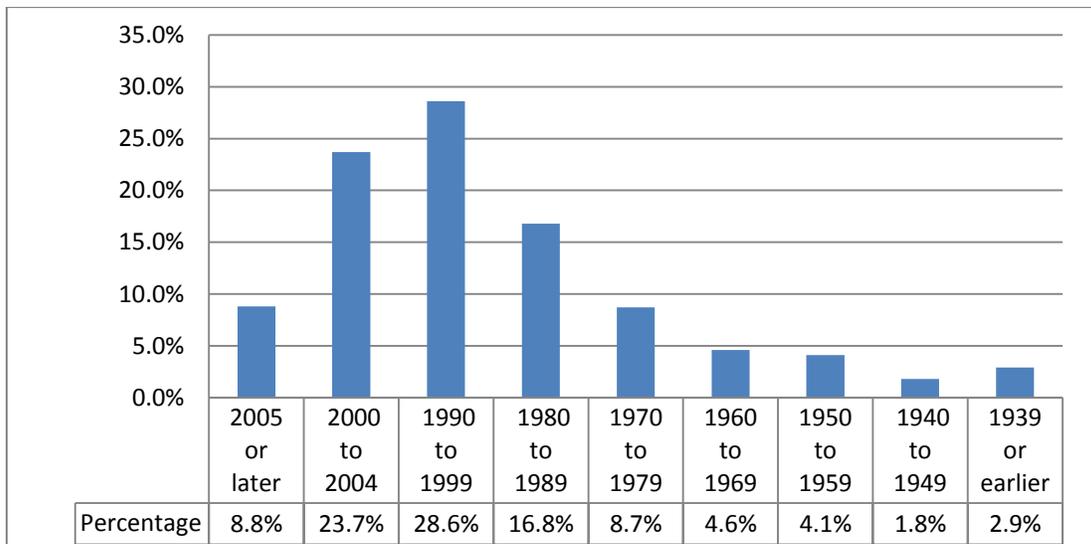
According to the 2007-2011 ACS, overcrowding was not a significant issue in the City.¹⁴ The overall level of overcrowding in the City was 0.5% (216 households) in 2007-2011. Only 50 owner-households (0.1%) and 166 renter-households (0.4%) were considered overcrowded.

Housing Conditions

Housing age is an important indicator of housing condition and quality in a community. If not properly and regularly maintained, housing can deteriorate over time, discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Maintaining and improving housing quality is thus an important goal for the City. A general rule in the housing industry is that after 30 years, structures begin to show signs of deterioration and require reinvestment. Unless properly maintained, homes older than 50 years require major renovations.

As of 2007-2011 ACS, approximately 38.9% of the housing units in the City were over 30 years old and 13.4% were over 50 years old (**Figure 10**). Over half of the homes in the City were built between 1990 and 2004 (61.1%), reflecting the rapid growth of the City during those years.

**FIGURE 10
YEAR STRUCTURE BUILT**



Source: 2007-2011 ACS

¹⁴ Data on overcrowding was taken solely from the 2007-2011 ACS

Housing Costs and Affordability

The cost of housing has the potential to cause housing problems in a community. If housing costs are relatively high in comparison to household income, there will be a correspondingly higher prevalence of cost burden and overcrowding. This section summarizes cost and affordability for the City.

Housing Cost

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

Home Purchase Cost

The sales prices of homes as well as the cost and availability of mortgage credit have changed significantly over the past four years across the nation.

According to Trulia Real Estate, an online real estate source, the median sales price for homes in the City for July-October 2014 was \$365,250. This figure represents a decrease of 1.4%, or \$5,250, compared to the prior three months. When comparing July-October 2014 to the 2013 annual median price for all properties, an increase in price of 1.7% is noted. Sales prices have appreciated 27.3% over the last five years in the City. The average listing price for Roseville homes for sale on Trulia.com was \$404,641 for the week ending October 22, 2014, representing an increase of 1.15%, or \$4,263, compared to the prior week.

Table 10 depicts home sale prices over the past five years for the City.

**TABLE 10
MEDIAN SALES PRICES**

Home Size	Jul-Oct 2014	3 Months Prior	2013 Annual Median	2009 Annual Median
All Properties	\$365,250	\$370,500	\$359,000	\$287,000
1 Bedroom	\$265,000	\$151,500	\$116,500	\$80,000
2 Bedrooms	\$278,000	\$249,000	\$260,000	\$209,000
3 Bedrooms	\$330,000	\$330,000	\$330,000	\$267,500
4 Bedrooms	\$416,250	\$418,250	\$412,250	\$329,750

Source: Trulia Real Estate, July-Oct 2014

Rental Costs

According to a housing unit rental survey conducted by PMC, City consultant, in October 2012, the median monthly rental price in the City is \$935 for a one bedroom, \$1,225 for a two bedroom, \$1,610 for a three bedroom and \$1,200 for a four bedroom housing unit.

The median monthly rents for housing units of varying sizes are shown in **Table 11**.

**TABLE 11
RENTAL COST**

Number of Bedrooms	Monthly Rental Range	Median Monthly Rental
1 Bedroom	\$650 - \$1,510	\$935
2 Bedrooms	\$768 - \$2,600	\$1,225
3 Bedrooms	\$884 - \$2,515	\$1,610
4 Bedrooms	\$1,198 - \$1,212	\$1,200

Source: Forrent.com, October 2012; Roseville Housing Element 2013-2021

The U.S. Department of Housing and Urban Development (HUD) publishes annual fair market rents (FMRs). Fair market rents are “gross rents,” which means they include an estimate of typical total housing costs including utilities. The figures effective in 2014 for the Sacramento–Arden- Arcade–Roseville HUD Metro FMR Area (which includes Placer County) are shown in **Table 12** below.

**TABLE 12
2014 FAIR MARKET RENT (FMR)**

Unit Size	2014 FMR
0 Bedroom	\$717
1 Bedroom	\$854
2 Bedrooms	\$1,072
3 Bedrooms	\$1,580
4 Bedrooms	\$1,899

Source: HUD 2014 Fair Market Rent Documentation System

Housing Affordability

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

Maximum affordable price refers to the maximum amount that could be afforded by households in the upper range of their respective income category. Households in the lower end of each category can afford less in comparison. **Table 13** shows the 2014 annual income for very low-, low-, and moderate-income households by household size and the maximum affordable housing payment.

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Maximum affordable purchase prices are calculated based on the buyer providing a 3.5% down payment and financing with a 30-year fixed-rate mortgage with an annual interest rate of 4.42%.¹⁵ Both maximum affordable purchase and rental prices are based on a household dedicating no more than 30% of household income to mortgage or rent payments. The calculation does not include the cost of taxes, insurance, utilities, or mortgage insurance. The 2014 median family income (MFI) for Placer County was \$67,990 for a household of four.¹⁶

TABLE 13
AFFORDABLE MORTGAGE/RENT AMOUNTS

	1 Person	2 Persons	3 Persons	4 Persons
Very Low (50%)				
Annual Income	\$24,050	\$27,500	\$30,950	\$34,350
Monthly Income	\$2,004	\$2,292	\$2,579	\$2,863
Affordable Purchase Price	\$61,200	\$75,300	\$89,400	\$103,300
Affordable Monthly Rent	\$601	\$688	\$774	\$859
Low (80%)				
Annual Income	\$38,550	\$44,050	\$49,550	\$55,050
Monthly Income	\$3,213	\$3,671	\$4,129	\$4,588
Affordable Purchase Price	\$119,400	\$136,500	\$153,500	\$170,600
Affordable Rent	\$964	\$1,101	\$1,239	\$1,376
Moderate (120%)				
Annual Income	\$57,700	\$65,950	\$74,200	\$82,440
Monthly Income	\$4,808	\$5,496	\$6,183	\$6,870
Affordable Purchase Price	\$178,800	\$204,300	\$229,900	\$255,400
Affordable Rent	\$1,442	\$1,649	\$1,855	\$2,061

Source: HUD 2014 Income Limits Documentation System; www.realtor.com/mortgage/tools/affordability-calculator

Ownership Affordability

According to the calculations completed to create **Table 13**, a very low-income four-person household in Placer County could afford a home purchase price of up to \$103,300. The same size low-income household could afford a home purchase price of up to \$170,600. For a moderate-income four-person household, \$255,400 would be the upper end of affordability.

When these figures are compared to the current median sales price of \$365,250 (see **Table 10**), only a household earning a moderate income would be able to afford the median-priced home in the City without assistance.

¹⁵ Note: This calculation assumes FHA. Rates may be higher for those with less than ideal credit.

¹⁶ Placer County is part of the Sacramento--Arden-Arcade--Roseville, CA, HUD Metro FMR Area.

Rental Affordability

The figures in **Table 13** also illustrate that a low-income household of four could afford a monthly rent of up to \$1,376. The same size very low-income household could afford a monthly rent of \$859.

The rental prices shown in **Table 11** indicate that the typical three-bedroom apartment with a rent of \$1,610 per month would be affordable to a low-income household. Although the average rent is higher than the affordable rent for a very low-income household, the range of prices indicates that affordable rental housing is available if not more challenging to find.

Housing Cost Burden

The federal standard for housing affordability is that a household not expend more than 30% of its gross income on housing. Households that expend more than this amount are considered to be “cost burdened.” Cost burden most often occurs in a housing market when housing costs increase faster than household incomes. While housing affordability in itself is not a fair housing issue, to the extent that housing cost burden is disproportionately impacting the most vulnerable members of a community, particularly those with special needs, the question of access to a range of housing choices arises.

The Comprehensive Housing Affordability Strategy (CHAS) data, which was developed by HUD to assist jurisdictions to write their Consolidated Plans, has special tabulation data based on the 2007-2011 ACS. According to this data, 2,290 renter households and 1,355 owner households earned less than 50% of the median family income (MFI) in the City in 2007-2011. Of these, 1,980 renter households and 1,000 owner households fell into the extremely low-income category (incomes less than 30% of MFI).

**TABLE 14
HOUSING COST BURDEN**

	Total Renters	Total Owners	Total Households
Household Income ≤ 50% MFI	2,290	1,355	3,645
Household Income ≤ 30% MFI	1,980	1,000	2,980
% Cost Burden > 30%	48.0%	36.3%	84.3%
% Cost Burden > 50%	23.4%	13.0%	36.4%

Source: HUD’s Comprehensive Housing Affordability Strategy (CHAS) data, 2007-2011 ACS

PUBLIC AND ASSISTED HOUSING

Section 8 Rental Assistance

The Roseville Housing Authority (RHA) administers the federal Section 8 Housing Choice Voucher Program (HCV) in the City. This program provides rental assistance to extremely low- and very low-income households, including families, elderly persons, the disabled and other special needs households.

The Section 8 HCV Program pays the difference between a set amount calculated by the RHA (called the payment standard) and what the RHA determines a participating household can afford to pay (approximately 30% of their income).¹⁷ The HCV allows a participating household the flexibility of being able to choose housing that may cost above the payment standard. The participating household pays the difference, if their portion of rent and utilities does not exceed 40% of their monthly adjusted income.

As of 2014, the RHA had 637 Housing Choice Vouchers under lease (112 in Rocklin); the RHA has the authority to lease up to 647 vouchers.

During 2013-2014, the RHA was awarded 75 new vouchers for families that have a head of household or spouse who is non-elderly and disabled. The RHA has accessed the Section 8 waiting list for families that qualify and has issued non-elderly, disabled (NED) vouchers.

In October 2014 the RHA was awarded 10 HUD-VASH vouchers through the HUD-Veterans Affairs Supportive Housing (HUD-VASH) Program. This program combines HCV rental assistance for homeless Veterans with case management and clinical services provided by the Department of Veterans Affairs (VA). Persons receiving HUD-VASH vouchers are not on the RHA Waiting List, they are referrals from the VA.

Affordable Housing Projects in Roseville

Table 15 provides an inventory of publicly assisted rental housing projects in the City. A total of 1,800 assisted rental units are provided in 22 developments, including units assisted through a variety of federal programs. These programs include HUD Section 8 (project-based), Section 236 (mortgage subsidy), Section 202 (mortgage subsidy), Section 515 (rural rental housing and rural cooperative housing), tax credits, bonds and redevelopment set-aside funds.

¹⁷ This is the amount determined by the PHA to rent a moderately priced dwelling unit in the local housing market. It is used to calculate the amount of housing assistance a family will receive from the PHA.

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

**TABLE 15
INVENTORY OF PUBLICLY ASSISTED HOUSING IN ROSEVILLE**

INVENTORY OF AFFORDABLE UNITS

THERE ARE NO AGREEMENTS WITHIN THE CITY OF ROSEVILLE THAT WILL EXPIRE DURING THE 10-YEAR TIME FRAME.

Apartment Complex	Affordability Period Expires	Very Low-Income Units 0–50%	Low-Income Units 51–80%	Total Units	Units per Acre
Senior Apartments					
Eskaton Roseville Manor 1725 Pleasant Grove Blvd	7/2065	48 @ 50%		48	19.6
Maidu Village I Apts. (Elderly 62+ years/Project Go, Inc.) 1750 Eureka Road	11/2041		80 @ 60%	80	13.6
Maidu Village II Apts. (Senior 55+ years/Project Go, Inc.) 101 Sterling Court	2/2040		84 @ 60%	84	25.6
Maidu Village III Apts. (Senior 55+ years/Project Go, Inc.) 109 Sterling Court	7/2060	23 @ 50%	52 @ 60%	76	22.9
Manzanita Place (Elderly 62+ years and/ or Mobility Impaired/VOA) 1019 Madden Lane	11/2030	63 @ 50%		63	35
Silver Ridge Apts. (Senior 55+ years) 1101 Stone Canyon Drive	4/2033	31 @ 50%	125 @ 60%	156	29
Sutter Terrace Apartments (Elderly 62+ years) 6725 Fiddymont Road	4/2038	20 @ 50%	80 @ 60%	100	25
Vintage Square at Westpark 2351 Wharton Lane	7/2064	75 @ 50%	75 @ 60%	150	19.3
Woodcreek Terrace Apts. (Senior 55+ years) 1295 Hemingway Drive	10/2039	4 @ 50%	100 @ 60%	104	19.5
<i>Subtotal of Units per Income Limit</i>		264	596		
Multi-Family Apartments					
Colonial Village Apartments 3881 Eureka Road	2/2025		6 @ 60%	56	12.87
Crocker Oaks Apartments 8000 Painted Desert Way	11/2042	14 @ 50%	38 @ 60%. 66 @ 80%	131	21

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Apartment Complex	Affordability Period Expires	Very Low-Income Units 0–50%	Low-Income Units 51–80%	Total Units	Units per Acre
Haverhill at Highland Reserve Apartments 701 Gibson Drive	4/2032		20 @ 80%	321	15.3
Heritage Park Apartments 1098 Woodcreek Oaks Blvd.	9/2047	65 @ 50%	263 @ 60%	328	19.4
Highland Creek Apartments 800 Gibson Drive	1/2043	55 @ 50%	129 @ 60%	184	21.5
The Oaks at Woodcreek Apartments 1550 Pleasant Grove Blvd.	9/2031		13 @ 60%	80	14.81
Pinnacle at Galleria Apartments 1100 Roseville Parkway	9/2031		12 @ 60% 23 @ 80%	200	16.42
Siena Apartments 2501 Hayden Pkwy	7/2064	78 @ 50%	76 @ 60%	156	22.5
State Hotel Apartments 324 Lincoln Street	7/2058	15 @ 50%		15	15
Terraces at Highland Reserve Apartments 700 Gibson Drive	6/2032		27 @ 80%	273	18.2
Trillium at Galleria Apartments 301 Gibson Drive	5/2034		26 @ 80%	258	20.12
Vineyard Gate Apartments 1601 Vineyard Road	3/2032		5 @ 60% 9 @ 80%	280	19.35
<i>Subtotal of Multi-Family Units per Income Limit</i>		227	713		
Total Number of Units per Income Limit		491	1,309		

LICENSED COMMUNITY CARE FACILITIES

Persons with special needs such as the elderly and those with disabilities must also have access to housing in a community. Residential community care facilities provide a supportive housing environment to persons with special needs in a group setting. Restrictions that prevent this type of housing represent a fair housing concern since lack of such housing impedes special needs groups from access to adequate housing. Currently, 102 residential care facilities are located in the City that can accommodate a combined total of 1,814 persons.

The following types of care facilities are located in the City:¹⁸

Adult Day Care Facilities (ADCF) provides programs for frail elderly and developmentally disabled and/or mentally disabled adults in a day care setting. There are currently 6 facilities in the City that can accommodate a combined total of 381 persons.

¹⁸ State of California's Community Care Licensing Division

Adult Residential Facilities (ARF) are facilities of any capacity that provide 24-hour nonmedical care for adults ages 18 through 59 who are unable to provide for their own daily needs. Adults may be physically handicapped, developmentally disabled and/or mentally disabled. There are currently 17 facilities in the City that can accommodate a combined total of 89 persons.

Group homes are facilities of any capacity and provide 24-hour nonmedical care and supervision to children in a structured environment. There are currently no children's residential group homes in the City.

Residential Care Facilities for the Elderly (RCFE) provide care, supervision and assistance with daily living activities to persons 60 years of age and over and persons under 60 with compatible needs. There are currently 79 facilities in the City that can accommodate a combined total of 1,344 persons.

PRIVATE SECTOR PRACTICES

This section of the AI discusses the City's efforts to determine and to evaluate the practices of the private sector as they relate to fair housing choice, including the policies and practices of real estate agents, property managers, and mortgage lenders.

REAL ESTATE SALES PRACTICES

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



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

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

Article 10 of the NAR Code of Ethics 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.

The California Association of Realtors (CAR) has many local associations throughout the state. The City is served by the Placer County Association of Realtors (PCAR). PCAR holds local real estate members to the professional code of ethics. Beyond the local board, real estate professionals are also held to a code of ethics mandated by the California Association of Realtors, the National Association of Realtors, and the California Department of Real Estate.

PCAR does not directly handle fair housing complaints nor does it offer fair housing educational courses. Instead, PCAR refers complaints and education opportunities to the state association. CAR offers

continuous online courses dealing with fair housing requirements and issues. CAR's online license renewal program is available at a nominal fee to CAR members. As part of CAR's online license renewal program, CAR offers a suite of real estate courses. "Fair Housing" is CAR's course that educates realtors on the history of fair housing as well as current fair housing laws. According to the course description, the course will provide an overview of the federal fair housing laws and an in-depth discussion of the individual laws and their application to the practice of real estate. The course also provides CAR members with a study of the State of California fair housing laws and regulations. The course emphasizes anti-discriminatory conduct that all licensees should practice and concludes by discussing the voluntary affirmative action marketing program and why promoting fair housing laws is a positive force at work in California and throughout the nation.

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

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



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

RENTAL AND PROPERTY MANAGEMENT

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

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

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

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



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

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

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

CAA's main office is located in downtown Sacramento, which is roughly 30 miles from the City. In addition to close proximity to the state association's main office, the City is also served by the Rental Housing Association (RHA) of Sacramento Valley located in Sacramento. The RHA of Sacramento Valley serves Amador, El Dorado, Nevada, Placer, Sacramento, Sutter, Yolo and Yuba counties. RHA offers many educational opportunities during the year, including on-site education classes and fair housing luncheons. Educational opportunities include the history of fair housing, fair housing for property managers, fair housing for landlords, and tenant-focused fair housing rights courses. Some courses are available online and others are offered at various locations across the region. As noted by RHA, the City's rental housing stock is made up of newer apartment complexes, which are managed by large property management agencies that generally exhibit a high level of awareness and resulting compliance with fair housing law.¹⁹

ADVERTISEMENT

Over a three-week period, a review of rental housing advertisements for the City was conducted to identify any fair housing violations or impediments.²⁰ Advertisements were examined for language that explicitly or implicitly indicated that housing would not be made available to persons based on membership in a protected class, or that there would be a preference for or bias against persons belonging to a protected class. No advertisements were found that would indicate unfair housing practices.

Rental advertisements were reviewed between October 15, 2014, and November 6, 2014, from the following sources:

- Sacramento Craigslist
- Placer Herald
- Roseville Today
- Roseville Press-Tribune
- Rent.com
- Forrent.com
- Apartmentguide.com

¹⁹ Correspondence, Cory Koehler, Director of Government Affairs, Rental Housing Association, January 25, 2011.

²⁰ Conducted by City consultant PMC in Oct/Nov 2014

USE OF RESTRICTIVE COVENANTS

Covenants that restrict the ownership or use of real property based on membership in a protected class are prohibited under state and federal law. Nonetheless, recorded documents with these terms persist. Today, the California Department of Real Estate reviews residential covenants, conditions and restrictions (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.

Since 2000, California state law has required that any person or entity that provides declarations, deeds and other governing documents related to the use of real property must place a cover page over the document or a stamp on the first page of the document containing a statement that any illegal restrictive covenants that may appear in the document are null and void and that any person with an interest in the property has the right to request that the language be removed.

MORTGAGE LENDING

Lending practices in the private sector may impact a household's access to housing. A key aspect of fair housing choice is equal access to credit for the purchase of a home. In the past, financial institutions did not always employ fair lending practices. Credit market distortions and other activities such as redlining prevented some groups from equal access to credit.²¹ This section reviews the lending practices of financial institutions and the access to financing from all households, particularly minority households and those of very low and low incomes.

Community Reinvestment Act

The 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 very low- and low-income persons and neighborhoods. The CRA was enacted by Congress in 1977 (12 U.S.C. 2901) and is implemented by Regulation BB (12 CFR 228). The CRA includes a reporting requirement that discloses an institution's lending activity by area and type of lending. Institutions are rated based on several factors. Those that have a poor rating may be required to improve community lending practices as a condition of regulatory agency approval for regulated activities such as branch openings, acquisitions, and mergers. The CRA has undergone several legislative changes since 1977 and was substantially revised in 2005.

Conventional Versus Government-Backed Financing

Mortgages are divided into two main types, conventional and government-backed loans. Conventional financing is market-rate-priced loans provided by private lending institutions such as banks, mortgage brokers and credit unions. To assist households who may have difficulty obtaining home mortgage financing in the private market, several government agencies offer loan products that have below-market interest rates and/or are insured (or guaranteed) by the agencies.

²¹ Redlining is a now illegal and discontinued practice where banks would not extend mortgage credit to purchase homes in certain areas. The banks would use maps wherein these areas were marked with red ink.

Sources of government-backed financing include the Federal Housing Administration (FHA-insured), the Department of Veterans Affairs (VA-guaranteed), and the Farm Service Agency or Rural Housing Service (FSA/RHS). These types of loans are offered to the consumer through private lending institutions or directly from the federal agency. These products often make the difference between qualifying and not qualifying for a mortgage.

HOME MORTGAGE DISCLOSURE ACT (HMDA) DATA ANALYSIS

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975. It is implemented by the Federal Reserve Board's Regulation C. The HMDA requires the reporting of mortgage lending data that can be used:

- To determine whether financial institutions are serving the housing needs of their communities; or

- To inform public officials who may be distributing public-sector investments to attract private investment; or

- To identify possible discriminatory lending patterns.

Under the HMDA, lenders are required to disclose information on the disposition of home loan applications and on the household characteristics of applicants for mortgage credit.

Overview

To prepare this analysis, 13,589 records of lender actions were extracted from the 2013 HMDA national data set. These represented records labeled as applications for mortgage credit to purchase homes located in census tracts in the City (see **Figure 11**).²²

Some of the records reported in the HMDA data are not useful when attempting to illustrate discriminatory lending patterns because they will not show variations in access to credit to purchase housing. These include loan records for home improvement requests, loans to refinance an existing mortgage, loan requests for purchase of non-owner-occupied dwellings, records of loans sold between lending institutions and records of pre-purchase approval requests. In the 2013 HMDA data set for Roseville, the following records were therefore excluded:

- records of home improvement loan requests;
- records of re-financing requests;
- records for purchase of non-owner-occupied homes;
- records of loans sold between lending institutions; and
- records of pre-purchase approval requests.

²² Please see Figure 11. Tract boundaries and labels correspond to the 2010 U.S. Decennial Census. Census tract boundaries are not contiguous with city limits. HMDA data are not tagged with the City within which the home is located.

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It is also important to note that a single HMDA record represents an individual application for mortgage credit. In the case that an individual borrower makes multiple requests, each request is reported. The HMDA data does not identify individual borrowers. This makes it impossible to exclude multiple loan requests by an individual borrower.

After excluding all records for the five types of requests listed above, the resulting data set has 2,700 loan records. These 2,700 records therefore represent only loan requests made by borrowers to purchase mortgage credit for financing the purchase of a home as a primary residence (owner-occupied).

Table 16 summarizes the share of mortgage requests processed by lending institutions in the City. Of the 2,700 records, the top 10 lenders in the City account for 52.9% of all mortgage applications processed in 2013.

**TABLE 16
TOP 10 MORTGAGE LENDERS IN 2013**

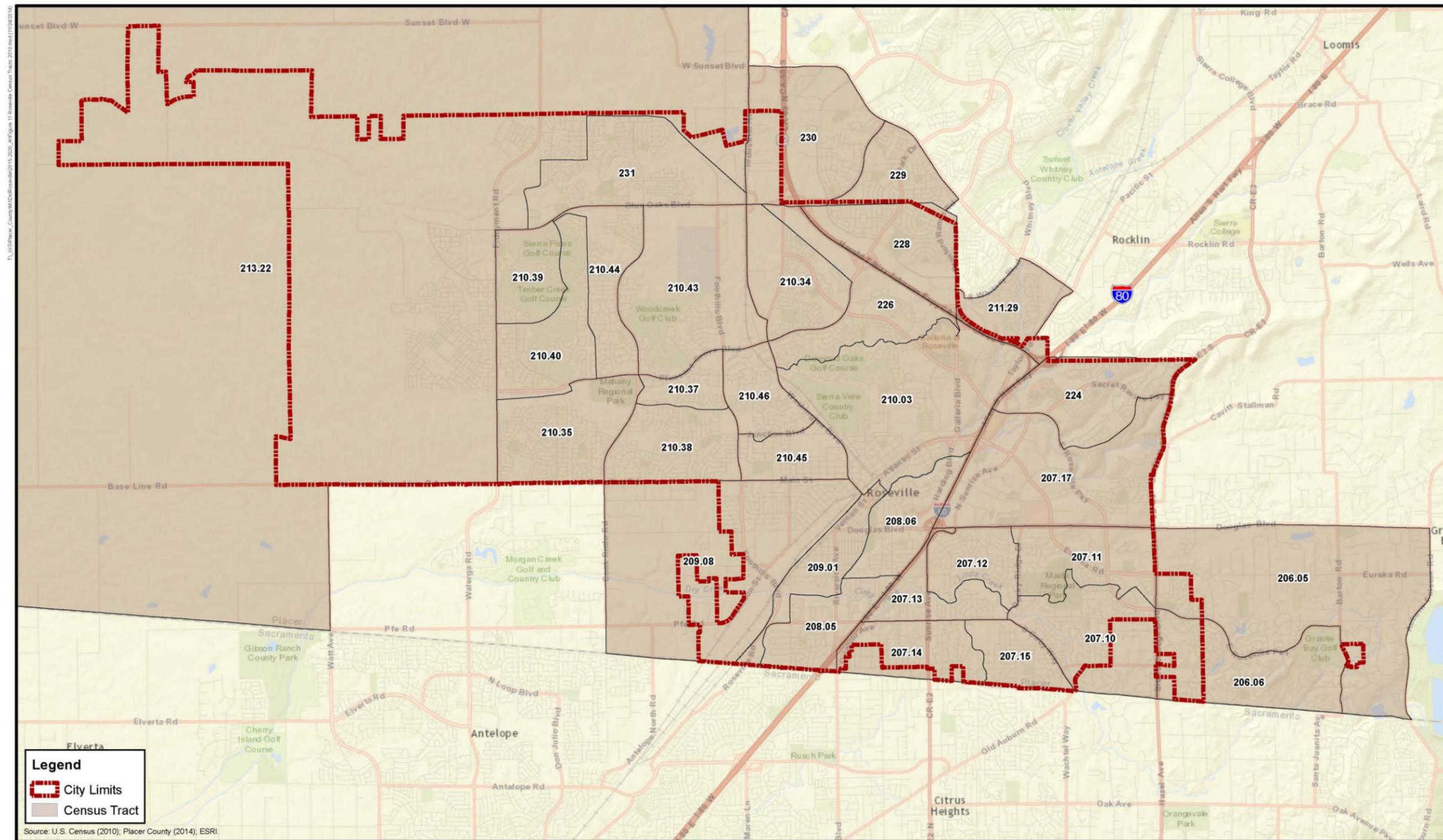
Lending Institution	Applications Processed	Share of Processed Applications
1. Wells Fargo Bank	251	9.3%
2. American Pacific Mortgage	175	6.5%
3. Summit Funding	170	6.3%
4. Pinnacle Capital Mortgage	169	6.2%
5. Sierra Pacific Mortgage	155	5.8%
6. IMortgage.com	137	5.1%
7. Vitek Mortgage	128	4.7%
8. Sacramento 1 st Mortgage	92	3.4%
9. Pulte Mortgage	82	3.0%
10. Bank of America	70	2.6%
Other	1,271	47.1%
Total	2,700	100%

Source: Home Mortgage Disclosure Act Loan/Application Register (LAR) data 2013

Note: "Other" lending institutions total 166.

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FIGURE 11 CITY OF ROSEVILLE CENSUS TRACTS



Legend
 City Limits
 Census Tract

Source: U.S. Census (2010), Placer County (2014); ESRI.



Figure 11
City of Roseville Census Tracts (2010 Decennial Census)



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Home Purchase Lending

Of the 2,700 loan requests, 2,677 (99.1 %) are requests to purchase a home in a structure with one to four units and 23 (0.9%) are requests to purchase a manufactured home. Of all home loan requests, lenders took the following actions:

2,000 (74.1%) resulted in loan originations (approved and issued loans);

166 (6.2%) applications were approved but not accepted by the applicant;²³

254 (9.4%) applications were denied by the financial institution;

233 (8.6%) applications were withdrawn by applicant; and

47 (1.7%) files were closed for incompleteness.

The remainder of the analysis will group the lending actions described above into applications which resulted in loan origination, applications which were denied and applications that failed to originate (not including denials).

Loan Type

The HMDA data set reports the type of loans requested as conventional, FHA-insured, VA-guaranteed or FSA/RHS.²⁴ **Table 17** summarizes loan types requested by outcome. As shown in the table, conventional loan requests (65.3%) are the most frequent, followed by FHA-insured loan requests (25.1%), VA-guaranteed requests (9.5%) and FSA/RHS requests (less than 1%).

Conventional loan types have the highest rate of loan origination (66%), followed by FHA-insured (24%), VA-guaranteed (9.9%) and FSA/RHS (less than 1%). Conventional loan requests have the greatest share of denied loans (53.6%), followed by FHA-insured (33.8%), VA-guaranteed (12.2%) and FSA/RHS (less than 1%).

²³ These are records where the lender approved the mortgage application but the applicant did not accept the offer of credit.

²⁴ Insured by the Federal Housing Administration, guaranteed by the federal Veterans Administration, or issued or guaranteed by the federal Farm Service Agency or federal Rural Housing Service, respectively.

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TABLE 17
LOAN REQUEST TYPE BY LENDING RATE

Loan Type	Applications Received		Loans Originated/Rate		Loans Denied/Rate		Loans Failed/Rate	
	#	%	#	%	#	%	#	%
All loan types	2,700	100%	2,000	74.1%	254	9.4%	446	16.5%
Conventional	1,763	65.3%	1,321	66.0%	136	53.6%	306	68.6%
FHA- Insured	678	25.1%	480	24.0%	86	33.8%	112	25.1%
VA- guaranteed	257	9.5%	198	9.9%	31	12.2%	28	6.3%
FSA/RHS	2	0.1%	1	0.1%	1	0.4%	0	0%

Source: Home Mortgage Disclosure Act Loan/Application Register (LAR) data 2013

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

Table 18 summarizes loan request types by loan applicant race. As shown, 73.4% of loan applicants report race as White and 11.6% do not provide race. Conventional loans show the highest share of minority (non-White) applicants at 15.9%. FHA-insured loans have the next highest share of minority applicants, followed by VA-guaranteed. There were no minority applicants for FSA/RHS loans. For all loan types, a number of records did not report race.

TABLE 18
LOAN REQUEST TYPE BY APPLICANT RACE

Applicant Race	Conventional		FHA-Insured		VA-Guaranteed		FSA/RHS		Total Applications	
	#	%	#	%	#	%	#	%	#	%
All applications	1763	100.0%	678	100.0%	257	100.0%	2	100.0%	2700	100.0%
American Indian or Alaska Native	4	0.2%	4	0.6%	0	0%	0	0.0%	8	0.3%
Asian	245	13.9%	68	10.1%	5	1.9%	0	0.0%	318	11.8%
Black or African American	12	0.7%	17	2.5%	11	4.3%	0	0.0%	40	1.5%
Native Hawaiian or other Pacific Islander	18	1.1%	15	2.2%	7	2.8%	0	0.0%	40	1.5%
Subtotal Minority	279	15.9%	104	15.4%	23	9.0%	0	0.0%	406	15.0%
White	1260	71.5%	502	74.0%	217	84.4%	1	50.0%	1980	73.4%
Race not provided	222	12.6%	72	10.6%	17	6.6%	1	50.0%	314	11.6%

Source: Home Mortgage Disclosure Act Loan/Application Register (LAR) data 2013

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Table 19 summarizes loan request types by loan applicant ethnicity. As shown, 6% of all loan applicants are Hispanic/Latino. This makes the Hispanic/Latino population the third largest sub-group of persons requesting a loan after White and Ethnicity not provided applicants.²⁵ FSA/RHS loans have the highest rate of Hispanic/Latino applicants, followed by FHA, VA, and conventional.

TABLE 19
LOAN TYPE REQUEST BY APPLICANT ETHNICITY

Applicant Ethnicity	Conventional		FHA-Insured		VA-Guaranteed		FSA/RHS		Total Applications	
	#	%	#r	%	#	%	#	%	#	%
Hispanic/Latino	74	4.2%	69	10.2%	19	7.4%	1	50%	163	4.0%
Not Hispanic/Latino	1463	83%	552	81.4%	222	86.4%	0	0%	2237	77.4%
Ethnicity not provided	226	12.8%	57	8.4%	16	6.2%	1	50%	300	18.6%
Total	1763	100.0%	678	100.0%	257	100.0%	2	100.0%	2700	100.0%

Source: Home Mortgage Disclosure Act Loan/Application Register (LAR) data 2013

Lending Outcomes

As shown in **Table 20** below, 11.4% of Roseville’s population in 2010 was minorities.²⁶ Of all 2013 loan applicants, 15% were minority, which is 3.6% more than the overall share of 2010 minority households. Asian households represent the largest share of 2010 minority households (8.4%) and the largest share of 2013 minority applicants (11.8%).

Table 20 shows lending actions and outcomes by race. As shown, 74.1% of all applications for a mortgage to purchase a primary residence in Roseville result in origination, 9.4% are denied and a total of 16.5% fail to result in a new loan.

The loan origination rate for all minority applicants is 60.3% lower than the overall origination rate. The loan denial rate for minorities is 2% greater than the overall denial rate. 20% of the loan applications for minority applicants fail to originate. The loan denial rate for White applicants is 72.4%.

HMDA data include explanations for denied loans: debt-to-income, employment history, credit history, collateral, insufficient cash, unverifiable information, credit application incomplete, mortgage insurance denied and other. Reasons for loan denial can assist in determining the systematic factors that prevent households from securing home mortgage credit.

²⁵ Please note that HMDA reporting follows the racial and ethnic enumeration conventions of the U.S. Census Bureau. Hispanic “ethnicity” is enumerated separately from “race.”

²⁶ 2010 U.S. Decennial Census

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TABLE 20
LENDING OUTCOME BY RACE

Applicant Race	2010 Population		Total Applications		Origination		Denial		Failure	
	#	%	#	%	#	%	#	%	#	%
All Applicants	118,788	100.0%	2,700	100.0%	2,000	74.1%	254	9.4%	446	16.5%
American Indian or Alaska Native	885	.7%	8	0.3%	6	0.3%	1	0.4%	1	0.2%
Asian	10,026	8.4%	318	11.8%	212	10.6%	34	13.4%	72	16.2%
Black or African American	2,329	2.0%	40	1.5%	28	1.4%	3	1.2%	9	2.0%
Native Hawaiian or other Pacific Islander	346	0.3%	40	1.5%	29	1.5%	4	1.6%	7	1.6%
Subtotal Minority	13,586	11.4%	406	15.0%	275	13.8%	42	16.6%	89	20.0%
White	94,199	79.3%	1,980	13.4%	1,511	75.5%	184	72.4%	285	63.9%
Race not provided	11,003	9.3%	314	11.6%	214	10.7%	28	11.0%	72	16.1%

Source: Home Mortgage Disclosure Act Loan/Application Register (LAR) data 2013; 2010 U.S. Decennial Census

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

Table 21 shows lending actions by ethnicity. As shown, 14.6% of Roseville residents reported their ethnicity as Hispanic/Latino in 2010, which is more than double the share of Hispanic/Latino loan applicants in 2013. This suggests that Hispanic/Latino loan applicants are underrepresented in comparison to their share of the population.²⁷

The loan origination rate for Hispanic applicants is 77.5% lower than for non-Hispanic applicants. The loan denial rate is 2.2% higher. This difference can be considered insignificant.

As mentioned, reason for loan denial is underreported in HMDA data, making it difficult to determine what systematic reasons lead to loan denial for Hispanic/Latino applicants.

It should be noted that as with race, a significant number of records did not report ethnicity.

²⁷ An alternative explanation is that the rates of reporting ethnicity for the 2010 U.S. Decennial Census and for HMDA are significantly different.

TABLE 21
LENDING ACTION OUTCOME BY ETHNICITY

Applicant Ethnicity	2010 Population		Total Applications		Origination		Denial		Failure	
	#	%	#	%	#	%	#	%	#	%
Hispanic/Latino	17,359	14.6%	163	6.0%	122	6.1%	21	8.3%	20	4.5%
Not Hispanic/Latino	101,429	85.4%	2,237	82.9%	1,672	83.6%	209	82.3%	356	80.0%
Ethnicity not provided	--	--	300	11.1%	206	10.3%	24	9.4%	70	15.7%
Total	118,788	100.0%	2,700	100.0%	2,000	74.1%	254	9.4%	446	16.5%

Source: Home Mortgage Disclosure Act Loan/Application Register (LAR) data 2013, 2010 U.S. Decennial Census

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

Mortgage Lending By Area

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

Table 22 shows lending actions and household characteristics for Roseville census tracts. HMDA data is available at the census tract level but not at the block group level. The census tracts presented in **Table 22** show the census tracts located in the City.²⁸

As shown, the share of minority households in the City’s census tracts is 15% and the Hispanic population is 6% of the total population of census tracts. As shown in **Table 22**, ten census tracts have rates of minority persons greater than the City overall and thirteen census tracts have rates of Hispanic persons greater than the rate of Hispanic persons in the City. The overall rate of loan denial in the City is 9.4%.

According to HUD’s 2010 Low/Mod summary data, 12.5% of all households in Roseville census tracts (**Table 22**) are categorized as low/moderate-income households.²⁹

As shown in **Table 22**, one (1) census tract (209.01) is at least 50% low- and moderate-income households. The rates of loan denial are 16.7% and 17% in census tracts 226 and 229, respectively.

The HMDA data do not show a correlation between census tracts with higher rates of minority or Hispanic persons and rates of loan denial.

As mentioned, the reason for loan denial is underreported in HMDA data, making it difficult to determine what systematic reasons lead to loan denial in lower-income census tracts. It can be presumed that given housing prices in Roseville, income, and loan to value were common reasons.

²⁸ It should be noted that census tract boundaries may not be contiguous with City limits. It is unavoidable that some of the lending actions in the HMDA data will fall outside City limits.

²⁹ Low/moderate-income households are those that have a gross annual household income that is at or less than HUD’s low-income limit adjusted for household size. This is approximately 80% of the area median family income.

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**TABLE 22
LENDING ACTIONS AND CHARACTERISTICS FOR ROSEVILLE CENSUS TRACTS**

Census Tract	Total Applications	Origination	Denial	Failure	Minority Population	Hispanic/Latino Population	Low/Mod Population
All Tracts	2,700	74.1%	9.4%	16.5%	15.0%	6.0%	12.5%
206.05	101	70.3%	12.9%	16.8%	11.9%	2.0%	0.0%
206.06	79	73.4%	6.3%	20.3%	12.7%	3.8%	0.0%
207.1	76	80.3%	5.3%	14.4%	13.2%	2.6%	23.7%
207.11	44	50.0%	0.3%	49.7%	9.0%	11.4%	11.4%
207.12	46	78.3%	0.0%	21.7%	0.0%	4.3%	41.3%
207.13	42	73.8%	11.9%	14.3%	7.1%	4.8%	19.0%
207.14	51	74.5%	9.8%	15.7%	7.8%	9.8%	13.7%
207.15	33	78.8%	9.0%	12.2%	9.0%	9.0%	30.3%
207.17	36	77.8%	8.3%	13.9%	16.7%	8.3%	2.8%
208.05	47	78.7%	10.6%	10.7%	12.8%	4.3%	38.3%
208.06	35	65.8%	11.4%	22.8%	2.9%	8.6%	37.1%
209.01	25	80.0%	0.0%	20.0%	4.0%	8.0%	64.0%
209.08	94	74.5%	9.6%	15.9%	9.6%	18.1%	40.4%
210.03	100	67.0%	12%	21.0%	7.0%	5.0%	29.0%
210.34	90	82.2%	6.7%	11.1%	16.7%	7.8%	7.8%
210.35	103	68.9%	11.7%	19.4%	14.6%	3.9%	6.8%
210.37	21	95.2%	0.0%	4.8%	9.5%	9.6%	19.0%
210.38	100	75.0%	9.0%	16.0%	9.0%	6.0%	14.0%
210.39	35	77.1%	8.6%	14.3%	2.9%	5.7%	22.9%
210.4	92	83.7%	3.3%	13.0%	1.1%	3.3%	10.9%
210.43	34	91.1%	0.0%	8.9%	2.9%	5.9%	8.8%
210.44	113	69.0%	7.0%	24.0%	24.8%	7.1%	7.1%
210.45	39	66.7%	12.8%	20.5%	5.1%	5.1%	17.9%
210.46	51	76.5%	7.8%	15.7%	5.9%	7.8%	15.7%
211.29	22	81.8%	9.0%	9.2%	18.2%	4.5%	18.2%
213.22	680	73.5%	11.3%	15.2%	21.5%	6.0%	6.0%
224	69	69.6%	8.7%	21.7%	20.3%	2.9%	0.0%
226	36	66.7%	16.7%	16.6%	11.1%	13.9%	5.6%
228	76	68.4%	10.5%	21.1%	28.9%	3.9%	9.2%

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Census Tract	Total Applications	Origination	Denial	Failure	Minority Population	Hispanic/Latino Population	Low/Mod Population
229	47	68.0%	17.0%	15.0%	23.4%	6.4%	8.5%
230	61	73.8%	9.8%	16.4%	23.0%	4.9%	8.2%
231	222	78.8%	5.4%	15.8%	16.7%	4.0%	7.7%

Source: Home Mortgage Disclosure Act Loan/Application Register (LAR) data 2013; HUD Low/Mod Data 2013; 2010 U.S. Decennial Census
Note: "Loans Failed" includes loan applications resulting in denial, applications approved but not accepted, withdrawn applications, and incomplete files.

Mortgage Lending Maps

The geographic distribution of loan activity is shown in **Figures 12** through **15**. As shown in **Figure 12**, the western portion of the City experienced greater numbers of loan applicants compared to other areas of the City. Because lending data is only available at the census tract level, it is important to note that a large portion of loan applications in the western portion of the City fall outside of the city limits, which makes it difficult to infer lending patterns in this portion of the City.

Figure 13 shows the geographic relationship of loan origination patterns in the City. As shown, the western area the City exhibits higher rates of lending patterns than other areas shown on the maps.

Figure 14 shows geographic distribution of the rate of loan denial. As shown in **Figure 14** the central and eastern areas of the City exhibit the highest rates of loan denial.

Figure 15 shows loan failures in the City with most failures being in the central and eastern areas of the City.

Summary of Home Purchase Lending Data

An important finding from the analysis is the difference between the share of Hispanic/Latino persons in the City (14.6%) and the share of loan applications from Hispanic/Latino applicants (6%). Although the large share of applicants not reporting ethnicity (11.1%) may explain some of this difference, the data show that less than half of the Hispanic/Latino population applies for mortgage financing. While it is difficult to determine the variety of reasons that the Hispanic/Latino population does not apply for mortgage financing at the same rate as the general population, the City should take steps to identify and mitigate any barriers.

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FIGURE 12 LOAN APPLICATIONS

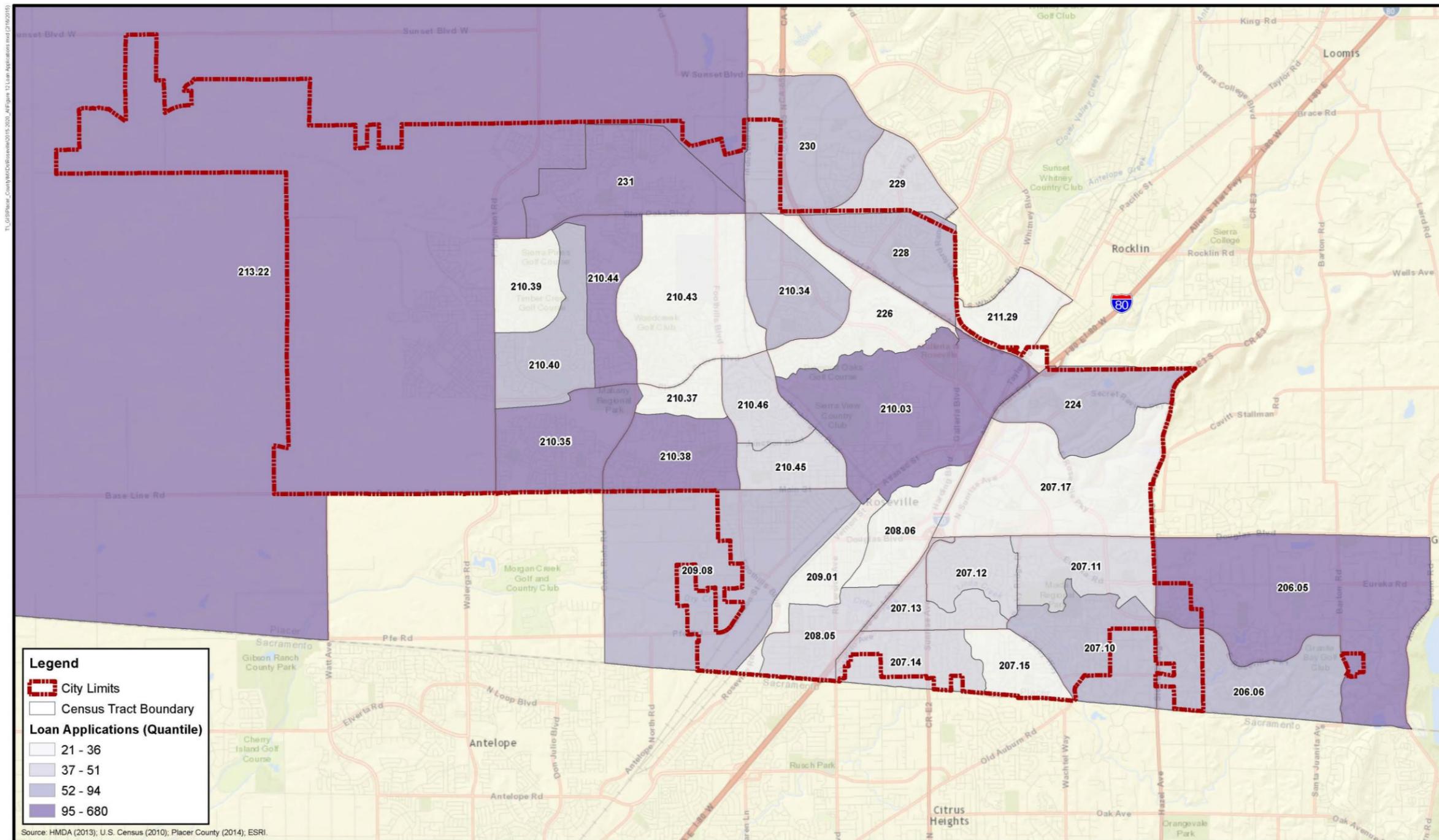


Figure 12
Loan Applications
PMC

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FIGURE 13 LOAN ORIGATION

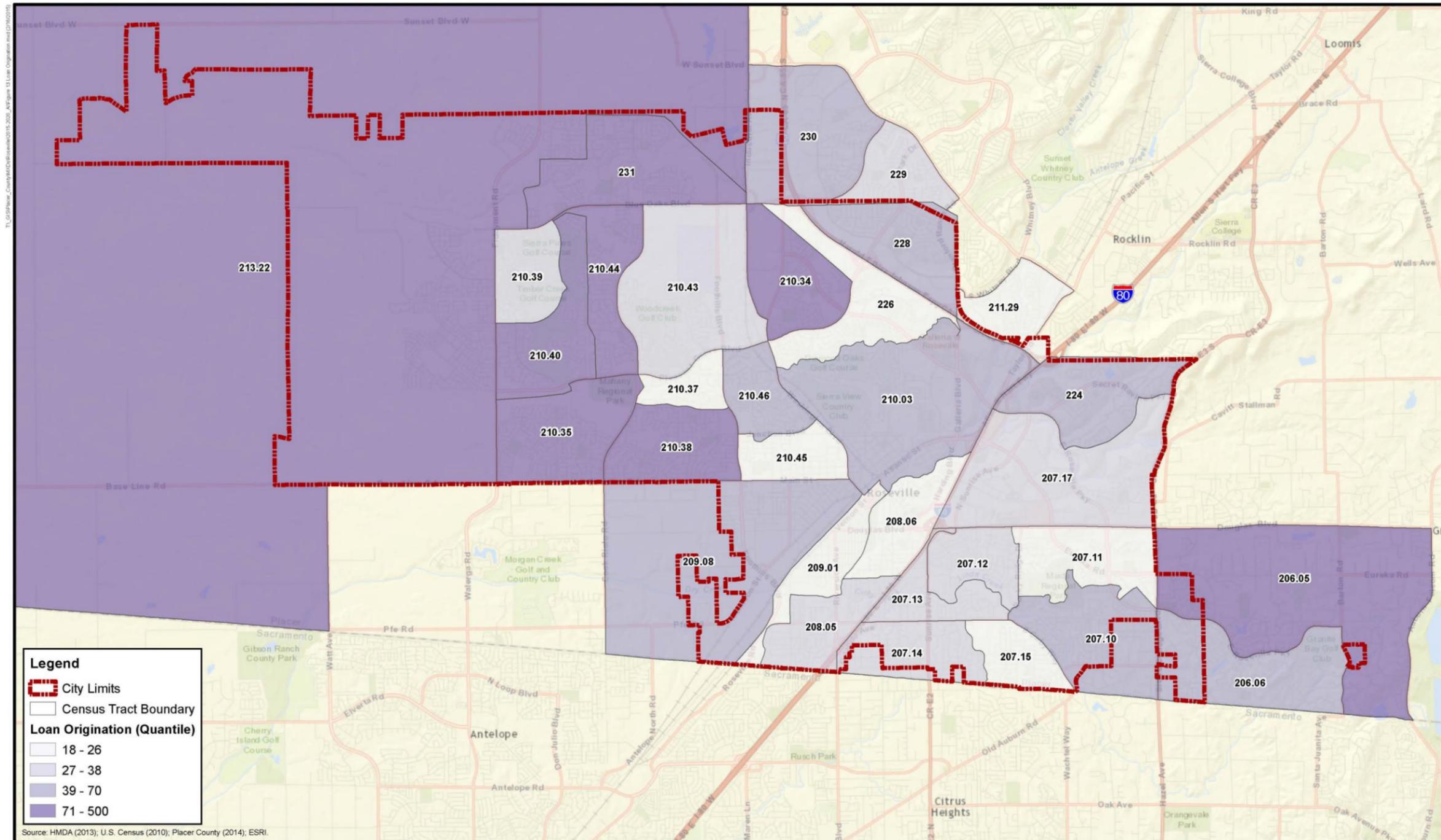


Figure 13
Loan Origination
PMC

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FIGURE 14 LOAN DENIAL

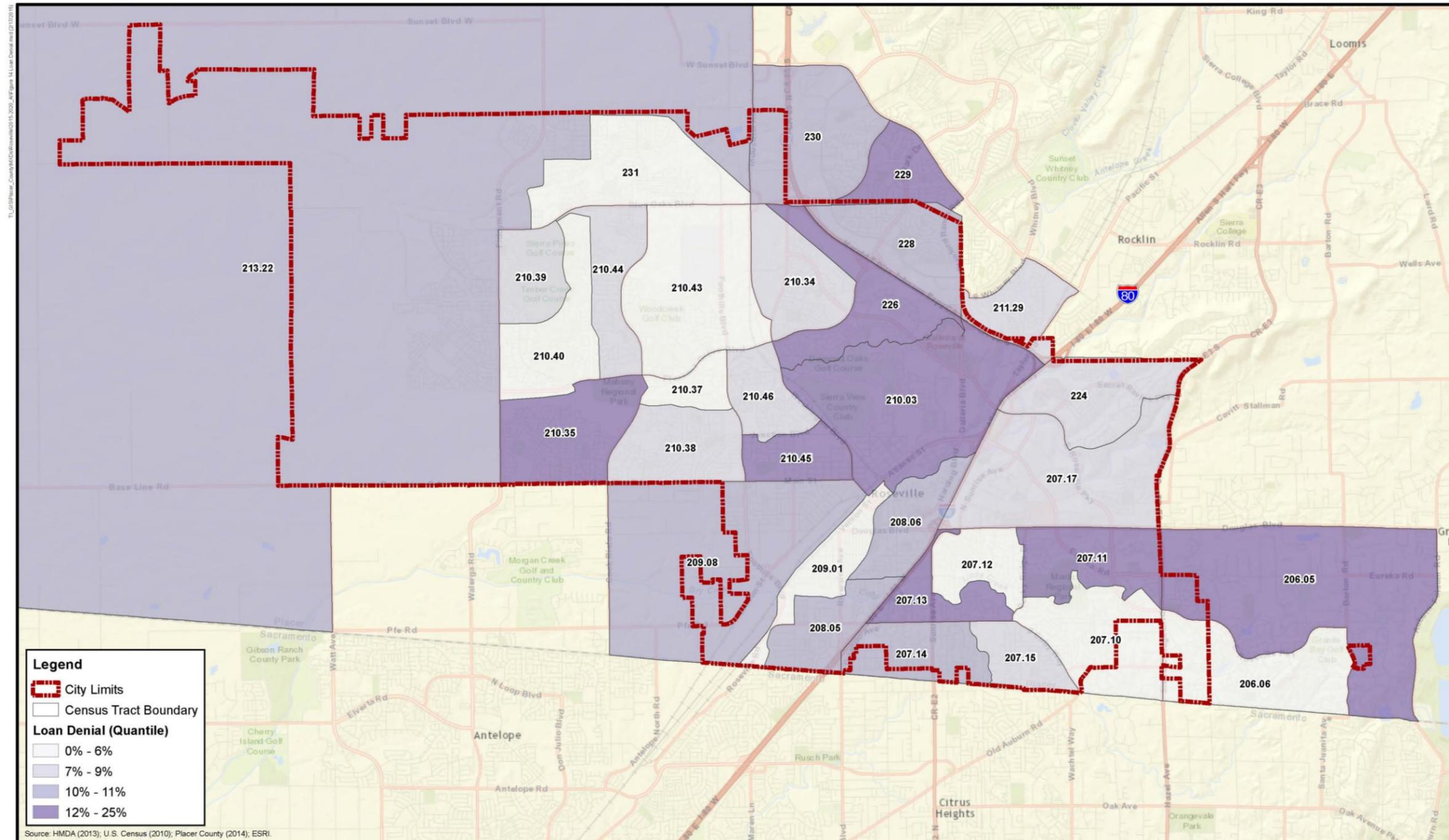


Figure 14
Loan Denial
PMC

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FIGURE 15 LOAN FAILURE

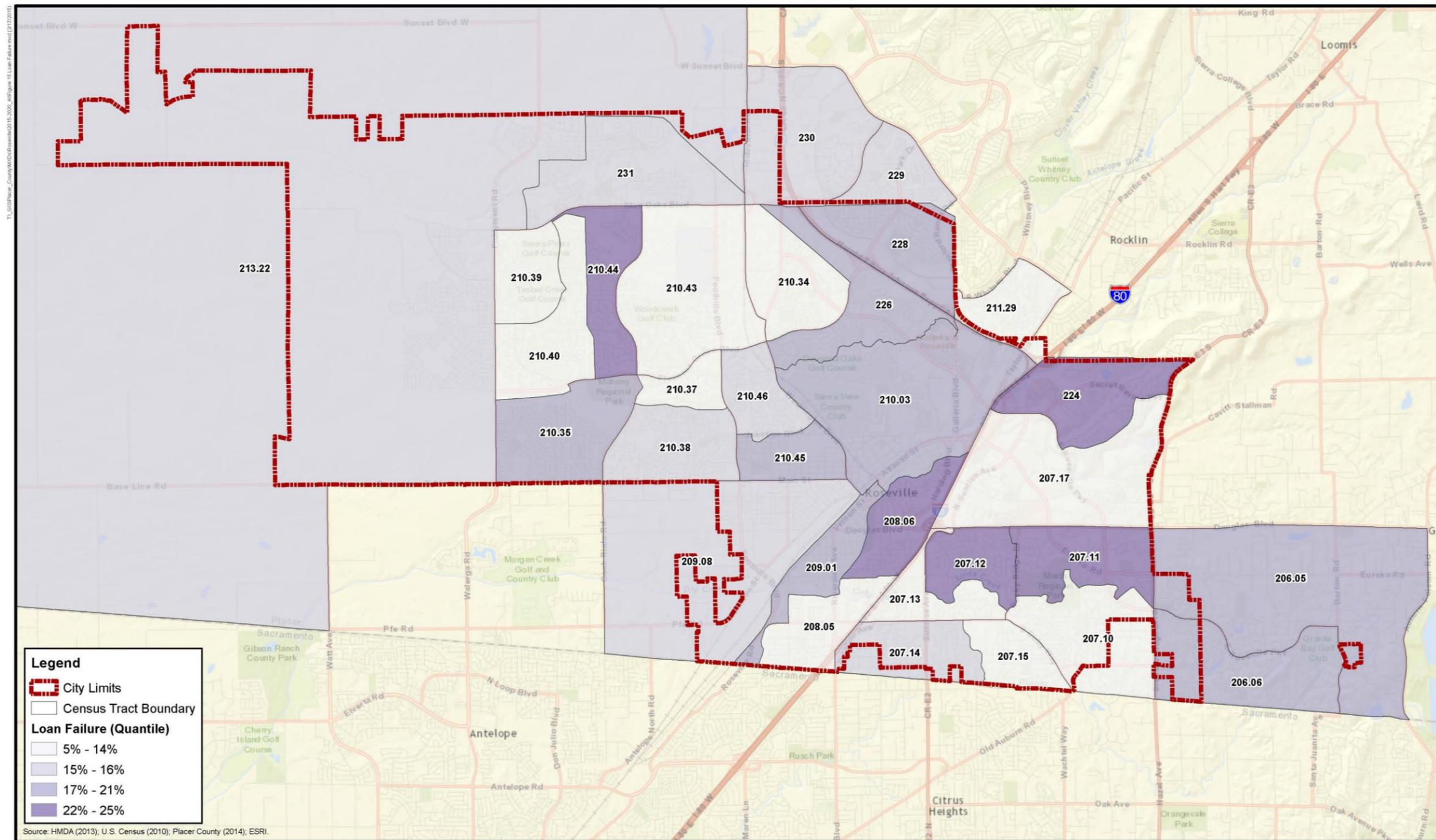


Figure 15
Loan Failure
PMC

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FAIR HOUSING COMPLAINTS AND ENFORCEMENT

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

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

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

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



The San Francisco FHEO office provided information on fair housing complaints and cases for the period January 1, 2012 through February 1, 2015.³⁰ FHEO recorded nine (9) fair housing complaints originating in the City over this period. The table below indicates the bases, issue and disposition of the complaints filed.

Violation City	HUD Filing Date	Bases	Issues	Closure Reason	Closure Date
Roseville	04/15/13	Disability	380 - Discriminatory terms, conditions, privileges, or services and facilities	No Cause	08/08/13
Roseville	12/05/11	Disability	382 - Discrimination in terms/conditions/privileges relating to rental	Complainant Failed to Cooperate	04/16/12
Roseville	05/04/12	Disability, Retaliation	310 - Discriminatory refusal to rent, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation	No Cause	05/07/13
Roseville	03/22/13	Race, Disability	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 510 - Failure to make reasonable accommodation	Unable to Locate Complainant	08/30/13

³⁰ Correspondence, Vicki A. Gums, Office of Fair Housing and Equal Opportunity, Department of Housing and Urban Development, San Francisco, February 18, 2015.

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Violation City	HUD Filing Date	Bases	Issues	Closure Reason	Closure Date
Roseville	12/06/12	Disability	320 - Discriminatory advertising, statements and notices, 382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.)	No Cause	11/11/13
Roseville	07/10/14	Disability	382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation	Conciliated/Settled	12/19/14
Roseville	03/31/14	National Origin	310 - Discriminatory refusal to rent	No Cause	05/28/14
Roseville	06/28/12	Disability	310 - Discriminatory refusal to rent, 510 - Failure to make reasonable accommodation,	Complainant Failed to Cooperate	08/02/12
Roseville	03/11/14	Disability	312 - Discriminatory refusal to rent and negotiate for rental, 382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation	Conciliated/Settled	05/23/14

California Department of Fair Employment and Housing (DFEH)



This section will be completed when information is received from the DFEH

Local Reports

According to the Placer Dispute Resolution Service (PDRS) they didn't track fair housing complaints in the City. However, the organization notes that they do assist Roseville residents with resolving a variety of issues, including tenant-landlord disputes. Because of confidentiality concerns and a lack of available discrimination data, each agency could not make data on housing discrimination available.³¹

As mentioned, limited information regarding fair housing issues and challenges is readily available at the local level, due in part to the lack of a dedicated agency to file, solve, and track fair housing issues in Roseville.

HATE CRIMES

Generally, a hate crime is a criminal act that is motivated by bias toward particular social groups. Hate crimes occur when a perpetrator targets a victim based on the perpetrator's perception that the victim belongs to a particular social group, typically defined by race, ethnicity, religion, sexual orientation, disability, class, age, gender, gender identity or political affiliation. Incidents of hate crimes may involve physical assault, property damage, bullying/harassment, and verbal abuse or insults.

³¹ Correspondence, Cynthia Spears, Placer Dispute Resolution Services, February 9, 2015.

Hate crimes become a fair housing concern when the acts described above intimidate residents from utilizing their home and/or neighborhood. This may mean that residents either chooses to avoid locating to a particular neighborhood or home based on the perception of being a victim or move from their current residence or neighborhood as a result of being a victim.

California law defines a hate crime as a criminal act committed, in whole or part, because of the actual or perceived characteristics of the victim—disability, gender, nationality, race/ethnicity, religion, sexual orientation or association with a person or group with one or more of these actual or perceived characteristics. The California Fair Employment and Housing Act and the federal Fair Housing Act make it a crime to threaten, harass, intimidate, or act violently toward a person who has exercised their right to free housing choice.

The Federal Bureau of Investigation (FBI) collects and reports incidents of hate crimes from law enforcement agencies across the United States in their Uniform Crime Reports, available on the FBI's website. The City reports crime data to the FBI on a quarterly basis, and according to the Uniform Crime Reports, there have never been any hate crimes reported in the City. According to the Roseville Police Department, the City is one of the safest communities in the Sacramento region, with one of the lowest per capita violent and property crime rates in the region.³²

³² Roseville Police Department Annual Report, 2014

PUBLIC POLICIES

CITY PROGRAMS

The City offers several programs that encourage fair housing choice or support the City's efforts to remove regulatory barriers to equal housing opportunities. Most of the programs to promote affordable housing opportunities for low and median income households (up to 80% to 100% of the median family income) and to preserve the City's existing housing stock.

First Time Home Buyer (FTHB) Down Payment Assistance Program

The City's First Time Home Buyer (FTHB) Down Payment Assistance Program is funded with HOME (State) funds to assist income-eligible qualified participants to purchase a home. Participants may borrow up to 99%, (including the first and second loans), of the value of an existing or new home in the City. Participants work with their own broker or agent to locate a house in the City and select their own mortgage lender, then submit the required application and documentation to the City.

The program offers deferred monthly payments for lower-income borrowers and a shared appreciation loan. The maximum amount of assistance a household may receive is \$60,000. The house price cannot exceed the State of California HOME Program Single-Family Maximum Purchase Price/After-Rehabilitation Value (currently at \$258,000 for existing homes and \$302,000 for new homes). The loan principal plus any shared appreciation become due and payable upon sale of the house or default.

Funding is limited for this program, which is on a first-come, first-served basis.

Owner-Occupied Housing Rehabilitation Program

The City's Owner-Occupied Housing Rehabilitation Program offers 0%, deferred interest loans to repair homes, including health and safety hazards, ADA modifications, weatherization, energy efficiency improvements and space or room additions to alleviate overcrowding. Funding is limited for this program, which is on a first-come, first-served basis.

Income eligible owner-occupants are eligible.

The following are the repairs that are eligible under the Owner-Occupied Housing Rehabilitation Program:

- Bathroom/kitchen repairs
- Bedroom additions (if the home is found to be overcrowded)
- Dual-pane windows
- Electrical
- Flooring
- Foundation
- Handicapped retrofitting

Heat/air conditioning

Interior/exterior doors

Plumbing

Roofing/gutters

Termite/Dry Rot Repairs

BUILDING AND PLANNING PRACTICES

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

Housing Element Law and Compliance

As part of evaluating potential impediments to fair housing choice and housing development, the City's 2013 Housing Element was reviewed. California housing element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community.

California housing element law requires each jurisdiction to:

Identify adequate sites that will be made available through appropriate zoning and development standards and with the services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the City's regional housing needs.

Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.

Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement and development of housing.

Conserve and improve the condition of the existing affordable housing stock.

Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status or disability.

Land Use Policies and Practices

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

Residential Zoning Districts

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

Under the Zoning Code, development must comply with specific, enforceable standards such as minimum lot requirements, minimum setbacks, maximum building heights, and a list of allowable uses.

Residential Zones

R-1: Single-Family Residential District: The R-1, Single-Family Residential district is intended for detached, single-family homes and similar and related uses inclusive of half-plexes.

R-S: Small Lot Residential District: The R-S, Small Lot Residential district is intended to allow either attached or detached single-family dwellings as well as similar and related compatible uses.

R-2: Two-Family Residential District: The R-2, Two-Family Residential district is intended to allow two dwellings per lot, either detached single-family dwellings or duplexes, and similar and related compatible uses.

R-3: Attached Housing District: The R-3, Attached Housing district is intended for multiple-family housing. The types of land use intended for the R-3 zoning district include apartments, condominiums, town homes, and similar and compatible uses.

RMU: Residential Mixed Use District: The Residential Mixed Use district is intended to promote a variety of residential uses/dwelling types and the flexible siting of uses that are typically considered to be compatible with residential development.

Commercial Zones

BP: Business Professional District: The Business Professional district is intended to provide locations for a wide variety of office uses and other uses that are related to and supportive of office uses.

NC: Neighborhood Commercial District: The Neighborhood Commercial district is intended to be applied to properties in close proximity to residential areas providing for convenient retail and personal service facilities.

CC: Community Commercial District: The Community Commercial district is intended to serve the principal retail shopping needs of the entire community by providing areas for shopping centers and other retail and service uses.

GC: General Commercial District: The General Commercial district is intended to serve the entire community by providing areas for commercial facilities that are more of a service or heavy commercial character than are permitted in the Community Commercial District, and may involve outdoor display, storage, or activity areas.

HC: Highway Commercial District: The Highway Commercial district is intended to be applied where commercial facilities serving the traveling public are necessary or desirable.

RC: Regional Commercial District: The Regional Commercial district is intended to provide for commercial facilities serving Roseville and the greater South Placer Area.

CBDL: Central Business District: The Central Business district is intended to be applied to the older portions of the downtown area to provide flexibility in the types of uses typically found in the traditional downtown where a range of business and service, residential, and mixed-use uses can be located to support the entire community.

CMU: Commercial Mixed Use District: The Commercial Mixed Use district is intended to promote a variety of commercial uses types and the flexible siting of other uses that are typically considered to be compatible with commercial development. It is the intent of the CMU zoning district to establish a mix of uses, which will be accompanied by overlay zones, to ensure that different commercial uses will be successfully integrated into desirable, cohesive commercial districts. The CMU zoning district shall always be applied in conjunction with either the DS (Development Standards) or SA (Special Area) overlay zones.

HD: Old Town Historic District: The Old Town Historic district is intended to be applied to the original commercial core of the City to acknowledge its historic and architectural significance. The HD zoning district is intended to ensure that new land uses and development within the district further the rehabilitation, revitalization, and preservation of the architectural, aesthetic, historic, and economic health of the district. Each parcel within a Historic District shall be subject to the specific historic district design guidelines contained within the City's Community Design Guidelines as adopted by the City Council from time to time. Whenever a design review permit is required for development of a parcel within the Historic District zone, the Historic District guidelines shall apply.

Industrial Zones

M1: Light Industrial District: The Light Industrial district is intended to designate areas appropriate for light industrial uses such as manufacturing, processing, assembly, high technology, research and development, and storage uses. The use types permitted within the M-1 district do not include outdoor manufacturing but may include limited outdoor storage and the emission of limited amount of visible gases, particulates, steam, heat, odor, vibration, glare, dust, and noise. These uses may be compatible operating in relatively close proximity to commercial and residential uses.

M2: General Industrial District: The General Industrial district is intended to designate areas suitable for a broad range of industrial uses, including manufacturing, assembly, wholesale distribution, and warehousing.

MMU: Industrial Mixed Use District: This district is intended to promote a variety of industrial use types and the flexible siting of uses that are typically considered to be compatible with industrial development. It is the intent of the MMU zoning district to establish a mix of uses, which will be accompanied by overlay zones, to ensure that different industrial uses will be successfully integrated into desirable, cohesive industrial districts. The MMU zoning district shall always be applied in conjunction with either the DS (Development Standards) or SA (Special Area) overlay zones as described in Chapter 19.18.

Provisions for a Variety of Housing

Permitting different types of housing is essential to providing a full range of housing choice. The City has many zoning districts that permit a variety of housing types, including single-family residential housing, multi-family residential housing, residential accessory dwelling units, mobile homes, duplexes, and family care homes. **Table 23** shows the housing types permitted in the various zoning districts in Roseville. No significant barriers were identified for any of the housing types listed below.

**TABLE 23
HOUSING TYPES BY PERMITTED ZONE**

Residential Use	R-1	RS	R-2	R-3	RMU
Single-Family Dwellings	P	P	P	P	P
Rooming and Boarding House	–	–	–	P	P
Two Family	–	–	P	P	P
Multi-Family Dwellings	–	–	–	P	P
Second Residential Units	P	P	–	–	P
Mobile Home Park	CUP	CUP	CUP	CUP	P
Community Care Facility, Small	P	P	P	P	P
Community Care Facility, Large	CUP	CUP	CUP	P	P
Family Day Care Homes, Small	P	P	P	P	P
Family Day Care Homes, Large	A	A	A	A	P
Transitional and Supportive Housing	P	P	P	P	P

Civic Use	MP	M1*	M2*	MMU*	GC*	HC*	CMU*
Emergency Shelters				P			

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Commercial Use	NC*	CC*	GC*	HC*	RC*	CBD*	CMU*	HD*	BP*
Multi-Family Dwelling	CUP	CUP	–	–	–	CUP	P	CUP	–
Caretaker/ Employee Housing	CUP	CUP	CUP	CUP	CUP	–	P	–	–
Single-Room Occupancy	–	–	–	–	–	CUP	CUP	CUP	–
Community Care Facility	P	P	P	–	–	P	P	–	P
Long Term Care Facility	CUP	P	P	–	–	P	P	–	CUP
Family Day Care Home, Small	P	P	P	–	P	P	P	CUP	P
Family Day Care Home, Large	CUP	CUP	CUP	–	CUP	CUP	P	CUP	CUP

Downtown SP	DT-1	DT-2	DT-3	DT-4	DT-5	DT-6	DT-7	DT-9	DT-10	DT-11
High Efficiency Residential Units	–	–	–	P/CUP	–	P/CUP	P/CUP	P/CUP	–	–

Principally permitted use, designated as "P"

Conditionally permitted use, designated as "CUP"

Administratively permitted use, designated as "A"

Primary use types not listed or designated by a dash (–) are not permitted in that zone district

Source: City of Roseville, 2013–2021 Housing Element

** Subject to 300-foot spacing requirement*

P = Permitted; C = Permitted Subject to a Conditional Use Permit (CUP); – = Not Permitted

Care Facilities

Sections 5115 and 5116 of the California Welfare and Institutions Code declare that mentally and physically disabled persons are entitled to live in normal residential surroundings. The use of property for the care of six (6) or fewer disabled persons is a residential use for the purpose of zoning. A state-authorized, certified, or licensed family care home, foster home or group home serving six (6) or fewer disabled persons or dependent and neglected children on a 24-hour-a-day basis is considered a residential use that is permitted in all residential zones.

Large community care facilities are described as a dwelling where nonmedical care is provided to no less than seven (7) and no more than 12 persons on a 24-hour basis and which is operated and occupied by the owners. Large community care facilities are licensed by the California Department of Social Services, permit no more than two (2) persons per bedroom, and shall be designed so as to be compatible with the residential character of the neighborhood.

The particular conditions or use restrictions for group homes with six or more persons, as described above, should not have a negative effect on the development or conversion of residences to meet the needs of persons with disabilities or affect the provision of services on site.

Persons with Disabilities

Both federal Fair Housing Law and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling.³³

The California Government Code requires localities to analyze potential and actual constraints and to include programs to accommodate housing for disabled persons. Pursuant to federal Fair Housing Law, a disabled person or representative may request reasonable accommodation relating to the various land use, zoning, or building codes, rules, and policies, practices, and/or procedures.

For rehabilitation projects, such as installation of ramps or interior modifications, the City processes these requests for reasonable accommodation over the counter. No special review is required; therefore, will not constrain the rehabilitation of housing. Some projects require modifications to development standards to accommodate persons with disabilities. The City reviews requests for reasonable accommodation at the staff level; often requests are processed within one week. Furthermore, the City provides zoning flexibility for rehabilitation of existing nonconforming housing. Some requests for reasonable accommodation may be processed under these provisions.

Although no policy, procedure or regulation functionally constrains the development of housing for persons with disabilities in Roseville, the City has not adopted a formal policy to process requests for reasonable accommodation from strict application of use regulations and development standards.

In addition, the occupancy standards of the Zoning Ordinance must comply with fair housing law in that they do not restrict occupancy based on relationship.

Emergency Shelters, Transitional and Supportive Housing

California Senate Bill 2 (Cedillo, 2007) requires that both transitional and supportive housing types be treated as a residential use and be subject only to those restrictions that apply to other residential uses of the same type in the same zone. Both transitional and supportive housing types must be explicitly permitted in the Zoning Ordinance.

Transitional housing means housing with supportive services that is exclusively designated and targeted for homeless persons. Transitional housing includes self-sufficiency development services with the ultimate goal of moving homeless persons to permanent housing as quickly as possible. Assistance in the Supportive Housing Program is provided to help homeless persons meet three overall goals: (1) achieve residential stability; (2) increase their skill levels and/or incomes; and (3) obtain greater self-

³³ Federal Fair Housing Law comprises the following federal acts: Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, the Architectural Barriers Act of 1968, the Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, and Executive Orders 11063, 11246, 12892, 12898, 13166, and 13217.

determination (i.e., more influence over decisions that affect their lives). The City will regulate supportive housing as a residential use provided supportive services are ancillary to the primary use.

The City's current zoning has not acted as a constraint to the provision of transitional or supportive housing. As required by SB 2, the City recognizes transitional and supportive housing as a residential use subject only to those restrictions that apply to other residential uses of the same type in the same zone and without any discretionary action.

Permit Processing

Development review procedures exist to ensure that proposals for new residential development comply with local regulations and are compatible with adjacent land uses. Table 24 provides typical local development timelines. Shown below are processing times for single-family and multi-family projects.

Single-Family Projects

For single-family dwelling production building permits, the time frame for review of a production building permit is 2–3 weeks. Master plan reviews take approximately 2–3 months.

For single-family dwelling custom homes, the time frame for these reviews is 6–12, weeks depending on the complexity of the custom home and applicant's promptness in responding. No master planning is involved.

Multi-Family Projects

For a multi-family development, the plan review time frame between City and applicant is approximately 8–16 weeks.

These time frames are reasonable and similar to the surrounding communities. The City's development services permit procedures are necessary to ensure proposed projects meet the City's established standards and regulations and do not unduly constrain or delay the development of housing.

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

**TABLE 24
DEVELOPMENT REVIEW PROCESS**

Application	Time Frame
Single-Family Project	10–12 weeks for construction plan check
Multi-Family Project	12 weeks for design review + 10–12 weeks for construction plan check
Administrative Permit	Approved by the Planning Director. Processing time 4–6 weeks.
Conditional Use Permit	Public hearing before Planning Commission. Processing time between 8 and 12 weeks.
Design Review Permit	Public hearing before Design Committee or Planning Commission. Processing time about 12 weeks. (Note: A design review permit is required for MF development but is not a separate entitlement.)
Flood Encroachment Permit	Public hearing before Planning Commission. Processing time between 8 and 12 weeks.
Major Project Permits	Public hearing before Planning Commission for processing Stage 1 (Preliminary Development Plan), Stage 2 (Architectural and Landscaping Plan), staff approval of Stage 3 (Final Plans). Processing time 16–20 weeks.
Tentative Subdivision Maps	Public hearing before Planning Commission. Processing time is between 8 and 10 weeks.
Design Review Permits for Residential Subdivisions	Should be obtained concurrent with or following processing an application for a tentative residential subdivision map or as a separate permit when modifying existing design standards. Public hearing before Planning Commission. Processing time 8–10 weeks (usually tracks concurrent with SUBD)
Grading Plan/Permits	Development Services Director approval for minor grading plans, or public hearing before Planning Commission for major grading plans. Processing time is between 4 and 8 weeks.
Tree Permits	Development Services Director approval of Administrative Tree Permits or public hearing before Planning Commission or Design Committee if the tree is associated with a design review permit. Processing time between 8 and 12 weeks.
Variance	Public hearing before Planning Commission or Design Committee. Processing time between 8 and 12 weeks.
Rezone	Public hearing by both Planning Commission and City Council. Processing time is between 16 and 20 weeks.
General Plan Amendment	Public hearing by both the Planning Commission and City Council. Processing time between 16 and 20 weeks.
Specific Plan Amendment	Public hearing by both the Planning Commission and City Council. Processing time between 16 and 20 weeks.
Boundary Line Adjustment	Development Services Director approval or public hearing before Planning Commission. Processing time between 6 and 8 weeks.

Source: City of Roseville, 2013–2021 Housing Element

10% Affordable Housing Goal

The City adopted a 10% Affordable Housing Goal (AHG) in 1988 which is a combination of rental and purchase units. Since its adoption 20 years ago, the 10% AHG has proven to be an effective tool in the production of rental and purchase housing affordable to very low-, low- and middle-income households. The 10% AHG is not meant as a maximum goal to the development of affordable housing.

The City's AHG is not intended to be used as an inclusionary zoning program, whereby the property owner would be required to shoulder the entire responsibility of producing the affordable housing. The intent of the 10% AHG is to ensure City and developer willingness to actively work together to develop housing affordable to households of very low, low and middle income. The City's experience has proven that incorporating the 10% AHG as a long-term policy within the framework of the Housing Element provides the legal and social motivation for the City and developers to work together to designate, finance and produce affordable housing units. However, the City will consider alternatives to achieving affordable housing within newly annexed areas should conditions or legislation require the City to alter its approach to affordable housing.

Density Bonus Incentive Program

The City continues to implement its Density Bonus Program to help promote and create affordable housing units. The Program provides a property owner the ability to construct more income producing units within the project that can offset the cost of providing affordable units. The Density Bonus Program is promoted on the City's website and information is available at the City's Permit Center. The City's Housing Division staff also actively promotes the Density Bonus Program in conjunction with implementation of the 10% Affordable Housing Program.

The City's Density Bonus Program is consistent with State Government Code Section 65915–65918. The Density Bonus Program provides for a minimum 20% to a maximum 35% density bonus in the maximum number of dwelling units, in addition to incentives and/or concessions. The concessions and/or incentives may include reduction in zoning standards, development standards, design requirements, mixed use zoning, financial assistance or any other incentive that would reduce costs of the developer.

A developer may qualify for a density bonus and additional incentives and/or concessions if the developer agrees to construct and maintain a minimum of:

- Ten percent (10%) of the units affordable to lower income households;

- Five percent (5%) of the units affordable to very low-income households;

- A senior housing development;

- Ten percent (10%) of the units in a condominium project affordable to moderate-income households.

The density bonus is increased on a sliding scale depending on the type and number of affordable units up to a maximum of 35% density bonus. The number of concessions/incentives granted by the City also increases based on the number and type of affordable units to be constructed.

The developer must enter into an Affordable Housing Agreement to secure the affordable units for a minimum of 30 years prior to issuance of building permits or prior to final map approval.

Addressing the Regional Housing Need Allocation

The Regional Housing Need Allocation (RHNA) is a minimum projection of additional housing units needed to accommodate projected household growth of all income levels by the end of the housing element’s statutory planning period. Each locality’s RHNA is distributed among four income categories to address the required provision for planning for all income levels.

The intent of the RHNA is to ensure that local jurisdictions address their fair share of the housing needs for the entire region. Additionally, a major goal of the RHNA is to assure that every community provides an opportunity for a mix of affordable housing to all economic segments of its population.

The 2013–2021 Regional Housing Needs Allocation Plan, adopted in September 2012 by SACOG (Sacramento Area Council of Governments), mandates the City’s share of the region’s housing needs for all income categories as 8,478 additional units. The following table shows the RHNA for the planning period from 2013 to 2021 for the City.

**TABLE 25
REGIONAL HOUSING NEEDS ALLOCATION 2013-2021**

Income Category	Number	Percentage
Extremely Low	1,134	13.4%
Very Low	1,134	13.4%
Low	1,590	18.8%
Moderate	1,577	18.6%
Above Moderate	3,043	35.9%
Total	8,478	100.0%

State law allows the City to obtain credits toward its Housing Element RHNA goals in three ways: (1) counting housing units constructed, building permits issued and projects approved during the planning period; (2) counting qualified projects that have been substantially rehabilitated, preserved or where the City has purchased affordability covenants; and (3) setting aside adequately zoned land for housing.

Realistic Capacity

The City is relying on sites within specific plans to meet its RHNA. Because of this, the exact capacity/allowable density has already been determined through the specific plan process, although affordability has not yet been determined.

According to state law, the default density standard for the City is 30 dwelling units per acre. The City currently has capacity for 1,292 units at 30 dwelling units per acre or more, meeting 37% of the lower-income RHNA on these sites. The remaining allocation will be met on 12 sites zoned to allow 25 to 29 dwelling units per acre and three sites zoned to allow 21-24 units per acre. The

City is also relying on underutilized sites within the Riverside Gateway Specific Plan and Downtown Specific Plan to meet a small portion of its RHNA.

As a result of the City’s 10% AHG, units affordable to low-income households have been produced on parcels with densities lower than 20 units per acre. For example, North Roseville Specific Plan Parcels WN-4 and WN-5 (medium-density residential parcels with densities of less than 9 units per acre) included a combined affordable housing goal of 43 units. The solution resulted in half-plex developments on corner lots. The half-plexes were priced affordable to low-income households using private financing. In another example, tax credits utilized on Northwest Roseville Specific Plan Parcel 91 allowed affordable units to be developed at 15 units per acre. The project resulted in 80 rental units, 32 of which are affordable to low-income households, (60% of median). The remainder is affordable to households of moderate income (80% to 120% of median). These projects demonstrate that an effective affordable housing program can produce affordable units on project sites with densities less than 20 units per acre.

Table 26 compares the City’s RHNA to the undeveloped land capacity. The City’s Housing Element provides additional information about the RHNA

**TABLE 26
COMPARISON OF REGIONAL HOUSING NEED AND RESIDENTIAL SITES**

Income Category	Regional Housing Needs Allocation	Existing Housing Unit Capacity (Undeveloped Units)	Underutilized Sites (Riverside Gateway and Downtown Specific Plans)	Housing Unit Surplus ⁴
Very Low and Low	2,268	3,4601	625	227
Moderate	1,577	4,5622	60	3,045
Above Moderate	3,043	11,6803	0	8,637
Total	8,478	19,702	685	11,909

Source: City of Roseville, 2013–2021 Housing Element, Availability of Land

HOUSING ELEMENT

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

Fair and equal housing opportunity remains an important issue in the City to ensure that all persons, regardless of their status, have the opportunity to find a suitable home. The City’s 2013 Housing Element includes the following policies and programs to follow in the ongoing efforts to promote fair and equal housing opportunities.

EQUAL HOUSING OPPORTUNITY PROGRAM

The provision of equal housing opportunities for all persons is an important goal of the 2013 Housing Element. The City will continue to provide assistance regarding equal housing opportunities through its Housing Division and Housing Authority.

Some of the programs offered are summarized below:

- To encourage and facilitate the development of affordable housing by providing increased density incentives through the City's Density Bonus Ordinance. The provisions of this ordinance are intended to comply with California Government Code Sections 65915-65918. In the event that any provision conflicts with California Government Code Sections 65915-65918, State law shall control over the conflicting provision. (Ord. 4669 § 1, 2008.)

The City continues to promote the Density Bonus Program at the City's Housing Division, Permit Center, and on the City's website.

- The City will continue its collaborative Housing Education Campaign to provide Fair Housing Counseling workshops and one-on-one counseling for City residents, landlords/property owners, and tenants with counseling provided by Legal Services of Northern California through the City's Fair Housing Education Program.

In addition to the provision of workshops and one-on-one counseling, the City's website includes fair housing information and referral service data with links to other Fair Housing Resources.

- The Roseville Housing Division will continue to advertise the availability of fair housing information and referral services on the City's website. Fair Housing Posters are displayed year round at the Roseville Housing Authority (RHA) Office.
- The Roseville Housing Division will continue education and outreach efforts in Spanish regarding fair housing issues and the availability of housing programs and activities including: brochures for the First Time Homebuyer Down Payment Assistance (FTHB) and Owner-Occupied Housing Rehabilitation Programs, Handyperson and Paint Programs and Housing Choice Voucher (HCV) Rental Assistance. Ads are placed in El Hispano newspaper during HCV open enrollment.
- The RHA will make every effort to reach out to HCV landlords to inform them of fair housing issues and workshops/seminars available to deal with fair housing law. Future landlords may be attracted to the program via referrals from HCV clients, the City's website, ads on government access Channel 14 or through various special events held in the City (Hispanic Festival, Senior Faire, and Downtown Tuesday Nights).
- The Roseville Housing Division will continue to incorporate into the briefing packet for the FTHB Program, a brochure from HUD entitled "Don't Be a Victim of Loan Fraud." Loan fraud is discussed once a program applicant has a reservation of funding and before they begin their housing search.
- The Roseville Housing Division uses a questionnaire for the FTHB Program designed to collect data relevant to the lending, realty and insuring practices in the private sector. The data collected should help to determine if any fair housing concerns exist in the area of home purchases.

ANNUAL ACTION PLAN

An Action Plan is a one-year plan to address the community development and low-income housing needs of the City. The 2015–2016 Annual Action Plan includes the following goals to reinforce the City's commitment to removing or reducing barriers to affordable housing over the next five years.

Maintain and improve the quality of existing housing and residential neighborhoods in the City ;
Facilitate the provision of a range of housing types to meet the diverse needs of the community;

Provide adequate housing sites through appropriate land use and zoning designations to accommodate the City's share of regional housing needs;

Mitigate or remove potential government constraints to housing production and affordability;

Coordinate and cooperate with surrounding jurisdictions to address regional housing issues, including the supply of affordable housing and homelessness; and

Promote equal opportunity for all residents to reside in the housing of their choice.

CONSOLIDATED PLAN

The 2015–2019 Consolidated Plan includes the following goal to reinforce the City's commitment to removing or reducing barriers to affordable housing over the next five years.

Promote equal opportunity and fair housing by providing a variety of housing choices to meet the needs of residents.

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

The 2013–2014 CAPER reiterates the value the City places on affirmatively furthering fair housing within the community and reports actions taken in support of fair housing.

The City also recognizes and supports the State of California Department of Housing and Community Development (HCD) Consolidated Plan and Analysis of Impediments to Fair Housing Choice. According to HCD's 2005–2010 Consolidated Plan, the Analysis of Impediments conducted by the state identified four impediments to fair housing:

- 1) Continued differential treatment of minorities, families with children and handicapped person when seeking housing and loans for home purchase.
- 2) Lack of affordable housing.
- 3) Difficulty obtaining homeowners insurance for residents of inner cities, regions with earthquake faults, regions with fire hazards and remote rural areas.

- 4) Local regulatory barriers including zoning and NIMBY-ism (Not in My Back Yard)³⁴ that hinder the development of affordable housing, multi-family housing, homeless shelters and residential care facilities.
- 5) Identify actions taken to overcome effects of impediments identified.

In accordance with federal and state priorities, the City is preparing its own local 2015 Analysis of Impediments to Fair Housing Choice document.

In terms of actions taken to overcome effects of impediments identified, the City will take the following actions:

- Make available to people, upon request, a list of affordable resources in the City and surrounding areas that serve the City;
- Through the Roseville Housing Authority's (RHA) Section 8 Housing Choice Voucher (HCV) Rental Assistance Program:
 - ✓ All RHA activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible in order to minimize vacancy losses for owners.
 - ✓ RHA will provide owners with a packet that explains the program, including HUD and RHA policies and procedures, in easy-to-understand language.
 - ✓ RHA will give special attention to helping new owners succeed through activities such as:
 - Providing the owner with a designated RHA contact person.
 - Coordinating inspection and leasing activities between RHA, the owner, and the family.
 - Initiating telephone contact with the owner to explain the inspection process, and provide other resource materials about HUD housing quality standards.
 - Providing other written information about how the program operates, including answers to frequently asked questions.
- Additional services may be undertaken on an as-needed basis, and as resources permit.
- Continue to provide down payment assistance to low-income households to expand homeownership opportunities;
- 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 on housing availability was appropriately advertised;

³⁴ "Not in My Back Yard" (NIMBY) refers to persons with concerns about housing and especially affordable and/or high-density housing in proximity to their place of residency.

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

- Work with affordable housing developers to assist the organizations in securing funds and provided technical assistance as appropriate;
- Work with nonprofit housing corporations, private developers, and public agencies to increase the supply of housing affordable to low- and moderate-income households; and
- Facilitate the development, maintenance, and improvement of housing for persons with disabilities and amend the Zoning Ordinance or other appropriate code to provide reasonable accommodations to further fair housing choice for persons with disabilities.

COMMUNITY PARTICIPATION

The City values citizen input on how well City government serves its residents. The public participation effort for the 2015 AI adhered to the City's Citizen Participation Plan for the 2015 Consolidated Plan and consisted of public hearings before the City Council as described below.

CONSULTATIONS

Throughout the preparation of the AI a number of local agencies and organizations were contacted to obtain feedback on housing discrimination complaints and perceptions. To assure the report responded to community concerns, the City conducted consultations with local organizations representing all segments of the community and held two public workshops and a public hearing before the City Council.

Along with City staff and department directors, a number of housing, community and social service providers and public agencies were consulted for the preparation of the AI. The City consulted with the following agencies:

- Placer Dispute Resolution Services
- Legal Services of Northern California
- Sierra Foothills AIDS Foundation
- Advocates for Mentally Ill Housing (AMIH)
- Rental Housing Association of the Sacramento Valley
- California Department of Fair Employment and Housing
- Placer County Association of Realtors (PCAR)
- St. Vincent De Paul, Roseville Area Conference
- Placer Consortium on Homelessness (PCOH)
- Placer Collaborative Network (PCN)
- Placer County Food Closets
- Placer People of Faith Together
- Roseville Home Start
- The Gathering Inn
- Stand Up Placer
- Acres of Hope
- Golden Sierra Job Training
- Lazarus Project
- New Leaf Counseling Services
- Placer Independent Resource Services

PUBLIC MEETING

The City conducted a public meeting on February 25, 2015 to discuss the AI process and to solicit input from service provider, citizens and stakeholders on the state of fair housing and possible impediments. Public notice of the public meeting was published on January 23, 2015. The public notice, sign in sheet and any notes or comments from the meeting can be found in **Appendix B**.

PUBLIC REVIEW PERIOD

The 2015 Analysis of Impediments was made available for public review for a 30-day period from February 25, 2015 to March 26, 2015. The City published a public notice in the local newspaper on January 23, 2015 informing the community. Copies of the AI were available on the City's website and the City's Housing Division. No comments were received.

PUBLIC HEARING

On May 20, 2015 a City Council public hearing was held to receive input and approve the 2015 Analysis of Impediments to Fair Housing Choice.

Proof of publication and public notice are included in **Appendix C**.

CONCLUSIONS AND RECOMMENDATIONS

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

To facilitate reporting of accomplishments and the association of planned activities with impediments and actions to address, each impediment and action is identified by a number. Actions are labeled according to the impediment they address. It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, this analysis is stating the nature of a problem which the actions to address will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

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

AFFORDABLE HOUSING

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

Although there are many affordable projects within the City, housing affordability in both the ownership and rental sectors of the housing market is still limited. Even with declining home prices offering a median sales price of about \$365,250, only a household earning a moderate income would be within reach of affording the median-priced home in Roseville. This means households earning less than 80% of the median family income will most likely overpay to own a home.

Rental affordability is an issue for persons and families earning extremely-low and very-low household incomes. The average four-person household in these income categories would have to allocate nearly 50% of its income to cover the average costs of a three-bedroom unit in the City.

1. Impediment: Lack of sufficient affordable housing supply.

- 1.1 **Action:** Continue to provide assistance to preserve existing affordable housing and to create new affordable housing.
- 1.2. **Action:** Continue to offer regulatory relief and incentives for the development of affordable housing.
- 1.3. **Action:** Continue to assure the availability of adequate sites for the development of affordable housing.
- 1.4. **Action:** Continue to pursue available and appropriate state and federal funding sources to support efforts to construct housing meeting the needs of lower-income households.

2. Impediment: Need for rental subsidy for lower-income households.

Action: Continue to support the Roseville Housing Authority (RHA) in administering the Section 8 Housing Choice Voucher (HCV) Rental Assistance Program. This will include distribution of program information at the Housing Division’s public counter and periodic meetings with representatives of the RHA to discuss actions the City can take to coordinate program implementation, and potential creation and maintenance of a link to the RHA’s websites in the City’s website.

MORTGAGE LENDING

The analysis of home mortgage lending patterns revealed that persons reporting as Hispanic/Latino appeared to be less likely to apply for mortgage credit. Because the reasons for lower loan request rates among Hispanic/Latino borrowers are not evident, it is difficult to target programs to correct the impediment. Nevertheless, programs should be designed to reach the Hispanic community and offer technical assistance with the home purchase process.

The analysis also revealed a lack of information on the reason for loan denial. This factor is optional for all lending institutions, except those regulated by the Office of Thrift Supervision. Although it is beyond the jurisdiction of the City, this weakness in federal reporting limits the usefulness of the HMDA data.

The mortgage lending analysis also suggests that those who request mortgage credit to purchase homes in areas that have concentrations of lower-income households are less likely to receive that credit. The general strategy suggested from the analysis: encouragement of lenders to reach out to underrepresented populations, both Hispanic and lower income.

3. Impediment: Differential rates of mortgage credit requests in the private lending market based on ethnicity.

3.1. **Action:** The City will periodically monitor Home Mortgage Disclosure Act (HMDA) data and report significant trends in mortgage applications by ethnicity.

3.2. **Action:** When selecting lending institutions for contracts and participation in the City’s homeownership assistance program, the City may prefer those with a Community Reinvestment Act (CRA) rating of “Outstanding.” The City may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC).

4. Impediment: Lower rates of loan origination in the private lending market based on neighborhood income characteristics.

4.1. **Action:** The City will continue to offer and to support home purchase programs targeted to lower-income (low and very low), immigrant, and minority households.

FAIR HOUSING EDUCATION AND ENFORCEMENT

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

The analysis indicated that there is sufficient information at the state and federal level regarding fair housing issues in the City. The state and federal data is informative for crafting policies to address fair housing issues; however, it is limited and is likely not inclusive of all housing discrimination in the City. In addition, the analysis finds that there is a lack of local fair housing complaint data, partly because of the lack of a dedicated agency. Such an agency would be responsible for taking in discrimination complaints, resolving issues, tracking complaints data and providing fair housing education.

5. Impediment: Knowledge of fair housing rights is limited.

5.1 **Action:** The City will designate a staff person to receive requests for information regarding fair housing or complaints regarding unfair housing practices and to provide referrals. The City will track and report such requests and reports to include in the CAPER.

5.2. **Action:** Continue to support efforts to educate tenants and owners and agents of rental properties regarding their fair housing rights and responsibilities. Review actual practices by industry professionals that educate the public on fair housing issues to ensure that tenants in various apartment complexes within the City have access to information and education about fair housing issues.

5.3. **Action:** Continue to support local advocate agencies and community stakeholders in efforts to disseminate fair housing information to people within the community.

5.4 **Action:** Update the City's website to ensure that the public can easily access fair housing information.

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

6.1. **Action:** Monitor the incidence of housing discrimination complaints and report trends annually in the CAPER.

6.2. **Action:** Work with local agencies to improve the collection and reporting of information on discrimination, particularly based on religion, race and ethnicity, age, gender, marital status, presence/absence of children, and household size.

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

GOVERNMENT BARRIERS

The role of local government is critical to providing a full range of housing types and to assuring the availability of housing suitable to all sectors of the public.

Local land use policy should include provisions for all housing types, including those intended for the homeless. This analysis indicates that the City currently defines transitional and supportive housing or allows transitional or supportive housing in all residential zones. The City also does not meet state law requirements pertaining to density bonus provisions and the definition of family.

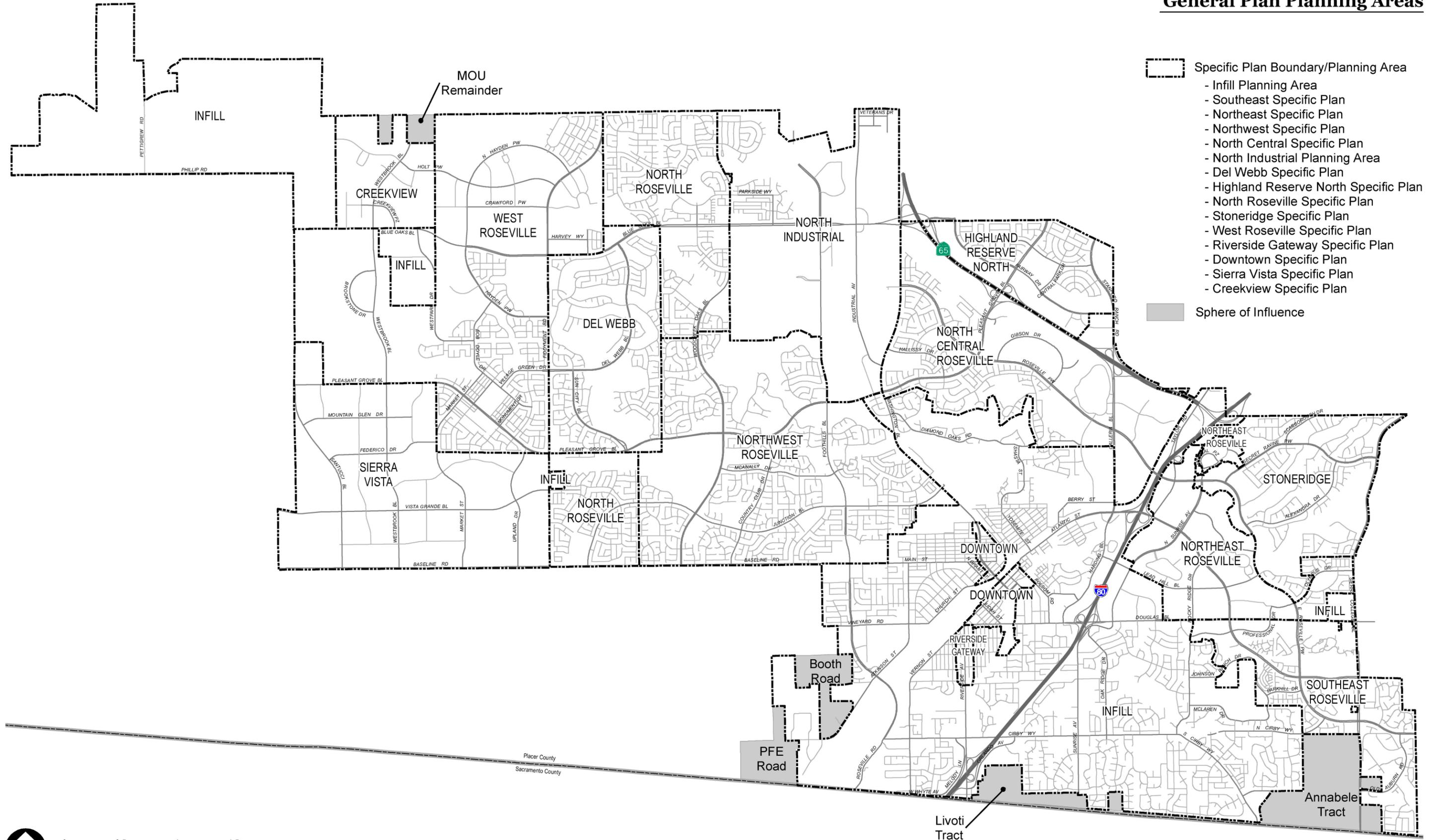
7. Impediment: Lack of formal policies and procedures regarding exceptions and variances requested by disabled persons.

- 7.1. **Action:** The City will consider establishing a formal procedure to consider requests for exceptions or variances to zoning and building codes from persons with disabilities. This procedure would be a ministerial process with no processing fee.

The City will place literature regarding the extent of and procedures for requesting reasonable accommodation (physical improvements to housing) at public counters. The City will also continue to monitor its development codes and procedures to ensure that no conditions exist which may unduly constrain the development of housing for persons with disabilities. When constraints are identified, the City will work to mitigate or eliminate such constraints.

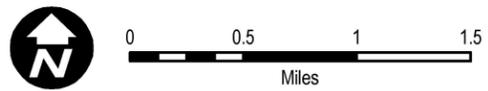
Attachment A

**Fig. II-1
General Plan Planning Areas**



- Specific Plan Boundary/Planning Area
 - Infill Planning Area
 - Southeast Specific Plan
 - Northeast Specific Plan
 - Northwest Specific Plan
 - North Central Specific Plan
 - North Industrial Planning Area
 - Del Webb Specific Plan
 - Highland Reserve North Specific Plan
 - North Roseville Specific Plan
 - Stoneridge Specific Plan
 - West Roseville Specific Plan
 - Riverside Gateway Specific Plan
 - Downtown Specific Plan
 - Sierra Vista Specific Plan
 - Creekview Specific Plan

- Sphere of Influence



Attachment B

PROOF OF PUBLICATION, CONT.
THE PRESS TRIBUNE
188 CIRBY WAY
ROSEVILLE, CA 95678

16572526

NOTICE OF PUBLIC MEETING FOR THE PREPARATION OF THE 2015 ANNUAL ACTION PLAN, 2015-2019 CONSOLIDATED PLAN, AND 2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

NOTICE IS HEREBY GIVEN that the City of Roseville is beginning its annual planning for the 2015 Community Development Block Grant (CDBG) program.

NOTICE IS ALSO HEREBY GIVEN that the City is preparing its 2015-2019 Consolidated Plan. This five-year plan is required for the City to receive CDBG funding from the US Department of Housing and Urban Development (HUD). Each year, the City receives funding from HUD through the CDBG program. Every year the City must submit an annual Action Plan, and every five years the City must submit a Consolidated Plan. Both the Action Plan and the Consolidated Plan are due to HUD by July 1, 2015. The primary objective of CDBG is the development of viable urban communities through the provision of decent housing, a suitable living environment, and expanded economic opportunities for low- and moderate-income individuals/families and communities. The Consolidated Plan will describe CDBG program housing and community needs for the next five years. This will be done through a community workshop and public meetings.

NOTICE IS ALSO HEREBY GIVEN that the City is preparing its 2015 Analysis of Impediments to Fair Housing Choice (AI). The AI is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin, which restrict housing choices or the availability of housing choices. Policies, practices or procedures that appear neutral on their face, but which operate to deny or adversely affect the provision of housing to persons of any particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments." (Adapted from Fair Housing Planning Guide, 1995 HUD Publication)

The planning process began on October 10, 2014, with a community workshop.

NOTICE IS HEREBY GIVEN that the City of Roseville Housing Division will hold a public meeting on: **Wednesday, February 25, 2014, at 3:30 p.m. in Civic Center Meeting Rooms 1 & 2, 311 Vernon Street, Roseville, CA**

This public meeting will solicit public comment on the priority needs that will guide the preparation of the City of Roseville's 2015 Annual Action Plan, 2015-2019 Consolidated Plan, and 2015 AI.

Please see the schedule of events below related to the five-year Consolidated Plan, planning for the use of 2015 CDBG funds, applications for 2015 CDBG funds, AI, and opportunities for public comment. Please note that dates are subject to change.

02/25/15 - Public Meeting to recommend priority needs
02/25/15 - CDBG Notice of Funding Availability (NOFA) and applications released
02/25/15 - Draft Annual Action Plan, five-year Consolidated Plan, and AI released for public comment

03/25/15 - CDBG applications and public comments due
05/20/15 - City Council meeting to receive the five-year priority needs
05/20/15 - Public Hearing; City Council to consider and adopt the 2015 Annual Action Plan, 2015-2019 Consolidated Plan, and 2015 AI
05/27/15 - Annual Action Plan, Consolidated Plan, and AI due to HUD

For questions or additional information about the public meeting or applying for CDBG funding, please call the City of Roseville at (916) 774-5469. Written comments or questions may be sent to Esmerita Rivera, Housing Analyst II, City of Roseville, 311 Vernon Street, Roseville, CA 95678 or by e-mail to rivera@roseville.ca.us.

The public meeting will be conducted in English. If you require a translator, please contact the Housing Division Office at housing@roseville.ca.us or (916) 774-5270, no fewer than two business days prior to the meeting to make the necessary arrangements.

In compliance with the Americans with Disabilities Act, the City of Roseville does not discriminate against persons with disabilities and is an accessible facility. Any person with a disability who requires a modification or accommodation to be able to participate in this meeting is asked to contact the Housing Division Office at housing@roseville.ca.us or (916) 774-5270, no fewer than two business days prior to the meeting to allow for reasonable arrangements.

Assisted listening devices are also available upon request.
PUBLISHED IN ROSEVILLE PRESS-TRIBUNE: JANUARY 23, 2015

JAN 30 2015

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PUBLIC NOTICES

PUBLIC NOTICES

PUBLIC NOTICES

AVISO DE JUNTA PÚBLICA**PARA LA PREPARACIÓN DEL PLAN DE ACCIÓN DEL 2015, PLAN CONSOLIDADO DEL 2015-2019, Y ANÁLISIS DE IMPEDIMENTOS A ESCOGER VIVIENDA JUSTA DEL 2015****PROGRAMA DE SUBSIDIOS GLOBALES PARA EL DESARROLLO COMUNITARIO (CDBG)**

SE ESTÁ AVISANDO que la Ciudad de Roseville está comenzando su planificación anual para el Programa de Subsidios Globales para el Desarrollo Comunitario (CDBG, por sus siglas en inglés) del 2015. **TAMBIÉN SE ESTÁ AVISANDO** que la Ciudad está preparando su Plan Consolidado del 2015-2019. Este plan de cinco años es requerido para que la Ciudad reciba fondos de CDBG del Departamento de Vivienda y Desarrollo Urbano de los EE.UU. (HUD, por sus siglas en inglés). Cada año, la Ciudad recibe fondos de HUD a través del programa CDBG. Cada año la Ciudad debe someter un Plan de Acción Anual, y cada cinco años la Ciudad debe someter un Plan Consolidado. Ambos, el Plan de Acción y el Plan Consolidado se deben entregar a HUD para el 1 de julio del 2015. El objetivo primario de CDBG es el desarrollo de las comunidades urbanas viables mediante la provisión de vivienda decente, un ambiente adecuado y ampliar las oportunidades económicas para los individuos/familias y comunidades de ingresos bajos y moderados. El Plan Consolidado describirá necesidades de vivienda de la comunidad del programa CDBG para los próximos cinco años. Esto se hará a través de un taller comunitario, y una audiencia pública. **TAMBIÉN SE ESTÁ AVISANDO** que la Ciudad está preparando su Análisis de Impedimentos a Escoger Vivienda Justa (AI, por sus siglas en inglés) El "AI" es una porción del "Plan Consolidado requerido por HUD el cual es actualizado cada 5 años. El AI es una revisión de los impedimentos para elección de vivienda justa en el sector público y privado. Impedimentos para elección de vivienda justa son cualquier acciones, omisiones o decisiones tomadas debido a raza, color, religión, sexo, discapacidad, estatus familiar u origen nacional, que restringe las opciones de vivienda o la disponibilidad de opciones de vivienda. Las políticas, prácticas o procedimientos que parecen neutrales en su cara, pero que operan para denegar o afectar negativamente a la provisión de vivienda para personas de cualquier raza, color, religión, sexo, discapacidad, estatus familiar u origen nacional puede constituir tales impedimentos." (Adaptado de vivienda justa planificación a guta, publicación de HUD de 1995)

El proceso de planificación comenzó el 10 de octubre del 2014, con un taller comunitario.

SE ESTÁ AVISANDO que la División de Vivienda de la Ciudad de Roseville se reunirá para sostener una junta pública el **miércoles, 25 de febrero del 2015, a las 3:30 p.m. Cuartos de Junta 1 & 2 en el Centro Cívico de Roseville en el 311 Calle Vernon, Roseville, CA.** Esta junta pública solicitará comentarios del público sobre las necesidades prioritarias que dirigirán la preparación del Plan de Acción Anual del 2015, Plan Consolidado del 2015-2019, AI del 2015 de la Ciudad de Roseville. **Por favor, vea el calendario de eventos a continuación relacionados con el Plan Consolidado de cinco-años, la planificación para el uso de fondos CDBG del 2015, las aplicaciones para fondos CDBG del 2015, y oportunidades para comentarios públicos. Por favor tenga en cuenta que las fechas están sujetas a cambio.**

02/25/15 – Junta pública para recomendar necesidades de prioridad
02/25/15 – CDBG Aviso de Fondos Disponibles (NOFA) y aplicaciones publicadas
02/25/15 – El borrador del Plan de Acción Anual, Plan Consolidado de cinco años, y AI publicados para comentarios públicos.

03/25/15 – Aplicaciones de CDBG y comentarios públicos se deben entregar
05/20/15 – Junta Pública del Concilio de la Ciudad para recibir las necesidades de prioridad de cinco años

5/20/15 – Audiencia Pública – Adopción del Plan de Acción del 2015, Plan Consolidado del 2015-2019, y AI del 2015 por el Concilio de la Ciudad

5/27/15 – Entregar el Plan de Acción 2015 y el Plan Consolidado 2015-2019 a HUD
Para preguntas o información adicional sobre la junta pública o solicitar fondos CDBG, por favor llame a la Ciudad de Roseville al (916) 774-5469. Comentarios escritos o preguntas pueden ser enviados a Esmerita Rivera, Housing Analyst II, Ciudad de Roseville, 311 Vernon Street, Roseville, CA 95678 o por correo electrónico a erivera@roseville.ca.us.

La junta pública se realizará en inglés. Si necesita un traductor, por favor comuníquese con Esmerita Rivera al (916) 774-5469 o erivera@roseville.ca.us, no menos de dos días de trabajo antes de la junta para hacer los arreglos necesarios.

En cumplimiento de la Ley de Estadounidenses con Discapacidades, la Ciudad de Roseville no discrimina a las personas con discapacidades y es una instalación accesible. Cualquier persona con una discapacidad que requiere una modificación o acomodo para poder participar en esta junta se le pide que llame a la Oficina de la División de Vivienda de Roseville al (916) 774-5469 o a erivera@roseville.ca.us, no menos de dos días de trabajo antes de la junta para permitir hacer los arreglos razonables.

Dispositivos de audición asistidos también están disponibles bajo petición.



Attachment C

16581395

NOTICE OF PUBLIC MEETING

SEE ATTACHED

APR 24 2015

The above space is reserved for Court/County Filed Date Stamp

**PROOF OF PUBLICATION
(2015.5 C.C.P.)**

**STATE OF CALIFORNIA
County of Placer**

I am a citizen of the United States and employed by a publication in the County aforesaid. I am over the age of eighteen years, and not a party to the mentioned matter. I am the principal clerk of the **Roseville Press Tribune**, a newspaper of general circulation, in the **City of Roseville**, which is printed and published in the **County of Placer**. This newspaper has been judged a newspaper of general circulation by the Superior Court of the State of California, in and for the **County of Placer**, on the date of November 13, 1951 (Case Number 16996). The notice, of which the attached is a printed copy (set in type not smaller than nonpareil) has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

APRIL 17

I certify, under penalty of perjury, that the foregoing is true and correct.



Terry Clark

Dated in Roseville, California

APRIL 17, 2015

**PROOF OF PUBLICATION
ROSEVILLE PRESS TRIBUNE
188 Cirby Way
Roseville, CA 95678**

PROOF OF PUBLICATION, CONT.
THE PRESS TRIBUNE
188 CIRBY WAY
ROSEVILLE, CA 95678

16581395

**NOTICE OF PUBLIC MEETING FOR THE CITY'S 2015-2019 CONSOLIDATED PLAN,
2015 ANNUAL ACTION PLAN AND 2015 ANALYSIS OF IMPEDIMENTS TO
FAIR HOUSING CHOICE (AI)**

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

NOTICE IS HEREBY GIVEN that the City of Roseville has completed its annual planning for the 2015 Community Development Block Grant (CDBG) program.

NOTICE IS ALSO HEREBY GIVEN that the City has prepared its 2015-2019 Consolidated Plan; this five-year plan is required for the City to receive CDBG funding from the US Department of Housing and Urban Development (HUD). Each year, the City receives funding from HUD through the CDBG program. Every year the City must submit an Annual Action Plan (Action Plan), and every five years the City must submit a Consolidated Plan (Con Plan). Both the Action Plan and Con Plan are due to HUD by July 1, 2015. The primary objective of CDBG is the development of viable urban communities through the provision of decent housing, a suitable living environment, and expanded economic opportunities for low- and moderate-income individuals/families and communities. The Con Plan describes the CDBG program's housing and community needs for the next five years. This was done through a two public workshops and meetings.

NOTICE IS ALSO HEREBY GIVEN that the City has prepared its 2015 Analysis of Impediments to Fair Housing Choice (AI). The AI is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, sexual orientation or national origin which restrict housing choices or the availability of housing choices. Policies, practices or procedures that appear neutral on their face, but which operate to deny or adversely affect the provision of housing to persons of any particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments." (Adapted from Fair Housing Planning Guide, 1995 HUD Publication)

PUBLIC NOTICE IS HEREBY GIVEN that a public hearing will be held before the City Council of the City of Roseville for public review, comment and approval of the City's 2015 Consolidated Plan, 2015 Annual Action Plan and 2015 Analysis of Impediments to Fair Housing Choice on Wednesday, May 20, 2015 at 7:00 p.m. or as soon thereafter as may be heard, in the Council Chambers of City Hall, 311 Vernon Street, Roseville, CA. All interested persons are invited to appear and be heard. If you challenge the decision in court, you may be limited to raising only those issues which you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Clerk at, or prior to, the public hearing.

Written comments or questions may be sent to Esmerita Rivera, City of Roseville, 311 Vernon Street, Roseville, CA 95678, by calling (916) 774-5469 or e-mail erivera@roseville.ca.us.

The public meeting will be conducted in English. If you require a translator, please contact the Housing Division Office at athousing@roseville.ca.us or (916) 774-5270, no fewer than two business days prior to the meeting to make the necessary arrangements.

In compliance with the Americans with Disabilities Act, the City of Roseville does not discriminate against persons with disabilities and is an accessible facility. Any person with a disability who requires a modification or accommodation to be able to participate in this meeting is asked to contact the Housing Division Office at housing@roseville.ca.us (916) 774-5270, no fewer than two business days prior to the meeting to allow for reasonable arrangements. Assisted listening devices are also available upon request.

PUBLISHED IN ROSEVILLE PRESS-TRIBUNE: APRIL 17, 2015

APR 24 2015

CLASIFI

PUBLIC NOTICES

PUBLIC NOTICES

PUBLIC NOTICES

AVISO DE JUNTA PÚBLICA

PARA EL PLAN CONSOLIDADO DEL 2015-2019, PLAN DE ACCIÓN ANUAL DEL 2015, Y ANÁLISIS DE IMPEDIMENTOS

A ESCOGER VIVIENDA JUSTA DEL 2015 PROGRAMA DE SUBSIDIOS GLOBALES PARA EL DESARROLLO COMUNITARIO (CDBG)

SE ESTÁ AVISANDO que la Ciudad de Roseville completó su planificación anual para el Programa de Subsidios Globales para el Desarrollo Comunitario (CDBG, por sus siglas en inglés) del 2015. **TAMBIÉN SE ESTÁ AVISANDO** que la Ciudad preparó su Plan Consolidado del 2015-2019. Este plan de cinco años es requerido para que la ciudad reciba fondos de CDBG del Departamento de Vivienda y Desarrollo Urbano de los EE.UU. (HUD, por sus siglas en inglés). Cada año, la ciudad recibe fondos de HUD a través del programa CDBG. Cada año la Ciudad debe someter un Plan de Acción Anual, y cada cinco años la Ciudad debe someter un Plan Consolidado. Ambos, el Plan de Acción y el Plan Consolidado se deben entregar a HUD para el 1 de julio del 2015. El objetivo primario de CDBG es el desarrollo de las comunidades urbanas viables mediante la provisión de vivienda decente, un ambiente adecuado y ampliar las oportunidades económicas para los individuos/familias y comunidades de ingresos bajos y moderados. El Plan Consolidado describirá necesidades de vivienda de la comunidad del programa CDBG para los próximos cinco años. Esto se hará a través de un taller comunitario, y una audiencia pública. **TAMBIÉN SE ESTÁ AVISANDO** que la Ciudad ha preparado su Análisis de Impedimentos a Escoger Vivienda Justa (AI, por sus siglas en inglés) El "AI" es una porción del "Plan Consolidado requerido por HUD el cual es actualizado cada 5 años. El AI es una revisión de los impedimentos para elección de vivienda justa en el sector público y privado. Impedimentos para elección de vivienda justa son cualquier acciones, omisiones o decisiones tomadas debido a raza, color, religión, sexo, discapacidad, estatus familiar, orientación sexual u origen nacional, que restringe las opciones de vivienda o la disponibilidad de opciones de vivienda. Las políticas, prácticas o procedimientos que parecen neutrales en su cara, pero que operan para denegar o afectar negativamente a la provisión de vivienda para personas de cualquier raza, color, religión, sexo, discapacidad, estatus familiar u origen nacional puede constituir tales impedimentos." (Adaptado del guía de planificación de vivienda justa, publicación de HUD de 1995)

NOTICIA PÚBLICA SE ESTÁ AVISANDO que una audiencia pública se llevará a cabo ante el Consejo Municipal de la Ciudad de Roseville para revisión público, comentario y aprobación del Plan Consolidado de 2015 de la Ciudad, Plan de Acción Anual del 2015 y Análisis de Impedimentos a Escoger Vivienda Justa el miércoles, 20 de mayo del 2015 a las 7:00 p.m. o lo más pronto después cómo se pueda escuchar, en la Cámara del Consejo Municipal de las Oficinas de la Ciudad, 311 Calle Vernon, Roseville, CA. Todas las personas interesadas están invitadas a presentarse y ser oídas.

Si desafia esta decisión en corte, puede ser limitado a sacar solamente esos asuntos los cuales Ud. o alguien más ha sacado en la audiencia pública descrita en este aviso, o por correspondencia escrita entregada al Funcionario de la Ciudad en, o antes de, la audiencia pública.

Comentarios escritos o preguntas pueden ser enviados a Esmerita Rivera, ciudad de Roseville, 311 Calle Vernon, Roseville, CA 95678, llamando al (916) 774-5469 o e-mail erivera@roseville.ca.us.

La junta pública se realizará en inglés. Si necesita un traductor, por favor comuníquese con Esmerita Rivera al (916) 774-5469 o erivera@roseville.ca.us, no menos de dos días de trabajo antes de la junta para hacer los arreglos necesarios.

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Attachment D

Table 2 – Agencies, groups, organizations who participated

Agency/Group/ Organization Name	Agency/Group/ Organization Type	Consolidated Plan Section Consulted	How Consulted?
Roseville Housing Authority	PHA – Housing Choice Voucher	Housing Needs	Email
The Gathering Inn	Services – Nomadic Shelter, Resource Center, Health & Hygiene	Homeless Needs; Anti-Poverty Strategy	Email
Roseville Home Start	Services – Transitional Housing for Homeless Families with Children	Homeless Needs; Anti-Poverty Strategy	Email
The Lazarus Project, Inc.	Services – Permanent Housing for Single Homeless Adults	Homeless Needs; Anti-Poverty Strategy	Email
Advocates for Mentally Ill Housing (AMIH)	Services – Temporary & Permanent Housing for Persons with Mentally Illness	Homeless Needs; Anti-Poverty Strategy	Email
St. Vincent De Paul, Roseville Area Conference	Services – Food and Nutrition	Homeless Needs; Anti-Poverty Strategy	Email
Roseville Salvation Army	Services – Food and Shelter	Homeless Needs; Anti-Poverty Strategy; Other Education; Non-Homeless Special Needs	Email
Sierra Foothill AIDS Foundation	Services – HIV/AIDS, Housing & Counseling	Homeless Needs; Anti-Poverty Strategy	Email
Placer Food Bank	Services – Food and Nutrition	Homeless Needs; Anti-Poverty Strategy	Email
Seniors First	Services – Seniors	Homeless Needs; Anti-Poverty Strategy; Other Education; Non-Homeless Special Needs	Email
KidsFirst	Services – Families & Children, Life Skills and Counseling	Homeless Needs; Anti-Poverty Strategy; Other Education; Non-Homeless Special Needs	Email
Placer County Adult System of Care (ASOC)	Other Government – Local; Temporary & Permanent Housing for Persons with Mental Illness		Email
Placer People of Faith Together (PPFT)	Services – Faith Based, Advocacy	Homeless Needs; Anti-Poverty Strategy	Email
Placer County Veteran’s Office	Other Government Local – Veteran’s	Homeless Needs; Anti-Poverty Strategy; Other Education; Non-Homeless Special Needs	Email
Legal Services of Northern California (LSNC)	Services – Legal and Advocacy	Homeless Needs; Anti-Poverty Strategy; Other Education; Non-Homeless Special Needs	Email
Stand Up Placer	Services – Domestic Violence, Safe House, Transitional & Permanent Housing	Homeless Needs; Anti-Poverty Strategy	Email
Volunteers of America	Services – Homeless Veteran’s, Housing & Employment	Homeless Needs; Anti-Poverty Strategy	Email

Placer County Probation Department	Other Government – Local; Re-Entry and Recidivism	Homeless Needs; Anti-Poverty Strategy; Other Education; Non-Homeless Special Needs	Email
Whole Person Learning	Services – Transition Age Youth (TAY), Housing	Homeless Needs; Anti-Poverty Strategy; Other Education; Non-Homeless Special Needs	Email
Golden Sierra Life Skills	Services – Parenting Life Skills, Education & Reunification	Homeless Needs; Anti-Poverty Strategy; Other Education; Non-Homeless Special Needs	Email
Roseville Joint Union High School District	Services – Homeless School Liaison; Health & Education	Homeless Needs; Anti-Poverty Strategy; Other Education	Email

Attachment E

SURVEY SUMMARY

INTRODUCTION

The community outreach process for the City of Roseville 2015 Analysis of Impediments to Fair Housing Choice (AI) included one public workshop, one public meeting, a print and online survey, and agency phone and email consultations. Over 40 regional and local service agencies, nonprofit organizations, and interested individuals were notified and encouraged to attend the public workshop and meeting and/or submit written comments on the AI.

PUBLIC WORKSHOP AND PUBLIC MEETING

The public workshop was held on November 13, 2014 and the public meeting was held on February 25, 2015 for the AI. No participants attended the public workshop held on November 13, 2014; five (5) participants attended the February meeting. The workshop and meeting began with a presentation by City staff; those attending were invited to provide their feedback during and after the presentation.

PRINT AND ONLINE SURVEY

An online survey for the AI was available on the City's website from November 13, 2014, to January 16, 2015. The option was also available to complete a written hard copy survey during this same time period. A total of 195 completed surveys were received. The following section includes survey results from the online surveys completed; no hard copy surveys were received.

SURVEY RESULTS BY QUESTION

Barriers to Equal Access to Housing

The first question in the AI survey was regarding barriers to equal access to housing. Many survey respondents felt that the cost of housing is a very common, and important to address, barrier to equal access to housing. A large number of respondents felt that it is somewhat important to address the size and type of housing, as well as accessibility to housing by seniors and disabled persons, as barriers to housing.

Please place a check mark in the column to tell us how common and important it is to address the following barriers to equal housing					
Answer Options	Very common, important to address	Somewhat important to address	Rare, not important to address	This is not a problem	Response Count
Cost	40	17	11	9	77
Accessibility (seniors and disabled)	21	34	12	10	77
Supply (new housing)	10	30	21	16	77
Proper size/type of housing	11	36	21	8	76
Other (please specify)					2

Fair Housing: Type/Area

The second question in the survey was regarding housing discrimination by type of housing. Many survey respondents believe that mortgage lending is a common, and important to address, type of housing discrimination. Many respondents believe that housing discrimination in rental housing and housing for sale is also somewhat important to address.

Please place a check mark in the column to tell us how common and important it is to address the following areas of housing discrimination					
Answer Options	Very common, important to address	Somewhat important to address	Rare, not important to address	This is not a problem	Response Count
Rental housing	17	27	18	13	75
Housing for sale	13	25	23	14	75
Mortgage lending	20	22	19	14	75
Other (please specify)					1

Fair Housing: Protected Classes

The third question in the survey was regarding housing discrimination by personal characteristics. Many survey respondents believe that housing discrimination based on disability is very common and important to address. Many respondents believe it is somewhat important to address housing discrimination based on national origin, race/ethnicity, and language. An equal number of people believe housing discrimination based on personal characteristics is rare and not important to address and some also believe this type of discrimination is not a problem.

Please place a check mark in the column to tell us how common and important it is to address housing discrimination by the following personal characteristics					
Answer Options	Very common, important to address	Somewhat important to address	Rare, not important to address	This is not a problem	Response Count
Race/ethnicity	12	21	20	18	71
Language	12	20	21	18	71
National origin	8	22	22	18	70
Gender	6	18	26	21	71
Disability	17	17	23	14	71
Familial/marital status	10	19	20	21	70
Sexual orientation	8	18	22	23	71
Other (please specify)					2

Fair Housing: Form of Discrimination

The fourth question in the survey was regarding forms of housing discrimination. Many survey respondents believe that the setting of different prices, rent, fees, or deposits is a very common, and important to address, form of housing discrimination. A large number of respondents believe that the types of housing discrimination listed in the survey are rare, and not important to address. A few respondents do not believe any of the listed housing discrimination types are a problem.

Please place a check mark in the column to tell us how common and important it is to address housing discrimination done in the following ways					
Answer Options	Very common, important to address	Somewhat important to address	Rare, not important to address	This is not a problem	Response Count
Refusal to rent/sell	14	14	30	13	71
Refusal to show	8	15	32	15	70
Deception regarding availability or price	20	17	24	10	71
Different price, rent, fees or deposit	22	13	26	9	70
Other (please specify)					2

Reasons Housing Discrimination Persists

The fifth question in the survey was regarding why housing discrimination persists. Many survey respondents believe there is a lack of reporting of housing discrimination and that consumers are not aware of their rights with respect to housing discrimination. Many respondents believe there is also a lack of enforcement of housing discrimination actions.

Please place a check mark in the column to tell us why housing discrimination might still happen				
Answer Options	Yes, this is one reason	Maybe, might be the reason	No, not the reason	Response Count
Lack of enforcement	25	32	12	69
Lack of reporting	32	28	9	69
Consumers are not aware of rights	32	29	8	69
Sellers/landlords are not aware of the law	24	23	19	66
Other (please specify)				4

Fair Housing: Methods to Address

The sixth question in the survey was regarding effective ways to address housing discrimination. Many survey respondents felt there is a high need to fund housing for aging-out foster youth and seniors. A high number of respondents believe that enforcement, reporting, and education are effective means of addressing housing discrimination. A small number of respondents believe the actions listed in the survey are not effective ways to address housing discrimination.

Please place a check mark in the column to tell us which are effective ways to combat housing discrimination				
Answer Options	Yes, this is effective	Maybe, might be effective	No, would not be effective	Response Count
Education	37	27	6	70
Enforcement	40	26	4	70
Reporting	38	31	2	71
Other (please specify)				4

Attachment F

INTRODUCTION

The City of Roseville is conducting community outreach to get input on the development of a 2015–2019 Analysis of Impediments to Fair Housing Choice Plan. This document will identify impediments or barriers that affect the rights of fair housing choice in the City of Roseville for the next five years.

Please take a few minutes to complete this survey to give input regarding fair housing in the City of Roseville. Surveys will be accepted until January 16, 2015.

All survey responses are anonymous.

1. BARRIERS TO EQUAL ACCESS TO HOUSING

Please place a check mark in the column to tell us how common and important it is to address the following barriers to equal housing.

	VERY COMMON, IMPORTANT TO ADDRESS	SOMEWHAT IMPORTANT TO ADDRESS	RARE, NOT IMPORTANT TO ADDRESS	THIS IS NOT A PROBLEM
Cost	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessibility (seniors and disabled)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supply (new housing)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proper size/type of housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. FAIR HOUSING: TYPE/AREA

Please place a check mark in the column to tell us how common and important it is to address the following areas of housing discrimination.

	VERY COMMON, IMPORTANT TO ADDRESS	SOMEWHAT IMPORTANT TO ADDRESS	RARE, NOT IMPORTANT TO ADDRESS	THIS IS NOT A PROBLEM
Rental housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing for sale	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mortgage lending	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. FAIR HOUSING: PROTECTED CLASSES

Please place a check mark in the column to tell us how common and important it is to address housing discrimination by the following personal characteristics.

	VERY COMMON, IMPORTANT TO ADDRESS	SOMEWHAT IMPORTANT TO ADDRESS	RARE, NOT IMPORTANT TO ADDRESS	THIS IS NOT A PROBLEM
Race/ethnicity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Language	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
National origin	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Familial/marital status	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4. FAIR HOUSING: FORM OF DISCRIMINATION

Please place a check mark in the column to tell us how common and important it is to address housing discrimination done in the following ways.

	VERY COMMON, IMPORTANT TO ADDRESS	SOMEWHAT IMPORTANT TO ADDRESS	RARE, NOT IMPORTANT TO ADDRESS	THIS IS NOT A PROBLEM
Refusal to rent/sell	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Refusal to show	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Deception regarding availability or price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Different price, rent, fees or deposit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. REASONS HOUSING DISCRIMINATION PERSISTS

Please place a check mark in the column to tell us why housing discrimination might still happen.

	YES, THIS IS THE REASON	MAYBE, MIGHT BE THE REASON	NO, NOT THE REASON
Lack of enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of reporting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Consumers are not aware of rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Consumers are not aware of rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. FAIR HOUSING: METHODS TO ADDRESS

Please place a check mark in the column to tell us why housing discrimination might still happen.

	YES, THIS IS EFFECTIVE	MAYBE, MIGHT BE EFFECTIVE	NO, WOULD NOT BE EFFECTIVE
Education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reporting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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INTRODUCTION

La Ciudad de Roseville está llevando a cabo la distribución de información a la comunidad para conseguir aportación en el desarrollo de un Análisis de Impedimentos al Plan de Elección a la Vivienda Justa del 2015-2020. Este documento identificará los obstáculos o barreras que afectan los derechos de elección de vivienda justa en la Ciudad de Roseville para los próximos cinco años

Por favor tome unos minutos para completar esta encuesta para dar aporte en relación con la vivienda justa en la Ciudad de Roseville. Las encuestas serán aceptadas hasta el 16 de enero del 2015.

Todas las respuestas a la encuesta son anónimas.

1. BARRERAS A LA IGUALDAD DE ACCESO A LA VIVIENDA

Por favor coloque un punto en la columna para que nos diga qué tan común e importante es de dirigir las siguientes barreras a la igualdad de vivienda.

	MUY COMÚN, IMPORTANTE OCUPARSE DE ESTO	ALGO IMPORTANTE OCUPARSE DE ESTO	RARO, NO ES IMPORTANTE OCUPARSE DE ESTO	ESTO NO ES UN PROBLEMA
Costo	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accesibilidad (personas mayores y discapacitadas)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Suministro (vivienda nueva)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tamaño apropiado/tipo de vivienda	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Si "otro," por favor especifique	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. VIVIENDA JUSTA: TIPO/ÁREA

Por favor coloque una marca de verificación (palomita) en la columna para que nos diga qué tan común e importante es de dirigir las siguientes áreas de discriminación de vivienda.

	MUY COMÚN, IMPORTANTE OCUPARSE DE ESTO	ALGO IMPORTANTE OCUPARSE DE ESTO	RARO, NO ES IMPORTANTE OCUPARSE DE ESTO	ESTO NO ES UN PROBLEMA
Vivienda de renta	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vivienda de venta	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Préstamos hipotecarios	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Préstamos hipotecarios	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Si "otro," por favor especifique	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. VIVIENDA JUSTA: CLASES PROTEGIDAS

Por favor coloque una marca de verificación (palomita) en la columna para que nos diga qué tan común e importante es de dirigir discriminación de vivienda por las siguientes características personales.

	MUY COMÚN, IMPORTANTE OCUPARSE DE ESTO	ALGO IMPORTANTE OCUPARSE DE ESTO	RARO, NO ES IMPORTANTE OCUPARSE DE ESTO	ESTO NO ES UN PROBLEMA
Raza/origen étnico	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Idioma	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Origen nacional	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Género	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discapacidad	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Estatus familiar/civil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Orientación sexual	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Si "otro," por favor especifique	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4. VIVIENDA JUSTA: FORMA DE DISCRIMINACIÓN

Por favor coloque una marca de verificación (palomita) en la columna para que nos diga qué tan común e importante es de dirigir la discriminación de vivienda hecha de las siguientes maneras.

	MUY COMÚN, IMPORTANTE OCUPARSE DE ESTO	ALGO IMPORTANTE OCUPARSE DE ESTO	RARO, NO ES IMPORTANTE OCUPARSE DE ESTO	ESTO NO ES UN PROBLEMA
Rechazo de rentar/vender	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rechazo de demostrar (para rentar o vender)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Engaño con respecto a la disponibilidad o precio	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Diferente precio, alquiler, honorarios o depósito	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Si "otro," por favor especifique	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. RAZONES LA DISCRIMINACIÓN EN LA VIVIENDA PERSISTE

Por favor coloque una marca de verificación (palomita) en la columna para que nos diga por qué la discriminación de vivienda todavía pueda pasar.

	SÍ, ESTA ES UNA RAZÓN	TAL VEZ, PODRÍA SER LA RAZÓN	NO, NO ES LA RAZÓN
Falta de imposición (de leyes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Falta en reportarlo	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Los consumidores no conocen los derechos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vendedores/propietarios no conocen la ley	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Si "otro," por favor especifique	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. VIVIENDA JUSTA: MÉTODOS PARA DIRIGIR

Por favor coloque una marca de verificación (palomita) en la columna para que nos diga cuáles son maneras efectivas para combatir la discriminación de vivienda.

	SÍ, ESTA ES EFECTIVO	TAL VEZ, PODRÍA SER EFECTIVO	NO, NO SERÍA EFECTIVO
Educación	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Imposición (aplicación de leyes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reportando	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Si "otro," por favor especifique	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>