

CITY OF ALBANY

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE AND FAIR HOUSING PLAN

CITY OF ALBANY, OREGON
COMMUNITY DEVELOPMENT DEPARTMENT

JUNE 2018

City of Albany

UPDATED ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Table of Contents

l.	Exec	cutive Summary	1
	A.	Introduction	1
	В.	Fair Housing Laws Background	2
	C.	Conclusions	2
	D.	Methodology and Community Engagement	3
III.	Comr	munity Profile	4
	A.	Population	4
	В.	Age Distribution	4
	C.	Race/Ethnicity	5
	D.	Disabilites	7
	E.	Familial Status and Household Composition	8
	F.	Income and Poverty	9
	G.	Housing Affordability	11
	Н.	Housing Conditions	14
IV.	Identi	fying Impediments to Fair Housing Choice	15
	A.	Private Sector Practices	15
		 Lending Analysis 	15
		 Real Estate Policies and Practices 	18
	В.	Public Sector Policies and Practices	18
		 Land Use and Zoning Laws 	18
		 Public Investments 	19
	C.	Fair Housing Allegations	19
	D.	Community Input	20
V. F	air Ho	using Impediments & Action Plan	21
	A.	Fair Housing Enforcement	21
	В.	Impediments, Progress and Recommendations	21
	C.	Conclusions	24
	В.	Fair Housing Priorities	24

City of Albany

2018 UPDATE to THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

SECTION I. EXECUTIVE SUMMARY

A. Introduction

As an Entitlement city receiving Community Development Block Grant (CDBG) from the U.S. Department of Housing and Urban Development (HUD), the City of Albany is required to conduct an Analysis of Impediments to Fair Housing Choice (AI) and to review and update it in conjunction with the Consolidated Plan to understand the various changing issues facing their community. Recipients of CDBG funds must also certify annually that they will affirmatively further fair housing choice in their communities by identifying factors that amy contribute to housing discrimination and take actions to mitigate these impacts.

The purpose of the AI is to assess how a variety of conditions and practices in a community may contribute to creating barriers to housing that may disproportionately impact persons who belong to state and federally identified protected classes. These conditions may include laws, government policies, real estate practices, and local conditions that can result in impediments to fair housing choice. As defined by the HUD, impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or
- Any actions, omissions, or decisions that have this effect.

The AI process includes examining these impediments and determining what actions may be taken to lessen or eliminate impacts on fair housing choice.

The AI is intended to complement other analyses presented in the City's five-year consolidated plans, annual action plans and annual performance reports. The AI and Action Plan elements will assist the City in its mission to further fair housing in the City, and help the City take steps to eliminate discriminatory practices that have occurred within the City, and reduce barriers to housing for persons in protected classes.

The 2018 Al Update and the Affirmatively Furthering Fair Housing Rule. In 2015, HUD determined that the Al needed to be reevaluated as a tool to help communities meet the obligation of the Affirmatively Furthering Fair Housing Rule (AFFH). The evaluation resulted in a new set of tools and a new analysis format for jurisdictions to use to evaluate fair housing challenges in their communities called an Assessment of Fair Housing (AFH). While Albany's first AFH was due in October 2021, the City started collecting data and developing an AFH in 2017 using the new format with hopes to adopt the new plan with the 2018-2022 Consolidated Plan. However, HUD suspended the new AFH requirement in 2018 after the City had made substantial progress on preparing the AFH under the now suspended guidelines.

Due to change in the AFH requirements, the City was required to review the 2014 AI to prevent any long period gaps in analysis. The 2018 review and update to the 2014 AI provides current data and analysis of fair housing conditions to determine whether the conditions reported in the 2014 AI have improved, worsened, or remained static, and assesses the City's progress on mitigating the impacts of identified impediments.

The City will build upon these findings and recommendations, as well as conduct additional research and outreach within the community to identify other barriers, areas for improvement, and recommended actions that would be addressed a new assessment of fair housing or analysis of impediments to fair housing depending final guidance on compliance with the 2015 Affirmatively Furthering Fair Housing Rule.

B. Fair Housing Background

Equal access to housing is protected as a fundamental right by the federal government of the United States under the Fair Housing Act (Title VIII of the Civil Rights Act of 1968). This access is necessary for each person to meet essential needs and pursue personal goals such as education and employment. 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. Oregon's fair housing laws are pursuant to and more stringent than the federal laws, by adding marital status, source of income, sexual orientation, and victims of domestic violence, sexual assault or stalking, or the fact that you have won an eviction case brought by a former landlord.

The Act prohibits housing discrimination and disparate treatment – whether intentional or not, and actions or policies that may not seem to discriminate but that have a negative effect on fair housing choice or restricting housing choice, such as land use and zoning regulations.

Numerous factors can impede access and choice in housing. In the sale and rental of housing, it is illegal to take any of the following actions, omissions or decisions based on a protected class:

- Refuse to rent or sell housing or negotiate for housing
- Make housing unavailable or falsely deny that housing is available for inspection, sale or rental
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In addition, it is illegal for anyone to:

- Threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right; or
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

In order to comply with state and federal laws and promote equal housing opportunity, communities must take steps to remove and/or mitigate the impacts of housing discrimination. The City of Albany aims to provide fair housing opportunities to all residents and comply with all applicable state and federal laws.

C. Conclusions – Identified Impediments

The 2018 review of fair housing conditions found the impediments or potential barriers to fair housing choice are generally the same as those identified in 2014. Identified impediments include:

- 1) Lack of understanding of fair housing laws and enforcement fair housing issues.
- 2) Linguistic and cultural barriers affect access to housing resources and reporting fair housing issues more challenging.
- 3) Discriminatory practices in the housing market exist.
- 4) Lack of quality affordable housing for low-income households.

An assessment of City's progress to remove these impediments is are detailed in Section Iv. The City of Albany is committed to pursuing actions and policies that remove barriers to fair housing choice and provide housing opportunities for all residents. Recommended actions are in Section V.

D. Methodology and Community Engagement

The 2018 AI Update included a review and update of demographics, policies, procedures, and practices within the City that affect the availability and accessibility of housing, and other conditions related to fair housing choice. The 2018 update also reviewed current mortgage lending data and fair housing complaints.

To better understand existing conditions, community engagement included surveys to residents through a network of area social service providers and to various stakeholders working with protected classes and lowincome residents and through the Web and press releases. Surveys were also collected from attendees of fair housing trainings. This collective input provided valuable data and insight on local fair housing issues and where the City can refine its efforts to address impediments.

A number of data sources and organizations were relied upon during the completion of the 2014 analysis and 2018 update for information regarding fair housing complaints and concerns, affordable housing conditions, and demographic and income patterns in Albany. These sources and organizations include the following:

- 1990, 2000 and 2010 Census population estimates;
- 2013-2017 American Community Survey five-year estimates;
- 2012-2016 Home Mortgage Disclosure Act (HMDA) public loan data;
- Department of Housing and Urban Development (HUD) civil rights complaints and income data;
- Fair Housing Council of Oregon Number of Albany complaints over the last few years;
- Bureau of Labor and Industries (BOLI) complaints regarding Oregon's protected class laws;
- Legal Aid of Oregon Community Services Consortium Final Narrative Report for Furthering Fair Housing Grant;
- 2016-2020 Oregon Analysis of Impediments to Fair Housing Choice; and
- City of Albany Development Code, Zoning Map and Comprehensive Plans

SECTION II. COMMUNITY PROFILE

This section presents a profile of Albany's general demographic trends since 1990 and presents economic conditions. This data is used to examine the conditions that affect housing choice, impediments to housing choice, and the prevalence of persons protected under fair housing law, as well as the geographic distribution of these residents within the city. Population, race, familial status, disability, income and housing conditions are examined in greater detail in in this section.

A. Population

Population is a critical indicator of current and future needs. Albany has grown by more than 20,000 residents since 1990. Albany has increased by 27 percent since 2000, and has been growing faster than Oregon, Linn and Benton Counties.

Table 1. Regional Population Growth 1990-2017

· ·						
				Percent Change		
	1990	2000	2017	1990-2000 2000-20		
Albany	33,523	40,852	52,007	21.9%	27.3%	
Linn County	91,227	103,069	123,626	13.0%	19.9%	
Benton County	70,811	78,153	92,287	10.4%	18.1%	
Oregon	2,842,321	3,421,399	4,141,100	21.0%	21.0%	

Sources: U.S. Census 1990 and 2000, and Portland State University for 2017

B. Age Distribution

Albany's population is continuing to age and is expected to see gradual improvements in life expectancy. Albany's median age was 36.6 in 2017 up from 32.7 in 2000. The population 65 and older increased from 12.7 % in 2000 to 15.2% in 2017. The senior population is projected to increase to 22.3% of the Linn County population by 2035 as birth rates decline and life expectancy increases. The needs of those over 65, and especially those over 75, could have a significant impact on housing needs in Albany.

Table 2. Age Groups as a Percentage of Albany's Population and Projections

Age Ranges	2000		2010		2017		Linn County 2035
0 to 14	9,012	22.1%	10,533	21.0%	10,188	19.6%	18.4%
15 to 24	5,715	14.0%	6,858	13.7%	7,155	13.8%	11.6%
25 to 34	5,914	14.5%	7,230	14.4%	7,409	14.2%	11.1%
35 to 44	6,070	14.9%	6,521	13.0%	6,570	12.6%	12.4%
45 to 54	5,583	13.7%	6,439	12.8%	6,885	13.2%	12.8%
55 to 64	3,358	8.2%	5,988	11.9%	5,921	11.4%	11.4%
65 to 74	2,298	5.6%	3,489	7.0%	4,457	8.6%	10.3%
75 and older	2,902	7.1%	3,100	6.2%	3,422	6.6%	12.0%
Total	40,852		50,158		52,007		
Median Age	32.7		34.6		36.6		

Source: U.S. Census Bureau and 2013-2017 American Community Survey and Portland State University

C. Race and Ethnicity

Albany's population has become more racially and ethnically diverse since 1990. According to the 2013-2017 ACS, Albany's non-Hispanic or Latino "white alone" population dropped to 80.6% of the population in 2017 from 94.4% in 1990. Albany's Hispanic/Latino population has quadrupled since 1990, going from 3% to 12.1% in 2017. The Asian and "two or more races" categories also increased over the same time period.

Table 3. Trends in Population and Race/Ethnicity 1990-2017

	19	1990		00	2010		2017	
Albany – Total Population	29,462	100%	40,852	100.0%	50,158	100%	52,007	100%
Hispanic or Latino	887	3.0%	2,489	6.1%	5,700	11.4%	6,296	12.1%
Not Hispanic or Latino	28,575	97.0%	38,363	93.9%	44,458	88.6%	45,711	87.9%
White alone	27,800	94.4%	37,453	89.0%	41,591	82.9%	42,451	80.6%
Black or African American alone	95	0.3%	217	0.5%	275	0.5%	363	0.7%
American Indian, Alaskan Native	303	1.0%	500	1.2%	473	0.9%	330	0.6%
Asian alone	367	1.2%	465	1.1%	745	1.5%	1,120	2.2%
Native Hawaiian & Other Pacific	10	0.0%	86	0.2%	63	0.1%	47	0.1%
Some Other Race alone	0	0.0%	1084	2.7%	63	0.1%	1,755	3.4%
Two or More Races	n/a		1,047	2.6%	1,311	2.6%	1,393	2.7%

Source: U.S. Census Bureau and 2013-2017 American Community Survey 5-Year Estimates

An important component of a fair housing analysis is an examination of the concentration of racial and ethnic minorities within a jurisdiction to detect evidence of segregation. In most cases, housing prices are likely to have the biggest influence on where people choose to live. Figure 1 shows the racial and ethnic population distributions in the City. Colored dots represent race/ethnicity which are distributed by general location within the City.

AFFIRMATIVELY FURTHERING FAIR HOUSING

Map Info
Legend
TOC

Junsdiction

Bemographics 2010
1 Dot * 25 People
White, Non-Hispanic
Plack, Non-Hispan

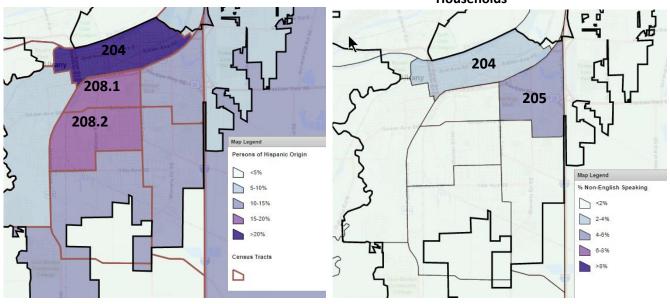
Figure 1. Race/Ethnic Population Distribution Map, Albany OR

Source: AFFH Data and Mapping Tool, 2009–2013 ACS

Three Census Tracts were considered to have a higher concentration of persons of Hispanic origin, between 15 and 20 percent and over 20 percent, compared to 12 percent for the population overall (Figure 2). The concentration of non-English-speaking households is shown in Figure 3.

Figure 2. Persons of Hispanic Origin Concentration

Figure 3. Concentration of Non-English-Speaking Households



D. Disabilities

The 2013-2017 ACS data for Albany reports that 16% of the Albany population had a physical or cognitive disability. A 2017 DHS Linn County report noted there were 1,727 aging residents with disabilities in Linn County. The table below indicates that 9 percent of residents 65 and older have a self-care or independent care difficulty.

Table 4. Type of Disability by Age

	Under 18	18 to 34	35-64	65-74	75 +	Totals	Percent
Total Population by Age Group	12,327	12,216	19,241	4,394	3,251	51,429	100%
Population with a Disability	916	1,264	3,254	1,342	1,663	8,439	16%
With a hearing difficulty	162	250	636	531	778	2,357	5%
With a vision difficulty	255	88	470	224	313	1,350	3%
With a cognitive difficulty	590	929	1,551	383	547	4,000	8%
With an ambulatory difficulty	42	182	1,696	758	1,136	3,814	7%
With a self-care difficulty	55	117	640	259	496	1,567	3%
With an independent living difficulty	0	620	1098	383	736	2,837	6%

Data Source: 2013-2017 ACS

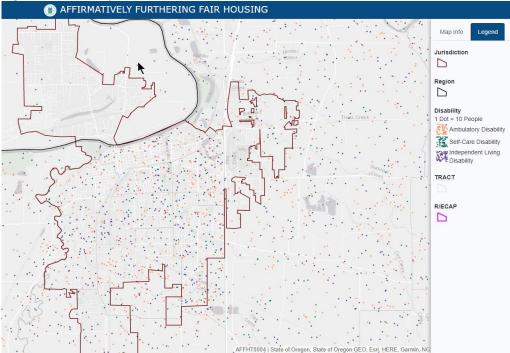
Many persons with disabilities require housing that has accessibility features, is near supportive services and public transit, and is affordable. Persons with disabilities are also at greater risk of experiencing housing discrimination, oftentimes due to a lack of knowledge about laws governing accommodations for the disabled. Persons with disabilities may also have greater challenges finding affordable and appropriate housing.

Failure to provide reasonable accommodations for persons with a physical and/or mental disability was the most

cited basis of reported allegations between 2014 and 2017. A few other allegations included eviction, failure to rent, failure to loan, and failure to insure.

Map Figure 4 shows that residents with different types of disabilities are dispersed throughout the City.





Source: AFFH Data and Mapping Tool, 2009-2013 ACS

E. Familial Status and Household Composition

Familial status is a protected class. Almost one-third of Albany's households have one or more children under 18 years old, while more than one-third of households have one or more persons 60 years and over. The number of senior householders living alone was estimated at 2,085 in 2017, or 10.4 percent of all households; with three quarters of these being female.

Table 5. Familial Status & Household Composition, 2017

			Male	Female	
		Married-	family, no	family, no	Nonfamily
Subject	Total	couple	wife	husband	household
TOTAL HOUSEHOLDS	20,049	9,410	946	2,758	6,935
Average household size	2.55	3.20	3.33	3.20	1.31
TOTAL FAMILIES	13,114	9,410	946	2,758	(X)
Average family size	3.07	3.17	2.92	2.77	(X)
HOUSEHOLD COMPOSITION					
HHs with own children under 18 years	6,016	3,803	463	1,750	(X)
HHs with 1 or more under 18 years	32.6%	43.5%	54.9%	69.5%	0.1%
HHs with 1 or more 60 years and over	36.5%	38.5%	22.7%	17.6%	43.1%
Householder living alone	26.1%	(X)	(X)	(X)	75.5%
65 years and over	10.4%	(X)	(X)	(X)	30.0%

Source: 2013-2017 American Community Survey 5-year estimates (S1101)

Household size is projected to decrease as life expectancy increases and fertility rates decrease. Sixty-two percent of Albany households are 1 or 2-person households, which is an indicator of the size and type of housing needed to meet the needs of residents.

Table 6. Household Size and Tenure, 2017

Household	Total		Own	_	Renter-		
Size	House	holds	Occuj	pied	Occup	oied	
Total HHs	20,049	100%	11,790	59%	8,259	41%	
1-person	5,236	26%	2,375	20%	2,861	35%	
2-person	7,170	36%	4,710	40%	2,460	30%	
3-person	3,031	15%	1,564	13%	1,467	18%	
4+ person	4,612	23%	3,141	27%	1,471	18%	
Average Size	2.55		2.71		2.33		

Source: U.S. Census Bureau and 2013-2017 ACS 5-year estimate

F. Income and Poverty

According to the ACS data in Table 7, half of Albany households earned less than \$50,000 in 2017 while 42% of Albany's families had incomes less than \$50,000. One of every five households with earnings received SNAP/food stamp assistance in the past 12 months, 5 percent receive supplemental security income, and 5 percent received public assistance income.

Table 7. Household and Family Incomes in the past 12 months, 2017

	All Hous	eholds	Fam	ilies
TOTALS	20,049	100%	13,114	100%
\$0 to \$24,999	4,191	20.9%	1,980	15.1%
\$25,000 to \$49,999	5,273	26.3%	3,003	22.9%
\$50,000 to \$74,999	3,589	17.9%	2505	19.1%
\$75,000 to \$99,999	3,248	16.2%	2387	18.2%
\$100,000 to \$149,999	2,446	12.2%	2033	15.5%
\$150,000 to \$199,999	682	3.4%	643	4.9%
\$200,000 or more	622	3.1%	564	4.3%
Median Income (dollars)	\$54,275		\$79,778	

Source: 2013-2017 American Community Survey 5-year estimates

Table 8. Albany Households with Supplemental Incomes, 2013-2017

			Mean
Total Households in 2017	20,049	100%	Income
Households with Earnings	15,337	76.5%	\$63,996
With Social Security Income	6,295	31.4%	\$20,459
With Supplemental Security Income	1,063	5.3%	\$9,463
With Retirement Income	4,431	22.1%	\$31,694
With Cash Public Assistance Income	1,002	5.0%	\$4,153
With Food Stamp/SNAP in past 12 mo.	4,004	20.0%	

Source: 2013-2017 American Community Survey 5-year estimates

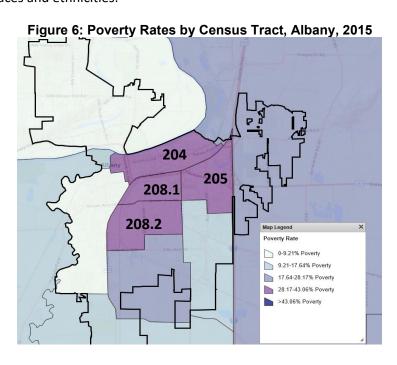
Estimates in Table 9 indicate one-third of female-headed households, one-fifth of residents under 18, and one in four persons with a disability, and all Native Hawaiian and Other Pacific Islanders lived below the federal poverty level. The 2018 United States poverty level was \$12,600 for one person, and \$22,600 for a family of 4.

Table 9. Albany Poverty Statistics, 2017

Albany Boyorty Statistics 2017		Below Po	verty Level
Albany Poverty Statistics, 2017		Persons	Percentage
Population for Whom Poverty Status is Determined	51,416	7,905	15.4%
Under 18	12,288	2,507	20.4%
18-64	31,483	5,055	16.1%
65 and over	7,645	343	4.5%
In Family households	42,040	5,423	12.9%
Female householder, no husband	8,806	2,924	33.2%
With any Disability	8,439	2,110	25.0%
Hispanic or Latino	6,236	1,122	18.0%
White alone, not Hispanic or Latino	42,043	6,264	14.9%
Black or African American, Alone	347	12	3.5%
American Indian, Alaska Native	387	121	31.3%
Asian Alone	1,123	346	30.8%
Native Hawaiian & Other Pacific	47	47	100.0%
Some other race	1,425	70	4.9%
Two or more races	1,839	440	23.9%

Source: 2013-2017 American Community Survey 5-year estimates

Albany does not have any racially or ethnically concentrated areas of poverty (R/ECAPs) as defined by HUD. Albany's lowest income households are concentrated in older areas of the City – in Tracts 204, 205, 208.1 and 208.2. Albany's Census Tracts with the greatest poverty are also where there is a higher percentage of households of other races and ethnicities.



G. Housing Affordability

The Housing Needs Analysis provided in the 2018-2022 Consolidated Plan (Section NA-10) determined that housing cost burden, or housing affordability, is the most common housing problem in the City of Albany. Very low-income residents, renters, and minority households experienced housing cost burden at higher rates than their counterparts.

Table 10 – Demographics of Households with Severe Housing Cost Burden

Severe Housing Cost Burden*	City of Alb	A, Region		
	% with			
	# with	severe	# with	% with
	severe cost	cost	severe cost	severe cost
Race/Ethnicity	burden	burden	burden	burden
White, Non-Hispanic	2,445	14.6%	5,615	13.8%
Black, Non-Hispanic	10	9.1%	10	7.5%
Hispanic	400	29.1%	505	25.6%
Asian or Pacific Islander, Non-Hispanic	110	27.2%	120	24.0%
Native American, Non-Hispanic	65	26.1%	85	14.2%
Other, Non-Hispanic	90	23.7%	100	18.1%
Total	3,120	16.2%	6,435	14.4%

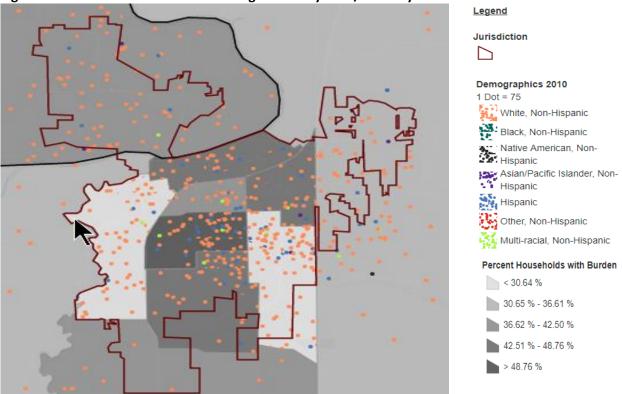
Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Figure 7. Percent Household with Housing Burden by Race/Ethnicity



Albany's housing stock was relatively affordable until a few years ago; rents were competitive with fair market rent levels. Now, publicly supported affordable housing complexes have multi-year waiting lists and the Section 8 housing choice voucher waiting list is also estimated to be two years. Most of the 1,193 households on the Section 8 voucher waiting list are federally protected class households – 37% of the households have a disabled member, 12% are elderly, 9% are Ethnic, and 68% are female-headed households.

This section of the AI assesses whether there are fair housing issues associated with the location or occupancy of publicly supported housing. HUD defines "publicly supported housing" as housing assisted with funding through federal, state, or local agencies or programs as well as housing that is financed or administered by or through any such agencies or programs. It also looks at the policies and procedures used by affordable, publicly supported housing agencies to select households to receive housing.

Albany has 535 publicly-supported housing units owned by a few different affordable housing agencies and Linn-Benton Housing Authority. The Housing Choice Voucher Program, managed by the housing authority, provides rental subsidies to qualifying households who find rental housing in the private market, providing affordable housing opportunities, locations, and choices. In 2018, 983 Albany households received housing vouchers, representing 1,990 people, and 964 households were on the waiting list of 2 to 3 years. Figure 9 shows the distribution of housing choice vouchers by race.

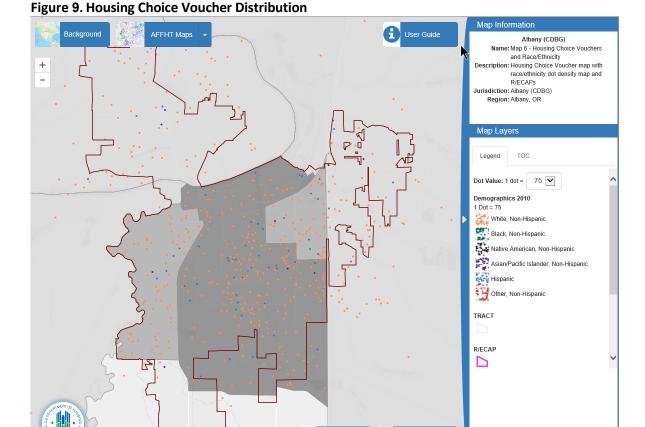


Table 11 provides race and ethnicity data of households receiving housing choice vouchers or residing in publicly supported housing, when available. The racial/ethnic makeup of Albany's housing voucher holders in 2018 was similar to the racial composition of the population at large, except that American Indian/Alaska Natives constituted 3.1% of voucher holders compared to 1.4% of the population at large. More than half of Albany's

state of Oregon, State of Oregon GEO, Esri, HERE, DeLorme, N.

Tables

Additional questions? View the user guide here

voucher holder households include a member with a disability, 30 percent are elderly households, and 38% are families with children.

Table 11. Publicly Supported Housing Households by Race/Ethnicity

		Race/Ethnicity						
(Albany, OR CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Project-Based Section 8	136	90.67	3	2.00	4	2.67	1	0.67
Other Multifamily								
Housing Choice Voucher Program	933	90.49	9	0.87	62	6.01	6	0.58
0-30% of AMI	1,590	77.00	10	0.48	240	11.62	115	5.57
0-50% of AMI	2,805	67.27	70	1.68	585	14.03	150	3.60
0-80% of AMI	5,470	73.62	70	0.94	945	12.72	195	2.62
(Albany, OR CDBG) Jurisdiction	35,590	82.14	251	0.58	5,240	12.09	618	1.43

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

Home Ownership

Rental housing is concentrated in the center of the City in Albany's four low- and moderate-income Census Tracts. The higher concentration of rentals and older single-family houses converted to rentals. Areas with higher home ownership rates are predominantly zoned for single-family development and have newer housing stock. The concentration of renter-occupied households corresponds to Albany's highest areas of poverty and highest concentration of minorities.

Figure 10. Renter-Occupied Housing Rates Figure 11. Owner-Occupied Housing Rates TRACT Regio R/ECAP TRACT R/ECAF 34.63 % - 50.26 % < 21 79 % 63 83 % - 76 31 % 21.79 % - 31.01 % 76.31 % - 100 % 31.01 % - 41.89 % 41.89 % - 58.82 % Percent Households who are Owners: Data not Available

In 2017 the homeownership rate was less than 30% for households of Hispanic or Latino origin as well as those with two or more races and other races. White households had the highest homeownership rates, followed by Black or African Americans.

The City allocated 2017 and 2018 CDBG funds for down payment assistance to help low-mod households become homeowners. More efforts need to be made to help households of Hispanic/Latino Origin and other minority races become homeowners.

Table 12. Tenure by Race and Hispanic/Latino Origin of Householder, 2017

	Total	Owr	ner-	Rent	ter-
	Households	occupie	d units	occupie	d units
Occupied housing units	20,049	11,790	59%	8,259	41%
One Race: White	18,773	11,337	60.4%	7,436	39.6%
Black or African American	102	54	52.9%	48	47.1%
American Indian and Alaska Native	180	78	43.3%	102	56.7%
Asian	290	118	40.7%	172	59.3%
Some other race	322	90	28.0%	232	72.0%
Two or more races	382	113	29.6%	269	70.4%
Hispanic or Latino origin	1,572	468	29.8%	1,104	70.2%
White alone, not Hispanic or Latino	17,578	10,959	62.3%	6,619	37.7%

Source: 2013-2017 American Community Survey 5-year estimates

H. Housing Conditions

More than half of the City of Albany's housing stock was constructed before 1980. Many of these homes that need rehabilitation are owned by low-income households who cannot afford to keep up with maintenance, repairs or improvements. Many of these homes may not have adequate insulation or energy efficient heating or appliances, adding to the monthly housing costs.

Habitability and safety may further be impacted by the presence of lead-based paint, which was widely used prior to 1978 when it was banned. Children living in these structures are at higher risk to lead exposure. Lowerincome households are more likely to live in structures where lead-based paint has not been mitigated.

Albany has allocated a substantial amount of money towards housing rehabilitation and weatherization in an effort to improve livability and safety of existing affordable units. Many recipients of these funds are elderly household on fixed incomes or families with children.

SECTION III. IDENTIFYING IMPEDIMENTS TO FAIR HOUSING CHOICE

This section reviews existing conditions around fair housing related policies and practices to identify barriers to fair housing in Albany. It includes an analysis of zoning and land use laws and policies; contains an analysis of lending activity; barriers identified by the community; and reports on fair housing complaints data.

Impediments to fair housing are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice.
- Any actions, omissions, or decisions that have this effect.

Impediments to fair housing choice include actions that:

- Constitute violations, or potential violations, of the Fair Housing Act,
- Have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin, source of income, or sextual orientation, or
- Are counterproductive to fair housing choice, such as resistance to the siting of housing facilities for persons with disabilities or resistance when minorities, persons with disabilities, and/or low-income persons first move into white and/or moderate- to high-income areas.

A. Private Sector Practices

This section examines the City's housing market issues and activities regarding equal access to financing for the purchase or improvement of a home and fair housing choice in the rental and owner markets.

Residential Lending Analysis (Home Mortgage Disclosure Act (HMDA)

Financial institutions have a history of employing unfair lending practices, and many of these activities are now illegal. Concern about discriminatory lending practices in the 1970s led Congress to adopt the Home Mortgage Disclosure Act (HMDA) that requires financial institutions to collect and report HMDA data to determine whether potentially discriminatory lending patterns are present in a jurisdiction.

Lending institutions meeting specific criteria are required to report lending transaction data annually as well as information about the clients and properties involved in those transactions. This data includes:

- Application and applicant data
- · Loan purpose and type (e.g., home improvement, purchases, refinancing; or conventional or government insured loans, etc.)
- Loans approvals and denials and reasons for denial

Information reported about applicants includes demographic information such as race, gender, marital status and income level. Data collected on the related property includes the location by Census tract, type of housing, value of housing, loan value, purpose, and loan type.

The 2018 update included an evaluation of the 2016 loan application data to determine whether there are indications of potential discriminatory lending patterns in Albany. Data in the tables that follow were updated from the 2014 AI.

To prepare this analysis, census tracts that were fully or partially contained in the City limits were selected for the data set. In addition, lending actions within the data set were narrowed to show only actions for the purchase of a primary residence to be owner-occupied. All lending actions for home improvement requests, refinancing requests, non-owner-occupied purchases, and loans purchased by investment institutions were removed and are not part of this analysis. This data set includes loans that have been originated, denied, or failed (the loan is not accepted by the applicant).

Table 13 below shows loan action by race and ethnicity for 2016. Hispanic or Latino applicants have higher denial rates than Non-Hispanic or Latino applicants and American Indian or Alaska Native residents have the highest denial rates.

Table 13. Loan Action by Race and Ethnicity, 2016

	Applications Received		ans inated		cations nied	But Accep	roved t Not oted by licant		cations idrawn		Closed nplete)
RACE	#	#	%	#	%	#	%	#	%	#	%
American Indian or Alaska Native	56	16	28.6%	19	33.9%	2	3.6%	15	26.8%	0	
Asian	28	16	57.1%	6	21.4%	1	3.6%	7	25.0%	0	
Black or African American	22	13	59.1%	5	22.7%	1	4.5%	3	13.6%	1	4.5%
Native Hawaiian or Other Pacific Islander	18	11	61.1%	4	22.2%	0	0.0%	2	11.1%	1	5.6%
White	4952	2979	60.2%	930	18.8%	161	3.3%	850	17.2%	232	4.7%
Joint (White/Minority)	111	59	53.2%	23	20.7%	2	1.8%	18	16.2%	5	4.5%
Race Not Provided by Applicant	876	473	54.0%	182	20.8%	27	3.1%	93	10.6%	68	7.8%
ETHNICITY											
Hispanic or Latino	227	112	49.3%	53	23.3%	6	2.6%	42	18.5%	14	6.2%
Not Hispanic or Latino	5048	2929	58.0%	924	18.3%	157	3.1%	832	16.5%	206	4.1%
Joint Hispanic/Not Hispanic	119	74	62.2%	22	18.5%	4	3.4%	15	12.6%	4	3.4%
Ethnicity not Provided	839	455	54.2%	171	20.4%	27	3.2%	103	12.3%	83	9.9%
Totals	6233	3570	57.3%	1170	18.8%	194	3.1%	992	15.9%	307	4.9%

Data Source: Home Mortgage Disclosure Act (HMDA), 2016.

Table 14 that follows compares the most recent data available for the year 2016 with the data from 2012. The percent of loans originations increased slightly to 57.3 percent from 55.6%, however the percent of loans denied increased to 18.8% in 2016 up from 13.1% in 2012.

Table 14. Loan Action Comparison 2012 and 2016

Action Taken on Loan	2012	2	2016		
Applications	No. of Applications	%	No. of Applications	%	
Loan originated	1,994	55.6%	3,570	57.3%	
Application denied	470	13.1%	1,170	18.8%	
Approved but not accepted by applicant	119	3.3%	194	3.1%	
Application withdrawn by applicant	327	9.1%	992	15.9%	
File closed for incompleteness	127	3.5%	307	4.9%	

Data Source: Home Mortgage Disclosure Act (HMDA), 2012 and 2016.p

Very few residents earning less than 50 percent of the area median income applied for home loans. Of those that applied, almost 39 percent were denied. Table 16 indicates poor credit history and debt-to-income ratio were the most common reasons for loan denial.

Table 15. Income of Loan Applicants

		cations eived		ans inated		oved but accepted		cations nied	Withd	cations rawn or osed
	#	%	#	%	#	%	#	%	#	%
<50% of MSA Median	351	5.6%	132	37.6%	8	2.3%	136	38.7%	75	3.7%
50-79% of MSA Median	979	15.7%	504	51.5%	28	2.9%	249	25.4%	198	4.1%
80-99% of MSA Median	810	13.0%	483	59.6%	28	3.5%	147	18.1%	152	3.5%
100-119% of MSA Median	750	12.0%	439	58.5%	26	3.5%	128	17.1%	157	4.5%
120%+ of MSA Median	2747	44.1%	1683	61.3%	78	2.8%	432	15.7%	554	4.3%
INCOME NOT AVAILABLE	596	9.6%	329	55.2%	26	4.4%	78	13.1%	163	12.6%

Data Source: Home Mortgage Disclosure Act (HMDA), 2016.

Table 16. Reasons Loans were Denied, 2016.

Table 10: Neasons Loans Were De	,	
Reason	Number	%
Collateral	112	16.4%
Credit application incomplete	89	13.0%
Credit history	157	22.9%
Debt-to-income ratio	148	21.6%
Employment history	12	1.8%
Insufficient cash (down payment,		
closing)	28	4.1%
Unverifiable information	32	4.7%
Other	112	16.4%
Totals	685	100%

Data Source: Home Mortgage Disclosure Act (HMDA), 2016.

The Community Reinvestment Act (CRA) was enacted by Congress in 1977 to encourage depository institutions to meet the credit needs of the communities in which they operate, including low and moderate-income neighborhoods. The Federal Financial Institutions Examination Council (FFIEC) reported no underserved or

distressed census tracts in the Albany area for 2017.

Real Estate Policies and Practices

Oregon law requires real estate brokers to take at least 30 hours of continuing education to renew an active license. Fair housing laws or policies are required courses. The Oregon Real Estate Agency and the Willamette Association of Realtors provide fair housing information and training to realtors including what acts are prohibited and how to prevent violations of fair housing laws.

The Rental Housing Alliance of Oregon provides fair housing information, training, and legislative updates as part of its regular education sessions and newsletters. The alliance has more than 1,800 members, most of whom are small business landlords throughout the state. The Oregon Rental Housing Association consists of 14 local chapter organizations throughout the state, including the Linn-Benton chapter. The association and local chapter are both dedicated to training and educating owners about changes in laws and providing monthly educational opportunities, including fair housing training. For example, the chapter has offered training about special accommodations and companion animals by the Fair Housing Council of Oregon. Oregon Rental Housing Association's membership caters to smaller rental owner/operators; most members have between one and ten units.

B. Public Sector Policies and Practices

This section assesses whether possible actions or omissions in the public sector that may affect housing choice are influenced by public policies, practices, and procedures, such as those regarding site selection for the construction of public and private housing, building, occupancy, and health and safety codes.

In order to adhere to fair housing law, planning and building policies and codes should avoid restricting housing choices in the following ways:

- Exclusions or limitations on special needs housing, including shelter and housing for homeless persons, persons with disabilities, seniors, and racial and ethnic minorities,
- Limited availability of housing affordable to low-income and moderate-income households, and
- High geographic concentrations of low-income housing.

In addition, this section assesses public investments in community revitalization of low- and moderate- income neighborhoods and the composition of City boards and commissions.

Land Use and Zoning Laws. The Fair Housing Act does not pre-empt local land use and zoning laws. The City of Albany Development Code (ADC), Zoning Map, and Comprehensive Plan were reviewed for potential barriers to affordable housing or negative effects on fair housing choice.

- The ADC does not place exclusions or limitations on special needs housing, including shelter and housing for homeless persons, persons with disabilities, seniors and racial or ethnic minorities. The Code allows group homes for five or fewer residents in all residential zoning districts and they are considered a singlefamily dwelling. Residential care facilities are allowed in most zones as are shelters, assisted living as conditional uses in most zones. The Code does not restrict housing opportunities for disabled residents.
- The ADC allows residential development in all of the City's residential, mixed-use and in most commercial zones. Accessory dwelling units are permitted where single-family residences are permitted but are subject to occupancy and parking requirements.
- The ADC allows a variety of housing types, but most of the residentially zoned land is zoned single-family and two of the four single-family districts only allow detached single-family units, except duplexes are allowed on corner lots.

- The multi-family zones and some mixed-use and commercial zoning districts allow a density of 20 or more units per acre.
- Affordable Housing Incentives. The City has a sliding scale density bonus between 5 and 15% for projects that provide a percentage of units affordable to households with income up to 1.2 times the median income for the counties. The incentives do not specifically address housing for very-low and extremelylow income households, those earning less than 50% of the area median income.

Since 2014, the City has removed some barriers to residential development in the downtown and will begin a code audit for clear and objective standards for housing development. In addition, the City is seeking approval to prepare a new housing needs analysis to have a better understanding of housing needs and land availability.

Public Investments. Since becoming an entitlement City in 2013, the City has made several investments in public facilities in Albany's Low-mod census tracts to improve access, safety and overall livability.

- Census Tract 204 Portions of this low-mod census tract are in the City's urban renewal district. The district has invested public funds for rebuilding streets and sidewalks and adding both market rate and new long-term publicly supported affordable housing. A traffic circle was installed on Main Street to improve the flow of traffic through this tract. CDBG funds were used to repair a portion of the Dave Clark path which had become dangerous for persons with disabilities.
- Census Tract 208.1 and 208.2 –CDBG funds were used to completely remodel Sunrise Park, located between these two census tracts, and refresh the park with new play equipment, basketball court,, and a parking lot with an accessible space. New lighting and path are planned. This project removed blighting influences and improved livability. CDBG funds also provided infill sidewalks, curb ramps and improved pedestrian crossing, to provide safe routes to Sunrise Elementary School.

City CDBG funds have supported owner-occupied housing rehabilitation.

Elected and Appointed Officials. Jurisdictions should pay close attention to the importance of the relationship between the membership of boards and commissions and the decisions they make regarding affordable housing developments and neighborhood revitalization activities.

The City of Albany Community Development Commission, appointed by the Mayor, provides CDBG programming and budgeting oversight. Conscious efforts are made to ensure minorities are represented on the Commission.

The City Councilors are elected by the public and they each get an appointment to the Planning Commission, and the Mayor gets 3 at large appointments. The Mayor's appointments are opportunities to broaden the representation of appointees.

C. Fair Housing Complaints

Between 2013 and 2018, a total of 55 allegations of fair housing violations were received by the Fair Housing Council of Oregon (FHCO) and the Bureau of Labor and Industries (BOLI). Disability and refusal to provide reasonable accommodations were the primary basis and issues reported, with national origin second. There were a couple of issues with evictions, terms and conditions, harassment, and refusal to rent. All but one allegation reported involved rental properties, and one involved a lending institution.

FHCO staff were able to mitigate the situation in most of the cases, while about 20 percent of "bonafide" cases referred to HUD or BOLI.

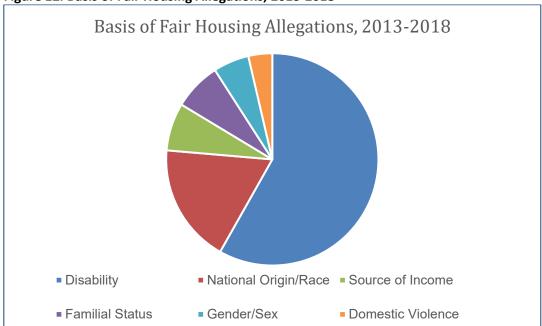


Figure 12. Basis of Fair Housing Allegations, 2013-2018

D. Community Input

Meaningful input came from responses to the community survey that the City distributed to Albany residents through a network of area social service providers, on the City of Albany's website, press releases in English and Spanish, and to various stakeholders working with protected classes and low-income people in Albany. Attendees of fair housing training provided data on potential acts of discrimination, and potential impediments to fair housing. Summary of Comments received through 2018 community survey:

- 15 percent thought discrimination was an issue in their neighborhood
- 28 percent experienced or knows someone who experienced housing discrimination in Albany
- Instances of discrimination occurred most frequently at apartments, followed by single-family neighborhoods and manufactured home or trailer parks. A few knew of discrimination when applying for services.
- Discriminatory acts were mostly done by landlords or property managers, with a couple by realtors, mortgage lenders, and government staff
- Source of income and familial status were reported most as the basis for discrimination, followed by race/color/national origin, and sexual orientation/gender, and disability
- About 25 percent that experienced discrimination reported it. Reasons for not reporting were that it would not make a difference, fear of retaliation, and not sure where to report

Impediments: Allegations and survey responses indicate more training is needed for small property landlords, rental property managers and staff, and agency staff.

SECTION IV. FAIR HOUSING IMPEDIMENTS & ACTIONS

A. Fair Housing Enforcement

Persons who believe they have been discriminated against under the provisions of the Federal Fair Housing act have the right to file an administrative complaint directly with the U.S. Department of Housing and Urban Development (HUD) and the Oregon Bureau of Labor and Industry (BOLI). Residents and others may also call the Fair Housing Council of Oregon (FHCO) to get more information about fair housing laws and to talk to staff to determine if an act of discrimination has occurred. The FHCO staff first determines if an alleged violation has occurred. If so, they may conduct further investigation or field testing to verify whether discrimination has occurred. The FHCO will first work to resolve the case favorably. Cases that cannot be resolved are referred to HUD or BOLI.

HUD has the responsibility to enforce the Fair Housing Act. BOLI has separate jurisdiction over claims of discrimination covered under state law, but not covered under federal law. Valid complaints that are filed with HUD or BOLI may be investigated directly by HUD or BOLI or may be investigated and processed by the Fair Housing Council of Oregon (FHCO), which receives reimbursement from HUD under the Fair Housing Assistance Program (FHAP).

As noted in the prior section, 55 allegations were submitted between 2013 and 2018, and 11 were forwarded to HUD or BOLI for enforcement.

In addition to the above paths, the City and Community Services Consortium (CSC) received and investigated calls regarding allegations of discrimination and refer callers to Legal Aid or FHCO for further resources and support. The City and CSC monitored rental advertisements on Craigslist and sent fair housing brochures to landlords that had discriminatory language in ads.

A grant to Legal Aid enabled FHCO to train testers and conduct rental audits in Linn County, specifically testing familial status, disability, color, and national origin. Testing found there to be a problem of discrimination on the basis of color and national origin despite proactive training efforts prior to testing.

B. Progress Addressing Impediments & Recommendations

The 2018 review and update identified similar impediments to fair housing as in the 2014 AI. The following section outlines actions the City has taking to address the impediments to fair housing choice identified in the 2014 AI and recommends additional steps based on the 2018 review.

Impediment 1: Lack of Understanding of Fair Housing Laws and Resources. There continues to be lack of knowledge about fair housing laws, protected classes, and rights and responsibilities among both consumers and providers.

Actions Taken:

- 1. The City worked with the Fair Housing Council of Oregon (FHCO) and Community Services Consortium (CSC) to provide several fair housing trainings for Albany residents and landlords and one educational event regarding the history of discrimination in Oregon for the public. The City hosted the traveling display at City Hall for one month in 2016. All trainings and materials were offered in both English and in Spanish for residents.
- 2. The local action agency, Community Services Consortium (CSC), established a local hotline for housing complaints and resources.

3. The City provides fair housing information at city facilities in English and Spanish and links to resources on the website.

Recommendations:

- 1. Work with FHCO, Legal Aid, and rental and realtor associations to provide training for "mom and pop" landlords, rental property managers, shelter providers, and agency staff.
- 2. Schedule fair housing training for elected and appointed officials to increase awareness among policy and decision makers to avoid making decisions that may have an unintended impact on a protected class.
- 3. Market fair housing resources and fair housing law campaigns using other media platforms, including social media.

Impediment II: Overcoming Cultural and Linguistic Barriers. Language and cultural differences make communication around fair housing issues and addressing fair housing barriers more challenging.

Actions Taken:

- 1. The City has worked to build connections, relationships, and trust with Albany's Latino and Hispanic community to enhance communication and delivery of resources in order to identify barriers to fair housing and work to eliminate acts of discrimination. The City is working with cultural leaders and volunteers to help promote awareness and education about fair housing laws and to find out how the City can ensure equal access to housing services.
- 2. Bilingual City staff were identified to communicate with residents regarding housing conditions and fair housing complaints.
- 3. The City translated applications for housing assistance in Spanish (housing rehabilitation and down payment assistance).
- 4. Legal Aid Services of Oregon subcontracted with CSC and FHCO to evaluate and improve fair housing materials.

Recommendations:

- 1. Continue building partnerships with agencies that serve the Hispanic/Latino community, residents with disabilities, and seniors and for guidance on how to remove barriers to housing and access to resources.
- 2. Work with FHCO, Legal Aid and local partners to provide fair housing and training resources to residents.

Impediment III: Discriminatory Practices in the Housing Market. HUD, FHCO and BOLI have pursued fair housing allegations in Albany. The most common basis reported was disability and failure to make reasonable accommodations. Familial status, national origin, source of income, and sexual orientation were also the basis of complaints.

Actions Taken:

- 1. The City worked with the Fair Housing Council of Oregon (FHCO) to provide several fair housing trainings for Albany residents and landlords to increase knowledge of fair housing laws. The number of allegations reported in 2017 and 2018 were much lower than prior years.
- 2. CSC conducted numerous trainings for landlords, social service agencies and consumers.
- 3. City and CSC staff reviewed housing advertisements that indicate the potential for discrimination and notified property managers of fair housing issues and laws.

Recommendations:

- 1. Work with FHCO to facilitate fair housing testing and investigations in Albany as recommended.
- 2. Develop targeted fair housing training and programs for housing providers to achieve a better understanding of protected classes and fair housing responsibilities.
- 3. Consult with Legal Aid to better understand sources of allegations to help plan for training or enforcement.
- 4. Continue to Identify and correct advertisements that indicate the potential for discrimination.
- 5. Encourage victims to report acts of discrimination or potential discrimination.

Impediment IV: Lack of Affordable Housing. Albany's housing stock has become less affordable since the 2014 Al due to national and regional pressures. Many renters are paying more than half their income on housing costs.

Actions Taken:

- 1. The City reviewed its land development policies and standards to ensure that they do not present obstacles to development of affordable or accessible housing, accessory units, and other forms of housing that are needed within the community. The review has included evaluation of residential design standards, infill design standards and standards for accessory dwelling units.
- 2. The City is recommending better development incentives to encourage the construction of new affordable housing in conjunction with market rate housing.
- 3. The City will begin work on updating the residential buildable land inventory and a new housing needs analysis in 2019.
- 4. CDBG funds are supporting down-payment assistance programs to help residents become homeowners, housing rehabilitation to keep existing housing affordable, and for property acquisition for new housing. Funds have been allocated to support small business development and job creation to improve incomes of residents.

Recommendations:

- 1. The City should evaluate city-owned residential surplus property for affordable housing partnerships.
- 2. Support infill and redevelopment projects that create new housing units.
- 3. Evaluate additional zoning or other incentives to encourage affordable housing development with market rate housing.
- 4. Explore partnerships and opportunities for affordable housing developments.
- 5. Allocate CDBG funds to affordable housing developments.

Impediment V: Concentration of Affordable Housing Stock. The American Community Survey data show that there are higher concentrations of low-income and minority populations in older areas of the City, primarily in Census Tracts 204 and 208. These areas also have a higher percentage of older housing stock, which is more affordable, but may have habitability issues or deferred maintenance. Most social and civic services are in these areas and many group homes are concentrated in these areas. On a positive note, these areas are close to services and employment.

Actions Taken:

1. The City has targeted CDBG and urban renewal funds into these census tracts to remove blight and improve the condition of public facilities, infrastructure and housing stock.

2. The City has tried to target housing rehabilitation and weatherization funds in Albany's low-income neighborhoods to gradually improve the aging and affordable housing stock over time.

Recommendations:

- 1. Conduct a buildable lands inventory and housing needs analysis to better understand the housing needs of the community.
- 2. Evaluate infill housing types and standards that may create affordable housing opportunities in all areas of the City.

Impediment VI: Lead Paint and Housing Conditions. Albany has over 11,500 housing units constructed before 1980, including 3,300 units constructed before 1950.

Actions Taken:

- 1. The City focused housing rehabilitation loan and grant money in Albany's lowest income Census Tracts where housing was constructed before 1980.
- 2. Lead-based paint testing is a requirement of housing rehabilitation projects on buildings constructed before 1978. Contractors must be licensed lead renovators and follow lead-safe practices. When required, lead paint stabilization or abatement is done.
- 3. Provide brochures on how to protect against lead-based paint and Renovate Right.

Recommendations:

- 1. Continue to support housing rehabilitation of Albany's older housing stock.
- 2. Monitor projects with lead-based paint.
- 3. Continue to provide information to the public and contractors regarding lead-based paint risks and requirements.

C. Conclusions

Albany is a growing and changing community.

- o Albany is becoming more racially and ethnically diverse. The non-white and non-Hispanic or Latino percent of Albany's population grew from 6% in 2000 to almost 20% in 2017. Albany's Hispanic or Latino population grew from 11.4 percent of the population to 12.1% in 2017.
- Minority residents are disproportionately low-income and consequently are challenged finding quality housing they can afford and become homeowners.
- The lack of affordable housing is a growing issue due to a competitive housing market and dwindling supply of buildable land.
- The City has a large stock of housing built before 1980; much of the aging and affordable housing stock is concentrated into older areas of City and in areas with lower incomes.

Housing discrimination persists in Albany despite efforts to increase knowledge of fair housing laws and efforts to monitor and correct violations.

A. Fair Housing Priorities

Embracing Diversity

A basic element of the City's efforts to further fair housing should be to strive for diversity in representation of citizens in the community, including racial and ethnic groups, gender categories, persons with disabilities, and families with children. This includes diversity on City boards and commissions and in staff.

Understanding Fair Housing Laws. Generally, there is a lack of knowledge about fair housing laws, rights and responsibilities among both consumers and providers. There is also a lack of understanding about the resources available to address fair housing issues and how to access these resources. Better education and outreach can help resolve disparate treatment of renters and homeowners on the basis of race, color, national origin, familial status, disability and persons with low incomes.

The City should further evaluate targeted training needs. The City should evaluate social media as a platform to increase awareness of fair housing laws and resources and identify community partners and advocates.

Discriminatory Practices in the Housing Market. HUD, FHCO and BOLI have pursued fair housing allegations in Albany. The most common basis for allegations was physical disability and the act was a failure to make reasonable accommodations. Familial status, national origin, source of income, and sexual orientation were also the basis of complaints.

The City should continue to work with the FHCO and CSC for fair housing investigating and testing. Outcomes of these efforts will help to inform the focus of fair housing enforcement and targeted fair housing training and education.

Housing Affordability and Condition. Albany households experienced severe housing cost burdened spending more than 50% of their income on housing expenses. Even more households experience housing cost burden of 30% or more. This is particularly true for very low and extremely low-income households. Minorities are disproportionately lower income and impacted by lack of housing.

The City should conduct a residential lands inventory and housing needs analysis to better plan for growth and affordable housing needs.

Another priority is to continue to explore affordable housing development opportunities and partnerships.

Lastly, the City should continue to support programs that maintain the existing affordable housing stock and support homeownership and ensure programs are marketed to and accessible to residents in protected classes.

FAIR HOUSING AND EQUAL OPPORTUNITY:

status, marital status, age, ancestry, sexual orientation, source of income, or any other arbitrary reason. As part of this planning process, the Each person is entitled to equal access to housing opportunities regardless of race, color, religion, sex, national origin, disability, familial City of Albany must also analyze factors that limit fair housing choice in Albany.

Do you believe discrimination is an issue in your neighborhood?

;		N _o	Yes	
				Answer Choices
Skipped	Answered	85.87%	14.13%	Responses
18	92	79	13	

Have you or someone you know experienced housing discrimination in Albany?

		No	Yes	
				Answer Choices
Skipped	Answered	71.88%	28.13%	Responses
14	96	69	27	

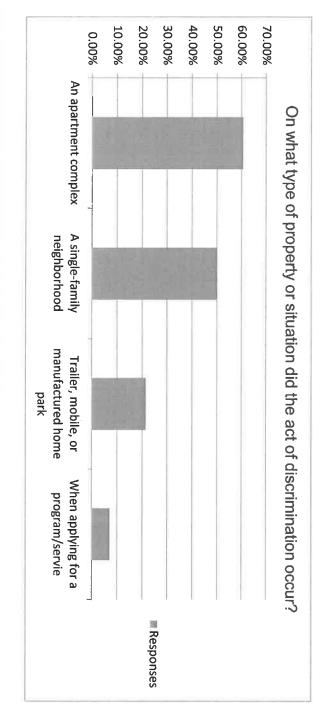
Who did the discriminating?

84	Skipped	
26	Answered	
20		Other (please specify)
0	0.00%	social service staff person
N	7.69%	√government staff person
ω	11.54%	nortgage lender
2	7.69%	real estate agent
26	100.00%	landlord / property manager
	Kesponses	Answer Choices

0 > > > > >

On what type of property or situation did the act of discrimination occur? HOUSING AND COMMUNITY DEVELOPMENT NEEDS SURVEY

		Other (please specify)	When applying for a program/servie	Trailer, mobile, or manufactured home park	A single-family neighborhood	An apartment complex	Answer Choices	
Skipped	Answered		7.14%	21.43%	50.00%	60.71%	Responses	
82	28	18	2	6	14	17		1 1 1 1 1



Respondents

see above comment

A duplex

Answered no, there is no answer

On what basis do you believe you or someone you know was discriminated against? HOUSING AND COMMUNITY DEVELOPMENT NEEDS SURVEY

on many many are you wenter you or controlled you when many about milliance against.	Se son minimus aga	
Answer Choices	Responses	
Race	29.63%	00
Color	14.81%	4
Religion	7.41%	2
National Origin	11.11%	ω
Family Status (Parent or Family with Children, Expecting)	37.04%	10
Ancestry	0.00%	0
Gender	7.41%	N
Marital Status	11.11%	ω
Sexual Orientation	18.52%	5
Age	25.93%	7
Source of Income	55.56%	15
Disability	33.33%	9
Other (please specify)		20
	Answered	27
	Skipped	83

Responses

Assistance animal

Socioeconomic status.

Please check if these amenities are in working order at the property:

61	Skipped	
49	Answered	
29	59.18%	Air conditioning
39	79.59%	Smoke detectors in bedrooms
47	95.92%	Electricity (working)
45	91.84%	Heat
48	97.96%	Working toilet
49	100.00%	Kitchen sink with hot water
48	97.96%	Bathroom sink with hot water
49	100.00%	Bathtub OR shower with running water
48	97.96%	Running water
	Responses	Answer Choices

If you believe you have been discriminated against, have you reported it? HOUSING AND COMMUNITY DEVELOPMENT NEEDS SURVEY

		N _o	Yes	
				Answer Choices
Skipped	Answered	85.71%	14.29%	Responses
61	49	42	7	

Why not?

ANITA HOLE		
Answer Choices	Responses	
Don't know where to report it	26.32%	ഗ
Too much trouble	10.53%	2
Afraid of retaliation	42.11%	∞
Don't believe it makes any difference	47.37%	9
Other (please specify)		16
	Answered	19
	Skipped	91

Respondents

Did report

 $I\square$ don't feel I have been discriminated against