

# City of Glendale



## Analysis of Impediments to Fair Housing Choice 2020-2025



**FINAL**  
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Submitted by:  
Community Services & Parks Department  
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# Executive Summary

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As a recipient of federal housing and community development entitlement funds, the City of Glendale is required to undertake fair housing planning to affirmatively further fair housing. This planning includes conducting an Analysis of Impediments to Fair Housing Choice (AI) and developing an action plan to address those impediments. This AI is a review of the City's laws, regulations, administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice in the City of Glendale. This AI serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts.

## Community Background

Glendale has grown from a small township of approximately 1,186 persons into a bustling metropolis of nearly 200,000. As part of the post-war population boom that characterized much of Southern California, a large portion of the City's growth occurred after 1950. From 1950 to 1980, Glendale's population grew 45 percent (43,358 residents). This increase was largely the result of numerous annexations to the City and the development of large parcels of vacant land. During the 1980s, Glendale's population growth remained strong, increasing by 29 percent (40,978 new residents) between 1980 and 1990. As the City became increasingly built out, population growth in Glendale had slowed, increasing by just six percent between 1990 and 2010 (11,681 residents). The 2019 Department of Finance estimates placed the City population at 206,300.

The growing ethnic diversity of Glendale is reflective of the overall changes occurring in Los Angeles County and Southern California as a whole. Until 1980, Glendale had a predominantly White population (91.7 percent); however, the ethnic composition of the City has changed significantly since that time. The proportion of White persons in Glendale decreased to 74 percent in 1990 and again to 64 percent in 2000. By 2010, however, the City's proportion of White residents climbed to over 70 percent. Immigrants are an important part of Glendale's ethnic and cultural diversity. Glendale is home to a substantial number of Armenian immigrants of Middle Eastern and Russian ancestry. Although only a dozen Armenian families resided in Glendale in the 1950s, by the late 1970s, many Armenian businesses and families from Iran, Iraq, and Lebanon had settled in Glendale. During the 1980s, a new wave of Armenians from a variety of countries settled in the community as a result of more liberal emigration policies under Mikhail Gorbachev's Glasnost, as well as the arrival of Armenians who fled Iran after the country's takeover in 1979 by a conservative Islamic faction. By the 1990s, Armenians formed an important core of residents in most parts of Glendale and in the adjacent valley that includes La Cañada Flintridge and Tujunga.

According to the 2013-2017 American Community Survey (ACS), 72,738 total households resided in Glendale, an increase of 469 households since 2010. According to the 2013-2017 American Community Survey, Glendale residents earned a median household income of \$58,657, slightly below the Los Angeles County median of \$61,015. The median income in Glendale was higher than the median income of the City of Los Angeles (\$54,501) but lower than the nearby cities of Pasadena (\$76,264), Burbank (\$97,706), and La Cañada Flintridge (\$160,481).

Glendale's 2010 housing stock of 76,269 units increased to 76,607 units by 2017. The City's growth rate during this period was comparable to housing growth in South Pasadena, but slower than residential growth

in the City and County of Los Angeles. Glendale's housing stock has a significant portion of older homes. Homes built prior to 1940 account for 19 percent of homes in the City. A plurality of Glendale's housing stock has a significant portion of older homes. Homes built prior to 1940 account for 20 percent of homes in the City. A plurality of Glendale's housing (41 percent) was constructed between 1940 and 1969. Between 2000 and 2017, the pace of housing development in Glendale slowed, with only an additional 3,727 dwelling units built, with only 400 of those units being built between 2010 and 2017.

### **Outreach Process for Developing the AI**

To ensure the AI accurately reflects the community's needs, a community outreach program consisting of two public meetings, one for the general public at the Pacific Community Center on October 3, 2019 and one for social service and housing service providers at the Adult Recreation Center on December 5, 2019. Seventeen residents and 15 representatives of service provider agencies attended these meetings.

In addition to the meetings, the City also created a Fair Housing Survey. The Fair Housing Survey sought to gain knowledge about the nature and extent of fair housing issues experienced by Glendale residents. The survey consisted of questions designed to gather information on a person's experience with fair housing issues and perception of fair housing issues in their own neighborhood. The survey was made available in English, Spanish, and Armenian. A total of 752 Glendale residents responded to the Fair Housing Survey.

# Chapter 1: Introduction

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One of the largest communities in Los Angeles County, the City of Glendale is located northeast of downtown Los Angeles. It is bounded by the cities of Burbank, Pasadena, La Cañada Flintridge and the City of Los Angeles communities of Eagle Rock, Atwater Village, and Tujunga. The Golden State (I-5), Glendale (SR 2), Ventura (SR 134), and Foothill (I-210) freeways pass through the community.

The City was incorporated in 1906 and consisted of 1,486 acres. By 1920, the City had grown through nine annexations to over 7,000 acres. From 1920 to 1930, ten annexations brought the total area to 12,294 acres. The period 1930 to 1950 established many small annexations culminating in the 2,160-acre Whiting Woods and Verdugo Mountains annexations. This brought the area of the City to 15,140 acres or 23.6 square miles. Two major annexations, New York Avenue (in the La Crescenta area) and Upper Chevy Chase Canyon, and several smaller annexations enlarged the City to 29.2 square miles by 1952. Since 1952, twenty-seven annexations have occurred. The largest of these was the 662.8-acre Inter-Valley Ranch, now known as Deukmejian Wilderness Park. Currently the City consists of 30.5 square miles.

The City of Glendale is divided into 33 neighborhoods which are delineated by streets, washes, and mountain ridges. Each neighborhood has a unique history and character. Combined, they form the City of Glendale as we know it today.

## A. Purpose of the Report

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

Pursuant to CDBG regulations [24 CFR Subtitle A §91.225(a)(1)], to receive CDBG funds, a jurisdiction must certify that it “actively furthers fair housing choice.” This report, the Analysis of Impediments to Fair Housing Choice (commonly known as the “AI”), presents a demographic profile of the City of Glendale, assesses the extent of fair housing issues among specific groups, and evaluates the availability of a range of housing choices for all residents. This report also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person’s access to housing.

## B. Legal Framework

Fair housing is a right protected by both Federal and State of California laws. Among these laws, virtually every housing unit in California is subject to fair housing practices.

### 1. Federal Laws

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



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

Specifically, it is unlawful to:

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

**Reasonable Accommodations and Accessibility:** The Fair Housing Amendments Act requires owners of housing facilities to make “reasonable accommodations” (exceptions) in their rules, policies, and operations to give people with disabilities equal housing opportunities. For example, a landlord with a “no pets” policy may be required to grant an exception to this rule and allow an individual who is blind to keep a guide dog in the residence. The Fair Housing Act also requires landlords to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces, at the tenant’s own expense. Finally, the Act requires that new multi-family housing with four or more units be designed and built to allow access for persons with disabilities. This includes accessible common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units.

**HUD Final Rule on Equal Access to Housing in HUD Programs:** On March 5, 2012, HUD published the Final Rule on “Equal Access to Housing in HUD Programs regardless of Sexual Orientation or Gender Identity.” It applies to all McKinney-Vento-funded housing programs, as well as to other housing assisted or insured by HUD. The rule creates a new regulatory provision that generally prohibits considering a person’s

marital status, sexual orientation, or gender identity (a person's internal sense of being male or female) in making housing assistance available.

## 2. California Laws

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

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

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex
- Marital status
- Source of income
- Sexual orientation
- Gender identity/expression
- Genetic information
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age

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

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

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

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

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

In addition to these acts, Government Code Sections 11135, 65008, and 65580-65589.8 prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, recent changes to Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including: persons with disabilities (including developmental disabilities) and the homeless.

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

### **3. Fair Housing Defined**

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

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

#### *Housing Issues, Affordability, and Fair Housing*

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

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either or both parties on their rights and responsibilities.

Tenant/landlord disputes and housing discrimination cross paths when the disputes are based on factors protected by fair housing laws and result in differential treatment.

#### **4. Impediments Identified**

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

*Any actions, omissions, or decisions taken because of the characteristics protected under State and Federal laws, which restrict housing choices or the availability of housing choices; or*

*Any actions, omissions or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of characteristics protected under State and Federal laws.*

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

#### **5. Organization of the Report**

This report is divided into eight chapters:

**Chapter 1: Introduction** defines “fair housing” and explains the purpose of this report.

**Chapter 2: Community Participation** describes the community outreach program and summarizes comments from residents and various agencies on fair housing issues such as discrimination, housing impediments, and housing trends.

**Chapter 3: Community Profile** presents the demographic, housing, and income characteristics in Glendale. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed. In addition, this section evaluates if community residential care facilities, public and assisted housing projects, as well as Housing Choice Voucher (HCV) recipients in the City, are unduly concentrated in low- and moderate-income areas.

**Chapter 4: Lending Practices** assesses the access to financing for different groups. Predatory and subprime lending issues are discussed.

**Chapter 5: Public Policies** analyzes various public policies and actions that may impede fair housing within the City.

**Chapter 6: Fair Housing Profile** evaluates existing public and private programs, services, practices, and activities that assist in providing fair housing in the City. This chapter also assesses the nature and extent of fair housing complaints and violations in different areas of the City. Trends and patterns of impediments to fair housing, as identified by public and private agencies, are included.

**Chapter 7: Progress since Previous AIs** evaluates the progress toward addressing impediments to fair housing choice as identified in the previous AI.

**Chapter 8: Impediments and Actions** summarizes the findings regarding fair housing issues in Glendale and provides a plan of action for furthering fair housing practices.

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

### **C. Data and Methodology**

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

- 2000-2010 U.S. Census and 2013-2017 American Community Survey (ACS)
- 2018 and 2019 State Department of Finance Population and Housing Estimates
- 2005 and 2011 City of Glendale AI reports
- 2014-2021 City of Glendale Housing Element
- Zoning Code, various plans, and resolutions of the City of Glendale
- California Department of Social Services Community Care Licensing Division
- 2019 Employment Development Department employment and wage data
- 2012 and 2017 Home Mortgage Disclosure Act (HMDA) data on lending activities
- Current market data for rental rates and home prices
- Fair housing records from the Housing Rights Center
- Section 8 data from the City's Housing Authority

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

# Chapter 2: Community Participation

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This Analysis of Impediments (AI) report has been developed to provide an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals, and service providers. To ensure the report accurately reflects the community's needs, a community outreach program consisting of three public meetings and a fair housing survey were conducted as part of the development of this report. This chapter describes the community outreach program conducted for this report.

## A. Public Meetings

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

- Real estate associations/realtors
- Apartment owners and manager's associations
- Banks and other financial institutions
- Fair housing service providers
- Supportive service providers and advocacy groups (e.g., for seniors, families, disabled persons, immigrant groups)
- Educational institutions
- Faith-based organizations
- Housing providers

As summarized in Table 1, two separate meetings were held in the City, both targeting a specific group of stakeholders. One meeting was held for the general public at the Pacific Community Center on October 3, 2019 and one for social service and housing service providers at the Adult Recreation Center on December 5, 2019.

Target Group	Location	Date
General Public	Pacific Community Center Sycamore Room 501 S. Pacific Avenue	October 3, 2019
Social Services and Housing Service Providers	Adult Recreation Center 201 E. Colorado Street	December 5, 2019

To encourage attendance and participation, the general public meeting was publicized through the following methods:

- Distributed flyers at various public locations, including Pacific Community Center, Adult Recreation Center, and Glendale City Hall.
- Mailings to 226 Service Providers were also sent out.
- An email was sent by Staff to participating organizations with CDBG, Housing, and Homeless programs and City department heads.
- Advertisement on the City's Cable Channel GTV6
- Posted flyers on the City's main webpage, and Community Services & Parks and CDBG webpages.

## **1. Workshop Participants**

Seventeen residents participated in the meeting for the general public on October 3, 2019. This meeting featured citizen focus groups who were asked to identify community needs and priorities concerning housing, community development, homeless, economic development, transportation and citizen participation.

On December 5, 2019, 15 social services and housing service providers attended a meeting that provided a general overview of the AI and the outreach process. Copies of the survey were made available for them to fill out and share with their clients in the community.

## **B. Fair Housing Survey**

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

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

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

The survey was also provided to the participants at the general public meeting on October 3, 2019.

Because the survey sample was not controlled, results of the survey are used only to provide insight regarding fair housing issues, but cannot be treated as a statistically valid survey.<sup>1</sup> Furthermore, fair housing is a complex issue; therefore, a survey of this nature can only explore the perception of housing discrimination, but cannot be used as proof of actual discrimination.

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<sup>1</sup> *A survey with a "controlled" sample would, through various techniques, "control" the socioeconomic characteristics of the respondents to ensure that the respondents are representative of the general population. This type of survey would provide results that are statistically valid but much costlier to administer.*

## 1. Who Responded to the Survey?

A total of 752 Glendale residents responded to the Fair Housing Survey. The responses were from residents living across the entire City. A vast majority of survey recipients felt that housing discrimination was not an issue in their neighborhoods. Of the 752 responses, approximately 73 percent (548 persons) had not experienced housing discrimination. About 77 percent of the survey respondents (579 persons) stated that they were renters, with only 23 percent of the respondents stating that they owned their homes.

## 2. Who Do You Believe Discriminated Against You?

Among the persons indicating that they had experienced housing discrimination, 103 of those persons responded to the housing discrimination questions. 80 percent (83 persons) indicated that a landlord or property manager had discriminated against them, while 18 percent (18 persons) of respondents identified a city/county staff person as the source of discrimination. Potential responses were not mutually exclusive; respondents had the option of listing multiple perpetrators of discrimination.

## 3. Where Did the Act of Discrimination Occur?

Among the persons indicating that they had experienced housing discrimination, 74 percent (76 persons) indicated that the discrimination they experienced occurred in an apartment complex. About 11 percent (11 persons) indicated that the discrimination occurred in a single-family neighborhood (most likely renters renting homes), nine percent (nine persons) indicated that it took place in a public or subsidized housing project, and 18 percent (18 persons) indicated it occurred when applying for City and or County housing programs.

	Number	Percent
Apartment Complex	76	74%
When Applying to a City/County Program	18	17%
Single-Family Neighborhood	11	11%
Public/Subsidized Housing Project	9	9%
Other	8	8%
Condo Development	7	7%
<b>Total Persons</b>	<b>103</b>	

*Source: City of Glendale Fair Housing Survey, 2019.*

*Notes:*

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

## 4. On What Basis Do You Believe You Were Discriminated Against?

Of the 103 people who felt they were discriminated against, 50 percent (51 persons) indicated that they believed the discrimination was based on race, 29 percent (30 persons) believed it was based on source of income, 24 percent (25 persons) believed it was based on familial status, and 17 percent (18 persons) believed it was based on age. Other responses included discrimination based on marital status, disability, gender, and national origin.



<b>Table 3: Basis of Discrimination</b>		
	<b>Number</b>	<b>Percent</b>
Race	51	50%
Source of Income	30	29%
Family Status	25	24%
Age	18	17%
Gender	16	16%
Other	14	14%
Marital Status	12	12%
National Origin	10	10%
Disability	9	9%
Sexual Orientation	7	7%
Color	6	6%
Ancestry	3	3%
Religion	2	2%
<b>Total</b>	<b>103</b>	<b>---</b>
<i>Source: City of Glendale Fair Housing Survey, 2019.</i> <i>Notes:</i> 1. Categories are not mutually exclusive. 2. Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.		

## 5. Requests for Reasonable Accommodation

Among the persons indicating that they had experienced housing discrimination, 8 percent (8 persons) indicated that they had been denied “reasonable accommodation” in rules, policies, or practices for their disability. Typical requests that were denied included modifications for wheelchair use and the addition of a service animal. However, based on the written narratives from the respondents, there is also evidence that many do not fully understand the modifications/flexibility covered under reasonable accommodation.

## 6. Why Did You Not Report the Incident?

Of the survey respondents who felt they were discriminated against, only nine percent reported the discrimination incident. Many of the respondents who did not report the incident indicated that they did not know where to report the incident (20 percent, or 19 persons), or they did not believe reporting would make a difference (54 percent, or 50 persons); four percent (four persons) felt it was too much trouble. Another 16 percent (15 persons) were afraid of retaliation.

<b>Table 4: Reasons for not Reporting Discrimination</b>		
	<b>Number</b>	<b>Percent</b>
Don't know where to report	19	20%
Don't believe it makes a difference	50	54%
Afraid of retaliation	15	16%
Too much trouble	4	4%
Other	5	6%
<b>Total</b>	<b>93</b>	<b>---</b>
<i>Source: City of Glendale Fair Housing Survey, 2019.</i> <i>Notes:</i> 1. <i>Categories are not mutually exclusive.</i> 2. <i>Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.</i>		

### **C. Public Review of Draft AI**

The Draft AI was made available for a 30-day public review from September 30, 2021 to October 29, 2021, accessible online at [www.glendaleca.gov/CDBG](http://www.glendaleca.gov/CDBG) and [www.glendaleca.gov/housing](http://www.glendaleca.gov/housing).



# Chapter 3: Community Profile

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The City of Glendale is located northeast of downtown Los Angeles and is bounded by the cities of Burbank, Pasadena, La Cañada Flintridge and the City of Los Angeles communities of Eagle Rock, Atwater Village, and Tujunga. With a population of a little more than 200,000, Glendale is the fourth largest city in Los Angeles County.

The City's central location near downtown Los Angeles, a major airport, and four major freeways has attracted many new residents and businesses in recent years. As Glendale's population has grown, the community has become more racially and ethnically diverse, with increases in the community's Asian population and individuals identifying themselves with a mixed racial heritage. With rapid growth, continuous diversification in demographics and associated needs, and increasing competition for limited housing resources, the potential for conflicts among different groups and fair housing concerns rises.

Various characteristics may affect the ability of households with similar income levels, in the same housing market, to access a like range of housing choice. This chapter of the AI analyzes the demographic profile, income distribution, housing stock characteristics, and access to public transportation in Glendale.

## A. Demographic Profile

The examination of demographic characteristics provides better insight regarding the need for and extent of equal access to housing in a community. Factors such as population growth, age characteristics, and race/ethnicity all help determine a community's housing needs and play a role in exploring potential impediments to fair housing choice.

### 1. Population Growth

Since Glendale's incorporation in 1906, the City has grown from a small township of approximately of 1,186 persons into a bustling metropolis of just over 200,000. As part of the post-war population boom that characterized much of Southern California, a large portion of the City's growth occurred after 1950. From 1950 to 1980, Glendale's population grew 45 percent (43,358 residents). This increase was largely the result of numerous annexations to the City and the development of large parcels of vacant land. During the 1980s, Glendale's population growth remained strong, increasing by 29 percent (40,978 new residents) between 1980 and 1990. Between 1990 and 2010, population growth in Glendale slowed, increasing by just six percent between 1990 and 2010 (11,681 residents). Since 2010, Glendale has grown quickly, increasing by almost 8 percent (14,564 residents) in 2019.

According to the State Department of Finance, Glendale's population was 206,283 persons in 2019, making Glendale the fourth largest city in Los Angeles County, behind Los Angeles, Long Beach, and Santa Clarita. Glendale has had a similar growth rate to its neighbor city Pasadena, which grew at a rate of nearly seven percent over the last nine years. In contrast, Santa Clarita, grew at a much faster rate of approximately 24 percent since 2010 (Table 5).

Jurisdiction	2000	2010	2019	Growth Rate	
				2000-2010	2010-2019
Burbank	100,316	103,340	105,952	3.0%	2.5%
Glendale	194,973	191,719	206,283	-1.7%	7.6%
Pasadena	133,936	137,122	146,312	2.4%	6.7%
Palmdale	116,573	152,750	157,854	31.0%	3.3%
Santa Clarita	151,088	176,320	218,103	16.7%	23.7%
Los Angeles County	9,519,338	9,818,605	10,253,716	3.1%	4.4%

*Source: Bureau of the Census, 2000-2010 Census; State Department of Finance Population and Housing Estimates, 2019.*

According to the Regional Housing Needs Assessment (RHNA), a State-mandated housing planning process coordinated by the Southern California Association of Governments (SCAG), the City of Glendale is required to accommodate about 13,400 new units between 2021 and 2029. Future growth in the City is expected to be concentrated in the western and southern portions of Glendale, including Downtown Glendale, where land is predominantly zoned for either multi-family or mixed-use development. New development is likely to consist of the replacement of single-family homes by apartments and condominiums, or low-scale commercial with mixed-use commercial and residential buildings, leading to increased development densities. A minimal amount of growth is anticipated in the canyons, on infill lots.

## 2. Age Characteristics

Housing demand is affected by the age characteristics of a community, among other factors. Traditionally, young adults prefer apartments, condominiums, and smaller single-family homes that are affordable. Middle-age adults typically prefer larger homes as they begin to raise families. However, as children leave home, seniors often prefer smaller, moderate-cost condominiums and single-family homes with less extensive maintenance needs. In recent years, the escalating housing prices in Southern California have meant that many young families find it increasingly difficult to find adequately-sized homes at affordable prices.

The age distribution of a population is an important factor that shapes the planning and development of future housing, neighborhoods, schools, parks, and social services. Glendale's population is older than the population Countywide, Statewide, and nationally. The City's median age in 2017 was 41.2, compared to 36.0 in Los Angeles County, 36.1 in California, and 37.8 in the United States. The high median age can be explained by the large proportion of residents beyond traditional child-rearing age (i.e., older than 45), including an expanding senior population, and declining number of children in the City (Table 6). As of 2017, young adults (age 25 to 44) comprised the largest segment of the population, closely followed by middle-age adults (age 45 to 64). Over the last two decades the senior population has grown at a steady pace. Trends indicate that the senior population will continue to expand as those in the middle-age group grow older.

The median age in Glendale has risen steadily since 2000. The increase in median age can be partially attributed to an increase in housing costs, which tends to price families with children out of the local housing market. Another factor may be a falling fertility rate among residents, a trend echoed throughout the State.

Age	2000		2010		2017	
	Number	Percent	Number	Percent	Number	Percent
Under 5	11,088	5.7%	9,168	4.8%	10,501	5.3%
5-9	12,346	6.4%	9,062	4.7%	9,621	4.8%
10-14	12,596	6.5%	10,464	5.5%	9,715	4.9%
15-19	12,354	6.3%	11,634	6.1%	9,818	4.9%
20-24	11,552	5.9%	12,013	6.3%	11,425	5.7%
25-34	29,070	14.9%	27,234	14.2%	31,933	16.0%
35-44	33,796	17.3%	27,284	14.1%	26,962	13.5%
45-54	27,427	14.1%	30,616	16.0%	28,564	14.3%
55-64	17,630	9.0%	24,326	12.7%	28,312	14.2%
65+	27,114	13.9%	29,918	15.6%	32,899	16.5%
<b>Total</b>	<b>194,973</b>	<b>100.0%</b>	<b>191,719</b>	<b>100.0%</b>	<b>199,750</b>	<b>100.0%</b>
<b>Median Age</b>	<b>37.5</b>		<b>41</b>		<b>41.2</b>	

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

### 3. Racial and Ethnic Composition

The growing ethnic diversity of Glendale is reflective of the overall changes occurring in Los Angeles County and Southern California as a whole. Until 1980, Glendale had a predominantly White population (91.7 percent); however, the ethnic composition of the City has changed significantly since that time. The proportion of White persons in Glendale was at 64 percent in 2000, but by 2010 and then 2017, however, the City's proportion of White residents increased to over 70 percent in 2010, and then to almost 73 percent in 2017 (Table 7).

The proportion of Hispanic residents in Glendale has increased slightly since 2010 after seeing a decline the previous decade. The Native American and Black population figures have remained static at approximately one percent of the City's population since 2000. As a share of citywide population, the Asian/Pacific Islander population has stayed relatively consistent. In Glendale, the Asian/Pacific Islander population consists primarily of Korean, Filipino, Chinese, Japanese, and Vietnamese residents.

Glendale is home to a substantial number of Armenian immigrants of Middle Eastern and Russian ancestry. Although only a dozen Armenian families resided in Glendale in the 1950s, by the late 1970s, many Armenian businesses and families from Iran, Iraq, and Lebanon had settled in Glendale. During the 1980s, a new wave of Armenians from a variety of countries settled in the community as a result of more liberal emigration under Mikhail Gorbachev's Glasnost, as well as the arrival of Armenians who fled Iran after the country's takeover in 1979 by a conservative Islamic faction. By the 1990s, Armenians formed an important core of residents in most parts of Glendale and in the adjacent valley, that includes La Cañada Flintridge and Tujunga. According to the 2013-2017 American Community Survey, of those reporting their ancestry, 70,718 persons are Armenian, which represents 35 percent of the City's population.

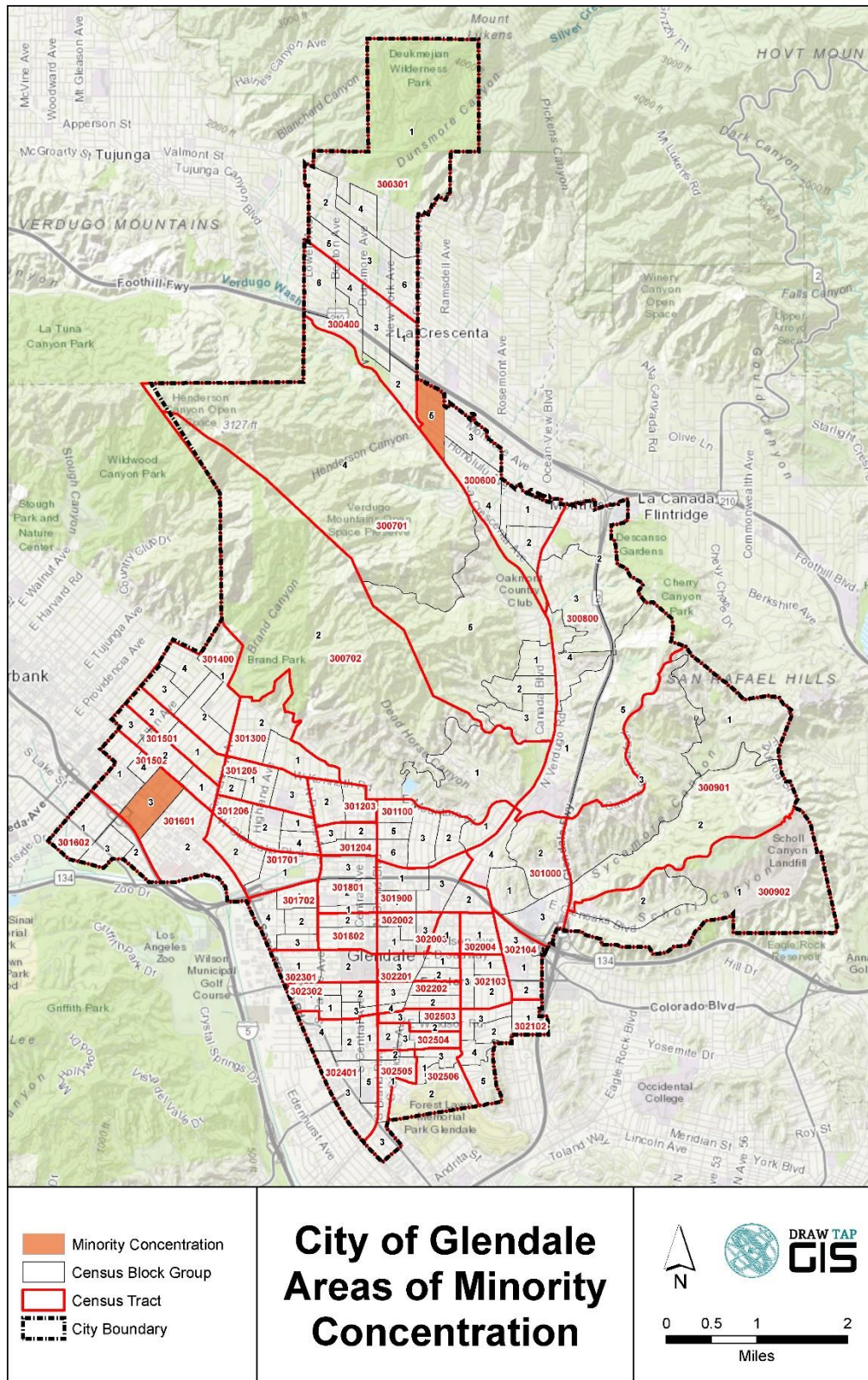
Race/Ethnicity	2000		2010		2017	
	Number	Percent	Number	Percent	Number	Percent
<b>One Race</b>	<b>175,359</b>	<b>89.9%</b>	<b>183,032</b>	<b>95.5%</b>	<b>192,645</b>	<b>96.4%</b>
White	123,960	63.6%	136,226	71.1%	145,218	72.7%
Black or African American	2,468	1.3%	2,573	1.3%	3,359	1.7%
American Indian and Alaska Native	629	0.3%	531	0.3%	493	0.2%
Asian	31,587	16.2%	31,434	16.4%	31,795	15.9%
Native Hawaiian/ Pacific Islander	163	0.1%	122	0.1%	194	0.1%
Some Other Race	16,715	8.6%	12,146	6.3%	11,586	5.8%
Multi-Racial	19,614	10.1%	8,687	4.5%	7,105	3.6%
<b>Total</b>	<b>194,973</b>	<b>--</b>	<b>191,719</b>	<b>--</b>	<b>199,750</b>	
<b>Hispanic or Latino (of any race)</b>	<b>38,452</b>	<b>19.7%</b>	<b>33,414</b>	<b>17.4%</b>	<b>36,370</b>	<b>18.2%</b>
Mexican	20,810	10.7%	19,126	10.0%	21,764	10.9%
Puerto Rican	624	0.3%	575	0.3%	567	0.3%
Cuban	1,838	0.9%	1,513	0.8%	1,574	0.8%
Other Hispanic or Latino	15,180	7.8%	12,200	6.4%	12,465	6.2%
<b>Not Hispanic or Latino</b>	<b>156,521</b>	<b>80.3%</b>	<b>158,305</b>	<b>82.6%</b>	<b>163,380</b>	<b>81.8%</b>

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

*a) Racial and Ethnic Concentrations*

Patterns of racial and ethnic concentration are present within particular areas of the City. Figure 1, on the following page, illustrates concentrations of minority households by Census block group in Glendale. A "concentration" is defined as a Census block whose proportion of minority households is greater than the overall Los Angeles County average of 72.2 percent. As shown in Figure 1, there are very few block groups that have a higher concentration of minorities than the County's average of 72.2 percent. Only two Census block groups were found to have a minority concentration.

**Figure 1: Minority Concentrations in Glendale**





b) *Linguistic Isolation*

In 2017, approximately 68 percent of all Glendale residents over age five spoke languages other than English at home; less than half of those residents spoke English very well. The prevalence of limited English proficiency appears to be greatest among those who spoke Indo-European languages (including Armenian) and is similar among residents who spoke Asian and Hispanic languages (Table 8). Approximately 14 percent of Glendale residents spoke Spanish at home and approximately 42 percent of these persons spoke English “less than very well.” In comparison, about 12 percent of the City’s residents spoke Asian languages at home and 46 percent of these persons spoke English “less than very well.” Language barriers can be a potential impediment to fair housing if prospective buyers or renters do not speak the same language as listing agents, landlords, or property managers. The most recently released 2017 American Community Survey data indicates that such patterns have persisted in Glendale. Approximately 68 percent of all residents spoke a language other than English at home.

English Speaking Ability	Indo-European Language Speakers		Asian and Pacific Island Language Speakers		Spanish Speakers		All Languages	
	#	%	#	%	#	%	#	%
"Very Well"	34,787	45.6%	12,490	54.0%	15,509	57.9%	64,419	49.8%
"Well"	19,088	25.0%	6,620	28.6%	5,920	22.1%	32,724	25.3%
"Not Well"	14,652	19.2%	3,443	14.9%	4,087	15.3%	22,668	17.5%
"Not at All"	7,709	10.1%	571	2.5%	1,279	4.8%	9,674	7.5%
<b>Total</b>	<b>76,236</b>	<b>100.0%</b>	<b>23,124</b>	<b>100.0%</b>	<b>26,795</b>	<b>100.0%</b>	<b>129,485</b>	<b>100.0%</b>

*Source: American Community Survey, 2013-2017.*

**B. Household Characteristics**

Changes in household characteristics can help to determine the need for housing and services in a community. The Census Bureau defines a household as all persons occupying a housing unit. Families are a subset of households. Single households are those single individuals living alone, but do not include persons in group housing situations such as convalescent homes or dormitories. Family households are those where the head of the household is related to one or more persons in the home by blood, adoption, or marriage; the Census Bureau defines any other household arrangement as non-family.

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

**1. Household Composition and Size**

a) *Household Composition*

According to the 2013-2017 American Community Survey, 72,738 total households resided in Glendale, an increase of 933 households since 2000. As shown in Table 9, the household composition in Glendale experienced some noticeable changes during this period. The “other families” category, which includes single parent families, grew by 13 percent since 2000. Conversely, married family households with children have decreased significantly since 2000 with the number of households dropping by about 23 percent.

Household by Type	2000		2010		2017		Percent Change	
	HH	%	HH	%	HH	%	2000-2010	2010-2017
Family Households	49,636	69.1%	50,087	69.3%	50,223	69.1%	0.9%	0.27%
Married with Children	18,877	26.3%	16,027	22.2%	14,476	19.9%	-15.1%	-9.68%
Married no Children	18,689	26.1%	21,459	29.7%	22,070	30.3%	14.8%	2.85%
Other Families	12,070	16.8%	12,601	17.4%	13,677	18.8%	4.4%	8.54%
Non-Family Households	22,169	30.9%	22,182	30.7%	22,515	31.0%	0.1%	1.50%
Singles	18,440	25.7%	18,021	24.9%	18,403	25.3%	-2.3%	2.12%
Others	3,729	5.1%	4,161	5.8%	4,112	5.7%	11.6%	-1.17%
<b>Total</b>	<b>71,805</b>	<b>100.0%</b>	<b>72,269</b>	<b>100.0%</b>	<b>72,738</b>	<b>100.0%</b>	<b>0.6%</b>	<b>0.65%</b>
Average Household Size	2.68		2.63		2.72			
Average Family Size	3.27		3.19		3.32			

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

### *b) Household Size*

The average household size increased modestly over the 17-year period between 2000 and 2017. In 2010, the average household size in Glendale was 2.63 persons, a decrease from 2.68 persons in 2000, but then increased to 2.72 in 2017. The larger average household size is expected, given the City's substantial increase in other family households during this timeframe. Although Glendale households have been getting larger, they are still smaller on average when compared to the average Los Angeles County household (3.01 persons).

## **2. Special Needs Households**

Certain segments of the population may have a more difficult time finding decent, affordable housing due to special circumstances. In Glendale, these "special needs" households include the elderly, disabled persons, large families, female-headed households, persons with HIV/AIDS, and the homeless. Los Angeles County Health Department and Service Planning Area (SPA) boundaries are used in compiling statistics for special needs populations, including those not tracked through census data such as emancipated youth.

In September 2005, the Strategic Housing Plan for Special Needs Populations was prepared by the Shelter Partnership, Inc. with information from the Special Needs Housing Alliance; Alliance members include the Los Angeles County Department of Children and Family Services, Community and Senior Services, Health Services Office of AIDS Programs and Policy, Mental Health, Public Social Services, as well as the Community Development Commission, Los Angeles Homeless Services Authority, the Office of Education, and Probation Department. The characteristics and considerations for various special needs populations identified in this report related to housing are referenced below.

### *a) Large Households*

Large households are defined as those with five or more members. Many large households are families with two or more children and/or with extended family members such as 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 basic necessities such as food, clothing and medical care, lower and moderate income large

households typically 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 such families a higher rent or security deposit than they normally would, limit the number of children in a complex or confine them to a specific location, or choose not to rent to families with children altogether.

There were 5,641 households with five or more members in 2017, representing nearly eight percent of the City's total households. Of these, 2,396 households (42 percent) were in owner-occupied units, and 3,245 households (58 percent) were in renter-occupied housing units.

For this particular population, the primary challenge is finding affordable, adequately-sized housing units. Discrimination, as well as access to services such as affordable child care, recreation facilities, health care and public transportation are also factors which may affect large households.

#### *b) Families with Children*

Families with children often face housing discrimination by landlords who fear that children will cause property damage. Some landlords may also have cultural biases against children of opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. According to the 2013-2017 American Community Survey, approximately 28 percent of all households in Glendale have children under the age of 18 and about eight percent of total households are female-headed households with children.

#### *c) Single-parent Households*

Single-parent households often require special consideration and assistance as a result of their greater need for affordable housing, as well as accessible day care, health care, and other supportive services. Due to their relatively lower per-capita income and higher living expenses such as day-care, single-parent households have limited opportunities for finding affordable, decent, and safe housing. In 2017, approximately 8,024 single-parent households resided within Glendale, representing nearly 11 percent of community households.

#### *d) Persons with Disabilities*

Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination in the housing market because of the need for wheelchairs, home modifications to improve accessibility, or other forms of assistance. Landlords/owners sometimes fear that a unit may sustain wheelchair damage or may refuse to exempt disabled tenants with service/guide animals from a no-pet policy. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Landlords often refuse to rent to tenants with a history of mental illness. Neighbors may object when a house becomes a group home for persons with mental disabilities.

The U.S. Census Bureau classifies disabilities (lasting for a period of six or more months) into the following categories:

- **Sensory disability:** blindness, deafness, or a severe vision or hearing impairment.

- **Mental/Developmental disability:** a physical, mental, or emotional condition lasting six months or more that makes it difficult to perform activities such as learning, remembering, or concentrating.
- **Physical disability:** a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying.
- **Self-care disability:** a physical, mental, or emotional condition lasting six months or more that makes it difficult to perform certain activities such as dressing, bathing, or getting around inside the home.
- **Going-outside-the-home disability (also known as mobility disability):** a physical, mental, or emotional condition lasting six months or more that makes it difficult to go outside the home alone to shop or visit a doctor’s office (tallied only for residents over 16 years of age).
- **Employment disability (also known as work disability):** a physical, mental, or emotional condition lasting six months or more that makes it difficult to work at a job or business (tallied only for residents between 16 and 64 years of age).

According to the 2013-2017 American Community Survey, 27,946 persons in Glendale had a disability, comprising approximately 14 percent of the population. Table 10 displays disabilities tallied by age. The proportion of individuals with disabilities increases with age. Approximately three percent of children aged five to 17 had a disability, compared to eight percent of adults aged 18 to 64, and 51 percent of seniors aged 65 years and older.

Age	Male	Female	Total
5-17	518	191	709
18-64	4,573	6,205	10,778
65+	6,443	10,016	16,459
<b>Total</b>	<b>11,534</b>	<b>16,412</b>	<b>27,946</b>

*Source: American Community Survey, 2013-2017.*

Housing opportunities for the handicapped can be maximized through the provision of barrier free housing.

To date, the City/Housing Authority has developed seven (7) projects with nonprofit development partners to provide affordable rental housing for physically/developmentally disabled households. In those projects, the Housing Authority provided approximately \$9 million in affordable housing financing towards their development.

These projects ranged between physical and/or developmentally disabled facilities in either a group home or independent living facilities format and total 78 units that serve approximately 97 households. Of the four (4) new construction independent living facilities, three (3) were developed in conjunction with HUD under their 811 program. The HUD 811 program serves very low income, developmentally disabled adults. This program allows persons with disabilities to live as independently as possible in the community by increasing the supply of rental housing with supportive services provided by the developer and monthly rental housing assistance provided by HUD directly through project based Section 8 housing vouchers.

The remaining three (3) projects were developed as single family group homes. These three projects involved the acquisition and rehabilitation of single family homes in R-1 zoned neighborhoods and were all sponsored by The Campbell Center. These homes provide housing for up to 23 individuals with disabilities.

All of these projects currently have waiting lists or referral systems for consideration for housing placement. While the waiting lists on many of them remain open for people to apply and are much smaller in number than other housing project waiting lists, the wait time for vacancies remains challenging for those in need. Most recently, the City developed a 66-unit affordable senior rental housing project. As part of that development process, the City reserved 7 units for low income, developmentally disabled adults. These residents were identified through a referral process from two non-profits specializing in providing services to this population, Modern Support Services and the Frank D. Lanterman Regional Center.

*e) Persons with HIV/AIDS*

The Los Angeles County Health Department reports approximately 915 Glendale residents have AIDS in 2017. The National Commission on AIDS estimates that between one-third and one-half of all people infected with AIDS either are homeless or are in imminent danger of becoming homeless. Among the County's population diagnosed with AIDS in 2016, 18 percent are White, 48 percent are Hispanic, 25 percent are African American, and three percent are composed of other racial/ethnic groups and unknown racial/ethnic groups. The City of Glendale has no housing at this time to exclusively serve persons with HIV/AIDS; however, a number of local agencies within Los Angeles County administer Housing Opportunities for Persons with AIDS (HOPWA) tenant-based rental assistance vouchers.

A major need facing this population is health care, particularly medical insurance. Persons living with AIDS are supported through a variety of networks in Los Angeles County, including the federal Ryan White CARE act and the federal HOPWA act. Housing needs of this population include adult residential facilities (ARFs), congregate living health facilities providing 24-hour care, HIV/AIDS substance abuse residential rehabilitation services and inpatient detoxification services, residential care facilities for the chronically ill, and hospice care. HIV/AIDS-related stigma can also lead to discrimination in traditional rental and owner housing markets.

*f) Homeless Persons*

Throughout the country, homelessness has become an increasing problem. Contributing factors include the general lack of housing affordable to lower and moderate income persons, an increase in the number of persons whose incomes fall below the poverty level, reductions in public subsidy to the poor, and the de-institutionalization of the mentally ill.

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

Homeless persons often have a difficult time finding housing once they have moved from transitional housing or other assistance program. Housing affordability for those who are or were formerly homeless is challenging from an economic standpoint, and this demographic group may encounter fair housing issues when landlords refuse to rent to formerly homeless persons. Under California laws, a landlord can deny rental to an applicant based on credit history, employment history, and rental history. However, the perception may be that homeless persons are economically (and sometimes mentally) unstable.

On January 22, 2020, 169 persons were homeless according to the Glendale 2020 Homeless Count and Survey Final Report. The previous homeless count and subpopulation survey was completed in 2019 during which 243 persons were counted. A comparison of the last two counts reveals that 74 less persons were counted in 2020, which represents a decrease of 30%. The homeless count was conducted on both sheltered and unsheltered population.

The total number of unsheltered persons counted was 75 (44%) and the total number of sheltered persons counted was 94 (56%). Of the 94 individuals included in the shelter count, 50% (47 persons) were in emergency shelter programs while 50% (47 persons) were residing in transitional housing programs on the night of the count. Persons in families with children, including the minor children, represented 38% (65) of the total population counted in the Point-in-Time Count, while 62% (104) were individuals without children. In total, 25% (42 persons) of those counted on January 22, 2020 were under the age of 18, 4% (7 persons) were between the ages of 18-24, and 71% (120) were over the age of 25. How many between 55 up and 65 up.?

On January 22, 2020, 38 people or 22% of the homeless population were experiencing chronic homelessness in Glendale.

Moreover, 26% (33 persons) of respondents reported having serious mental health conditions which is an increase of 43% from last year, 13% (17 persons) had substance use disorder which is a decrease of 15% from last year, 15% (19 persons) were survivors of domestic violence which is an increase of 52% from last year and 1% (2 persons) were adults with HIV/AIDS which is a 50% reduction from last year.

The City of Glendale recognizes the high need for ongoing supportive services and development of affordable housing to prevent homelessness, particularly for extremely low-income households (households making less than 30 percent AMI). Recent reports from service providers demonstrate a large homeless at-risk population in Glendale. Households at-risk are comprised of families with children, seniors, and single adults living below the poverty level.

Provision of social services is one key to addressing barriers to self-sufficiency and providing support to households who continue to need services throughout their lives. Among the following agencies, the Salvation Army, Door of Hope, Armenian Relief Society, YWCA of Glendale and Catholic Charities operates a homeless prevention case management program through which families and disabled or elderly individuals who have received an eviction or utility disconnect notice are eligible for one-time direct financial assistance. The Salvation Army Glendale Corps also provides limited food services to families in poverty.

The Section 8 Housing Choice Voucher program, as well as the development of affordable rental and ownership projects, prevents homelessness through the provision of long-term affordable housing and in some cases linkages to on-going supportive services. In 2019, the Glendale Housing Authority applied for and was awarded 14 Mainstream Section 8 Vouchers from HUD. These are special vouchers designated from non-elderly, developmentally disabled clients. All 14 of the special use vouchers have been utilized for this clientele. Permanent Supportive Housing, including Shelter Plus Care, also provides affordable housing along with intensive case management to serve disabled homeless persons who would not otherwise be able to maintain housing. Fair housing education is a supplemental resource that is provided to educate renters about their rights and responsibilities. (Note: HUD notified the City of Glendale about an award for 225 new Section 8 Vouchers for chronically homeless individuals. The acceptance of the vouchers will go before City Council for approval in May/June 2021.)

The City’s website, accessible to both Glendale and non-Glendale residents, is a resource for disseminating information about grant-funded social service programs, City projects and services, including opportunities for affordable housing projects. The City’s website is also frequently used to provide outreach regarding the Verdugo Jobs Center, which provides employment counseling, job training, and English as Second Language (ESL) classes. The City also provides press releases of upcoming events and programs through its vast array of social media platforms and regular periodicals such as the Glendale Independent and Glendale News Press.

## C. Income Profile

Household income is the most important factor that determines a household’s ability to balance housing costs with other basic life necessities. Regular income is the means by which most individuals and families finance current consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population. While economic factors that affect a household’s housing choice are not a fair housing issue per sé, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

### 1. Income Distribution

For purposes of most housing and community development activities, HUD has established the four income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA). HUD income definitions differ from the State of California income definitions. Table 11 compares the HUD and State income categories. This AI report is a HUD-mandated study and therefore HUD income definitions are used. For other housing documents of the City, the State income definitions may be used, depending on the housing programs and funding sources in question.

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

*Source: Department of Housing and Urban Development and California Department of Housing and Community Development, 2019.*

According to the 2013-2017 American Community Survey, Glendale residents earned a median household income of \$58,657, slightly below the Los Angeles County median of \$61,015. The median income in Glendale was higher than the median income of the City of Los Angeles (\$54,501) but lower than the nearby cities of Pasadena (\$76,264), Burbank (\$97,706), and La Cañada Flintridge (\$160,481).

According to the Comprehensive Housing Affordability Strategy (CHAS), 36 percent of households in Glendale earned less than 80 percent of the AMI in 2016 (Table 12). Twenty-two percent of the City's total households in 2015 were extremely low-income (under 30 percent AMI), 14 percent were low-income, (31-50 percent AMI), and 17 percent earned moderate-income levels (51-80 percent AMI). Approximately 47 percent of the households had incomes above 80 percent of the median in 2016.

City/Area	Total Households	Percent			
		Extremely Low Income	Low Income	Moderate Income	Middle/Upper Income
Glendale	71,490	22.1%	14.3%	17.1%	46.5%
Los Angeles County	3,263,065	20.0%	15.1%	17.9%	47.0%

*Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.*

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

## 2. Income Distribution by Household Type

Income often varies by household type (elderly, small, and large families). Certain groups had a higher proportion of lower income households. Specifically, elderly households had a much higher percentage of lower income households than any other household type. Approximately 69 percent of elderly households were lower income; nearly 55 percent earned less than 50 percent of the AMI (Table 13).

Another special needs group in Glendale is large family households. This group also had a slightly higher percentage of households that were lower income (50 percent) than the other household types in the City. There is a large percentage (52 percent) of low and moderate income persons who belong to "other" (Table 13).

Household Type	Income Group (% of AMI)				
	Extremely Low (0-30%)	Low (31-50%)	Moderate (51-80%)	Middle/ Upper (81%+)	Percent of All
Elderly (62+ years)	38.9%	16.0%	14.2%	30.9%	26.6%
Small Family (2-4 persons)	15.4%	13.0%	17.7%	53.9%	48.2%
Large Family (5+ persons)	11.8%	19.8%	17.9%	50.5%	7.2%
Other	19.4%	13.0%	19.7%	47.9%	18.0%

*Source: HUD CHAS Data, 2012-2016.*

## 3. Income Distribution by Race/Ethnicity

Race/ethnicity is a characteristic that often is related to housing need. This is because different race/ethnic groups may earn different incomes. Hispanic households had a noticeably lower proportion of households earning above 80 percent of the AMI (39 percent) when compared to the City overall (46 percent). Conversely, a higher proportion of Hispanic households were within the lower and moderate income (42



percent) levels compared to the citywide average (31 percent). Income levels among White and “Other” households mostly mirrored the citywide averages (Table 14).

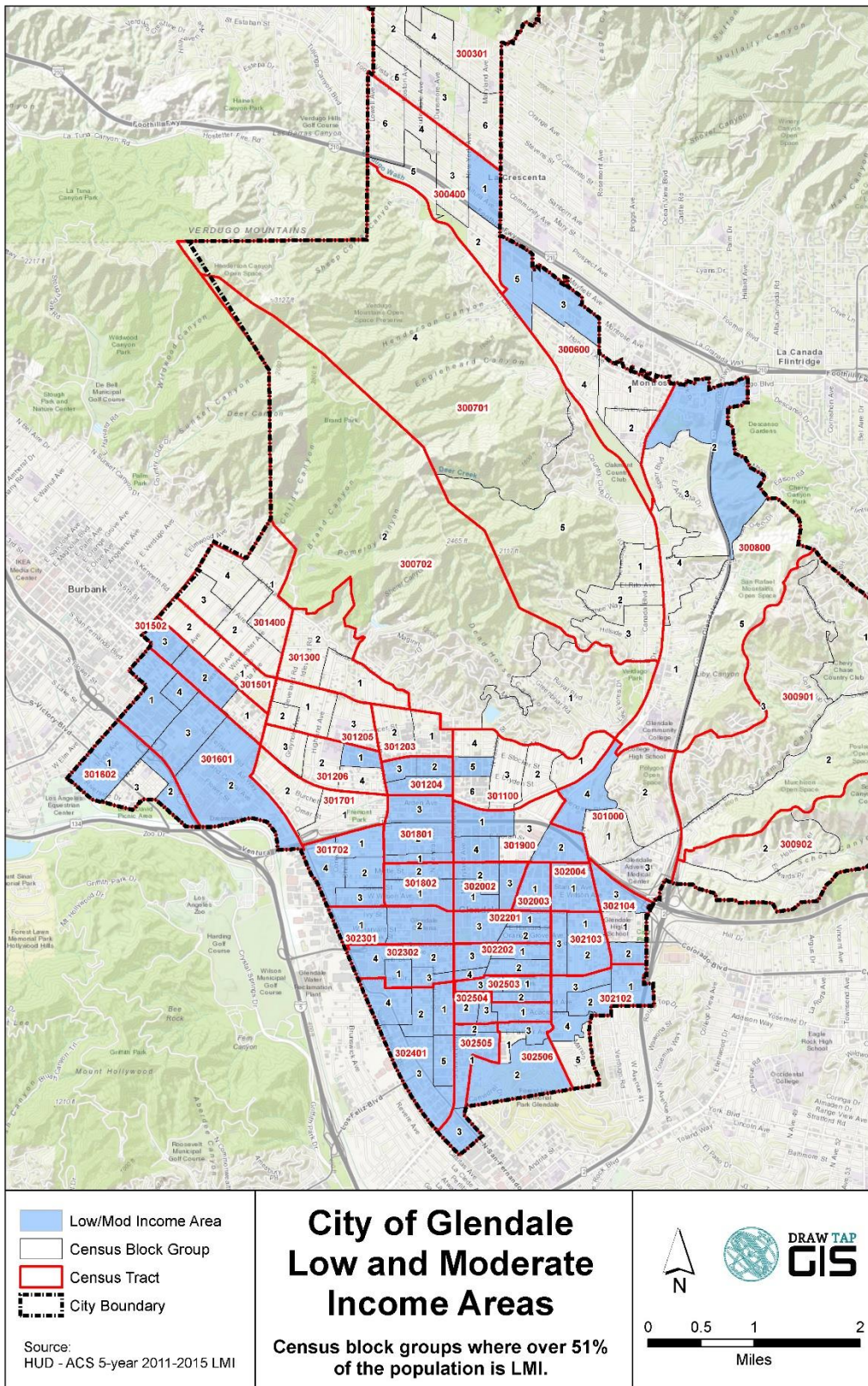
**Table 14: Income by Race/Ethnicity**

Income Level	Total HHs	Non-Hispanic White		Hispanic or Latino		Black or African American		Asian	
		HHs	Percent	HHs	Percent	HHs	Percent	HHs	Percent
Extremely Low	15,805	12,140	25.8%	2,050	18.8%	150	16.4%	1,200	11.0%
Low	10,199	6,565	13.9%	2,025	18.6%	125	13.7%	1,225	11.3%
Moderate	12,250	7,365	15.6%	2,595	23.8%	105	11.5%	1,880	17.3%
Middle/Upper	33,233	21,075	44.7%	4,220	38.8%	534	58.4%	6,569	60.4%
<b>Total</b>	<b>71,487</b>	<b>47,145</b>	<b>65.9%</b>	<b>10,890</b>	<b>15.2%</b>	<b>914</b>	<b>1.3%</b>	<b>10,874</b>	<b>15.2%</b>

*Source: HUD CHAS Data, 2012-2016.*

Figure 2 illustrates the Low and Moderate Income (LMI) areas in the City by Census block group. For the purposes of implementing the Community Development Block Grant (CDBG) program, HUD defines an LMI area as a Census tract or block group where over 51 percent of the population earns incomes below 80 percent of the AMI. As shown in Figure 2, a significant number of block groups in the City are identified as LMI areas.

**Figure 2: Lower and Moderate Income Areas in Glendale**



## D. Housing Profile

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

***What is a housing unit?***

*A housing unit is defined as a house, an apartment, or a single room, occupied as a separate living quarter or if vacant, intended for occupancy as a separate living quarter.*

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

### 1. Housing Growth

Glendale’s 2010 housing stock of 76,269 units increased to 76,607 units by 2017. The City’s growth rate during this period was comparable to housing growth in South Pasadena, but slower than residential growth in the City and County of Los Angeles (Table 15).

Jurisdiction	Number of Housing Units		Percent Increase
	2010	2017	
Burbank	44,309	43,323	-2.2%
Glendale	76,269	76,607	0.4%
Los Angeles	1,413,995	1,457,762	3.1%
Pasadena	59,551	60,286	1.2%
South Pasadena	11,118	11,143	0.2%
Los Angeles County	3,445,076	3,506,903	1.8%

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

### 2. Housing Condition

a) *Housing Age*

Glendale’s housing stock has a significant portion of older homes. Homes built prior to 1940 account for 20 percent of homes in the City. A plurality of Glendale’s housing (41 percent) was constructed between 1940 and 1969. Between 2000 and 2017, the pace of housing development in Glendale slowed, with only an additional 3,727 dwelling units built, with only 400 of those units being built between 2010 and 2017. This equaled an approximately five percent increase in the City’s total housing stock over the 17-year period (Table 16). Due to the diminishing supply of vacant land in Glendale, new residential development was and continues to be accommodated by the replacement of older single-family homes with higher density developments, as permitted under zoning.

Decade	Number of Units	Percent of Units
2000s	3,727	4.9%
1990s	3,959	5.2%
1980s	10,633	13.9%
1970s	10,966	14.3%
1960s	12,911	16.9%
1940-1960	19,009	24.8%
Pre 1940s	15,402	20.1%
<b>Total</b>	<b>76,607</b>	<b>100.0%</b>

*Source: American Community Survey, 2013-2017.*

A housing unit is likely to need major rehabilitation when it is 30 years old. With nearly three-quarters (76 percent) of Glendale’s housing stock built prior to 1980, and an additional 14 percent built between 1980 and 1989, continued housing maintenance is necessary to prevent widespread housing deterioration in the City. Fortunately, many of the older residences are well maintained single-family homes and are not in need of significant rehabilitation. In some cases, these homes are a part of potential historic districts. Unfortunately, many apartments built in the 1980’s were poorly constructed and therefore require frequent and costly maintenance.

*b) Substandard Conditions*

Approximately 1,775 units of the City’s occupied housing units (out of 72,738 units) are in substandard condition, according to the 2013-2017 American Community Survey. Substandard housing is defined by the Federal Department of Housing and Urban Development (HUD) as housing units lacking complete kitchens or bathrooms. Some of these units are undoubtedly in need of replacement. To address the deterioration of the housing stock, property rehabilitation programs are made available to property owners. Code enforcement staff works closely with rehabilitation staff to refer eligible properties and property owners to financial assistance programs. Currently, the City administers home rehabilitation programs that provide home repair grants and loans to lower and moderate income homeowners whose homes need improvement.

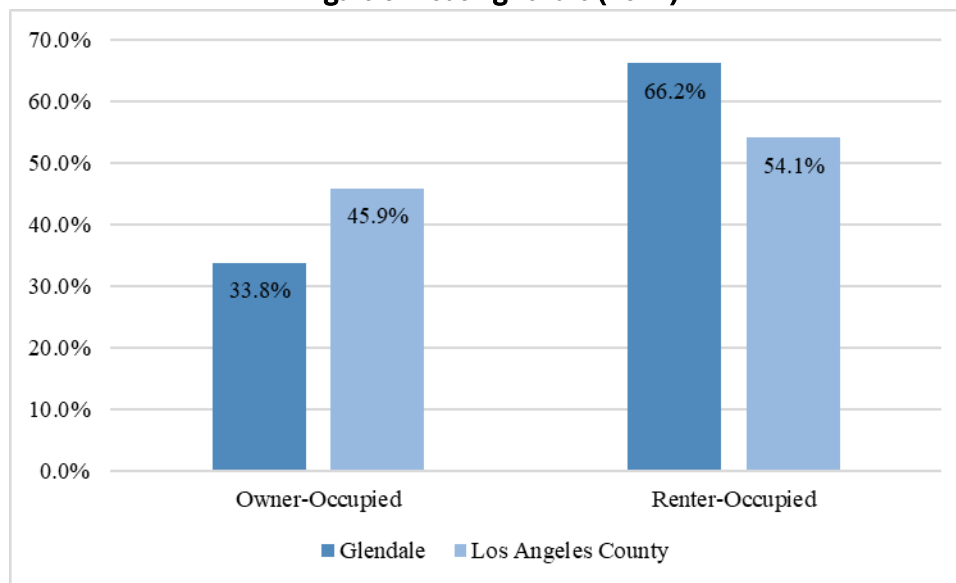
**3. Housing Tenure**

Tenure in the housing industry typically refers to the occupancy of a housing unit – whether the unit is owner-occupied or an occupied rental unit. Tenure preferences are primarily related to household income, composition, and ages of the household members; housing cost burden is generally more prevalent among renters than among owners. However, the extremely high costs of homeownership in Southern California also create high levels of housing cost burden among owners. The tenure distribution (owner versus renter) of a community’s housing stock influences several aspects of the local housing market. Tenure choices are primarily related to household income, composition, and age of the householder. Residential mobility is also influenced by tenure, with owner-occupied housing evidencing a much lower turnover rate than rental housing.

For the past several decades, Glendale has been a predominately renter-occupied community with approximately 66 percent of the housing stock renter-occupied in 2017 (Figure 3). Although this situation is influenced by many factors, much of this can be attributed to the significant amount of condominium and

multi-family unit development that has occurred in Glendale. Though condominiums are a form of homeownership, many condominiums are utilized as rental units.

**Figure 3: Housing Tenure (2017)**



Source: American Community Survey, 2013-2017.

#### 4. Housing Type

Glendale has a broad range of housing opportunities reflective of a diverse community, as shown in Table 17. As shown, only minor changes have occurred with the composition of the housing stock in Glendale since 2000. A majority of Glendale’s housing stock continues to consist of multi-family units (61 percent) and the remaining 39 percent of the City’s housing units consists of single-family homes. These proportions have remained relatively static since 2000. Most single-family homes are detached units (89 percent) and the vast majority of multi-family homes (86 percent) are located within buildings with five or more units.

**Table 17: Housing Type**

Housing Type	2000		2010		2019	
	Number	Percent	Number	Percent	Number	Percent
Single-family	29,849	40.5%	29,945	39.9%	31,315	38.8%
Detached	26,035	87.2%	26,131	87.3%	27,753	88.6%
Attached	3,814	12.8%	3,814	12.7%	3,562	11.4%
Multi-Family	43,767	59.4%	44,967	59.9%	49,421	61.2%
2-4 Units	6,917	15.8%	6,942	15.4%	6,947	14.1%
5+ Units	36,850	84.2%	38,025	84.6%	42,474	85.9%
Mobile Homes & Other	97	0.1%	97	0.1%	50	0.1%
<b>Total Units</b>	<b>73,713</b>	<b>100.0%</b>	<b>75,009</b>	<b>100.0%</b>	<b>80,786</b>	<b>100.0%</b>

Sources:

1. Bureau of the Census, 2000.
2. State Department of Finance, 2010 and 2019 Population and Housing Estimates.

After the 1970s, the City’s composition of single-family and multi-family units reversed, so that multi-family units now make up the predominant housing type in the City. This trend reflects the limited amount of vacant

land available for lower density development in Glendale. Single-family residential development occurred almost exclusively in the City’s mountainous areas at very low densities, whereas multi-family development occurred in much of the City’s flatland areas primarily through the conversion of single-family and lower density residential land uses to multi-family uses.

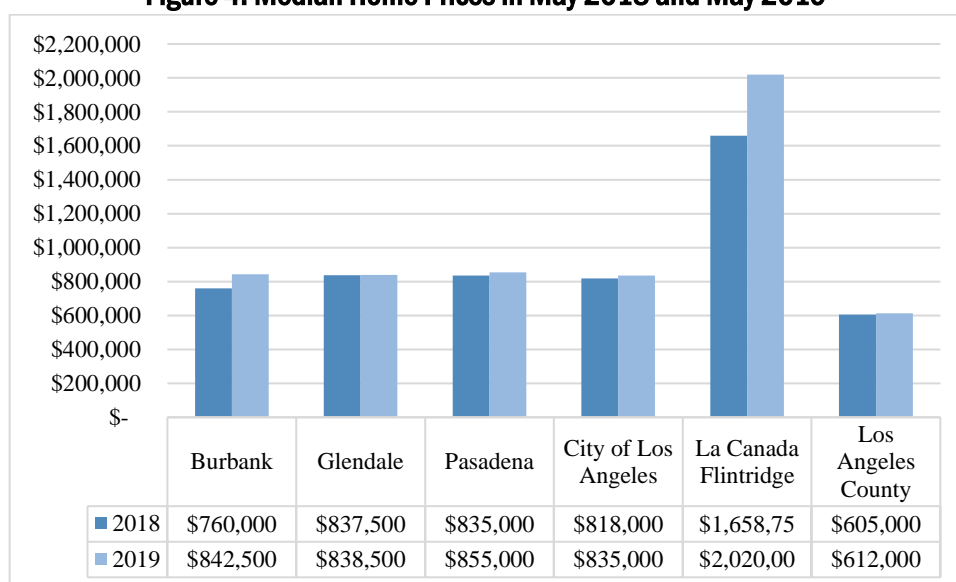
## E. Housing Cost and Affordability

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

### 1. Ownership Housing Costs

Regional housing market demand, Glendale’s strong local employment base, and convenient freeway access to employment centers have placed strong demand on the for-sale housing market. Figure 4 compares the median sales price of single-family homes in Glendale and surrounding jurisdictions in 2018 and 2019.

**Figure 4: Median Home Prices in May 2018 and May 2019**



Source: CoreLogic Services, [www.corelogic.com](http://www.corelogic.com)

In May 2019, the median value of a single-family home in Glendale was \$838,500, compared to \$837,500 in 2018. The value of for-sale housing in May 2019 was 37 percent higher in Glendale than the County, but only \$3,500 higher than the City of Los Angeles. The median home values of the surrounding jurisdictions also exceed the County median and are relatively similar to the home prices in Glendale besides La Canada Flintridge.

## 2. Rental Housing Costs

Apartment rents in Glendale vary significantly by area and unit size. Information on current rental rates in the City was obtained from a review of advertisements from Zillow.com in September 2020. Available rental housing ranged from single room studios to five-bedroom units, with the majority of apartment units advertised as one- and two-bedroom units. Table 18 summarizes average apartment rents by unit size. Overall, 354 units of varying sizes were listed as available for rent in September 2020 for an average rent of \$2,416.

Size	Number Advertised	Average Rent
Studio	33	\$1,510
One Bedroom	102	\$1,958
Two Bedroom	173	\$2,506
Three Bedroom	32	\$2,900
Four+ Bedroom	14	\$3,204
<b>Total</b>	<b>354</b>	<b>\$2,416</b>

*Source: Zillow.com, 2020.*

## 3. Housing Affordability

The cost of housing in a community is directly correlated to the number of housing problems and affordability issues. High housing costs can price lower income families out of the market, cause extreme cost burdens, or force households into overcrowded or substandard conditions. While housing affordability alone is not a fair housing issue, fair housing concerns may arise when housing affordability interacts with factors covered under fair housing laws, such as household type, composition, and race/ethnicity.

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

HUD conducts annual household income surveys to determine the maximum payments that are affordable for different household income groups. In evaluating affordability, the maximum affordable price refers to the maximum amount that could be afforded by households in the upper range of their respective income categories. Table 19 shows annual household income by household size. The maximum affordable housing payment is based on the standard of 30 to 35 percent of household income. General cost assumptions for utilities, taxes, and property insurance are also shown.

The citywide median home price (\$838,500) in 2019 places homeownership out of reach for Glendale's lower to middle income households (Table 19Figure 4). Given the high costs of homeownership in the City, lower and moderate income households are usually confined to rental housing; however, the affordability problem also persists in the rental market. Most, if not all, appropriately-sized rental housing in Glendale is also unaffordable for the City's lower to middle income households.

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



**Table 19: Housing Affordability Matrix – Los Angeles County (2019)**

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

**Assumptions:**

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

**Sources:**

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

## **F. Housing Problems**

A continuing priority of communities is enhancing or maintaining the quality of life for residents. A key measure of quality of life in Glendale is the extent of “housing problems.” The Department of Housing and Urban Development assesses housing need within a city according to two criteria: (1) the number of households that are paying too much for housing; and (2) the number of households living in overcrowded units.

### **1. Overcrowding**

Some households may not be able to accommodate high cost burdens for housing, but may instead accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding.

According to the U.S. Census Bureau, “overcrowding” occurs when a household has more members than habitable rooms in a home (e.g., a three-person family may live in an apartment with a bedroom and a living room and be considered “overcrowded”). Moderate overcrowding refers to 1.0 to 1.5 persons per habitable room and severe overcrowding occurs when a home has 1.5 or more occupants per habitable room. Household overcrowding is reflective of various living situations: (1) a family lives in a home that is too small; (2) a family chooses to house extended family members; or (3) unrelated individuals or families are doubling up to afford housing. Not only is overcrowding a potential fair housing concern, it can strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes.

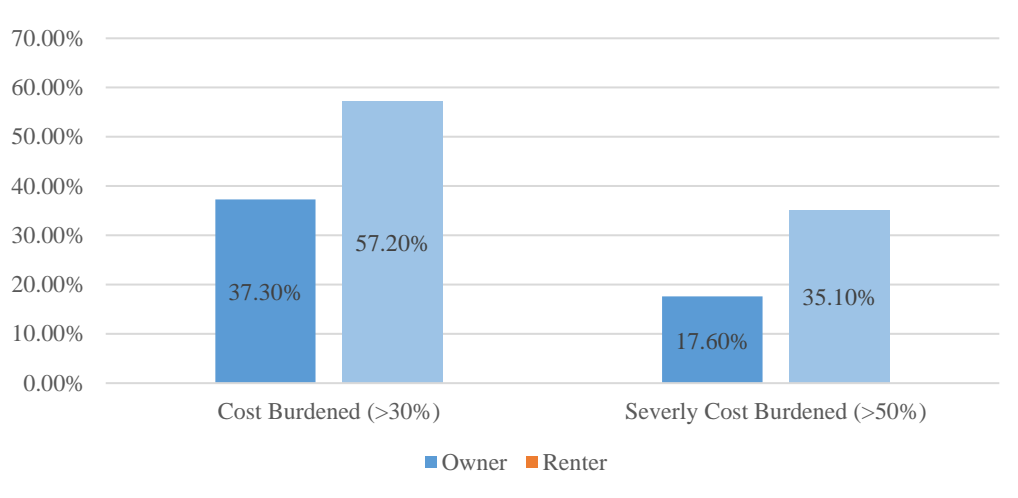
According to the 2013-2017 American Community Survey, 24 percent (17,042 units) of the occupied housing in Glendale was considered overcrowded in 2017, up from 19 percent in 2010. A larger share of renter households (33 percent) was affected by overcrowding than owner households (10 percent). Although high, housing overcrowding in Glendale is comparable to overcrowding in the region. In Los Angeles County, about 23 percent of households were considered overcrowded in 2017.

### **2. Housing Cost Burden**

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

Housing cost burden varies by tenure, household income, and special needs. According to 2012-2016 CHAS data shown in Figure 5, housing cost burden is more prevalent among renter- households (57 percent) than owner-households (37 percent). Also, a higher proportion of renter-households experienced severe cost burdens (35 percent) than owner households (18 percent).

**Figure 5: Housing Cost Burden in Glendale (2012-2016)**



## G. Assisted Housing

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

### 1. Housing Choice Voucher (Section 8) Rental Assistance

Despite popular perception, most of the nation's affordable housing stock is not in public housing projects but in privately owned and operated developments subsidized by the federal government.<sup>2</sup> The Housing Choice Voucher program (more commonly known as Section 8) is a rent subsidy program that helps lower income families and seniors pay rents of private units. Section 8 tenants pay a minimum of 30 percent of their income for rent and the local housing authority pays the difference up to the payment standard established by the Glendale Housing Authority. The program offers lower income households the opportunity to obtain affordable, privately owned rental housing and to increase their housing choices. The Housing Authority establishes payment standards based on HUD Fair Market Rents. The owner's asking price must be supported by comparable rents in the area. Any amount in excess of the payment standard is paid by the program participant.

#### a) Voucher Recipients

The Glendale Housing Authority currently administers the Section 8 program for the City. As of August 2019, 2,806 households were receiving Section 8 Housing Choice Vouchers. An additional 2,205 households are currently on the waiting list for Section 8 assistance. The Glendale Housing Authority has no public housing projects.

<sup>2</sup> *Eroding Neighborhood Integration: The Impact of California's Expiring Section 8 rent Subsidy Contracts on Low Income Family Housing.* Elaine Forbes. UCLA Lewis Center for regional Policy Studies, Working Paper #34. 2000.

Table 20 summarizes the race and ethnicity of the head of households of those households being assisted by Section 8. A vast majority of the City's Section 8 recipients (98 percent) were White. Most Asian and Black households in the City had higher incomes, therefore, voucher use by these groups is comparatively limited. However, Hispanic households may be underrepresented in the Section 8 program.

	Number	Percent
Black	35	1%
White	2,748	98%
Asian	21	1%
Other	2	0%
<b>Total</b>	<b>2,806</b>	<b>100%</b>
Hispanic	135	5%

*Source: Glendale Housing Authority, 2019.*

Table 21 describes the household characteristics of Glendale's Section 8 voucher holders. Of the 2,806 households receiving Section 8 vouchers, 90 percent have a head of household with a disability, 84 percent are headed by an elderly householder, and 72 percent are female-headed households.

	Number	Percent
Elderly	2,370	84%
Disabled	2,524	90%
Large Households	13	0%
Female-Headed Households	2,015	72%
<b>Total</b>	<b>2,806</b>	<b>100%</b>

*Source: Glendale Housing Authority, 2019.*

Figure 6 illustrates the geographic distribution of Section 8 Voucher recipients in Glendale. Most of the City's Section 8 voucher holders reside in the southern portion of the City, south of the 134 Freeway and East of Highway 5. The largest concentration of voucher holders appears to exist East of Highway 5 and along Glendale Avenue and Colorado Street, where much of the City's assisted housing is also located. It should be noted that neighborhoods with the heaviest concentrations of Section 8 recipients are not necessarily neighborhoods with the highest minority concentrations.

*b) Wait List*

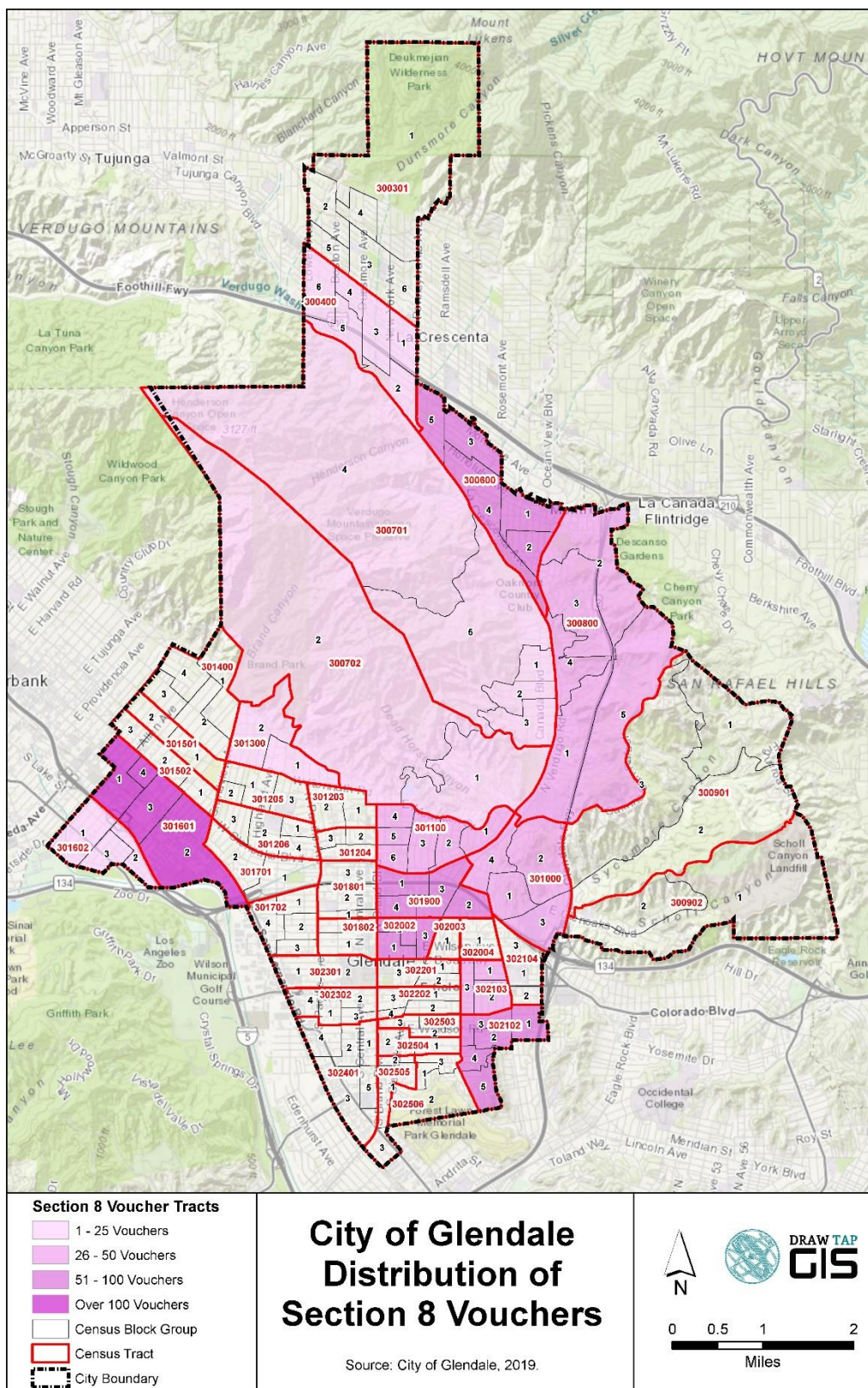
The City's Section 8 wait list has been closed since January 2001. During two weeks in 2001 when the wait list was open to accept applications, the City received over 12,000 applications for assistance. Due to the large number of applicants and limited funding, the waiting list is closed. Approximately 2,200 households are still on the wait list seeking assistance, for them, to date, that has been a 20 year wait time with approximately anywhere between 2 – 8 more years to wait until they can be served.

During the time the wait list was open, the City conducted extensive public outreach in the community at 12 community sites and prepared Section 8 registration materials/notices in English, Spanish, Armenian, & Arabic, Persian, Tagalog (Filipino), and Korean. Information on Section 8 assistance and fair housing is provided on the City's website, including fair housing complaint forms and descriptions of federal and State laws. With the extensive outreach efforts, the applicants show a more diverse racial/ethnic profile.

If selecting from the wait list, the Housing Authority will give priority to families that are:

- Homeless, living in a City shelter, and referred by the Homeless Coalition of Care;
- Homeless victims of domestic violence;
- Victims of hate crime reprisals or families approved under a Witness Relocation protection program;
- Families displaced of their housing due to government action occurring in the community; and
- U.S. Veterans and family, immediate family members of deceased veterans, and un-remarried survivor spouses.

**Figure 6: Distribution of Section 8 Voucher Recipients**



Source: Glendale Housing Authority, 2019.

## 2. Assisted Housing Projects

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

As in typical urban environments throughout the country, however, areas designated for high density housing in the City are usually adjacent to areas designated for commercial and industrial uses. Lower and moderate income households tend to live in high density areas, where the lower land costs per unit (i.e. more units on a piece of property) can result in lower development costs and associated lower housing payments. Therefore, the location of public/assisted housing is partly the result of economic feasibility.

Table 22 summarizes the publicly subsidized units in Glendale. Currently, a total of 37 apartment complexes in Glendale provide 1,113 units that are dedicated solely for occupancy by lower and moderate income households. The City also has 12 projects providing 531 units for seniors. These projects maintain affordability covenants and/or low-income use restrictions to ensure the long-term availability of these units as affordable housing.

Most of Glendale’s affordable housing stock is concentrated in the southern half of the City along Glendale Avenue and Central Avenue and near Cerritos Park. Nearly all of the City’s assisted housing is located in the City’s low/mod areas. The location of the City’s affordable housing is the result of a combination of factors, including financial feasibility and topographical considerations. Much of the land in the northern half of the City is comprised of steep hillside areas, which is considerably more expensive to develop housing on. The topography of northern Glendale makes the area much more suitable for low density market-rate single family development.

**Table 22: Assisted Rental Housing Inventory (2019)**

Project Name	Address	Target Population	Affordable Units	Assistance
David Gogian House	1239 Alma Street	Disabled	6	HOME, LMIHAF
Glendale Accessible Apartments	6200 San Fernando Road	Disabled	23	HOME, LMIHAF
Maple Park Apartments	711 E. Maple Street	Disabled	24	CDBG
Ivy Glen Apartments	113 N. Cedar Street	Disabled	24	LMIHAF
Chester Village	615 Chester Street	Disabled Homeless	4	HOME, Supporting Housing Program
Metro Loma Apartments	328 Mira Loma Street	Families	43	HOME, LMIHAF
Gardens on Garfield	303 E. Garfield Street	Families	29	HOME, LMIHAF
ACE 121	121 N Kenwood Avenue	Families	69	LMIHAF
Onyx Glendale Phase 1	313 W California Avenue	Families	4	Density Bonus

Project Name	Address	Target Population	Affordable Units	Assistance
Onyx Glendale Phase 2	304 Myrtle Street	Families	4	Density Bonus
The Link	3901 San Fernando Road	Families	12	Density Bonus
CC Tan Center Apartments	521 W Colorado Street	Families	5	Density Bonus
1407 W Glenoaks	1407 W Glenoaks	Families	5	Density Bonus
518 Glenwood Road	518 Glenwood Road	Families	1	Density Bonus
Glendale City Lights	3673 San Fernando Road	Families	67	HOME, LMIHAF
Vassar City Lights	1814 Vassar Avenue	Families	70	HOME, LMIHAF
910 Wilson Apartments	910 E. Wilson Avenue	Families	2	Density Bonus
Orange Grove Apartments	700 Orange Grove Avenue	Families	23	HOME
Metropolitan City Lights Apartments	1760 Gardena Avenue	Families	64	HOME, LMIHAF
Eleve Glendale	200 E. Broadway	Families	14	Density Bonus
Camden Glendale	3900 San Fernando Road	Families	22	Density Bonus
Vestalia Glendale	515 W Broadway	Families	8	Density Bonus
Veterans Village	331 Salem Street	Families/Veterans	43	HOME
1911 Gardena	1911 Gardena Avenue	Homeless	9	HOME
Euclid Villa Apartments	154-160 S. Euclid Avenue	Homeless	7	HOME, Supporting Housing Program
Vista Grande Court	1416 5th Street	Seniors	65	HOME, LMIHAF
Park Paseo Senior Apartments	123 S. Isabel Street	Seniors	96	CDBG
Palmer House Senior Apartments	555 E. Palmer Avenue	Seniors	21	LMIHAF
The Gardens Senior Apartments	333 Monterey Road	Seniors	74	LMIHAF
Monte Vista Senior Apartments	714 E. Elk Avenue	Seniors	10	HOME, LMIHAF
Otto Gruber Senior Apartments	143 S. Isabel Street	Seniors	39	HOME
Silvercrest Senior Apartments	323 W. Garfield Avenue	Seniors	73	LMIHAF
Heritage Park Senior Apartments	420 E. Harvard Street	Seniors	51	HOME, LMIHAF
Fairmont Senior Apartments	700 Fairmont Avenue	Seniors	38	Density Bonus
Honolulu Manor Senior Apartments	2500 Honolulu Avenue	Seniors	22	Density Bonus

Project Name	Address	Target Population	Affordable Units	Assistance
Cypress Senior Apartments	311 Cypress Street	Seniors	17	HOME
Twin Oaks Apartments	2840 Honolulu Avenue	Seniors	25	Density Bonus
Casa De La Paloma	133 S Kenwood St	Seniors	166	LMIHAF
<b>Total</b>			<b>1,279</b>	

*Source: City of Glendale, 2019.*

**Future Affordable Housing Opportunities**

In the face of the California housing crisis and despite the number of internal and external challenges in providing affordable housing options, the Glendale City Council and Housing Authority have taken significant and meaningful actions that will have a long-lasting impact on future affordable housing opportunities in Glendale.

Since adopting an affordable housing strategy containing specific action items to promote the development of more affordable housing across all segments of the community, the City has approved a slate of significant steps to address the issue of housing affordability in Glendale and in the region. Analysis and policy considerations by the City Council over the last two years has led to a slew of new and innovative policies and programs that will add to an already robust portfolio of affordable housing.

In just the last two years, the Glendale City Council/Housing Authority has:

- Authorized the acquisition of two Glendale properties that are designated to be developed as long term affordable housing for lower income residents by committing a combined \$25.5 million to acquire 4.4 acres of land. The acquisitions represent the most significant and largest investment the City has made to date for affordable housing purposes.

The first site, located at 515 Pioneer Drive, is made up of 2.8 acres that was listed for sale on the open market. The site has gone through an RFP process and is slated to be developed with 340 affordable family rental housing units. The affordable units will be reserved for households earning between 30 and 80 percent of the area median income, with the three remaining to be reserved for staff. The complex will also include an on-site parking garage with 342 lots.

The second site is located at 900-920 E. Broadway will be split and developed separately. 900 E. Broadway will be developed with a new construction, 127-unit affordable senior project called Citrus Crossing. 920 E. Broadway will consist of the historic preservation and adaptive reuse of the Harrower Lab campus at 912-920 E. Broadway, and development of a 40-unit affordable housing project for seniors called Harrower Village.

- Authored AB 1110, newly adopted statewide rental housing legislation that amended state law on rent increase noticing by requiring that when landlords of a residential dwelling with a month-to-month tenancy increases the rent by more than 10% of the amount of the rent charged to a tenant

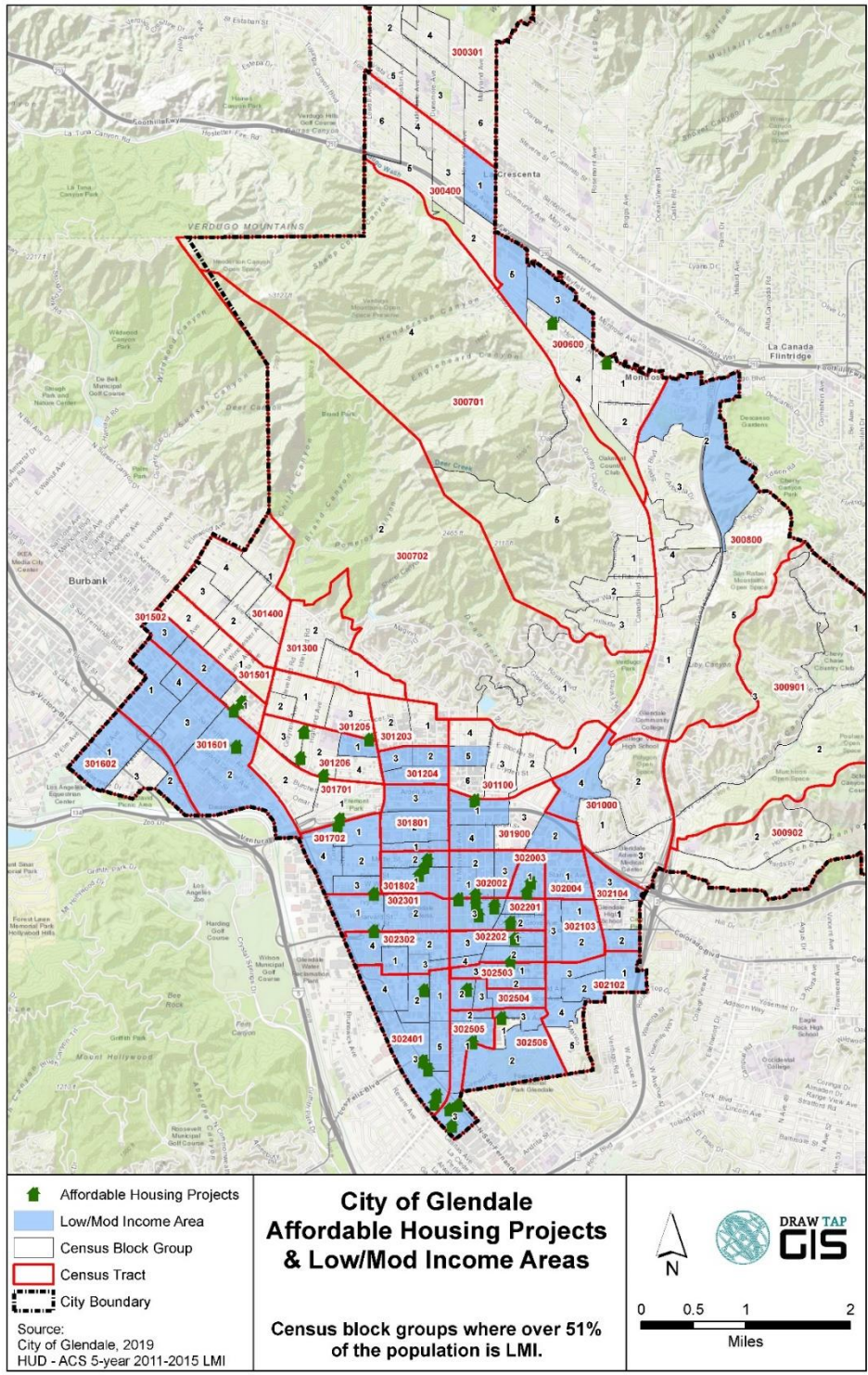


annually, as specified, the landlord shall provide an additional 30 days' notice, for a total of 60 days, before the effective date of the increase.

- Approved a Monthly Housing Subsidy Program, an \$8.4 million pilot program that will provide a \$300 monthly housing subsidy, for 24 months, to lower-income senior Glendale renter households. The purpose of the program is to assist extremely low-income senior renter households being impacted by rising rental rates, particularly those of lower income, who are rent burdened and disabled.
- Approved the Low Income Student Rental Assistance Program, an affordable housing program designed to provide rental housing assistance to low income, Glendale-based students who are living alone or with family, while also providing them supportive services such as education and employment support/skills. The program operated and administered by Glendale Community College (GCC), via its Glendale College Foundation programming for its "Fresh Success" program. \$1.3 million in funding was allocated to the program.

Approved the Low Income Family Employment and Rental Assistance Program a \$1.32 million program providing housing and employment assistance to low income families for a 12-month period. The goal is to support employment training and education activities or any other goals identified/set by the family and case manager for adults in working families to facilitate income progression. Ultimate goal would be to assist families so by the time of successful completion of the program the family members are left with the necessary tools to support themselves.

**Figure 7: Affordable Housing Projects**



- **Licensed Community Care Facilities**

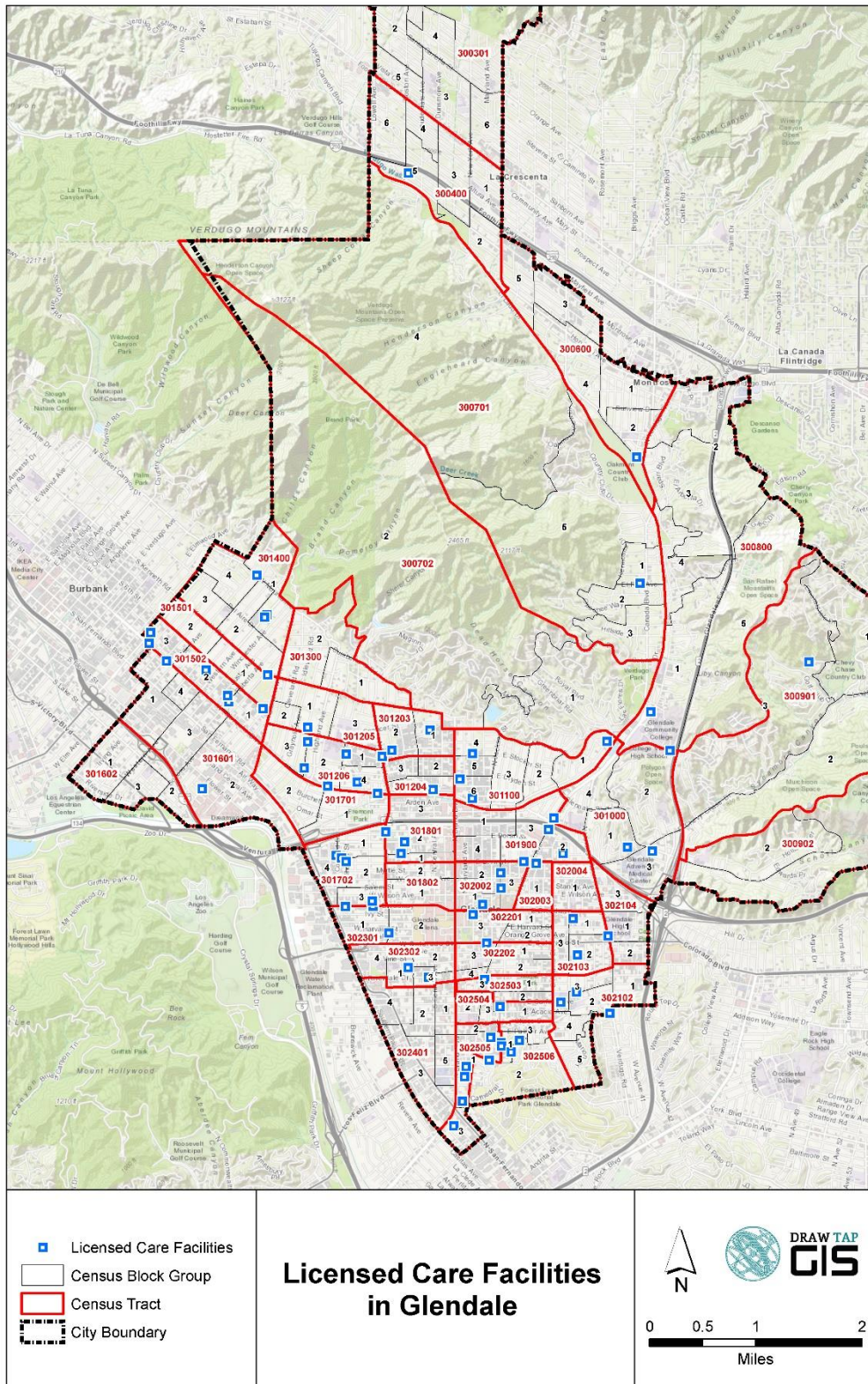
Persons with special needs, such as the elderly and those with disabilities, must also have access to housing in a community. Community care facilities provide a supportive housing environment to persons with special needs in a group situation. Restrictions that prevent this type of housing represent a fair housing concern.

According to the State of California Community Care Licensing Division of the State’s Department of Social Services, as of December 2019, there were 82 State-licensed community care facilities with a total capacity of 4,489 in Glendale (Table 23). The locations of these facilities are shown in Figure 8. Concentrations of licensed care facilities can be seen in the southern half of the City, south of State Route 134.

Type	Number of Facilities	Total Capacity
Adult Day Care	1	60
Adult Residential Care	8	51
Child Care Center	41	2,678
Infant Center	5	102
Residential Care for the Elderly	27	1,428
<b>Total</b>	<b>82</b>	<b>4,319</b>

*Source: State of California Department of Social Services, Community Care Licensing Division, 2019.*

**Figure 8: Licensed Care Facilities in Glendale**



Source: State of California Department of Social Services, Community Care Licensing Division, 2011.

## H. Disparities in Access to Opportunity

HUD has developed a series of indices for the purpose of fair housing assessment to help inform communities about disparities in access to opportunity. The HUD-provided index scores are based on nationally available data sources and assess City residents' access to key opportunity assets in Glendale. Table 24 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices.

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. ***The higher the score, the less exposure to poverty in a neighborhood.***
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. ***The higher the score, the higher the school system quality is in a neighborhood.***
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. ***The higher the score, the higher the labor force participation and human capital in a neighborhood.***
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). ***The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.***
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region/CBSA. ***The higher the index, the lower the cost of transportation in that neighborhood.***
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. ***The higher the index value, the better the access to employment opportunities for residents in a neighborhood.***
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. ***Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.***

As shown in Table 24, in Glendale, Hispanic residents were more likely (compared to other racial/ethnic groups) to be impacted by poverty and to have limited access to proficient schools. Hispanics were also more likely to use public transportation than other racial/ethnic groups and to have less access to higher proficiency schools.

<b>Table 24: Opportunity Indicators by Race/Ethnicity</b>							
City of Glendale	Poverty Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index	School Proficiency Index
<b>Total population</b>							
White, Non-Hispanic	54.24	76.91	57.59	83.34	86.70	50.84	15.22
Black, Non-Hispanic	46.82	76.54	51.76	85.73	90.31	58.54	11.09
Hispanic	43.93	76.79	48.62	85.75	90.25	56.28	10.96
Asian or Pacific Islander, Non-Hispanic	54.02	77.53	57.71	83.58	86.97	51.01	16.09
Native American, Non-Hispanic	53.57	77.44	58.90	84.37	88.36	57.94	14.47
<b>Population below federal poverty line</b>							
White, Non-Hispanic	40.92	76.37	45.96	87.20	91.61	55.44	10.01
Black, Non-Hispanic	28.58	75.57	33.97	88.49	93.56	74.94	6.51
Hispanic	31.05	75.95	38.56	88.36	94.25	63.67	5.86
Asian or Pacific Islander, Non-Hispanic	48.65	76.38	56.51	86.39	89.80	51.62	13.93
Native American, Non-Hispanic	36.58	74.09	28.63	88.32	94.42	73.71	7.05

*Note: American Community Survey Data are based on a sample and are subject to sampling variability.*

*Source: AFFHT Data Table 12; Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA*

## 1. Major Employers

Glendale serves as a major employment center for the region. The City is surrounded by Southern California's leading commercial districts, providing face to face opportunities with the largest client and vendor base in the world. With service from four major freeways, Glendale also connects directly to the Southern California marketplace. Businesses and residents alike have taken advantage of Glendale's central location, reputation for safety, excellent business environment, outstanding schools, healthcare facilities, and growing restaurant and entertainment options. The major employers within the City of Glendale are listed in Table 25.

**Table 25: Major Employers in Glendale (2010)**

Business	Address	# of Employees	% of Total City Employment
Glendale Adventist Medical Center	1509 Wilson Terrace Glendale, CA 91206	2,700	2.60%
Glendale Unified School District	223 N. Jackson Street, Glendale, CA 91206	2,617	2.52%
City of Glendale	613 E Broadway Glendale, CA 91206	2,025	1.95%
Dream Works Animation/NBC Universal	1000 Flower St, Glendale, CA 91201	1,685	1.62%
Glendale Community College	1500 North Verdugo Road Glendale, CA 91208	1,677	1.61%
Glenair Inc.	1211 Air Way Glendale, CA 91201	1,500	1.44%
Glendale Memorial Hospital	1420 S Central Ave, Glendale, CA 91204	1,075	1.03%
USC Verdugo Hills Hospital	1812 Verdugo Blvd, Glendale, CA 91208	850	0.82%
Public Storage	5500 San Fernando Rd, Glendale, CA 91203	366	0.35%
Acco Engineered Systems	6265 San Fernando Road Glendale, CA 91201	305	0.29%
<b>Total</b>		<b>14,800</b>	<b>14.23%</b>

*Source: City of Glendale Comprehensive Annual Financial Report, 2018.*

## 2. Public Transit

Public transit information is important to the Analysis of Impediments to Fair Housing, as access to public transit is of paramount importance to households affected by low incomes and rising housing prices. Public transit should link lower and moderate income persons, who are often transit dependent, to major employers where job opportunities exist. Access to employment via public transportation can reduce welfare usage rates and increase housing mobility, which enables residents to locate housing outside of traditionally lower and moderate income neighborhoods. The lack of a relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice because persons who depend on public transit will have limited choices regarding places to live. In addition, seniors and persons with disabilities also often rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Public transit that provides a link between job opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunities to access housing, services, and jobs.

Transit services in Glendale include the Beeline local transit system and the services provided by the Los Angeles County Metropolitan Transportation Authority (MTA). These systems combine to provide frequent transit service on many key streets in downtown Glendale. Transit service is offered at least every 10 minutes on Brand Boulevard, Central Avenue, San Fernando Road, Glendale Avenue, and Broadway. With service this frequent, riders do not need to carry a schedule; riders can depend on the next bus arriving soon after they reach their bus stop.

The Beeline system consists of seven fixed routes serving Glendale and two express routes with service from the Glendale's train station known as the Glendale Transportation Center (GTC) to downtown Glendale as well as to Grand Central Business District. The Beeline system provides greater service frequency on the most heavily used local streets.

GTC, located at 400 West Cerritos Avenue hosts Metrolink and Amtrak train service. The depot was originally constructed in 1923 and was extensively renovated in 1999. GTC serves as a central transportation hub for Glendale, and is within walking distance of the City's "transit-oriented" affordable housing developments. Several public transportation systems, including Amtrak, Metrolink, Greyhound, Metro, and the Glendale Beeline, utilize GTC. In addition, the City provides Dial-A-Ride service to seniors and persons with disabilities.

Despite this network of high frequency transit services, many residents in Glendale find transit services inadequate, or are unaware of the level of service actually provided. Many people who are likely to use public transit are concentrated in the southern part of the City. In order to serve this significant population of bus patrons, most of the bus routes in the City pass through or are concentrated in these areas. Some areas such as Chevy Chase Canyon, the La Crescenta area, and northwest Glendale are more than ¼-mile from a bus route. It is difficult to extend public transportation to these areas because of low housing densities.

Lower income workers, especially female heads of household with children, have unique travel patterns that may prevent them from obtaining work far from home, regardless of access to public transit. Women in general are disproportionately responsible for household-supporting activities such as trips to grocery stores or to accompany young children to and from schools. Women using public transit are often limited to looking for employment near home that will allow them time to complete these household-sustaining trips.





# Chapter 4: Lending Practices

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

## A. Background

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

### 1. Legislative Protection

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

#### a) *Community Reinvestment Act and Home Mortgage Disclosure Act*

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

CRA ratings are provided by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC). However, the CRA rating is an overall rating for an institution and does not provide insights regarding the lending performance at specific locations by the institution.

### *b) Home Mortgage Disclosure Act*

In tandem with the CRA, the HMDA requires lending institutions to make annual public disclosures of their home mortgage lending activity. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants.

HMDA data provide some insight into the lending patterns that exist in a community. However, HMDA data are only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices due to the lack of detailed information on loan terms or specific reasons for denial. The City should continue to monitor the approval rates among racial/ethnic and income groups and continue to take appropriate actions to remove barriers to financing.

### *c) Conventional versus Government-Backed Financing*

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. To assist lower and moderate income households that may have difficulty in obtaining home mortgage financing in the private market, due to income and equity issues, several government agencies offer loan products that have below market rate interests and are insured (“backed”) by the agencies. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHA/FSA). Often, government-backed loans are offered to the consumers through private lending institutions. Local programs such as first-time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements.

### *d) Financial Stability Act*

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

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

### *e) Fraud Enforcement and Recovery Act*

The Fraud Enforcement and Recovery Act (FERA) enhances the criminal enforcement of federal fraud laws by strengthening the capacity of federal prosecutors and regulators to hold accountable those who have committed fraud. FERA amends the definition of a financial institution to include private mortgage brokers and non-bank lenders that are not directly regulated or insured by the federal government, making them liable

under federal bank fraud criminal statutes. The law also makes it illegal to make a materially false statement or to willfully overvalue a property in order to manipulate the mortgage lending business.

## B. Overall Lending Patterns

### 1. Data and Methodology

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

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

Table 26 summarizes the disposition of loan applications submitted to financial institutions in 2012 and 2017 (most recent HMDA data available) for home purchase, refinance, and home improvement loans in Glendale. Included is information on loan applications that were approved and originated, approved but not accepted by the applicant, denied, withdrawn by the applicant, or incomplete.

Loan Type	Total Applicants		Percent Approved		Percent Denied		Percent Other	
	2012	2017	2012	2017	2012	2017	2012	2017
Conventional Purchase	1,917	1,975	59%	64%	12%	5%	9%	13%
Government-Backed Purchase	221	69	51%	51%	9%	9%	14%	14%
Home Improvement	252	433	55%	59%	20%	19%	8%	18%
Refinance	9,264	3,489	56%	52%	14%	15%	13%	20%
<b>Total</b>	<b>11,654</b>	<b>5,966</b>	<b>56%</b>	<b>56%</b>	<b>14%</b>	<b>12%</b>	<b>12%</b>	<b>18%</b>

*Source: www.lendingpatterns.com, 2019.*

### 2. Home Purchase Loans

In 2012 and 2017, relatively the same number of households applied for conventional loans to purchase homes in the City, only 58 more applications were received in 2017 as compared to 2012.

The approval rate in 2017 for conventional home purchase loans was approximately 64 percent, while five percent of applications were denied. In 2012, 59 percent of conventional home loan applications were approved and 12 percent were denied.

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

Government-backed loans generally have more lenient credit score requirements, lower down payment requirements, and are available to those with recent bankruptcies. However, these loans may also carry higher interest rates and most require homebuyers to purchase mortgage insurance. Furthermore, government-backed loans have strict limits on the amount a homebuyer can borrow for the purchase of a home. The number of government-backed loans has decreased since 2012 with only 69 applications in 2017 as compared to 221 in 2012. Approval rates for government-backed loans were lower than the approval for conventional home purchase loans. Of the government-backed loan applications in 2017, approximately 51 percent were approved and nine percent were denied. It is interesting to note that government-backed loans in 2012 and 2017, even with a different number of applications, had the same approval, denial and other rates as denoted in Table 26.

### **3. Home Improvement Loans**

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

In 2017, 433 households applied for conventional home improvement loans compared to only 252 households in 2012. Approval rates for home improvement loans have increased since 2012 (55 percent) now at 59 percent, however the denial rate has stayed high in comparison to other loan types. Home improvement loans had a denial rate of 19 percent.

In 2017, 433 households applied for conventional home improvement loans compared to only 252 households in 2012. A lower percentage of home improvement loans were approved (59 percent) in 2017 than conventional home purchase loans (64 percent). Denial rates were also higher, at 19 percent compared to five percent for conventional home purchase loans.

### **4. Refinancing**

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

The number of refinance applications received in 2017 dropped significantly from 2012, approximately 62

percent. The approval rate for refinance loans in 2017 (52 percent) was comparable to the approval rate of government backed home purchase loans (51 percent). The percent of refinance loans denied has stayed the same, but the amount of loan applications withdrawn or unfinished has increased by seven percent similar to conventional purchase loan and home improvement loan applications.

### C. Lending Patterns by Race/Ethnicity and Income Level

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

In the ideal situation, the applicant pool for mortgage lending should be reflective of the demographics of a municipality. When one racial/ethnic group is overrepresented or underrepresented in the total applicant pool, it could be an indicator of a possible fair housing issue. Such a finding may be a sign that access to mortgage lending is not equal for all individuals. As shown in Table 27, White and Hispanic applicants were noticeably underrepresented in the loan applicant pool during 2017.

Race/Ethnicity	Percent of Applicant Pool	Percent of Total Population	Variation
White	61%	71%	-10%
Black	1%	1%	0%
Hispanic	6%	17%	-11%
Asian	12%	16%	-4%

*Note: Percent of total population estimates are based on 2017 applicant data and compared to total population estimates from the 2010 Census.*  
*Source: Bureau of the Census, 2010; www.lendingpatterns.com, 2019.*

In addition to looking at whether access to lending is equal, it is important to analyze lending outcomes for any signs of potential discrimination by race/ethnicity. When looking at approval rates for loans, it is generally seen that as household income increases so does the rate of approval; however, lending outcomes should not vary significantly by race/ethnicity among applicants of the same income level. Table 28 summarizes lending outcomes in the city by race/ethnicity and income. In 2012 and 2017, approval rates were generally comparable among different races/ethnicities (around 60 percent) at the upper income level. However, for lower income households, approval rates varied by year and race/ethnicity. In 2012, approval rates for lower income Whites, Blacks, and Asian were similar but higher than approval rates for Hispanics. By 2017, approval rates had decreased for all races/ethnicities of lower income, but White applicants had the highest approval rates (38 percent) followed by Hispanics and Asians, while Black applicants had the lowest approval rates (19 percent).

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

Source: [www.lendingpatterns.com](http://www.lendingpatterns.com), 2019.

## D. Lending Patterns by Census Tract Characteristics

### 1. Income Level

To identify potential geographic differences in mortgage lending activities, an analysis of the HMDA data was conducted by Census tract for 2012 and 2017. HMDA also provides the minority population percentage within each census tract.

Based on the Census, HMDA defines the following income levels:

- Low Income Tract – Tract Median Income ≤ 50 percent AMI
- Moderate Income Tract – Tract Median Income between 51 and 80 percent AMI
- Middle Income Tract – Tract Median Income between 81 and 120 percent AMI
- Upper Income Tract – Tract Median Income ≥120 percent AMI

In 2017, there were no applicants that were categorized as low income by HMDA but there were applications among the moderate, middle, and upper income tracts. Table 29 below summarizes the home loan approval and denial rates of the City's census tracts by income level for 2012 and 2017. In 2012 home loan approval rates generally increased as the income level of the census tract increased. In 2017 there were significantly less applicants that live within middle income tracts. Even though there were less applicants in tracts

considered middle income, they also had a lower approval rating compared to other income levels. In both 2012 and 2017, the denial rates were actually higher for higher income tracts.

Tract Description	Total Applications		% Approved		% Denied	
	2012	2017	2012	2017	2012	2017
Low Income	83	0	0.4%	0%	0.2%	0%
Moderate Income	1,837	1,523	9%	14%	4%	8%
Middle Income	3,875	871	19%	8%	9%	5%
Upper Income	5,859	3,572	29%	34%	12%	17%
<b>Total</b>	<b>11,654</b>	<b>5,966</b>				

*Source: www.lendingpatterns.com, 2019.*

## 2. Minority Population

HMDA also provides the minority population percentage within each census tract. Table 30 summarizes the home loan approval and denial rates of census tracts in the city by the proportion of minority residents during 2012 and 2017. A census tract with more than 51 percent minority population is considered “substantially minority.” In general, the approval rates and denial are comparable in neighborhoods that were considered substantially minority versus those that were not.

Tract Description	Total Applications		% Approved		% Denied	
	2012	2017	2012	2017	2012	2017
<10% Minority	0	0	0%	0%	0%	0%
10 - 20% Minority	483	670	75%	64%	11%	14%
20 - 50% Minority	10,662	4,836	70%	68%	14%	11%
50 - 80% Minority	509	460	65%	68%	18%	13%
>80% Minority	0	0	0%	0%	0%	0%
<b>Total</b>	<b>11,654</b>	<b>5,966</b>				

*Source: www.lendingpatterns.com, 2019.*

## E. Major Lenders Serving Glendale

In 2017, the top ten mortgage lenders in the City of Glendale received approximately 66 percent of the conventional home mortgage loan applications. Among these lenders, Bank of America, Wells Fargo, Skyline Financial and Chase received the most home purchase loan applications. These top four lenders received approximately 49 percent of all conventional home purchase loan applications.

### 1. Approval Rates by Lender

An analysis of the disposition of conventional home purchase loan applications by lending institution in Table 31 indicates that approval rates among the top lenders in Glendale varied significantly. In 2012 and 2017, most of the top lenders had varying approval rates. The approval rates of the top four institutions were all generally the same level in 2012 and 2017, and the average approval rate for the top institutions (53 percent)



was similar to the City’s average approval (56 percent). Five of the top ten for 2017 were not on the list in 2012. The new list is indicating applicants who are starting to use online lenders more often with companies such as Quicken Loans and Shore Mortgage climbing the ranks.

**Table 31: Top Lenders (2012 and 2017)**

Lender	Overall Market Share		Approved		Denied		Withdrawn or Closed	
	2012	2017	2012	2017	2012	2017	2012	2017
JP Morgan Chase Bank	9.0%	8.8%	58.2%	63.7%	22.4%	4.8%	4.1%	7.6%
Wells Fargo Bank	18.3%	8.2%	34.0%	39.5%	9.0%	15.8%	12.5%	13.1%
Skyline Financial Corp	2.8%	4.8%	76.1%	77.1%	7.5%	3.1%	16.5%	19.8%
Bank of America	4.7%	3.6%	60.8%	54.7%	21.1%	15.0%	14.6%	19.6%
Nationstar Mortgage	--	2.9%	--	13.7%	--	14.3%	--	66.9%
US Bank National Association	--	2.7%	--	48.1%	--	18.8%	--	13.1%
Homebridge Financial Services	--	2.5%	--	70.5%	--	4.7%	--	24.8%
Shore Mortgage	--	2.5%	--	69.6%	--	17.6%	--	12.8%
Quicken Loans, Inc	--	2.4%	--	70.4%	--	23.9%	--	5.6%
Flagstar Bank	4.2%	2.3%	64.7%	56.8%	8.4%	10.1%	8.6%	4.3%
<b>Total All Lenders (Entire Market)</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52.1%</b>	<b>53.3%</b>	<b>13.6%</b>	<b>11.8%</b>	<b>16.1%</b>	<b>20.6%</b>

*Source: www.lendingpatterns.com, 2019.*

## F. Subprime Lending

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

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

Subprime lending can both impede and extend fair housing choice. On the one hand, subprime loans extend credit to borrowers who potentially could not otherwise finance housing. The increased access to credit by previously underserved consumers and communities contributed to record high levels of homeownership among minorities and lower income groups. On the other hand, these loans left many lower income and

minority borrowers exposed to default and foreclosure risk. Since foreclosures destabilize neighborhoods and subprime borrowers are often from lower income and minority areas, mounting evidence suggests that classes protected by fair housing faced the brunt of the recent subprime and mortgage lending market collapse.<sup>3</sup>

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

The frequency of loans with reported spread has increased since 2012. While just under one percent of loans in 2012 had a reported spread, 1.89 percent of loans reported a spread by 2017 (Table 32). Since 2012, the frequency of spread has increased for all racial/ethnic groups, but most notably for Hispanic and White applicants. However, the average spread did not increase significantly. In fact, average spread decreased for Hispanic and Asian applicants.

<b>Race/Ethnicity</b>	<b>Frequency of Spread</b>		<b>Average Spread</b>	
	<b>2012</b>	<b>2017</b>	<b>2012</b>	<b>2017</b>
White	0.83	2.24	2.15	2.55
Black	0.00	0.00	0.00	0.00
Hispanic	0.57	1.88	3.43	2.40
Asian	0.75	1.53	2.88	2.27
<b>Total</b>	<b>0.77</b>	<b>1.89</b>	<b>2.40</b>	<b>2.57</b>

*Source: www.lendingpatterns.com, 2019.*

<sup>3</sup> *Foreclosure Exposure: A Study of Racial and Income Disparities in Home Mortgage Lending in 172 American Cities. Association of Community Organizations for Reform Now. September 2007.*



# Chapter 5: Public Policies

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Public policies established at the regional and local levels can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. Public policies refer to land use regulations, housing policies, transit accessibility, and other factors that impact housing in Glendale. Fair housing laws are designed to encourage an inclusive living environment and thus require a community to analyze governmental regulations that may impede fair housing opportunity. This section reviews the City's General Plan, Housing Element, Zoning Code, Consolidated Plan, existing Fair Housing Plan, and other documents to analyze governmental regulations that may impact fair housing.

## **A. Policies and Programs Affecting Housing Development**

The General Plan of a jurisdiction establishes a vision for the community and provides long-range goals and policies to guide the development in achieving that vision. Two of the seven State-mandated General Plan elements – Housing and Land Use Elements – have direct impact on the local housing market in terms of the amount and range of housing choice. The Unified Development Code, which implements the Land Use Element, is another important document that influences the amount and type of housing available in a community – the availability of housing choice.

### **1. Housing Element Law and Compliance**

As one of the State-mandated elements of the local General Plan, the Housing Element is the only element with specific statutory requirements and is subject to review by the State Department of Housing and Community Development (HCD) for compliance with State law. Housing Element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that, for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. Specifically, the Housing Element must:

- Identify adequate sites which will be made available through appropriate zoning and development standards and with services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the community's housing goals;
- Assist in the development of adequate housing to meet the needs of lower and moderate income households;
- Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing;
- Conserve and improve the condition of the existing affordable housing stock; and
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, disability, sexual orientation, gender identification, or any other arbitrary factor.

### *a) Compliance Status*

A Housing Element found by HCD to be in compliance with State law is presumed to have adequately addressed its policy constraints. The City of Glendale's Housing Element was found to be in compliance by HCD on February 24, 2014 and subsequently adopted. The City is in the process of updating its Housing Element for the 2021-2029 planning period. This 6<sup>th</sup> cycle update is due October 15, 2021. As part of that update, the City will be assessing its compliance with new State laws, as well as its land use policies and development regulations in facilitating the development of a range of housing options in the community.

## **2. Land Use Element**

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

The City's General Plan has six primary land use designations that permit residential uses. In addition, mixed-use and Specific Plan areas also permit residential uses. It should also be noted that residential uses are permitted in commercial zones, subject to limitations. Together with implementation measures in the Zoning Code, the Land Use Element establishes the types of residential uses permitted in Glendale. Table 33 describes the City's major land use designations, corresponding residential densities, and types of housing allowed in each district. Specific Plan areas are not included in this table because each Specific Plan area has unique standards relating to residential uses.

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

Glendale's Land Use Element includes three designations (Mixed-use, Medium High, and High Density Residential) that allow for high-density residential uses. The City has established sufficient minimum required densities in the Medium High and High Density residential zones in order to ensure that residential projects build at, or very near, the maximum density allowed in order to efficiently utilize available residential land.

Mixed-use development areas are generally located along the City's major arterials. These areas allow for a compatible mix of commercial, industrial, and residential land uses, or just (stand-alone) commercial, industrial, or residential land uses in various combinations depending on the specific zoning district designation. Residential densities generally range from a low of 35 to a high of 100 dwelling units to the acre (du/ac), with the specific density adjusted depending on the adjoining land use and zoning district designation

to help ensure compatibility between land uses. For example, the 35 du/ac density is available to sites abutting a single-family zoning district designation, the 87 du/ac density is available to sites abutting a multi-family zoning district, while the highest allowable density of 100 du/ac is only available to sites abutting nonresidential zoning districts. Residential development (mixed-use or free-standing) at even higher densities may be permitted in the Downtown area and is discussed under the Downtown Specific Plan area land use category.

<b>Table 33: Residential Land Use Categories</b>		
<b>General Plan Land Use Designation</b>	<b>Density (du/acre)</b>	<b>Residential Type</b>
Very Low Density Residential	1.0-3.0	Development is indicated as desirable in respect to Glendale's major mountainous areas, in the Verdugo Mountains, San Rafael Hills, and the lower slopes and canyons of the San Gabriel Mountains.
Low Density Residential	1.0-8.0	Development is compatible with Glendale's existing single-family developed neighborhoods and vacant subdivided properties. The plan designates that these neighborhoods and properties be preserved and maintained at existing levels.
Moderate Density Residential	9.0-14.0	Development areas are sparsely located in the western, southeastern, and northern portions of the City and reflect locations for townhouse complexes mixed with medium-sized garden apartments. These locations are ideal with respect to convenience and access to the regional transportation network as well as functioning as buffer or transition areas between intensive development and areas designated for less intensive uses.
Medium Density Residential	15.0-19.0	Development is located mainly in the southern portions of the City, south of the Ventura Freeway. Small pockets occur in the western and northern portions. Intended for these areas are medium size garden apartments.
Medium High Density Residential	20.0-26.0	Development is located sparsely in North Glendale and Central Glendale. Intended for these areas are medium-sized garden apartments.
High Density Residential	27.0-35.0	Development is generally centered around the Downtown Specific Plan area with a relatively small pocket located in North Glendale. These locations provide ideal access to the regional freeway network as well as close-in convenience to the major shopping facilities of the Central Business District. The standards provide for relatively large multiple dwelling complexes.

*Source: City of Glendale, Land Use Element & Amendments. [www.ci.glendale.ca.us/planning/plangenerallanduselement.asp](http://www.ci.glendale.ca.us/planning/plangenerallanduselement.asp).*

### 3. Zoning Code

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

#### a) Definition of Family

A community's Zoning Code can potentially restrict access to housing for households failing to qualify as a "family" by the definition specified in the Zoning Code. For instance, a landlord may refuse to rent to a

“nontraditional” family based on the zoning definition of a family. A landlord may also use the definition of a family as an excuse for refusing to rent to a household based on other hidden reasons, such as household size. Even if the code provides a broad definition, deciding what constitutes a “family” should be avoided by jurisdictions to prevent confusion or give the impression of restrictiveness.

California court cases<sup>4</sup> have ruled that a definition of “family” that: (1) limits the number of persons in a family; (2) specifies how members of the family are related (i.e. by blood, marriage or adoption, etc.), or (3) denotes that a group of not more than a certain number of unrelated persons can serve as a single housekeeping unit, is invalid. Court rulings stated that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the jurisdiction, and therefore violates rights of privacy under the California Constitution. A Zoning Code also cannot regulate residency by discrimination between biologically related and unrelated persons. Furthermore, a zoning provision cannot regulate or enforce the number of persons constituting a family.

The City of Glendale Zoning Code does not include a definition of “family.”

#### *b) Definition of Disability*

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

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

The Glendale Zoning Code was amended to include a definition of “disability” as part of Ordinance 5810 adopted by the City Council on October 1, 2013.

#### *c) Density Bonus*

Under the provisions of Section 65915-65918 of the California Government Code, when a developer agrees to provide a certain percentage of units as affordable to various income households or for senior housing, the City is required to grant certain specified concessions to the developer. The Glendale density bonus incentive for lot consolidation is considered “by-right” density and serves as the base density for calculating the state density bonus provisions for affordable housing. The amount of density bonus for affordable housing is based on the amount by which the percentage of affordable units exceeds the percentage established by housing type up to a 35 percent density bonus (See Table 30.36 of the Glendale Municipal Code). For example, a 20,000 square foot lot in the R-1250 Zone with at least 90 feet of lot width would be eligible for 20 units or a “by-right” density of one unit per 1,000 square feet of lot area, rather than the 16 units or one unit per 1,250 square feet per lot area for similarly zoned lots with less width. If each of these projects proposed to provide 10 percent of the units as affordable to lower income households, then each would be

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<sup>4</sup> *City of Santa Barbara v. Adamson (1980), City of Chula Vista v. Pagard (1981), among others.*

eligible for a 20 percent density bonus. The project with the lot density bonus would be eligible for a total of 24 units, with 10 percent or two units affordable to low income residents. The project without the lot density bonus would be eligible for a total of 19 units, with 10 percent or two units affordable to low income residents. However, recent changes to the State density bonus law will necessitate the City to amend the current Density Bonus ordinance to be consistent with State guidelines.

Furthermore, all multiple dwelling zones other than the R-3050 (Moderate Density Residential) zone in the City allow a 25 percent density bonus when a property is 90 feet wide or more. Thus the density of property in the R-2250 (Medium Density Residential) Zone can be increased from 19 units per acre to 24 units per acre, the density of property in the R-1650 (Medium High Density Residential) Zone can be increased from 26 units per acre to 33 units per acre and the density of property in the R-1250 (High Density Residential) Zone can be increased from 35 units per acre to 43 units per acre by combining smaller lots for larger more efficient sites. Since much of the land with these zoning categories is located near major streets, this lot consolidation ordinance permits the development of increased density near transportation corridors. This provision was also intended to promote large development that can theoretically offer more amenities and outdoor space. In addition to the lot width density bonus, the City proactively encourages the use of density bonuses for affordable and senior housing projects as provided under State law.

In addition to the residential zones, the Downtown Specific Plan (DSP) area in the downtown core allows up to 100 dwelling units to the acre; even higher densities may be permitted in the Downtown area and is discussed further in the DSP. The SFMU (Commercial/Residential Mixed Use) and IMU-R (Industrial/Commercial-Residential Mixed Use) zones allow density at up to 100 dwelling units to the acre on properties that do not abut a residential zone; up to 87 units to the acre on properties abutting a multi-family zone; and up to 35 units per acre on properties abutting a single-family zone. In addition, the C1, C2, and C3 Zones allow residential development at the R-1250 standard except that a conditional use permit is required for residential use at the ground floor level. The CR (Commercial Retail) Zone in downtown Montrose also allows residential development at the R-1250 standard, but residential use is prohibited at the ground floor level.

#### *d) Parking Requirements*

Parking standards are critical to encourage circulation by modes other than automobiles, prevent traffic congestion caused by a shortage of parking spaces, to maximize efficiency, protect the public safety, provide for the special needs of the physically handicapped, and, where appropriate, insulate surrounding land uses from their impact. City parking standards are designed to ensure that sufficient on-site spaces are available to accommodate vehicle ownership rates of residents, the needs of the businesses, and the actual parking required for special needs housing, while encouraging use of other modes of transportation. Table 34 sets forth the general standards for off-street parking space requirements.



<b>Residential Use</b>	<b>Number of Required Spaces</b>
Single-family detached dwellings in the R-3050, R-2250, R-1650, R-1250, SFMU, IMU and IMU-R zones where more than one dwellings unit exists on a lot; and duplexes, multi-family dwellings, condominiums, and townhouses in all zones.	Efficiencies of up to 1,500 sq. ft. and 1 bedroom units – 2 spaces
	2 bedroom units – 2 spaces
	Efficiencies of 1,501 to 2,000 sq. ft. and 3 bedroom units – 2.5 spaces
	Efficiencies of more than 2,000 sq. ft. and any unit containing 4 or more bedrooms – 3 spaces
	Guest parking – 1/4 space per unit for residential projects of 4 or more units in the R-3050, R-2250, R-1650, R-1250, SFMU, IMU and IMU-R zones. In the PRD zone, 1 uncovered guest space per dwelling unit in addition to enclosed parking spaces
Dwelling units in the DSP zone	1 bedroom units – 1 space
	Units of 2 bedrooms or more – 2 spaces, except that only 1 parking space is required for each senior residential unit
	Guest parking – 1 space per 10 units for projects with 10 or more units
Senior housing	1 space per unit in projects with more than 1 dwelling unit
Residential congregate care facilities	1 space for every 3 residents
Residential congregate care facilities, limited	See single-family dwellings
Single-family dwellings Domestic Violence Shelter	Cumulative Gross Floor Area of dwelling: 0-3,499 sq. ft. – 2 spaces
	3,500 - 5,999 sq. ft. – 3 spaces
	6,000 - 7,999 sq. ft. – 4 spaces
	8,000+ sq. ft. – 5 spaces
Live/work units	3 spaces for the first 2,000 sq. ft. and 3 spaces per 1,000 sq. ft for any additional floor area over 2,000 sq. ft.
Affordable Housing with Density Bonus Incentives	Zero to 1 bedroom units – 1 space
	2 to 3 bedroom units – 2 spaces
	4 or more bedroom units – 2.5 spaces

*Source: City of Glendale, Zoning Code, 2019.*

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

Glendale’s parking space requirements are generally two spaces or less per unit, and generally match the vehicle ownership patterns and parking needs of residents. Parking for multi-family projects is required to be semi- or subterranean; this requirement can be waived through the concessions and waivers process for density bonus projects. Because of this, parking is not considered an impediment to the development of housing and special needs housing.

e) *Variety of Housing Opportunity*

To ensure fair housing choice in a community, a Zoning Code should provide for a range of housing types, including single-family, multi-family, second dwelling units, mobile and manufactured homes, licensed residential care facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. Table 35 provides a summary of the City’s Zoning Code as it relates to ensuring a variety of housing opportunities.

The City’s Downtown Specific Plan allows for residential development in all districts except the Civic Centers. A goal of the specific plan is to encourage infill development, especially mixed-use and residential uses, in designated areas of Downtown.

Residential Use	Residential Allowed										
	ROS	R1R	R1	R-3050	R-2250	R-1650	R-1250	IMU	IMU-R	SFMU	IND
Apartments, Duplexes, Condominiums and Townhomes				P	P	P	P	P	P	P	
Emergency Shelters								P			P
Domestic Violence Shelter	P	P	P	P	P	P	P	P	P	P	P
Live/Work Unit								C	C	P	C
Mixed Use								C	C	P	P
Mobile Homes and Manufactured Housing	P	P	P	P	P	P	P				
Accessory Dwelling Units	P	P	P	P	P	P	P	P	P	P	P
Senior Housing				P	P	P	P		C	P	
Single-family Residence	P	P	P	P	P	P	P				
Single Room Occupancy (SRO)								C	C	C	
Sorority or fraternity houses and dormitories					C	C	C				
Residential Congregate Care Facilities (up to 6 persons)	P	P	P	P	P	P	P	C	C	P	
Residential Congregate Care Facilities (more than 6 persons)								C	C	C	C

*Source: City of Glendale, Zoning Code, 2019.*

**Multi-family Uses**

Apartments and other multi-family residences are allowed in all of the City’s multi-family zones, mixed use zones, commercial zones, and in the downtown area.

## Emergency Shelters

An emergency shelter provides housing with minimal supportive services for homeless persons and is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay (Health and Safety Code Section 50801[e]). State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (Government Code Section 65583[c][1]). Changes to State law (SB 2) in 2008, require that local jurisdictions make provisions in the zoning code to permit emergency shelters by right and with a ministerial approval process in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish limited and objective standards to regulate the development of emergency shelters.

Emergency shelters, at this time, are permitted by-right in the City's Industrial (IND) and Industrial Mixed-use zones, and in the IMU zone. Approximately 300 acres lie in the IND zone which is comprised of 407 parcels which could be suitable for emergency shelter uses. The IND Zone has no required street front, street side, or interior setback requirement, except for a 15-foot setback when abutting a residential zone. The IND Zone is applied to areas appropriate for live/work housing and industrial activities including, but not limited to, assembly, entertainment production, manufacturing, research and development, service, and testing activities, in conformance with the General Plan. IND Zones are primarily located west of the San Fernando Road corridor and north of State Route 134. This zone contains a mix of uses, including manufacturing and some older residential neighborhoods. Public transportation is readily available to serve properties in the IND Zones, with bus service from San Fernando Road and links to the Glendale and Burbank Metrolink stations.

Zoning standards for emergency shelters allow by-right emergency shelter uses in the IND and IMU zones. Development of new buildings in the IND Zone, including emergency shelters, is subject to the same building standards as other uses in this zone. Additionally, there are a number of vacant structures in the IND Zone which could be converted to emergency shelter use, at less cost than development of new structures. Development of emergency shelters in the IND Zone allows opportunities for shared parking which may further reduce costs for shelter operation. In 2010, the City granted approval of an emergency shelter for PATH Achieve Glendale, located in the IMU-R zone.

Emergency shelters are conditionally permitted in the C2 and C3 commercial zones. Other uses in this zone which require CUPs are live/work units, residential congregate care facilities, residential units on the first floor, night clubs, schools, and taverns. What these uses share in common is that they are sensitive uses which may impact and be impacted by neighboring residential areas. This requirement for a conditional use permit is not to prevent development, but rather to ensure that the development is compatible with neighboring properties. There are no standards applicable to emergency shelters which are not applicable to other residential uses in the C2 and C3 zones.

Domestic violence shelters are a specific type of emergency shelter and are permitted throughout the City in every residential zone (ROS, R1R, R1, R-3050, R-2250, R-1650, R-1250), every commercial zone (C1, C2, C3, CR, CPD), every mixed use zone (IMU, IMU-R and SFMU), and in the industrial zone (IND). No conditional use permit is required for a domestic violence shelter and there are no standards for domestic violence shelters which do not apply generally to other uses within applicable zones. Domestic violence shelters are subject to different public noticing requirements which keep the location of such facilities

confidential for the protection of residents and service providers. Therefore, zoning encourages development of domestic violence shelters. Depending on the individual characteristics of a proposal, emergency shelters and transitional housing are permitted by-right throughout the City's various zoning districts. A domestic violence shelter can be similar to residential uses that are permitted by-right in all single-family and multi-family residential zones of the City.

On October 1, 2013, the City Council approved the removal of the distance requirement for emergency shelters in the Zoning Code. Furthermore, recent changes to State law require additional changes to the City's Emergency Shelter Ordinance:

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

This City will need to make changes to their Emergency Shelter Ordinance to comply with new States laws.

### **Live/Work Uses**

A live/work unit is an integrated dwelling unit and working space, occupied and utilized by a single housekeeping unit in a structure that has been modified or designed to accommodate joint residential occupancy and work activity, and which includes complete kitchen and sanitary facilities in compliance with applicable building standards, and working space reserved for and regularly used by one or more occupants of the unit, in addition to any other employees. The commercial use must be one permitted by the applicable land use tables. Live/work residential units are permitted by-right in the mixed use SFMU zone and above the first floor on lots having frontage on San Fernando Road, Broadway and Colorado Street, and conditionally permitted in the IMU, IMU-R, and IND zones.

### **Mixed-Use**

Projects that have both residential and commercial land uses are permitted by-right on certain properties in the Commercial/Residential Mixed Use (SFMU) Zone and in the commercial (C1, C2, C3, and CR) zones, provided that the ground floor is occupied with permitted commercial uses. Projects with residential on the ground floor are conditionally permitted in the C1, C2, C3 and IMU-R zones. Mixed-use residential projects are also allowed in the Downtown Specific Plan and in the Town Center Specific Plan areas, subject to certain conditions.

### **Mobile Homes and Manufactured Housing**

Mobile homes and manufactured homes are permitted subject to the same zoning restrictions as single-family residences. The City of Glendale has no mobile home parks and mobile home parks are not permitted in the City.

## **Accessory Dwelling Units (also known as Second Units)**

In recent years, the State has amended the legislation on Second Units, renaming it as Accessory Dwelling Units (ADU). The amendments are intended to remove constraints to the development of ADUs, such as parking, size, utility meter requirements, etc. ADUs are attached or detached dwelling units that provide complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, cooking and sanitation. ADUs units may be an alternative source of affordable housing for lower income households and seniors. These units typically rent for less than apartments of comparable size.

California law requires local jurisdictions to adopt ordinances that establish the conditions under which ADUs are permitted. The Glendale Municipal Code allows ministerial consideration of accessory and junior accessory dwelling units (ADUs/JADUs) in any zoning district that allows residential uses.

Since adoption of the City's ADU provisions in 2018 under Ordinance 5907, there have been additional State Laws passed. Specifically, on October 9, 2019, Governor Newsom signed 18 bills to boost housing production, five of which further eliminated barriers to building ADUs:

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

The City adopted Ordinance 5957 in December 2020 that complies with this latest legislation. The City of Glendale received a total of 260 building permit applications for ADU in 2020.

## **Senior Housing**

A development consisting of dwelling units in which each unit is restricted for occupancy by at least one person in each household who is 62 years of age or older, or 55 years or older if the development consists of 35 units or more. Senior housing developments are permitted in multi-family residential (R-3050, R-2250, R-1650 and R-1250) zones, in commercial (C1, C2, C3, CR) zones, provided the ground floor level is occupied by commercial uses, and in the mixed use SFMU Zone as part of a mixed use project. Ground floor level senior housing development is conditionally permitted in commercial (C1, C2, C3, CR) zones and in the IMU-R Zone.

## Single-family Uses

Single-family homes are allowed in all residential zones (ROS, R1R, R1, R-3050, R-2250, R-1650 and R-1250). No distinction is made in Glendale's code between stick-built and pre-fabricated manufactured housing. Pre-fabricated manufactured housing is allowed in residential zones subject to the same regulations that apply to single-family residences.

## Single Room Occupancy (SRO) Housing

SROs are similar to hotels but usually have shared, rather than individual, bathrooms, and may have communal kitchens. For purposes of zoning, SROs have been categorized as hotel or motel uses, which are permitted in the C2, C3, and in the CR zone when above the first level of commercial uses, and conditionally permitted in the IMU, IMU-R, and SFMU zones. The adoption of a definition to clarify the status of SROs was included in Ordinance 5810 adopted on October 1, 2013. This update formally included SROs as a part of the definition of "Hotel or Motel."

## Residential Care Facilities

The Lanterman Developmental Disabilities Services Act (Sections 5115 and 5116 of the California Welfare and Institutions Code) declares that mentally and physically disabled persons are entitled to live in normal residential surroundings and that the use of property for the care of six or fewer disabled persons is a residential use for zoning purposes. A state-authorized, certified, or licensed family care home, foster home, or group home serving six or fewer persons with disabilities or dependent and neglected children on a 24-hour-a-day basis is considered a residential use that is permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes (commonly referred to as "group" homes) of six or fewer persons with disabilities than are required of the other permitted residential uses in the zone. The Lanterman Act covers only licensed residential care facilities.

On October 1, 2013 Ordinance 5810 was adopted and provided three definitions to clarify residential congregate facilities within the City. The three definitions added are as follows:

- **Residential congregate care living, limited:** "Residential congregate living, limited" means a dwelling including a common eating area, with or without on-site assistance with activities of daily living, limited to six (6) or fewer individuals or one (1) household. Residential congregate living, limited includes assisted living centers; boarding or lodging houses; residential congregate care facilities, limited; retirement and rest homes; supportive housing; and transitional housing.
- **Residential congregate living, medical:** "Residential congregate living, medical" means a residential use with or without private kitchens and including a common eating area, with or without on-site assistance with activities of daily living and on-site assistance with counseling or medical care, and with seven (7) or more beds. Residential congregate living, medical includes convalescent homes, extended care, and skilled nursing facilities. This use does not include hotels or motels which are defined separately.
- **Residential congregate living, non-medical:** "Residential congregate living, non-medical" means a residential use with or without private kitchens and including a common eating area, with or without

on-site assistance with activities of daily living, and with seven (7) or more individuals. Residential congregate living, non-medical includes assisted living centers; dormitories; fraternities or sororities; residential congregate care facilities, retirement and rest homes; supportive housing and transitional housing. This use does not include hotels and motels which are defined separately.

### **Transitional and Supportive Housing**

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

Pursuant to SB 2, supportive housing is defined as housing with no limit on length of stay that is occupied by a target population, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (California Health and Safety Code 50675.14 (b)). Target population includes adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act (Division 4.5, commencing with Section 4500, of the Welfare and Institutions Code) and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people (California Health and Safety Code 53260 (d)).

Under SB 2, transitional and supportive housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). Supportive and transitional housing provides additional housing options for people with disabilities, a protected class of the population. The City's Municipal Code was amended on October 1, 2013 to include definitions for transitional and supportive housing in compliance with State Law. However, new State law (AB 2162) requires that supportive housing meeting specific criteria must be permitted by right in mixed use and nonresidential zones where multi-family housing is also permitted. The City will review AB 2162 for compliance with State law as part of the Housing Element update.

## **B. Building, Occupancy, Health, and Safety Codes**

### **1. Building Codes**

Building codes, such as the California Building Standards Code<sup>5</sup>, are necessary to protect public health, safety, and welfare. However, local codes that require substantial improvements to a building might not be warranted and deter housing construction and/or neighborhood improvement.

The California Building Standards Code is published every three years by order of the California legislature. The Code applies to all jurisdictions in the State of California unless otherwise annotated. Adoption of the triennial compilation of Codes is not only a legal mandate, it also ensures the highest available level of safety for citizens and that all construction and maintenance of structures meets the highest standards of quality. The City adopted the most recent (2019) California Building Code and California Residential Code, each with multiple local amendments, into the Glendale Building Safety Code (2019). The local amendments reflect non-arbitrary local conditions and do not limit use or occupancy in a manner that could impede fair housing choice by limiting housing options for persons with disabilities.

### **2. Occupancy Standards**

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

In general, no State or federal regulations govern occupancy standards. The State Department of Fair Employment and Housing (DFEH) uses the “two-plus-one” rule in considering the number of persons per housing unit – two persons per bedroom plus an additional person. Using this rule, a landlord cannot restrict occupancy to fewer than three persons for a one-bedroom unit or five persons for a two-bedroom unit, etc. Other issues such as lack of parking, or gender of the children occupying one bedroom, should not be factors considered by the landlord when renting to a household. While DFEH also uses other factors, such as the age of the occupants and size of rooms, to consider the appropriate standard, the two-plus-one rule is generally followed. Other guidelines also used as occupancy standards include the California Fire Code and the Uniform Housing Code. The Fire Code allows one person per 200 square feet of “habitable” space.

A review of occupancy standards for Glendale revealed that the City’s Municipal Code does not overtly limit the number of people who can occupy a housing unit. However, the definition used by some jurisdictions to define “family” as a household of not more than a certain number of individuals or a “reasonable” number of individuals could constitute an impediment to fair housing choice. Such a definition of family may be interpreted as an occupancy standard that in some cases could be more restrictive than that established in the Uniform Housing Code, California Fire Code, or DFEH guidelines. The City has no definition of family and this is therefore not considered an impediment to fair housing.

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<sup>5</sup> California Building Code, adopted by the Building Standards Commission, is actually a set of uniform building, electrical, mechanical, and other codes adopted by professional associations such as the International Conference of Building Officials, and amended to include California-specific requirements.



## **Affordable Housing Development**

In general, many minority and special needs households are disproportionately affected by a lack of adequate and affordable housing in a region. While affordability issues are not directly fair housing issues, expanding access to housing choices for these groups cannot ignore the affordability factor.

### **1. Siting of Affordable Housing**

Glendale has a large inventory of affordable housing units. The distribution of these units is shown in Figure 7. As shown in Figure 7, much of Glendale's affordable housing stock is concentrated in the southern half of the City along Glendale Avenue and Central Avenue and near Cerritos Park. Nearly all of the City's assisted housing is located in the City's low/mod areas. The location of the City's affordable housing is the result of a combination of factors, including increased zoning opportunities, financial feasibility and topographical considerations. Much of the land in the northern half of the City is comprised of steep hillside areas, which is considerably more expensive to develop housing on. The topography of northern Glendale makes the area much more suitable for low density market-rate single family development.

### **2. Development Fees**

Various fees and assessments are charged by the City and other agencies to cover the costs of processing permits and providing services and facilities, such as utilities, schools, and infrastructure that are associated with building housing. Almost all of these fees are assessed through a pro rata share system, based on the magnitude of the project's impact, or on the extent of the benefit, which will be derived.

The majority of the City is highly urbanized with most of its necessary infrastructure, such as streets, sewers, electrical and water facilities already established. As a result, the cost of land improvements in these areas is generally less than in undeveloped suburban or hillside areas of the City. New development is occasionally required to repair or install curb, gutter and sidewalk; street lighting; fire hydrants; and parkway landscaping. New subdivisions with new streets are extremely rare in Glendale; such development will also have to build streets to City standards. Based on the level residential development activities in the City, there is no evidence that City on or off-site improvement requirements result in any significant constraint to development.

The City implemented a Commercial Development Impact Fee, a one-time fee charged to new commercial developments that will be designated for affordable housing – one of only five agencies in Southern California to do so.

## **C. Other Land Use Policies, Programs, and Controls**

Land use policies, programs, and controls can impede or facilitate housing development and can have implications for fair housing choice in a community. Inclusionary housing policies and redevelopment project areas can facilitate new affordable housing projects, while growth management programs and Article 34 of the California Constitution can impede new affordable housing development.

### **1. Inclusionary Housing Ordinance**

The City adopted an Inclusionary Housing Ordinance on May 7, 2019. The ordinance is applicable citywide to multi-family rental developments of eight units or greater. Under the ordinance the following is applied:

- Fifteen percent of the total units in an otherwise market-rate rental project must be affordable to lower income (60% AMI) individuals or families.
- Any fractional unit resulting from the fifteen percent calculation will be rounded up.

Inclusionary units must be comparable to market rate units with respect to size, bedroom count, design, quality, workmanship, and finishes.

- A developer may request and be granted the right to build smaller inclusionary units provided the square footage of the inclusionary units is equal to or greater than if not seeking the alternative.

Unit mix of inclusionary units must reflect unit mix of market rate units and be dispersed throughout the development.

- A developer may request and be granted the right to build a different unit mix provided the inclusionary bedroom count is 10% greater than if not seeking the alternative.

Developer may provide the required number of inclusionary units off-site provided:

- Inclusionary units will be within one (1) mile of the project; and
- Inclusionary units will be comparable to market rate units with respect to size, bedroom count, design quality, workmanship and finishes.

Developer may provide the required number of inclusionary units through the acquisition and rehabilitation of an existing residential building, provided:

- The building to be acquired and rehabilitated has been cited for substantial building code violations;
- All of the units have been vacant for 90 days or longer; and
- The rehabilitation of the building must be substantial, such that the after-rehab value will be at least twenty-five percent (25%) greater than the pre-rehab value of the building.

## **2. Article 34**

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

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

The City of Glendale has determined that its investment in affordable housing is typically not considered development of “low-rent housing projects” that will be “developed, constructed or acquired” by a public body, for which an election is required pursuant to Article 34 of the California Constitution. The basis for such a

determination is contained in the clarifications relating to the scope of the applicability of Article 34 pursuant to California Health and Safety Code Sections 37000-37002.

According to the City's Housing Authority, the City invests in development projects that are typically "comparable to market rate projects in terms of architecture, design, and locational standards as well as the level of amenities provided" and therefore should not be considered "federally subsidized conventional public housing projects" pursuant to California Health and Safety Code Section 37000.

The activities of the Housing Authority of the City of Glendale (Housing Authority) in connection with affordable housing financing are limited to the following:

- Carrying out routine governmental functions;
- Performing conventional activities of a lender; and
- Imposing statutorily authorized conditions accepted by the grantee of assistance.

Therefore, pursuant to California Health and Safety Code Section 37001.5, the words "develop, construct, or acquire," as used in Section 1 of Article 34 should not be interpreted to apply to the Housing Authority's activities in relation to a proposed project.

For the reasons described above, the City of Glendale has determined on a case-by-case basis that the City's participation in housing developments is not classified as "low-rent housing projects" that will be "developed, constructed or acquired" by a public body, for which an election is required pursuant to Article 34 of the California Constitution.

### **3. Growth Management**

Growth management programs facilitate well-planned development and ensure that the necessary services and facilities for residents are provided. However, a growth management program may act as a constraint if it prevents a jurisdiction from addressing its housing needs, which could indirectly impede fair housing choice. These programs range from general policies that require the expansion of public facilities and services concurrent with new development, to policies that establish urban growth boundaries (the outermost extent of anticipated urban development), to numerical limitations on the number of dwelling units that may be permitted annually. The City of Glendale does not have any growth management programs or policies in place.

### **D. Policies Causing Displacement or Affecting Housing Choice of Minorities and Persons with Disabilities**

Local government policies could result in displacement or affect representation of minorities or the disabled. Policy areas that could have these effects are summarized accordingly: redevelopment activities, reasonable accommodations, ADA compliant public facilities, and occupancy standards.

## **1. Condominium Conversions**

The City's condominium conversion ordinance was adopted in late 1978 and requires a 180-day eviction notice for existing tenants. It offers the right of first purchase to existing tenants and provides reimbursement of moving expenses up to \$500 to displaced occupants, consistent with state law. Additionally, the City adopted a Just Cause Eviction ordinance which also provides for assistance for those displaced through conversion of apartment rental units to condominiums. However, the Just Cause ordinance does not address evictions of renters from individually-owned condominium units.

## **2. Reasonable Accommodation**

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

Although most local governments are aware of State and federal requirements to allow reasonable accommodations, if specific policies or procedures are not adopted by a jurisdiction or a jurisdiction requires a public hearing or discretionary decision, residents with disabilities may be unintentionally displaced or discriminated against.

The City of Glendale adopted a Reasonable Accommodation ordinance in the Zoning Code in May 2010. The purpose of this ordinance is to establish a formal procedure for an individual with a disability, or developers of housing for individuals with disabilities, to seek reasonable accommodation in rules, policies, practices and procedures to ensure equal access to housing and to facilitate the development of housing for individuals with disabilities as provided by the federal Fair Housing Amendments Act of 1988 and California's Fair Employment and Housing Act. Reasonable accommodation means providing an individual with a disability, or developers of housing for individuals with disabilities, flexibility in the application of land use and zoning regulations or policies, including the modification or waiver of certain requirements, when necessary to eliminate barriers to housing opportunities.

A reasonable accommodation request must be submitted in writing on a form provided by the Community Development Department, with decision being rendered by the Planning Hearing Officer based on the following findings:

- That the dwelling, which is the subject of the request for reasonable accommodation, will be used by an individual with a disability protected under the Acts;
- That the requested accommodation is necessary to make the dwelling available to an individual with a disability protected under the Acts;
- That the requested accommodation would not impose an undue financial or administrative burden on the City; and
- That the requested accommodation would not require a fundamental alteration in the nature of the City's overall land use and zoning program.

If the Planning Hearing Officer grants (or grants with modifications) the request, the request shall be granted to an individual and shall not run with the land unless the Planning Hearing Officer also finds that the modification is physically integrated into the structure and cannot be easily removed or altered to comply with

the City's zoning regulations or policies. The City has granted several requests for reasonable accommodation since the adoption of the City's Reasonable Accommodation Ordinance.

## **E. Equal Provision of and Access to Government Services**

It is important that all socioeconomic segments of society are served equally with government services. This issue has become a rising concern as it relates to environmental justice.

### **1. Public Schools**

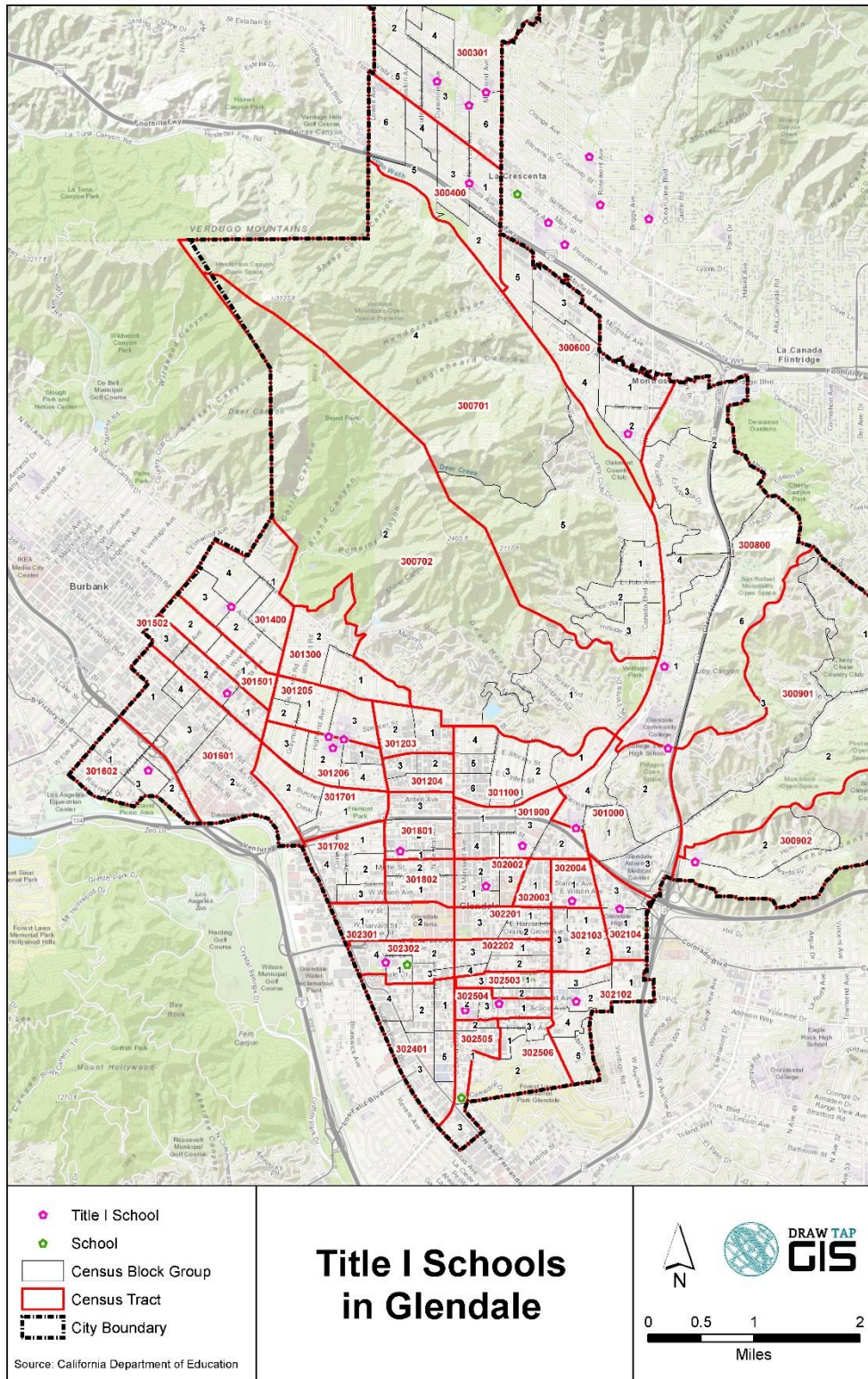
Public education in the City of Glendale is administered by the Glendale Unified School District, which is comprised of 31 Schools and over 2,620 employees, serving 27,000 students in grades Kindergarten through 12<sup>th</sup> grade. The School District serves a culturally diverse group of children with innovative educational programs. Located within the district's boundaries are all of the City of Glendale, a small portion of the City of La Cañada Flintridge and the unincorporated Los Angeles County communities of La Crescenta and Montrose.

School district facilities include 20 elementary schools (grades K to 6<sup>th</sup>), four middle schools (7<sup>th</sup> to 8<sup>th</sup>), three comprehensive senior highs (9<sup>th</sup> to 12<sup>th</sup>), a magnet high school, one continuation high school, a developmental center for multi-handicapped students, and numerous child care centers serving preschool or school-age children. Nine district schools have earned the U.S. Office of Education's highest designation for a public school, the National Blue Ribbon. Twenty-three of the district's campuses have received California's highest award for excellence, the State Distinguished School. Earning the designation as a State Distinguished School means completing a rigorous evaluation that includes academic achievement, quality of instruction, school leadership, parent involvement, and school-community partnerships. Eleven of Glendale public schools' 18 Title I schools have been named a Title I Achieving School. Glendale's reputation also attracts excellent teachers and other professionals. People want to come and work in the district.

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

Figure 9 illustrates the location of the City's Title I schools. Most of these schools can be seen in the southern half of the City, south of State Route 134 and west of State Route 2, where many of the City's lower income and minority populations currently reside. However, school funding is primarily controlled by the State. The City has little influence in this area.

Figure 9: Title I Schools in Glendale



Source: California Department of Education, 2019

## **2. ADA Compliant Public Facilities (Section 504 Assessment)**

The Americans with Disabilities Act (ADA) of 1990 is federal civil rights legislation which makes it illegal to discriminate against persons with disabilities. Title II of the ADA requires elimination of discrimination in all public services and the elimination of architectural barriers in all publicly owned buildings and facilities. It is important that public facilities are ADA compliant to facilitate participation among disabled residents in the community planning and decision-making processes. One of the key places that facilitate community participation is City Hall. Most of the City's facilities are ADA compliant. The City maintains a Facilities and Program Access Survey, which documents any and all deficiencies between full compliance with ADA standards and the current state of the City's facilities, services, and programs. The City is committed to reaching full ADA compliance, and has developed, and regularly updates, its Capital Improvement Project program (CIP) to address all identified deficiencies.

### **F. Local Housing Authority**

In Glendale, the HUD Section 8 Housing Choice Voucher program is administered by the Glendale Housing Authority. The Housing Authority does not own or manage any public housing, but does administer the Section 8 Housing Choice Voucher program for the City's residents. The availability and use of Section 8 vouchers must adhere to fair housing laws. The Housing Authority has adopted the following preferences for Section 8 vouchers:

- Victims of hate crimes and witness relocation (12 points)
- Persons displaced by government action (12 points)
- Homeless, including victims of domestic violence (12 points)
- U.S. Veteran and survivors of U.S. Veterans (six points)
- Resident of Glendale including persons who work or attend school in Glendale (one point)
- Elderly single persons over the age of 62 (one point)
- Households with a disabled family member (one point)
- Households with extremely low-income (one point)
- Working families including families that are unable to work due to age or disability (one point)

For Section 8 vouchers, the Housing Act mandates that not less than 75 percent of new admissions must have incomes at or below 30 percent of the AMI. The remaining balance of 25 percent may have incomes up to 80 percent of the AMI.

### **G. Tenant Protection**

#### **1. Evictions**

Typically, in a tight rental housing market, the potential for housing discrimination tends to escalate. As there are more people demanding rental housing than is available in the market, landlords are less hesitant to evict "undesirable" tenants. In general, a renter's right to occupy a unit is protected by the lease. Lease terms often range from one month to one year. The longer the lease term, the better protection offered to the tenant as the rent is established for the duration of the lease term and the tenant has the right to occupy the unit unless he/she breaks the condition of the lease.

State law allows the termination of a tenancy under three-day, 30-day, and 60-day notices. In certain cases, eviction notices must specify longer periods of time. Other exceptions are tenancies governed by lease agreements, where a landlord and tenant agree to specified rental conditions for a specified period of time. Evictions generally occur only if the tenant does not pay rent or substantially violates the lease agreement.

The type and length of eviction notice depend on whether the eviction is for "at-fault" reasons or "no-fault" reasons. Generally, at-fault evictions are issued for specific violations committed by the tenant. In contrast, "no-fault" evictions typically refer to actions initiated by the landlord where the tenant is not at fault. Noticing periods and reasons for eviction allowed under California code are summarized below:

- **Three-day Notice:** State law allows a landlord to terminate a tenancy after a three-day notice for at-fault reasons, where the tenant is at-fault. Under this provision, the landlord may issue a three-day notice for failure to pay rent, violation of rental or lease agreement, unlawful use of property or property damages, or committing a nuisance. These evictions apply to conditions where the tenant is at fault.
- **30-day Notice:** Pursuant to California Civil Code, any month-to-month tenancy can be terminated by a 30-day written notice by either the tenant or landlord (if the tenant has occupied the unit for less than one year) or the eviction is for the owner occupancy for a condominium. Lease agreements cannot typically be terminated with a 30-day notice.
- **60-day Notice:** State law has additional protections for long-standing good tenants. If the tenant has occupied the unit for more than one year and has not violated any provisions under the three-day (at-fault) notice, State law was amended effective January 1, 2002 to require a 60-day notice for evicting tenants.

## 2. Just Cause for Eviction Ordinance

Many communities in California face similar issues with rising housing costs and limited supply of rental housing. The increase in evictions has caused many housing advocates and tenant groups to advocate the adoption of just cause for eviction ordinances. In general, just cause for eviction ordinances are a component of rent control/stabilization ordinances. In California, only a handful of communities in the State have rent stabilization ordinances; all have just cause protections. On the other hand, few communities have just cause for eviction protections without rent control/stabilization laws. Because nonpayment of rent is a legitimate reason for eviction, without rent control/stabilization provisions, landlords/ managers can simply raise the rent as a means of "forcing" the undesirable tenants to vacate the units.

### a) *City of Glendale Rental Rights Program*

In 2019, the Rental Rights program was established, which is made up of three sections: Just Cause Eviction, Right to Lease, and Renter Relocation. The Just Cause Eviction section establishes rules for evictions within the City of Glendale. Right to Lease requires landlords to offer a one-year lease to new tenants and when increasing rents on current tenants. Renter Relocation requires landlords to offer relocation assistance when increasing rents beyond 7%, over the last 12 months. These 3 provisions work to create stability and to mitigate the impacts of displacement for Glendale residents.



The Just Cause Eviction program was established in 2001 and continues to be an essential part of the Rental Rights Program. The Just Cause Eviction Ordinance promotes stability, limiting the reasons which a landlord may evict a tenant. Properties with less than 3 units are exempt from the requirements of Just Cause Eviction. In Glendale, landlords may only evict a tenant based on the 12 reasons given in the ordinance. The 12 reasons are divided into two groups, "at fault" and "no fault" evictions. At fault evictions include nonpayment of rent and breach of terms of the lease among others. No fault evictions include removing the units off the rental market, major improvements to the property that renders the unit uninhabitable for at least 30 days, and other reasons that are not related to the fault of the tenant. Any eviction not caused by the Tenant is subject to relocation assistance calculated at a rate of, *2 x HUD Fair Market Rent plus \$1,000*.

The Right to Lease function of the Rental Rights Program requires landlords of "non-exempt" properties to offer a minimum one year (12 month) lease option to all tenants at the time of initial occupancy and/or when a rent increase is proposed. Tenants may accept the offer or reject it and continue as a month to month tenant or other type of lease arrangement. Right to Lease applies to properties with at least 5 or more units.

Under the Relocation provisions of the Rental Rights Program, landlords must offer tenants relocation assistance when increasing the rent above 7% within a 12-month period. Units constructed after February 1, 1995 and properties of 1-2 units are exempt from this requirement. Relocation calculations differ from properties with 3 to 4 units and properties with 5 or more units. The Relocation assistance calculation also takes into account the tenants income and years living in the unit.

The program was created to provide stability and to mitigate the impacts of displacement for Glendale residents. Within the last year the Rental Rights staff have continually conducted outreach and provided support for Glendale landlords and tenants. Recently, new laws like AB 1482 and the Emergency Orders of the COVID-19 pandemic have had a direct impact not only to the Rental Rights Program but to the greater residential renter market in general. City staff is currently working on a new brochure that covers the elements of the Rental Rights Program in addition to impacts of the new State law, AB 1482.

## **H. Community Participation**

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

- **Design Review Board.** The City's Design Review Board reviews building plans concerning site plan and design issues prior to issuance of building permits for projects larger than those which have statutory exemption. The Design Review Board consist of five members each, all of whom are confirmed by a majority of the City Council.
- **Historic Preservation Commission.** The Historic Preservation Commission (HPC) advises the City Council regarding historic preservation issues in Glendale. The HPC conducts monthly hearings at

which it considers nominations to the Glendale Register of Historic Resources and new historic district applications. The Commission also reviews work proposed for designated properties, eligible for designation and within pending and adopted historic districts to ensure consistency with preservation guidelines and principles. The HPC is comprised of five members, all of whom are confirmed by a majority of the City Council.

- **Planning Commission.** Charged with the duty of planning for Glendale's long-range growth and development, the Planning Commission is responsible for review and recommendation to the City Council on general and master plans and approval of major land subdivision plans. The Commission also considers and determines issues of condominium approvals, minor land divisions, and approvals for Special Recreation Zone issues. The Planning Commission is comprised of five members, all of whom are confirmed by a majority of the City Council.
- **Building and Fire Board of Appeals.** The members of the Building & Fire Board of Appeals hear and decide the appeals of orders, decisions or determinations made by the Building Official, the Fire Marshal or both, relative to the application and interpretation of the Glendale Building & Safety Code. The Board is comprised of five members, all of whom are confirmed by a majority of the City Council.
- **Community Development Block Grant Advisory Committee.** Each year the City receives approximately \$2,000,000 in federal Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). Funds are to be used to provide services to lower income persons and to revitalize lower income neighborhoods. Each year the City develops a plan for the expenditure of these funds and is required to involve citizens in the development and decision making process of the annual funding plan. To achieve this mandate, the City Council appoints the CDBG Advisory Committee. The duties of the Committee are to oversee an annual community needs assessment and determine funding priorities, evaluate funding proposals and make funding recommendations to the City Council, and review performance and program revisions by funded agencies. The Committee is comprised of five members, all of whom are confirmed by a majority of the City Council.

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

While providing fair housing education for the public and housing professionals is critical, ensuring city and County staff understand fair housing laws and are sensitive to the discrimination issues is equally important. It is the policy of the City of Glendale to train and test every City employee on issues of discrimination, hostile work environment, violence in the workplace, protected class, retaliation, and other workplace topics. The City provides full training for every new employee within 45 days of hire and re-trains every employee, both supervisory and non-supervisory, every two years. Furthermore, the City has the capability of accommodating the following languages: English, Spanish, Armenian, Tagalog, Korean, American Sign Language, Farsi, Vietnamese, Chinese (Cantonese & Mandarin), Arabic, and Russian.

Most of the City's facilities are ADA compliant. The City maintains a Facilities and Program Access Survey, which documents any and all deficiencies between full compliance with ADA standards and the current state of the City's facilities, services, and programs. The City is committed to reaching full ADA compliance, and has developed, and regularly updates, its Capital Improvement Project program (CIP) to address all identified deficiencies.

On September 15, 2020, the Glendale City Council unanimously passed a resolution acknowledging Glendale's past history as a racially exclusionary "sundown town" becoming the first city in California and the third in the nation to pass a sundown town resolution. Sundown towns kept African Americans and other people of color from living in certain communities through formal and informal methods in a purposeful effort to maintain a white population. The resolution acknowledges and apologizes for Glendale's racist past and pledges to work towards an anti-racist future.

As part of its examination of the historical role that racism has played in the City, the Glendale City Council requested a historic context statement to better understand and address historical development patterns within Glendale. As part of this request, staff has been reviewing available historic documents to identify and understand Glendale's history as it pertains to its racist past. The City of Glendale contracted the services of a firm to write a historic context statement for the City with a focus on the theme of race/ethnicity, with the following subsections: African American, Latinx, Eastern Asian, and Western Asian. A consultant has been selected and research and staff work has begun.

# Chapter 6: Fair Housing Profile

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

## **A. Fair Housing Practices in the Homeownership Market**

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

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

### **1. The Homeownership Process**

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

#### *a) Advertising*

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

- Current or potential residents;
- Neighbors or the neighborhood in racial or ethnic terms;
- Adults preferred;
- Perfect for empty nesters;
- Conveniently located by a Catholic Church; or
- Ideal for married couples without kids.

## Review of For-Sale Ads in Glendale

In a survey of online listings for homes available for purchase in Glendale in September 2020, a small percentage of advertisements included potentially discriminatory language. While advertisements would rarely state discrimination outright, often the descriptions beyond the physical characteristics of the homes suggest a certain lifestyle that works to steer specific groups to or from the units. Of a total of 208 listings, 26 listings included references to something other than just the physical description of the available home, amenities, and services included (Table 36). Most of the potentially discriminatory advertisements were targeted specifically at families, and several ads included income-related language.

Discrimination Type	Number of Listings	Examples of Potentially Discriminatory Language*
No Discriminatory Language	182	n/a
Income Related	11	<ul style="list-style-type: none"> <li>• Would prefer a cash only option</li> <li>• Price has been reduced several times, don't miss it</li> <li>• This home requires some TLC - do you have the means to do so?!</li> <li>• Located in an area of prestigious homes with high land value</li> </ul>
Household Size/ Family Related	15	<ul style="list-style-type: none"> <li>• Perfect home for a brand new family!</li> <li>• Large yard perfect for kids and animals alike</li> <li>• Located in one of the best school districts in Los Angeles</li> <li>• Close proximity to all elementary schools, perfect for a new young family</li> <li>• Perfect home for the executive looking for an escape</li> <li>• Perfect location located in the Verdugo Woodlands School District</li> <li>• Enjoy this expansive home located on a quiet cull-de-sac with all young families as your new neighbors!</li> </ul>

*\*Examples are direct quotes from the listings (includes punctuation and emphasis).  
Source: www.realtor.com, accessed September, 2020.*

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

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

### *b) Lending*

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA). However, the current mortgage lending crisis has demonstrated widespread misuse of the information, where lower income households and minorities have been targeted for predatory lending.

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

### *c) Appraisals*

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

### *d) Real Estate Agents*

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

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

### *e) Covenants, Conditions, and Restrictions (CC&Rs)*

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

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

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

f) *Homeowners Insurance Industry*

Many insurance companies have applied strict guidelines, such as not insuring older homes, that disproportionately affect lower income and minority households that can only afford to buy in older neighborhoods. Underwriting guidelines are not public information; however, consumers have begun to seek access to these underwriting guidelines to learn if certain companies have discriminatory policies.

The California Fair Access to Insurance Requirements (FAIR) Plan was created by the Legislature in 1968 after the brush fires and riots of the 1960s made it difficult for some people to purchase fire insurance due to hazards beyond their control. The FAIR Plan is designed to make property insurance more readily available to people who have difficulty obtaining it from private insurers because their property is considered "high risk."

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

## **2. National Association of REALTORS® (NAR)**

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

a) *Code of Ethics*

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

A REALTOR® pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations upon REALTORS® and is also a firm statement of support for equal opportunity in housing. A REALTOR® who suspects discrimination is instructed to call the local Board of REALTORS®. Local Boards of REALTORS® will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase or rental of housing. Local Boards

of REALTORS® have a responsibility to enforce the Code of Ethics through professional standards procedures and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

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

#### *b) Diversity Certification*

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

### **3. California Department of Real Estate (DRE)**

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

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

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

### **4. California Association of REALTORS® (CAR)**

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



a) REALTOR® Associations Serving Glendale

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

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

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

## 5. Assisted Home Ownership Projects for First Time Home Buyers

The City of Glendale has a significant number of affordable homeownership housing units that receive public subsidies in return for affordability controls in terms of sales to income qualified first time home buyers. Typically, these residential projects provide units affordable to lower and moderate income households.

The program involves include indirect and direct assistance from the City to a developer as well as direct assistance to the homebuyer to achieve affordable home ownership. Additionally, the City is able to leverage funding by realizing a return on its investment, which can then be used for future affordable housing.

Table 37 summarizes the publicly subsidized homeownership units to income qualified first time home buyers in Glendale. Currently, a total of 13 housing developments in Glendale provided 120 units that are dedicated for sale to lower and moderate income first time homebuyer households. These projects either maintain affordability covenants and/or low-income use restrictions to ensure the long-term availability of these units as affordable housing or contain equity share provisions that will create program income at sale for future projects to be developed.

Project Name	Address	Target Population	Affordable Units	Assistance
Doran Villas	423-427 W. Doran St.	First Time Home Buyer households with income below 120% of Area Median Income	13	LMIHAF

<b>Table 37: Assisted Ownership Housing Inventory (2019)</b>				
<b>Project Name</b>	<b>Address</b>	<b>Target Population</b>	<b>Affordable Units</b>	<b>Assistance</b>
Habitat for Humanity - Allen Ave.	531-533 ½ Allen Avenue	First Time Home Buyer households with incomes below 50% of Area Median Income	4	LMIHAF
Habitat for Humanity - Orange St.	1256 S. Orange St.	First Time Home Buyer households with incomes below 50% of Area Median Income	4	HOME
Habitat for Humanity - Gardena Ave.	1830 Gardena Avenue	First Time Home Buyer households with incomes below 80% of Area Median Income	3	HOME
Vine Street Walk	333-337 Vine St.	First Time Home Buyer households with incomes below 120% of Area Median Income	3	LMIHAF
Elk Avenue Town Homes	415-417 E. Elk Ave.	First Time Home Buyer households with incomes below 120% of Area Median Income	4	LMIHAF
Habitat for Humanity - Vine/Pacific	401-411 S. Pacific Ave.	First Time Home Buyer households with incomes below 80% of Area Median Income	4	LMIHAF
Habitat for Humanity - Palmer Homes	900-904 E. Palmer Ave. & 1201 Cottage Grove	First Time Home Buyer households with incomes below 80% of Area Median Income	3	LMIHAF
Doran Gardens	331-343 W. Doran St.	First Time Home Buyer households with income between 80%-120% of Area Median Income	57	LMIHAF
Habitat for Humanity - Geneva St.	624 Geneva Street	First Time Home Buyer households with incomes below 80% of Area Median Income	5	LMIHAF

Project Name	Address	Target Population	Affordable Units	Assistance
Habitat for Humanity - Kenwood St.	711-717 N. Kenwood	First Time Home Buyer households with incomes below 80% of Area Median Income	11	HOME
Habitat for Humanity - Chestnut St.	806 E. Chestnut Street	First Time Home Buyer households with incomes below 80% of Area Median Income	3	HOME
Habitat for Humanity - Lomita Ave.	634-700 Lomita Ave.	First Time Home Buyer households with income between 50%-80% of Area Median Income	6	HOME
<b>Total</b>			<b>120</b>	

*Source: City of Glendale, 2019.*

## **B. Fair Housing Practices in the Rental Market**

### **1. Rental Process**

#### *a) Advertising*

Glendale, like most parts of California, faces a shortage of rental housing. Many rental properties have low vacancy rates and do not require published advertising. Often, vacancy is announced either via word of mouth of existing tenants or a for-rent sign outside the property. Unless one happens to drive by the neighborhood or have friends or families currently residing at the property, one may not have access to information regarding vacancy. Furthermore, this practice tends to intensify segregation of neighborhoods and properties that already have a high concentration of a racial/ethnic group. When advertising is done, no checks-and-balances mechanism exists to ensure English advertising is provided.

#### **Review of Rental Ads in Glendale**

Like with ad listings for for-sale homes, rental advertisements cannot include potentially discriminatory references. Of a total of 264 rental listings surveyed in September 2020, 66 advertisements were found to contain potentially discriminatory language (Table 37). While advertisements would rarely state discrimination outright, often the descriptions beyond the physical characteristics of the units suggest a certain lifestyle that works to steer specific groups to or from the units. A majority of the problematic language involves disability-related and household size/family related references.

Under California's fair housing law, source of income is a protected class. It is, therefore, considered unlawful to prefer, limit, or discriminate against a specific income source for a potential renter. It is also considered unlawful to publish or print advertisements to that effect. In 2019, the California legislature passed SB 329

and SB 222, requiring landlords to accept Section 8 and VASH vouchers and other forms of rental assistance as part of an applicant's income. SB 329 redefines source of income as "lawful, verifiable income paid directly to a tenant or to a representative of a tenant, or paid to a housing owner or landlord on behalf of a tenant, including federal, state or local public assistance, and federal, state, or local housing subsidies, including, but not limited to, federal housing assistance vouchers issues under Section 8 of the United States Housing Act of 1937." SB 222 adds to the definition of source of income HUD Veterans Affairs Supportive Housing (VASH) vouchers and clarifies that a landlord is not considered a representative of a tenant unless the source of income is a VASH voucher. SB 222 also adds military and veteran status as new protected classes under the FEHA. Many landlords and tenants may not be fully aware of these changes.

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

Persons with disabilities have the right to ask their housing provider to make a reasonable accommodation in a "no pets" policy in order to allow for the use of a companion or service animal. However, in the case of rental ads that specifically state "no pets," some disabled persons may not be aware of their right to ask for an exception to this rule. Because of this, a person with a disability may see themselves as limited in their housing options and a "no pets" policy could, therefore, be interpreted as potentially discriminatory. Of the 364 rental listings surveyed, 40 ads included language to specifically ban pets.

<b>Table 37: Potential Discrimination in Listings of Homes for Rent</b>		
<b>Discrimination Type</b>	<b>Number of Listings</b>	<b>Potentially Discriminatory Language</b>
No Discriminatory Language	198	n/a
Disability Related	40	<ul style="list-style-type: none"> <li>• No dogs allowed. May consider a cat</li> <li>• No pets</li> <li>• Sorry, No Pets</li> <li>• NO PETS ALLOWED</li> </ul>
Household Size/ Family Related	26	<ul style="list-style-type: none"> <li>• The complex is walking distance to the park, schools, libraries, and public transit.</li> <li>• Great size home on the corner for a family</li> <li>• Walking distance to some of the best schools in the local school district.</li> <li>• Not far from the Americana and plenty of entertainment perfect for the family</li> <li>• Home is meant for 1 person, may consider a married couple.</li> <li>• a few blocks from local parks and schools</li> <li>• Perfect home for a young working professional</li> <li>• Looking for a clean and outstanding single renter</li> </ul>

*Sources: www.Zillow.com, September 2020.*

*b) Viewing the Unit*

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

*c) Credit/Income Check*

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

*d) The Lease*

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

Lease-related language barriers can impede fair housing choice if landlords and tenants do not speak the same language. In California, applicants and tenants have the right to negotiate lease terms primarily in Spanish, Chinese, Tagalog, Vietnamese or Korean. If a language barrier exists, the landlord must give the tenant a written translation of the proposed lease or rental agreement in the language used in the negotiation

before the tenant signs it.<sup>6</sup> This rule applies to lease terms of one month or longer and whether the negotiations are oral or in writing. Also, the landlord must provide the translation whether or not the tenant requests it. The translation must include every term and condition in the lease or rental agreement. A translation is not required if the tenant provides his or her own adult interpreter.

#### e) *Security Deposit*

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

#### f) *During the Tenancy*

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex, or disability. Usually this type of discrimination appears in the form of varying enforcement of rules, overly strict rules for children, excessive occupancy standards, refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction notices, illegal entry, rent increases, or harassment. These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

## **2. California Apartment Association**

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

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

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

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<sup>6</sup> California Civil Code Section 1632(b).

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

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

### **3. Foothill Apartment Association**

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

### **4. The Apartment Association of Greater Los Angeles**

The Apartment Association of Greater Los Angeles is an association comprised of property owners, managers, suppliers, and service providers who seek professional growth, operational advice, and advocacy on behalf of the rental housing industry. The Association provides a wide range of educational classes and events that provide operational advice for owners and managers of rental properties.

### **5. The National Association of Residential Property Managers (NARPM)**

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

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

In addition to promoting high standards of business ethics, professionalism and fair housing practices, the Association also certifies its members in the standards and practices of the residential property management industry and promotes continuing professional education.

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

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

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

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

## **6. Western Manufactured Housing Communities Association (WMA)**

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

WMA offers an award-winning manager accreditation program as well as numerous continuing education opportunities. The Manufactured Home Community Manager (MCM) program is a manager accreditation program that provides information on effective community operations. WMA's industry experts give managers intensive training on laws affecting the industry, maintenance standards, HCD inspections, discrimination, mediation, disaster planning, and a full range of other vital subjects.

## **C. Fair Housing Services**

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

### **1. Rental Rights Program**

The Rental Rights Program has established a set of staff that is available to City of Glendale residents for questions and inquiries regarding rights and responsibilities between landlords and tenants. Residents can contact staff to get information on different fair housing services such as the Just Cause Eviction, Right to Lease, and Relocation Assistance provided under the Rental Rights Program to better understand their rights as a tenant.

### **2. Housing Rights Center (HRC)**

The Housing Rights Center (HRC) is a non-profit agency whose mission is to actively support and promote fair housing through education and advocacy. The services provided by HRC include the investigation and



resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. The materials are made available free to the public in several different languages including English, Spanish, Korean, Mandarin, Armenian, Cantonese, and Russian. Depending on the audience, the presentations can be translated by staff into Armenian, Mandarin, Spanish, or Russian. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords.

### 3. Department of Fair Employment and Housing (DFEH)

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

## D. Fair Housing Statistics

As part of the enforcement and tracking services provided by the above mentioned fair housing service providers, intake and documentation of all complaints and inquiries result in the compilation of statistics provided to each jurisdiction in the form of quarterly and annual reports.

### 1. Housing Rights Center (HRC)

#### a) Overall Clients Served

Between Fiscal Year (FY) 2014-15 and FY 2018-19, HRC provided fair housing services to a total of 3,215 clients. The number of Glendale residents served has declined over time, from a high in FY 2014-15 of 790 clients to just 528 clients in FY 2018-19. This consistent decline could be an indication of an improved fair housing environment.

	2014-15	2015-16	2016-17	2017-18	2018-19	Total
<b>Glendale</b>	790	728	576	593	528	3,215

*Source: HRC Annual Reports, 2014-2018.*

#### b) Clients Served by Race and Ethnicity

During this time period, Whites represented approximately 53 percent of clients, followed by Other (35 percent) and Asians (5 percent). The “Other” category most likely includes those who are of Hispanic origin. Often Hispanic persons identify with their ethnicity (e.g., Mexican, Puerto Rican) but generally do not identify with their race. Approximately 23 percent of clients identified themselves as ethnically Hispanic and three percent of clients were Black. The racial/ethnic distribution of HRC’s clients is not consistent with the City’s demographics, however. According to the 2013-2017 American community Survey, Hispanics made up about 18 percent of the population, whereas Non-Hispanic Whites represented about 61 percent and Asians

represented about 16 percent of the population. HRC client data indicates that Hispanics may be disproportionately impacted by housing discrimination.

<b>Table 38: Clients Served by Race (2014-2018)</b>							
	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
White	505	395	335	242	224	1,701	52.9%
Black	41	33	25	10	11	120	3.7%
American Indian/Alaskan Native and White	1	1	5	0	0	7	0.2%
Other	187	234	172	296	247	1,136	35.3%
American Indian/Alaskan Native and Black	1	0	1	0	2	4	0.1%
Asian	35	36	23	35	36	165	5.1%
American Indian/Alaskan Native	4	10	4	3	0	21	0.7%
Pacific Islander	14	16	8	3	6	47	1.5%
Black and White	1	3	2	3	1	10	0.3%
Asian and White	1	0	1	1	1	4	0.1%
<b>Total</b>	<b>790</b>	<b>728</b>	<b>576</b>	<b>593</b>	<b>528</b>	<b>3,215</b>	<b>100.0%</b>

*Source: HRC Annual Reports, 2014-2018.*

<b>Table 39: Clients Served by Ethnicity (2014-2018)</b>							
	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Hispanic	191	197	148	111	101	748	23.3%
Not Hispanic	599	531	428	482	427	2,467	76.7%
<b>Total</b>	<b>790</b>	<b>728</b>	<b>576</b>	<b>593</b>	<b>528</b>	<b>3,215</b>	<b>100.0%</b>

*Source: HRC Annual Reports, 2014-2018.*

c) *Clients Served by Income*

As with most other jurisdictions, statistics reported for the City of Glendale indicate that lower income persons, regardless of race, are the most heavily impacted by fair housing issues. Between FY 2014-15 and FY 2018-19, most of the people served by the HRC were lower income, with most clients falling in the extremely low income category (53 percent).

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Extremely Low	331	365	301	386	323	1,706	53.1%
Very Low	163	120	98	63	44	488	15.2%
Low	154	116	77	77	92	516	16.0%
Moderate	142	127	100	67	69	505	15.7%
<b>Total</b>	<b>790</b>	<b>728</b>	<b>576</b>	<b>593</b>	<b>528</b>	<b>3,215</b>	<b>100.0%</b>

*Source: HRC Annual Reports, 2014-2018.*

*d) Clients Served by Other Characteristics*

Approximately nine percent of all inquiries/complaints between FY 2014-15 and FY 2018-19 came from persons with disabilities, three percent from female-headed households, almost 10 percent from seniors, and two percent from households who received government subsidies for housing.

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Persons with Disabilities	80	63	42	56	51	292	9.1%
Female Headed Households	45	22	19	6	13	105	3.3%
Seniors	64	83	54	53	60	314	9.8%
Housing Subsidy Recipients	17	14	6	14	21	72	2.2%
Special Needs Total	206	182	121	129	145	783	24.4%
<b>Total Clients</b>	<b>790</b>	<b>728</b>	<b>576</b>	<b>593</b>	<b>528</b>	<b>3,215</b>	<b>100.0%</b>

*Source: HRC Annual Reports, 2014-2018.*

*e) Housing Discrimination Complaints*

Between FY 2014-15 and FY 2018-19, 238 complaints of housing discrimination were reported. Most allegations were related to physical disability (52 percent), but a significant number of complaints involved mental disability (18 percent), familial status (10 percent), and general discrimination (nine percent).

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Age	0	0	0	0	1	1	0.4%
Familial Status	7	5	6	1	4	23	9.7%
Gender	1	3	1	1	3	9	3.8%
Marital Status	0	0	1	0	0	1	0.4%
Mental Disability	14	7	9	2	10	42	17.6%
National Origin	2	6	1	2	1	12	5.0%
Physical Disability	21	27	16	28	32	124	52.1%
Race	0	2	1	1	1	5	2.1%
Religion	0	0	0	0	0	0	0.0%
Sexual Orientation	0	0	0	0	0	0	0.0%
Source of Income	0	0	0	0	0	0	0.0%
Arbitrary	0	0	0	0	0	0	0.0%
General Information	4	5	4	5	3	21	8.8%
<b>Total</b>	<b>49</b>	<b>55</b>	<b>39</b>	<b>40</b>	<b>55</b>	<b>238</b>	<b>100.0%</b>

*Source: HRC Annual Reports, 2014-2018.*

It is important to note that not all allegations of discrimination evolve into actual fair housing cases. Of the 238 complaints of discrimination received between 2014 and 2018, only 43 (18 percent) were deemed significant enough to turn into fair housing cases, and only 72 percent of the cases opened had enough evidence to sustain the allegation of discrimination (Table 45).

A popular criticism made by residents during public meetings was that many people may not be aware of who to call when they have fair housing related questions and concerns. According to results of the fair housing survey conducted as part of this AI, only nine percent of the respondents who experienced housing discrimination reported the incident. Among those who had not reported the issue, 20 percent indicated that they did not know where to report the incident and 54 percent indicated that they did not believe any difference or action would result from the reporting.

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Allegations	49	55	39	40	55	238	100.0%
Cases	11	13	5	5	9	43	18.1%
<i>Findings</i>							
Allegation Sustained	8	7	3	4	9	31	72.09%
Inconclusive Evidence	2	3	2	1	0	8	18.60%
Pending	1	3	0	0	0	4	9.30%
<i>Dispositions</i>							
Successful Conciliation	7	7	2	4	4	24	55.81%
No enforcement possible	1	0	1	0	1	3	6.98%
Client withdrew allegation	2	3	2	1	1	9	20.93%
Pending	1	3	0	0	3	7	16.28%

*Source: HRC Annual Reports, 2014-2018.*

## f) Education and Outreach Efforts

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

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

## 2. U.S. Department of Housing and Urban Development (HUD)

The U.S. Department of Housing and Urban Development (HUD) maintains a record of all housing discrimination complaints for jurisdictions, including the City of Glendale. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status, and retaliation. From 2014 to 2018, 21 fair housing cases were recorded by HUD in Glendale.

In the City as a whole, disability related cases were the most common, comprising 12 of the 21 cases (Table 46). Cases concerning race, national origin, and familial status were also reported, only two of each however. The number of cases fluctuated annually, with a high of seven complaints recorded in 2014.

**Table 46: Basis for Discrimination of Cases filed with HUD (2014-2018)**

Year	Race	National Origin	Disability	Religion	Familial/ Marital Status	Retaliation	None Given	Total
2014	--	--	7	--	--	--	--	7
2015	--	--	1	--	--	--	1	2
2016	1	1	1	--	--	1	--	4
2017	--	1	1	--	1	--	--	3
2018	1	--	2	1	1	--	--	5
<b>Total</b>	<b>2</b>	<b>2</b>	<b>12</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>21</b>

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

## E. Hate Crimes

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

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

Hate crime statistics compiled for the City of Glendale show that a total of six (6) hate crimes were committed and then reported in the City over a four-year period. Only Race and Religion based complaints were reported (Table 47 ). In Los Angeles County as a whole, race-based hate crimes were the most prevalent.

<b>Table 47: Hate Crimes (2013-2017)</b>						
<b>Basis of Complaints</b>	<b>Race</b>	<b>Religion</b>	<b>Sexual Orientation</b>	<b>Ethnicity</b>	<b>Disability</b>	<b>Total</b>
<b>Glendale</b>						
2013	1	0	0	0	0	1
2014	0	2	0	0	0	2
2015	1	0	0	*	0	1
2016	1	1	0	*	0	2
2017	--	--	--	--	--	--
<b>Total</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>
<b>Los Angeles County</b>						
2013	20	3	17	10	0	50
2014	7	3	3	5	0	18
2015	16	2	9	*	1	28
2016	17	3	6	*	0	26
2017	6	5	4	*	0	15
<b>Total</b>	<b>46</b>	<b>13</b>	<b>22</b>	<b>5</b>	<b>1</b>	<b>137</b>
<i>Source: U.S. Department of Justice Federal Bureau of Investigation, 2013-2017.</i> <i>* After 2014, Ethnicity was no longer reported separately.</i> <i>Glendale did not have data reported for 2017.</i>						

# Chapter 7: Progress since Previous AI

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This chapter summarizes and compares key findings of the previous AI document completed for the City of Glendale in order to evaluate the progress toward addressing impediments to fair housing choice.

## A. Impediments, Recommendations, and Efforts Undertaken

### 1. Housing Discrimination

Incidents of housing discrimination were reported in the City of Glendale. The largest proportion of fair housing complaints over the past twenty years relate to familial status, race, and national origin.

*Recommendations:*

- Maintain a contract with a fair housing service provider to provide educational and investigative services for multi-language housing discrimination questions and landlord/tenant complaints to further fair housing.
- Clarify zoning, housing, and supportive services definitions, standards, and/or policies to ensure that they do not violate federal and State fair housing laws or violate State constitutional privacy rights with regard to housing for persons with disabilities.
- Promote nondiscrimination of housing by implementing the recommendations of Glendale's Analysis of Impediments to Fair Housing Plan and regularly update the Plan.
- Continue to provide information to the public about housing rights, responsibilities, and opportunities including the provisions of the Glendale Rental Rights Program and Just Cause Eviction Ordinance, which outlines the legal reasons for eviction, required lease terms, and any relocation assistance that may be due to tenants.
- Coordinate annual community fair housing workshops. The workshops will be made available under a CDBG contract with a fair housing service provider to serve City residents with fair housing education, conciliation, mediation, and resolving tenant/landlord disputes. Residents who feel discriminated against by rental property owners, rental property managers, real estate agents, or loan and credit agents are also referred to the fair housing service provider to get information and assistance with their discrimination claim.
- Continue to offer housing and supportive services to special needs groups such as the elderly and the homeless to enable independent living.
- Coordinate with local social service providers to address the needs of the City's homeless population, including the development of service-enriched and transitional/permanent affordable housing for the formerly homeless.

- Hold homeless fairs to connect homeless individuals with services available in the local community.
- Continue to work with the Glendale Continuum of Care on an ongoing basis for the Plan period to support existing programs that have demonstrated effectiveness.

*Efforts:*

- The City continues to maintain a contract with a fair housing service provider to provide educational and investigative services for multi-language housing discrimination questions and landlord/tenant complaints to further fair housing.
- The City promotes nondiscrimination of housing by implementing the recommendations of Glendale's Analysis of Impediments to Fair Housing Choice and regularly updating this Plan.
- The City continues to provide information to the public about housing rights, responsibilities, and opportunities including the provisions of the Glendale Rental Rights Program and Just Cause Eviction Ordinance, which outlines the legal reasons for eviction, required lease terms, and any relocation assistance that may be due to tenants.
- The City continues to work with the Housing Rights Center to better publicize the fair housing services available to Glendale residents and housing providers.
- The City coordinates semiannual community fair housing workshops. The workshops are made available under a CDBG contract with the Housing Rights Center to serve City residents with fair housing education, conciliation, mediation, and resolving tenant/landlord disputes.
- Annually, the City and the Housing Rights Center present a fair housing workshop that targets landlords and apartment managers and a workshop for renters and homeowners. Outreach for workshops targets owners of multifamily properties and residents in low income neighborhoods. Outreach and workshops are targeted to include non-English speaking segments of the community.
- The City continues to work with the fair housing service provider, the Glendale Housing Authority, the Glendale Rental Inspection Program, and local apartment and realtor associations to reach out to managers and property owners of smaller rental properties. This may include compiling a mailing list of smaller rental property owners and managers in order to provide informational material regarding fair housing rights and responsibilities.

## **2. Fair Housing Education and Outreach**

There is an ongoing need in the City for fair housing education and outreach. There is a general lack of knowledge among rental property owners of fair housing laws and landlord rights and responsibilities.



### *Recommendations:*

- Continue to work with the fair housing service provider to better publicize the fair housing services available to Glendale residents, rental property owners/managers, and homeowners' associations.
- Maintain a contract with a fair housing service provider to provide educational and investigative services for multi-language housing discrimination questions and landlord/tenant complaints to further fair housing.
- Clarify zoning, housing, and supportive services definitions, standards, and/or policies to ensure that they do not violate federal and State fair housing laws, or violate State constitutional privacy rights with regard to housing for persons with disabilities.
- Continue to provide information to the public about housing rights, responsibilities, and opportunities including the provisions of the Glendale Just Cause Eviction Ordinance, which outlines the legal reasons for eviction, required lease terms, and any relocation assistance that may be due to tenants.
- Periodically update the Analysis of Impediments to Fair Housing Plan (AI) and implement its recommended actions.
- Coordinate annual community fair housing workshops. The workshops will be made available under a CDBG contract with the Housing Rights Center to serve City residents with fair housing education, conciliation, mediation, and resolving tenant/landlord disputes. Residents who feel discriminated against by rental property owners, rental property managers, real estate agents, or loan and credit agents are also referred to the HRC to get information and assistance with their discrimination claim.
- Annually present a fair housing workshop that targets landlords, apartment managers, and homeowners associations, and a workshop for renters and homeowners. Target outreach for workshops to owners of multifamily properties and residents in low income neighborhoods, including non-English speaking segments of the community. Only homeowner's associations have the authority to review and make necessary amendments to CC&Rs; fair housing workshop topics can include local homeowners' associations' responsibilities regarding CC&Rs and the necessity of periodically reviewing and amending their CC&Rs.
- Provide support to the Glendale Continuum of Care, whose mission is to develop housing choices for people coming through the homeless continuum of care.
- Continue to work with the fair housing service provider to educate landlords and tenants on the reasonable accommodation process in order to reduce the confusion surrounding this issue.
- Periodically publish fair housing case summaries from the fair housing service provider on City website to demonstrate the positive outcome of reporting fair housing issues.

### *Efforts:*

- The City continues to work with the Housing Rights Center to better publicize the fair housing services available to Glendale residents.
- The City coordinates semiannual community fair housing workshops. The workshops are made available under a CDBG contract with the Housing Rights Center to serve City residents with fair housing education, conciliation, mediation, and resolving tenant/ landlord disputes.
- Annually, the City and the Housing Rights Center present a fair housing workshop that targets landlords and apartment managers and a workshop for renters and homeowners. Outreach for workshops targets owners of multi-family properties and residents in low income neighborhoods. Outreach and workshops are targeted to include non-English speaking segments of the community.
- The City will continue to expand its website to provide additional links to housing services and resources, such as a link to the fair housing service providers and a link to the Fannie Mae Foundation that offers free guides and resources for first-time home buyers in English, Spanish, and other languages.
- The City will continue to work to promote and educate both resident and landlords on the City's Rental Rights Program.

### **3. Accessibility**

There is a lack of accessible housing in the City for persons with disabilities.

### *Recommendations:*

- Encourage both the private and public sectors to produce or assist in the production of housing for special needs groups such as: the handicapped, the elderly, large families, single-parent households, and formerly homeless.
- Continue to offer housing and supportive services to special needs groups such as the elderly and the homeless to enable independent living.
- Coordinate with local social service providers to address the needs of the City's homeless population, including the development of service-enriched and affordable housing.
- Permit the development of transitional housing for service-dependent populations in the City's residential zones.
- Adopt zoning to ensure that in any zone in which hospitals or nursing homes are permitted, mental health treatment programs, either residential or non-residential, are permitted in accordance with California Welfare & Institutions Code Section 5120.
- Adopt zoning to ensure compliance with SB 2 requirements relating to transitional housing or supportive housing.

- Adopt amendments to the Zoning Code to clarify definitions of residential and institutional uses related to housing.
- Clarify zoning definitions, standards, and/or policies to ensure that they do not violate federal and State fair housing laws or violate State constitutional privacy rights with regard to housing for persons with disabilities.

*Efforts:*

- The City provided supportive housing services at several affordable senior developments and as a stand-alone service at the Adult Recreation Center.
- The City continued to expand services and facilities for emergency shelters, transitional shelters, case management and supportive services, homeless prevention services, street outreach, domestic violence programs, and runaway youth shelters.
- The City adopted Ordinance 5695 in 2010 for reasonable accommodation procedures to address housing and persons with disabilities.
- The City Adopted Ordinance 5810 on October 1, 2013 that amended the following:
  - Mental health treatment programs now permitted wherever hospitals are permitted.
  - Definitions of “supportive housing” and “transitional housing” were added for clarification.
  - Added clarity to definitions of residential and institutional uses related to housing.
  - Added clarity to definitions, standards, and/or policies to comply with State Law in regards to persons with disabilities.

#### **4. Segregation**

The City has experienced segregated housing patterns; both self-selected and steering practices for minority renters have been an issue.

*Recommendations:*

- Provide a variety of residential development opportunities in the City through the zoning of sufficient land with a range of densities.
- The location of the City’s affordable housing is the result of a combination of factors, including financial feasibility and topographical considerations. Much of the land in the northern half of the City is comprised of steep hillside areas, which is considerably more expensive to develop housing on. The topography of northern Glendale makes the area much more suitable for low density market-rate single family development. Assure that affordable housing is dispersed throughout the City to the extent that is feasible, given the City’s topographical constraints.

*Efforts:*

- The City continues to work to expand its housing stock to accommodate a range of housing options and income levels.
- The City continues to look for ways to disperse its affordable housing stock to different areas of the City to provide more coverage for marginalized groups.

## **5. Homeownership Education**

There is a lack of homeownership education in the City for Armenian and Hispanic homebuyers.

*Recommendations:*

- Maximize funding to increase homeownership such as through regional collaboration and by seeking additional federal, State, and private funding opportunities.
- Review subdivision standards with Zoning Code and Specific Plan standards to minimize barriers to affordable homeownership.
- Assist qualifying tenants displaced by conversion of apartments to condominiums to obtain any assistance for which they may be eligible including first right of refusal to purchase a unit and mortgage and/or down payment assistance through first-time home buyers programs.
- Continue to provide a homebuyer assistance program for low and moderate income first-time home buyers, both for the purchase of resale homes and as part of the production of new homeownership units.

## **6. Minority Outreach**

There is a lack of outreach to minority communities by real estate professionals in the City. Glendale continues to be a racially, ethnically, and culturally diverse community. Glendale is a unique community in that foreign born residents comprise more than half of the City's population. Most of the City's foreign-born residents emigrated from Asia, North and South America, and Europe, with a sizable population from Western Asia, which includes Iran and Armenia. While immigration adds to the diversity of the community, educational background, language skills, and cultural traditions vary considerably. This may present a challenge for recent immigrants to find and access housing and information.

*Recommendations:*

- Continue to contract with a fair housing service provider for multi-language fair housing and landlord/tenant services.
- To the extent feasible, continue to maintain multi-lingual capabilities among staff to serve a diverse population.

### *Efforts:*

- Currently, the City has multi-lingual capabilities to serve Spanish speaking residents. The City can also accommodate Armenian, Tagalog, Korean, American Sign Language, Farsi, Vietnamese, Chinese (Cantonese & Mandarin), Arabic, and Russian speakers.

## **7. Land Use Regulations**

Current land use regulations in the City are not conducive or compatible with fair housing laws and practices, specifically definitions and terminology for transitional housing, supportive permanent housing, disability, and reasonable accommodations. The current Glendale Zoning Code also does not include a classification or definition for community care facilities or group homes and associated provisions for permitting such uses. In addition, the current Glendale Zoning Code does not include a classification or definition for emergency shelters or transitional housing and associated provisions for permitting such uses.

### *Recommendations:*

- Implement provisions of SB 2 and remove the zoning process requiring a conditional use permit (CUP) for emergency shelters located with 300 feet of a residential zone. This will encourage and facilitate development of emergency shelters by removing a potential approval barrier by allowing by-right siting of emergency shelters in the IND and IMU Zones regardless of proximity to residential zones.
- The Glendale Municipal Code does not contain a definition or zoning language addressing SRO units. In order to clarify how the City will manage such facilities, the City commits to adopting a definition and other appropriate amendments to the Zoning Code.
- The City's definition of residential congregate care may be so broad that it encompasses other types of housing, such as a rest home, or it may conflict with other definitions, such as for boarding houses. The use of the term "facilities" may not convey the residential character of the use. The way the facilities are regulated may be in conflict with State or federal privacy rights of the residents. Conditional use permit requirements for residential congregate care facilities of 7 or more persons and prohibitions against such facilities in single-family residential zones may pose a housing constraint for persons with disabilities. Finally, there may be inconsistent regulation of residential congregate care facilities and hospitals. The City will undertake a review of the Zoning Code to clarify zoning definitions, standards, and/or policies to ensure that they do not violate federal and state fair housing laws or violate State constitutional privacy rights with regard to housing and supportive services for persons with disabilities and other special needs populations. The City commits to adopting appropriate amendments to the Zoning Code, or procedural changes.
- The Glendale Municipal Code does not contain specific language addressing supportive housing. In order to clarify how the City will manage such facilities, the City commits to adopting a definition of supportive housing that will identify which residential land uses comprise supportive housing and will permit such uses only subject to those restrictions that apply to other residential uses of the same type in the same zone.

Glendale has no definition of “transitional housing” and it could be argued that in certain conditions, a transitional housing situation could be considered an emergency shelter, single-family residence, a multi-family residence, a lodging or boarding house, or residential congregate care facility. In order to clarify how the City will manage such facilities, the City commits to adopting a definition of transitional housing that identifies which residential land uses comprise transitional housing and will permit such uses only subject to those restrictions that apply to other residential uses of the same type in the same zone.

### *Efforts:*

- Amended the Zoning Code to remove the distance requirement from the Emergency Shelter Ordinance.
- Amended the Zoning Code to include the definitions of SROs as a part of the “Hotel or Motel” definition.
- Amended the Zoning Code to add three definitions to clarify residential congregate care.
- Amended the Zoning Code to add a definition of “supportive housing” and “transitional housing.”
- Continued to expand services and facilities for emergency shelters, transitional shelters, case management and supportive services, homeless prevention services, street outreach, domestic violence programs, and runaway youth shelters.

## **8. Access to Financing**

Discrepancies exist in terms of access to financing programs for Glendale residents of different income groups. While conventional home financing is generally available to Glendale residents, the majority of home purchase loan applications were originated from upper income households earning more than 120 percent of the area AMI. The loan approval rate for lower income applicants that earned less than 80 percent of the area AMI was considerably lower than for upper income applicants.

Similarly, only a very small number of household utilized government-backed home loans to achieve homeownership. This may be due to a lack of information regarding these programs and also the home sale price limits under these programs. Furthermore, conventional lenders have been successful in developing loan products that are competitive with government home loans.

Among all conventional home loan applicants, Hispanic and African American households had lower approval rates and higher denial rates than other households. Among upper income applicants, Hispanic and African American households had lower approval rates than White or Asian applicants. Approval rates also differ significantly by lender. Among the top ten lenders active in the City, the discrepancy in approval rates was 42 percentage points in 2002.

*Recommendations:*

- Continue to contract with a fair housing service provider for multi-language fair housing and landlord/tenant services.
- To the extent feasible, continue to maintain multi-lingual capabilities among staff to serve a diverse population.
- Continue to provide a homebuyer assistance program for low and moderate income first-time home buyers, both for the purchase of resale homes, condominium conversion, and as part of the production of new homeownership units.
- Refer clients to the fair housing service provider or other appropriate agencies to educate distressed homeowners on the home loan modification process.

## **9. Access to Services**

The geographic distribution of certain services within the City of Glendale is uneven. Most of the Title I schools can be seen in the southern half of the City, south of the 134 Freeway and west of the 2 Freeway, where many of the City's lower and moderate income households and minority populations currently reside. Such concentrations limit lower income and minority households' access to quality education for their children.

*Recommendations:*

- Provide supportive services to children and their parents to improve truancy at schools and academic performance. Such services may include counseling, tutoring, and other after-school programs, and parent literacy programs.

*Efforts:*

- The City continues to utilize its CDBG funds to help support supportive human services throughout the City in order to improve academic performance.

## **10. Housing Rehabilitation**

Glendale's housing stock has a significant portion of older homes. Homes built prior to 1940 account for 19 percent of the housing stock. A plurality of Glendale's housing (40 percent) was constructed between 1940 and 1969. Between 2000 and 2010, the pace of housing development in Glendale slowed quite a bit, with only an additional 2,556 dwelling units being built. Due to the diminishing supply of vacant land in Glendale, new residential development was and continues to be accommodated by the replacement of older single-family homes with higher density developments, as permitted under zoning.

*Recommendations:*

- Continue to utilize the City's code enforcement program to bring substandard units into compliance with City codes and to improve overall housing conditions in Glendale.
- Promote increased awareness among property owners and residents of the importance of property maintenance to long term housing quality.
- Monitor City-assisted affordable housing units for compliance with appropriate housing quality standards

*Efforts:*

- The City continues to utilize the Code Enforcement program to ensure that substandard units are in compliance with City codes.
- The City continues to monitor City-assisted affordable housing units within the City to ensure the maintenance and housing standards are met.

## **11. Access to Housing Choice Vouchers (Section 8) and Other Affordable Units**

Participants of the fair housing workshops alleged corruption and favoritism in the allocation of Section 8 vouchers and the tenant selection process for the City's limited affordable rental units.

*Recommendations:*

- Work to educate residents on the selection process utilized for Section 8 vouchers, through the City Council and Section 8 Advisory Board. The City may make presentations to the City Council regarding the status of the Section 8 wait list periodically and summarize the priority status of households that receive Section 8 or other affordable units.

*Efforts:*

- The City and the Section 8 Advisory Board have worked to educate the residents on the selection process that is utilized for Section 8 vouchers. To that end, the City has developed a webpage dedicated to describing the Section 8 application and wait list process and has produced a bilingual video detailing how the Section 8 program is funded, managed, and monitored.

## **12. Definition of "Disability" or "Handicap"**

Persons with disabilities may have restricted access to housing if a Zoning Code's definition for "disability" or "handicap" is inconsistent with the Federal Fair Housing Act (FFHA). Glendale's Zoning Code does not define "disability" or "handicap." To avoid potential impediments to fair housing choice that may arise from ambiguous and subjective assumptions about what constitutes a protected disability or handicap, the City should amend the Zoning Code to include a definition that is consistent with the FFHA definition.



*Recommendations:*

- Add a definition of “disability” or “handicap” to the Zoning Code that is consistent with the FFHA definition.

*Efforts:*

- Amended the Zoning Code to include a definition of “disability.”

### **13. Discriminatory Advertising**

Reviews of rental and for-sale housing ads on the internet and local newspapers indicate that potentially discriminatory language is present. Many ads include descriptions that do not relate to the physical characteristics of the units and may be perceived as language designed to attract specific groups to or steer specific groups away from the units.

*Recommendations:*

- Work with the fair housing service provider to monitor housing ads and contact listing agencies (such as craigslist.com and newspapers) to remind these agencies of the importance of screening housing ads for potentially discriminatory language.

### **14. ADA Accessibility**

Most of the City’s facilities are ADA compliant. The City maintains a Facilities and Program Access Survey, which documents any and all deficiencies between full compliance with ADA standards and the current state of the City’s facilities, services, and programs. The City is committed to reaching full ADA compliance, and has developed, and regularly updates, its Capital Improvement Project program (CIP) to address all identified deficiencies.

*Recommendations:*

- Regularly update the Capital Improvement Project program (CIP) to address all identified deficiencies in the Facilities and Program Access Survey.

*Efforts:*

- The City annually works to complete a Capital Improvement Project to address concerns with ADA compliance at different locations throughout the City,

# Chapter 8: Impediments and Actions

The previous chapters evaluate the conditions in the public and private market that may impede fair housing choice. This chapter builds upon the previous analysis, summarizes conclusions and presents a list of actions to address the impediments to fair housing choice. When identifying actions, this AI focuses on actions that are directly related to fair housing issues and can be implemented within the resources and authority of the City of Glendale. Existing State, local, and federal requirements, such as the Affirmative Marketing Plan, Relocation Plans, deconcentration of Section 8 and public housing, are not re-stated in this AI. General actions, such as supporting the efforts of other agencies or enhancing affordability, are also not included.

The ability of the City of Glendale to carry out the actions outlined in this Chapter is largely contingent upon the availability of funding resources. Given the current economic conditions, various funding sources are in jeopardy. Through the State’s action to eliminate Redevelopment, the City has lost millions of dollars annually designated for affordable housing development. Furthermore, CDBG and HOME funds, the City’s key housing funds from HUD, are also facing potentially significant cuts by the Congress. The City will evaluate annually during its Annual Action Plan process the feasible and effective actions to undertake based on budgetary constraints.

## A. Impediments and Actions

### Impediment #1: Housing Discrimination

Incidents of housing discrimination were reported in the City of Glendale. The largest proportion of fair housing complaints over the past five years relate to physical disability, familial status, and race. Housing service providers have also stated that discrimination against the previously homeless by landlords is a challenge to overcoming the problem of homelessness.

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Maintain a contract with a fair housing service provider to provide educational and investigative services for multi-language housing discrimination questions and landlord/tenant complaints to further fair housing.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> Community Services & Parks (CSP)
<ul style="list-style-type: none"> <li>Expand fair housing outreach and education efforts regarding the new Source of Income protection under SB 329 and SB 222 to ensure that tenants and landlords are aware of these new changes.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> <i>Community Services &amp; Parks (CSP)</i>
<ul style="list-style-type: none"> <li>Promote nondiscrimination of housing by implementing the recommendations of Glendale’s Analysis of Impediments to Fair Housing Plan.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF, LMIHAF, CDBG, HOME <b>Agency:</b> CD, CSP
<ul style="list-style-type: none"> <li>Continue to provide information to the public about housing rights, responsibilities, and opportunities including the provisions of the Glendale Just Cause Eviction Ordinance, which outlines the legal reasons for eviction, required lease terms, and any relocation assistance that may be due to tenants.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF <b>Agency:</b> CD

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Coordinate annual community fair housing workshops. The workshops will be made available under a CDBG contract with a fair housing service provider to serve City residents with fair housing education, conciliation, mediation, and resolving tenant/landlord disputes. Residents who feel discriminated against by rental property owners, rental property managers, real estate agents, or loan and credit agents are also referred to the fair housing service provider to get information and assistance with their discrimination claim.</li> </ul>	<b>Timeframe:</b> Conduct workshops annually <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> CSP, CD
<ul style="list-style-type: none"> <li>Continue to offer housing and supportive services to special needs groups such as the elderly and the homeless to enable independent living.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, GF, SHP <b>Agency:</b> CSP
<ul style="list-style-type: none"> <li>Coordinate with local social service providers to address the needs of the City's homeless population, including the development of service-enriched and transitional/permanent affordable housing for the formerly homeless.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, SHP, HOME, LMIHAF <b>Agency:</b> CSP, CD
<ul style="list-style-type: none"> <li>Hold homeless fairs to connect homeless individuals with services available in the local community.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG CoC <b>Agency:</b> CSP, Homeless Coalition
<ul style="list-style-type: none"> <li>Continue to work with the Glendale Continuum of Care on an ongoing basis for the Plan period to support existing programs that have demonstrated effectiveness.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG <b>Agency:</b> CSP
<ul style="list-style-type: none"> <li>Complete research and analysis of developing a Historical Context statement that identifies and understands Glendale's history as it pertains to its racist past as part of its acknowledgement of past history as a racially exclusive sundown town".</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> General Fund <b>Agency:</b> Management Services

## Impediment #2: Fair Housing Education and Outreach

There is an ongoing need in the City for fair housing education and outreach. Many residents are unclear regarding where to look for assistance with fair housing issues and generally do not believe reporting the incidents would make any difference. According to the fair housing survey conducted as a part of the development of this AI, about 20 percent of the survey respondents who were discriminated against did not report the incident because they did not know where to report the act. In addition, some rental property owners may lack knowledge of fair housing laws and landlord rights and responsibilities.

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

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Continue to work with the fair housing service provider to better publicize the fair housing services available to Glendale residents, rental property owners/managers, and homeowners associations.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> CSP, CD

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Maintain a contract with a fair housing service provider to provide educational and investigative services for multi-language housing discrimination questions and landlord/tenant complaints to further fair housing.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> CSP
<ul style="list-style-type: none"> <li>Continue to provide information to the public about housing rights, responsibilities, and opportunities including the provisions of the Glendale Just Cause Eviction Ordinance, which outlines the legal reasons for eviction, required lease terms, and any relocation assistance that may be due to tenants.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Coordinate annual community fair housing workshops. The workshops will be made available under a CDBG contract with the Housing Rights Center to serve City residents with fair housing education, conciliation, mediation, and resolving tenant/landlord disputes. Residents who feel discriminated against by rental property owners, rental property managers, real estate agents, or loan and credit agents are also referred to the HRC to get information and assistance with their discrimination claim.</li> </ul>	<b>Timeframe:</b> Conduct workshops annually <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> CSP, CD
<ul style="list-style-type: none"> <li>Annually present a fair housing workshop that targets landlords, apartment managers, and homeowners associations, and a workshop for renters and homeowners. Target outreach for workshops to owners of multifamily properties and residents in low income neighborhoods, including non-English speaking segments of the community. Only homeowner's associations have the authority to review and make necessary amendments to CC&amp;Rs; fair housing workshop topics can include local homeowners associations' responsibilities regarding CC&amp;Rs and the necessity of periodically reviewing and amending their CC&amp;Rs.</li> </ul>	<b>Timeframe:</b> Conduct workshops annually <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> CSP, CD
<ul style="list-style-type: none"> <li>Provide support to the Glendale Continuum of Care, whose mission is to develop homeless services for people coming through the homeless continuum of care. Coordinate with the Community Development Department for development of special permanent /affordable housing for homeless individuals and families</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG <b>Agency:</b> CSP
<ul style="list-style-type: none"> <li>Continue to work with the fair housing service provider to educate landlords and tenants on the reasonable accommodation process in order to reduce the confusion surrounding this issue.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> CSP
<ul style="list-style-type: none"> <li>Expand fair housing outreach and education efforts regarding the new Source of Income protection under SB 329 and SB 222 to ensure that tenants and landlords are aware of these new changes.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> <i>Community Services &amp; Parks (CSP)</i>

### Impediment #3: Accessibility

There is a need for accessible housing in the City for persons with disabilities.

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Encourage both the private and public sectors to produce or assist in the production of housing for special needs groups such as: the handicapped, the elderly, large families, single-parent households, and formerly homeless.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> LMIHAF, HOME <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Continue to offer housing and supportive services to special needs groups such as the elderly and the homeless to enable independent living.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, GF, SHP <b>Agency:</b> CSP
<ul style="list-style-type: none"> <li>Coordinate with local social service providers to address the needs of the City's homeless population, including the development of service-enriched and affordable housing.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, SHP, HOME, RDA <b>Agency:</b> CSP, CD
<ul style="list-style-type: none"> <li>Permit the development of transitional housing for service-dependent populations in the City's residential zones.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF <b>Agency:</b> CD

### Impediment #4: Segregation

Patterns of racial and ethnic concentration are present within particular areas of the City. Figure 1, on page 17, illustrates concentrations of minority households by Census block group in Glendale. A "concentration" is defined as a block group whose proportion of minority households is greater than the overall Los Angeles County average of 72.2 percent. As shown in Figure 1, there are very few block groups that have a higher concentration of minorities than the County's average of 72.2 percent. Only two Census block groups were found to have a minority concentration, but these areas may still need more assistance.

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Provide a variety of residential development opportunities in the City through the zoning of sufficient land with a range of densities.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Encourage developers to provide on-site affordable housing units to fulfill the inclusionary housing requirements.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Assure that affordable housing is dispersed throughout the City to the extent that is feasible, given the City's topographical constraints.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> HOME, LMIHAF, other <b>Agency:</b> CD

### Impediment #5: Homeownership Education

There is a need for homeownership education in the City, especially for Armenian and Hispanic homebuyers.

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Maximize funding to increase homeownership such as through regional collaboration and by seeking additional federal, State, and private funding opportunities.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> HOME, LMIHAF, GF <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Review subdivision standards with Zoning Code and Specific Plan standards to minimize barriers to affordable homeownership.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Assist qualifying tenants displaced by conversion of apartments to condominiums to obtain any assistance for which they may be eligible including first right of refusal to purchase a unit and mortgage and/or down payment assistance through first-time home buyers programs.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Continue to provide a homebuyer assistance program for low and moderate income first-time home buyers, both for the purchase of resale homes and as part of the production of new homeownership units.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> HOME, LMIHAF, other <b>Agency:</b> CD

### Impediment #6: Minority Outreach

There is a lack of outreach to minority communities by real estate professionals in the City. Glendale continues to be a racially, ethnically, and culturally diverse community. Glendale is a unique community in that foreign-born residents comprise more than half of the City’s population. Most of the City’s foreign-born residents emigrated from Asia, North and South America, and Europe, with a sizable population from Western Asia, which includes Iran and Armenia. While immigration adds to the diversity of the community, educational background, language skills, and cultural traditions vary considerably. This may present a challenge for recent immigrants to find and access housing and related resources and information.

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Continue to contract with a fair housing service provider for multi-language fair housing and landlord/tenant services.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> CSP
<ul style="list-style-type: none"> <li>To the extent feasible, continue to maintain multi-lingual capabilities among staff to serve a diverse population.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> All <b>Agency:</b> All City Depts.

## Impediment #7: Land Use Regulations

Current land use regulations in the City are not conducive or compatible with fair housing laws and practices, specifically updates will need to be made the Emergency Shelter Ordinance and the Accessory Dwelling Unit Ordinance.

Actions	Timeframe, Funding, and Responsible Agency
<p>Implement provisions of new State Laws in regard to the City's Emergency Shelter Ordinance:</p> <ul style="list-style-type: none"> <li>• AB 139 (Emergency and Transitional Housing) - parking for shelter staff only; definition of sufficient capacity</li> <li>• AB 101 (Low Barrier Navigation Center) - housing for homeless or at-risk homeless while waiting to transition to permanent housing</li> </ul>	<p><b>Timeframe:</b> Amend Zoning Code by 2021  <b>Funding:</b> GF  <b>Agency:</b> CD</p>
<p>Implement provisions of new State Laws in regard to supportive housing:</p> <ul style="list-style-type: none"> <li>• AB 2162 (Supportive Housing) - by right if meeting specific criteria in zones where multi-family housing is permitted, including mixed use and other nonresidential zones.</li> </ul>	<p><b>Timeframe:</b> Amend Zoning Code by 2021  <b>Funding:</b> GF  <b>Agency:</b> CD</p>
<p>Implement provisions of new State Laws in regard to density bonus:</p> <ul style="list-style-type: none"> <li>• AB 2345 (Gonzales) - allows developers to increase their density bonuses – the number of units permissible on any plot of land – to 50%, depending on the number and level of deed-restricted affordable homes on a piece of property. Under existing density bonus law, developers are able to receive up to a maximum of a 35% bonus of allowed density. Additionally, the bill allows local governments to grant additional waivers for projects located within a half-mile of transit and which are 100% affordable, and incentivizes additional density bonus projects by reducing the maximum parking required for certain projects.</li> <li>• AB 2501 - makes changes to: the timeline for processing application for a density bonus; electing to accept no density increase; and determining the value of concessions and incentives.</li> <li>• AB 2556 - clarifies the replacement requirements as established by AB 2222.</li> <li>• AB 2442 - requires a density bonus be granted for a housing development if applicant agrees to construct housing for transitional foster youth, disabled veterans, or homeless person.</li> </ul>	<p><b>Timeframe:</b> Amend Zoning Code by 2021  <b>Funding:</b> GF  <b>Agency:</b> CD</p>

Actions	Timeframe, Funding, and Responsible Agency
<p>Implement provisions of new State Laws in regard to Accessory Dwelling Units in the City:</p> <ul style="list-style-type: none"> <li>• SB 13: Addresses high development impact fees by removing fees for ADUs under 750 square feet and creating a fee structure in proportion to the primary home on the lot for larger ADUs.</li> <li>• AB 68: Prohibits requirements for minimum lot size, rear and side setback more than 4' and replacement parking if converting a garage. AB 68 also allows for two ADUs on same property (a junior ADU and ADU on the same lot).</li> <li>• AB 881: Streamlines approval for ADU permits if constructed in existing garages and eliminates owner-occupancy requirement for five years.</li> <li>• AB 587: Provides affordable housing organizations the exemption to sell ADUs separately from the primary residence to eligible low-income homeowners.</li> </ul>	<p><b>Timeframe:</b> Completed December 2020  <b>Funding:</b> GF  <b>Agency:</b> CD</p>

### **Impediment #8: Access to Financing**

Discrepancies exist in terms of access to financing for Glendale residents. While conventional home financing is generally available to Glendale residents, the majority of home purchase loan applications were originated for upper income households earning more than 120 percent of the AMI. In comparison, the loan approval rate for lower income applicants who earned less than 80 percent of the AMI was considerably lower.

Similarly, only a very small number of households utilized government-backed home loans to achieve homeownership. This may be due to a lack of information regarding these programs and also the home sale price restricted by these programs. Furthermore, conventional lenders have been successful in developing loan products that are competitive with government home loans.

Actions	Timeframe, Funding, and Responsible Agency
•	
•	
<ul style="list-style-type: none"> <li>• Continue to provide a homebuyer assistance program for low and moderate income first-time home buyers, both for the purchase of resale homes, condominium conversion, and as part of the production of new homeownership units.</li> </ul>	<p><b>Timeframe:</b> Ongoing  <b>Funding:</b> HOME, LMIHAF, other  <b>Agency:</b> CD</p>
<ul style="list-style-type: none"> <li>• Refer clients to the fair housing service provider or other appropriate agencies to educate distressed homeowners on the home loan modification process.</li> </ul>	<p><b>Timeframe:</b> Ongoing  <b>Funding:</b> CDBG, HOME Admin, LMIHAF  <b>Agency:</b> CD, CSP</p>



### Impediment #9: Access to Services

The geographic distribution of certain services within the City of Glendale is uneven. Figure 9: (on page 79) illustrates the locations of the City’s Title I schools. Most of these schools can be seen in the southern half of the City, south of the 134 Freeway and west of the 2 Freeway, where many of the City’s lower and moderate income households and minority populations currently reside. Such concentrations limit lower income and minority households’ access to quality education for their children.

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Provide supportive services to children and their parents to improve truancy at schools and academic performance. Such services may include counseling, tutoring, and other after-school programs, and parent literacy programs.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG <b>Agency:</b> CSP

### Impediment #10: Housing Rehabilitation

The accepted standard for when housing needs major rehabilitation is when the housing is 30 years old. With nearly 20 percent of Glendale’s housing stock built prior to 1990, continued housing maintenance is necessary to prevent widespread housing deterioration in the City. Fortunately, many of the older residences are well maintained single-family homes and are not in need of significant rehabilitation. In some cases, these homes are a part of potential historic districts.

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Continue to utilize the City’s code enforcement program to bring substandard units into compliance with City codes and to improve overall housing conditions in Glendale.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> GF <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Promote increased awareness among property owners and residents of the importance of property maintenance to long term housing quality.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, GF <b>Agency:</b> CD
<ul style="list-style-type: none"> <li>Monitor City-assisted affordable housing units for compliance with appropriate housing quality standards</li> </ul>	<b>Timeframe:</b> Annually <b>Funding:</b> CDBG, Section 8, LMIHAF, SHP <b>Agency:</b> CD, CSP

### Impediment #11: Discriminatory Advertising

Reviews of rental and for-sale housing ads on the internet and local newspapers indicate that potentially discriminatory language is present. Many ads include descriptions that do not relate to the physical characteristics of the units and may be perceived as language designed to attract specific groups to or steer specific groups away from the units.

Actions	Timeframe, Funding, and Responsible Agency
<ul style="list-style-type: none"> <li>Work with the fair housing service provider to monitor housing ads and contact listing agencies (such as craigslist.com and newspapers) to remind these agencies of the importance of screening housing ads for potentially discriminatory language.</li> </ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> CDBG, Section 8 <b>Agency:</b> CSP, CD

## **Impediment #12: ADA Accessibility**

Most of the City's facilities are ADA compliant. The City maintains a Facilities and Program Access Survey, which documents any and all deficiencies between full compliance with ADA standards and the current state of the City's facilities, services, and programs. The City is committed to reaching full ADA compliance, and has developed, and regularly updates, its Capital Improvement Project program (CIP) to address all identified deficiencies.

<b>Actions</b>	<b>Timeframe, Funding, and Responsible Agency</b>
<ul style="list-style-type: none"><li>• Regularly update the Capital Improvement Project program (CIP) to address all identified deficiencies in the Facilities and Program Access Survey.</li></ul>	<b>Timeframe:</b> Ongoing <b>Funding:</b> Capital Improvement and Gas tax funds <b>Agency:</b> All City Departments

## Appendix A: List of Agencies Invited to Public Meetings

The Salvation Army	320 W. Windsor Road	Glendale	CA	91204	818.246.5586
The Housing Rights Center	3255 Wilshire Blvd. St. 1150	Los Angles	CA	90010	213.387.8400
Armenian Relief Society of Western USA	517 W. Glenoaks	Glendale	CA	91202	818.241.7533
Glendale Youth Alliance	1255 S. Central Avenue	Glendale	CA	91204	818.548.2790
All for Health	519 E. Broadway	Glendale	CA	91205	818.409.3020
Ascencia	1851 Tyburn Street	Glendale	CA	91204	818.246.7900
Catholic Charities of Los Angeles	1531 James M. Wood Blvd.	Los Angles	CA	90015	213.251.3400
Committee for Armenian Students in Public Schools	6252 Honolulu Ave.	La Crescenta	CA	91214	818.249.5044 310.780.4222
Door Of Hope	P.O. Box 90455	Pasadena	CA	91206	626.304.9130
Homenetmen Shant Chapter	2951 Honolulu Ave., Suite A	La Crescenta	CA	91214	818.248.4680
Armenian Cultural Association, Hamazkayin	407 E. Colorado Street	Glendale	CA	91205	818.621.9308
Family Promise	P.O. Box 7151	Burbank	CA	91510	818.562.7778
Armenian General Benevolent Union	2495 E. Mountain Street	Pasadena	CA	91104	626.794.7942
Armenian Cultural Foundation	211 West Chestnut St.	Glendale	CA	91204	818.672.6260
Adventist Health Glendale	1509 Wilson Terrace	Glendale	CA	91206	818.409.8008
YWCA of Glendale	735 E. Lexington Dr.	Glendale	CA	91206	818.242.4155
Homenetmen Glendale Ararat Chapter	3347 N. San Fernando Road	Los Angles	CA	90065	323.256.2564

# Appendix B: Fair Housing Survey



## CITY OF GLENDALE – RESIDENT SURVEY

### WHAT ARE THE HOUSING AND COMMUNITY DEVELOPMENT NEEDS IN YOUR NEIGHBORHOOD?

The City of Glendale receives Community Development Block Grants (CDBG) from HUD each year for housing and community development projects. In order to access these funds, the City must develop a five-year plan to assess housing and community development needs. The City wants you to have a voice in how this money is invested. Please assist us by filling out this survey.

**TELL US SOMETHING ABOUT YOURSELF** (These questions are optional; however, your response will allow us to better serve the community).

What ZIP Code do you reside in? \_\_\_\_\_

1. Ethnic Categories (select one):     Hispanic or Latino                       Not-Hispanic or Latino
2. Racial Categories (select one or more):
  - American Indian or Alaska Native                       Asian                       Black or African American
  - Native Hawaiian or Other Pacific Islander                       White                       Other \_\_\_\_\_
3. Do you rent or own your home?     Rent                       Own
4. Do you currently reside in a subsidized housing unit?     YES     NO
5. Age:             18-24             25-34             35-44             45-54             55-64             65+
6. Do you have a disability?     YES             NO
7. Do you have children under the age of 18 years old in your home?     YES             NO

### HOUSING AND COMMUNITY DEVELOPMENT NEEDS SURVEY

(Survey Example)

Community Facilities: Rank the following programs in order of importance to you (1 = highest, 3 = lowest)	1	2	3
Indoor Community Centers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Libraries	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Outdoor Parks & Recreation Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In the survey example above, this person selected "Park & Recreation Facilities" as the item they would prefer to see improved the most (1 = highest) and "Libraries" as the item they would least prefer to see improved (3 = lowest). **Please rank each item once.**

Community Facilities: Rank the following facilities in order of importance to you. (1 = highest, 5 = lowest)	1	2	3	4	5	Public Services: Rank the following services in order of importance to you. (1 = highest, 7 = lowest)	1	2	3	4	5	6	7
Indoor Community Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Anti-Crime Programs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Libraries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Graffiti Removal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Outdoor Parks & Recreation Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mental Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Senior Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Legal Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homeless Day Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Senior Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
						Youth Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
						Homeless Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Public Infrastructure:</b> Rank the following needs in order of importance to you. (1 = highest, 5 = lowest)						<b>Special Needs Services:</b> Rank the following services in order of importance to you. (1 = highest, 5 = lowest)					
	1	2	3	4	5		1	2	3	4	5
Sidewalk Improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Services for Disabled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Street & Alley Improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Services for Domestic Violence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Small-Scale Neighborhood Beautification Projects (Infrastructure Improvement)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Services for Homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessibility Improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Services for Substance Abuse	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
						Services for Mental Health	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Housing:</b> Rank the following housing needs in order of importance to you. (1 = highest, 8 = lowest)									<b>Special Needs Housing:</b> Rank the following needs in order of importance to you. (1 = highest, 5 = lowest)				
	1	2	3	4	5	6	7	8		1	2	3	4
Affordable Rental Housing Near Transit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Housing for Disabled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Code Enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Housing for Seniors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Housing Rehabilitation Financial Assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency Shelter for Homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homeowners Rehabilitation Financial Assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Permanent Housing for Homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homebuyer Financial Assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Rental Security Deposit Assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Lead Testing/Abatement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Landlord Incentive	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					

<b>Business &amp; Jobs:</b> Rank the following programs in order of importance to you. (1 = highest, 6 = lowest)					
	1	2	3	4	5
Programs to Attract New or Retain Businesses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Business Assistance Programs for Entrepreneurs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Business Technical Assistance to Improve or Expand Businesses (Including Access to Capital)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Business Corridor Beautification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Create Jobs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## FAIR HOUSING SURVEY

As part of the CDBG program, the City is also required to address fair housing concerns. As part of this assessment, please provide input on your **experience** of fair housing issues in your neighborhood. The sole purpose of this survey is to gauge the overall **experience** of fair housing in the community so that the City can develop a plan of action to further fair housing.

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

8. Have **you** personally ever experienced discrimination in housing?  YES  NO  
(If you answered "YES" please answer questions #9 - #11. If you answered "NO" please proceed to question #12)
9. If you believe you have been discriminated against:
- a) Who do you believe discriminated against you? (check all that apply)
- Landlord/Property Manager  Real Estate Agent  Insurance Broker/ Company  
 Mortgage lender  Government Staff Person  Other \_\_\_\_\_
- b) Where did the act of discrimination occur? (check all that apply)
- Apartment Complex  Condo/Townhome Development  Other \_\_\_\_\_  
 Single-Family Neighborhood  Public or Subsidized Housing Project  
 Mobile Home Park  When Applying for City/County Programs
- c) On what basis do you believe you were discriminated against? (check all that apply)
- Race  Color  Religion  National Origin  Age  
 Gender  Ancestry  Marital Status  Sexual Orientation  
 Family Status (e.g. single-parent with children, family with children or expecting a child)  
 Source of Income (e.g. welfare, unemployment insurance)  
 Disability/Medical Conditions (either you or someone close to you)  
 Other (please explain): \_\_\_\_\_
- d) How were you discriminated against? (check all that apply)
- Not Shown Apartment  Higher Rent than Advertised  
 Higher Security Deposit than Industry Standard  Provided Different Housing Services or Facilities  
 Other \_\_\_\_\_
10. Reasonable modifications and reasonable accommodations allow for certain changes or flexibility in the rules, policies, or procedures set by housing providers. This allows a resident with a disability an equal opportunity to use and enjoy a housing unit. A **reasonable modification** is a structural change made to the premises while a **reasonable accommodation** is a change, exception or adjustment to a rule, policy, practice or service. For example, installing a ramp for an individual who uses a wheelchair or grab bars in the bathroom are reasonable modifications. A reasonable accommodation would include making an exception to an existing 'no pet' rule to permit a service dog.

11. Have you ever been denied a:  "Reasonable Modification" (structural changes to a unit)  
 "Reasonable Accommodation" (flexibility in rules and policies)  
 N/A
- a) If YES, what was your request?  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
12. If you believe you have been discriminated against, have you reported the incident?  
 YES  NO
- a) If NO – Why?  
 Don't Know Where to Report  Don't Believe it Makes Any Difference  
 Afraid of Retaliation  Too Much Trouble  
 Other \_\_\_\_\_
- b) If YES, how did you report the incident?  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
- c) If you reported the complaint, what is the status?  
 Unresolved  Unresolved/Pending Resolution  Resolved via Mediation  
 In Litigation  Other \_\_\_\_\_
13. Have you ever attended a Fair Housing Training?  YES  NO
- a) If YES, was it free or was there a fee?  Free  Required a Fee
- b) If YES, where was the training?  Home  Work  City of \_\_\_\_\_  
 Other \_\_\_\_\_
14. Have you ever seen or heard a Fair Housing Public Service Announcement (PSA) on TV/ Radio/  
 Online/ Flyer?  YES  NO

**Please provide any additional comments you may have on fair housing and needs in the community:**

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**THANK YOU!**

**Please return surveys to:**  
 City of Glendale Housing Division  
**Attention: Maggie Kavarian**  
 141 N. Glendale Ave, Glendale CA 91206 Second Floor

## Appendix C: Public Notices

**HLR MEDIA, LLC LEGAL QUOTES**  
**626-301-1010**



### **PUBLIC NOTICE**

The City of Glendale is seeking public comment to the City's proposed Analysis of Impediments to Fair Housing Choice (AI) for the period September 30, 2021 through October 29, 2021.

The AI is required by the U.S. Department of Housing and Urban Development (HUD) for any community that receives federal housing funds.

The City of Glendale invites the public to submit written comments regarding the AI. A link to the AI document can be found at: <http://www.glendaleca.gov/government/departments/community-services-parks/community-development-block-grant>

Please provide written comments on or before October 29, 2021 to:  
City of Glendale Community Services & Parks CDBG Section  
Attn: Maggie Kavarian  
613 E Broadway, Room 120  
Glendale CA 91206  
Or email [mkavarian@glendaleca.gov](mailto:mkavarian@glendaleca.gov)

**Publish on September 30, 2021**  
**GLENDALE INDEPENDENT**

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