

Analysis of Impediments to Fair Housing Choice

City of Glendora

2018 Update

City of Glendora
Planning Department
116 E. Foothill Blvd.
Glendora, CA 91741

Signature Page

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



Name Chris Jeffers
(Elected Official/Designee)

April 30, 2018
Date

City Manager
Title

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Introduction

Founded in 1887, Glendora was officially incorporated as a City in 1911. The City is nestled at the base of the scenic San Gabriel Mountains, in the eastern portion of Los Angeles County approximately 27 miles from downtown Los Angeles. Glendora offers convenient access to major commercial, cultural, educational and recreational areas in Southern California. The City remained a small citrus-producing community until the late 1950s, when agriculture gave way to large scale residential development. Today, more than 50,000 residents enjoy Glendora's excellent public and private schools, lush parks, comprehensive community services and one of the lowest crime rates in Los Angeles County.

A. Purpose of the Report

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

Through the federally-funded Community Development Block Grant (CDBG) program, among other state and local programs, the City of Glendora 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, each jurisdiction must certify that it “actively furthers fair housing choice” through the following:

- Completion of an Analysis of Impediments to Fair Housing Choice (AI)
- Actions to eliminate identified impediments; and
- Maintenance of fair housing records.

This report, the Analysis of Impediments to Fair Housing Choice (commonly known as the “AI”), presents a demographic profile of Glendora, assesses the extent of housing needs of its residents, and evaluates the availability of a range of housing choices for all. This report also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person’s access to housing. As the name of the report suggests the document reviews “impediments” to fair housing. While this report also assesses the nature and extent of housing discrimination, the focus is on identifying impediments that may prevent equal housing access and developing solutions to mitigate or remove such impediments.

While HUD has adopted a new Affirmatively Furthering Fair Housing (AFFH) Rule that would mandate the preparation of an Assessment of Fair Housing (AFH) using a HUD-provided data and mapping tool, this AFH requirement would not take effect until the next Consolidated Plan (CP) cycle starting on or after October 31, 2020. Since the City of Glendora’s next CP cycle after October 31, 2020 would begin on July 1, 2023, the City’s first AFH would be due October 4, 2022. In the meantime, the City is required to update this AI as part of its fair housing requirements, concurrent with its Consolidated Plan update.

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. No one may take any of the following actions based on race, color, national origin, religion, sex, familial status, or handicap:

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

Reasonable Accommodations and Accessibility

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

HUD Final Rule on Equal Access to Housing in HUD Programs

On March 5, 2012, the U.S. Department of Housing and Urban Development (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 homeless programs, as well as to permanent 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 homeless 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
- Gender identify or expression
- Genetic information
- Marital status
- Source of income
- Sexual Orientation
- Familial status (households with children under 18 years of age)
- Religion
- Mental/Physical Disability
- Medical Condition
- Age
- Arbitrary discrimination

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** 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 (California Civil Code section 51.7). 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.

And, finally, **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 111135, 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 (Housing Element law) require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities (SB 520)
- Housing for homeless persons, including emergency shelters, transitional housing, supportive housing (SB 2)
- Housing for extremely low income households, including single-room occupancy units (AB 2634)
- Housing for persons with developmental disabilities (SB 812)

C. 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.

1. Housing Issues, Affordability, and Fair Housing

HUD's Office of Fair Housing and Equal Opportunity (FHEO) 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.

2. Impediments Defined

Within the legal framework of federal and state laws and based on the guidance provided by the U.S. Department of Housing and Urban Development (HUD) 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. Specifically, to receive HUD Community Planning and Development (CPD) formula grants, a jurisdiction must:

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

D. Lead Agency and Funding Sources

The City of Glendora's Planning Department is the lead agency for this report. Preparation of the report was funded by Community Development Block Grant (CBDG) general planning and administration funds.

E. Data and Methodology

According to the *Fair Housing Planning* Guide prepared by the U.S. Department of Housing and Urban Development (HUD), HUD does not require the 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. The following data sources were used to complete this AI. Sources of specific information are identified in the text, tables and figures. To the extent data are available, 2010 Census (100 percent count) is used. Sample data from the American Community Surveys (ACS) and other sources are used to supplement the Census.

- Census data (1990-2010) and American Community Surveys¹
- California Department of Fair Employment and Housing
- California Department of Department of Finance (2017)
- California Department of Social Services Community Care Licensing Division
- Home Mortgage Disclosure Act (HMDA) data (2011 and 2016)

¹ The 2010 Census no longer provides detailed demographic or housing data through the "long form". Instead, the Census Bureau conducts a series of American Community Surveys (ACS) to collect detailed data. The ACS surveys different variables at different schedules (e.g. every year, every three years, or every five years) depending on the size of the community. Multiple sets of ACS data are required to compile the data for Glendora in this report.

- Dataquick housing sales activity data
- U.S. Department of Housing and Urban Development (HUD)
- U.S. Federal Bureau of Investigation (FBI)

F. Scope and Organization

1. Scope of Analysis

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

- A comprehensive review of the laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws, regulations, policies, procedures, and practices affect the location, availability, and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choice.

2. Organization of the Report

The AI is divided into the following chapters:

Introduction - Defines "fair housing" and explains the purpose of the report.

Community Outreach - Discusses the outreach efforts undertaken for the development of the AI.

Community Profile - Presents the demographic, housing, and income characteristics in the City of Glendora. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed.

Lending Practices - Assesses the access to financing for different groups. Predatory and subprime lending issues are also discussed.

Public Policies - Analyzes various public policies and actions that may impede fair housing within the City.

Current 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 the City.

Progress Since Previous AI - Assesses the progress the City has made since the preparation of the previous Analysis of Impediments (AI) to Fair Housing Choice.

Fair Housing Action Plan - Summarizes the findings regarding fair housing issues in Glendora and provides recommendations for furthering fair housing practices.

Community Outreach

This AI Report has been developed to provide an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals, and service providers. To assure the report responds to community needs, development of the AI includes a community outreach program consisting of a community workshop, a fair housing and community needs survey conducted in conjunction with the Consolidated Plan, and a public meeting before the City Council.

A. Community Workshops

The City of Glendora conducted one community workshop to provide residents, housing professionals and providers, and local service agencies an opportunity to gain awareness of fair housing laws and to share issues and concerns:

Community Workshop	Glendora Public Library 140 S. Glendora Avenue Glendora, CA 91741	Wednesday, February 21, 2018 6:00 pm
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Detailed information on the agencies invited can be found in Appendix A. These agencies were encouraged to attend the workshop, make the workshop flyer available at their service locations, encourage participation in the Fair Housing Survey, and invite their clients to attend a workshop. To ensure that the fair housing concerns of low and moderate income and special needs residents were addressed, individual invitations were mailed to over 100 housing and service providers, housing professionals, local religious organizations, and school offices. The City also promotes the survey on social media.

The City also took efforts to publicize the community workshop through announcements and disbursement of the flyer at various local events. Advertisements were also published for the community workshop in the *San Gabriel Tribune* and social media.

B. Fair Housing Survey

1. Method of Distribution

As part of this AI development, a survey was implemented to gauge the perception of fair housing needs and concerns of residents. The survey was made available on the City's website and hard copies of the survey were provided to a number of local agencies for distribution to their clients. Mailing of the community workshop flyer, including links to the online survey, was also sent to nearly 140 housing and service providers, housing professionals, local religious organizations, and school offices, encouraging them to provide their unique perspective by participating in the Fair Housing Survey.

2. Survey Responses

A total of 120 City of Glendora residents responded to the Fair Housing and Community Needs Survey. The majority of survey respondents felt that housing discrimination was not an issue in their neighborhoods. Of 86 respondents that answered questions about fair housing, approximately 92 percent (79 persons) had not experienced housing discrimination.

On What Basis Do You Believe You Were Discriminated Against?

Of the seven people who felt they were discriminated against, six provided responses concerning basis of the discrimination. The most common causes for alleged discrimination were marital status, age, family status, and 'other'.

Table 1: Basis of Alleged Discrimination

Basis	Number	Percent
Marital Status	2	15.4%
Age	2	15.4%
Family Status	2	15.4%
Other	2	15.4%
Race	1	7.7%
Gender	1	7.7%
Religion	1	7.7%
Sexual Orientation	1	7.7%
Source of Income	1	7.7%
Color	0	0.0%
Ancestry	0	0.0%
National Origin	0	0.0%
Disability/Medical Conditions	0	0.0%
Total Selections	13	100%
Total Respondents	6	--

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.

Why Did You Not Report the Incident?

Of the survey respondents who felt they were discriminated against, only two persons reported the discrimination incident. Two of the respondents who did not report the incident indicated that it was too much trouble. One other person also stated they were afraid of retaliation, and another individual reported 'other reason' for not reporting the incident, specifically mentioning their legal status hindered them from seeking to report the discriminatory incident.

Table 2: Reason for Not Reporting Alleged Discrimination

Reason	Number	Percent
Too much trouble	2	50.0%
Afraid of retaliation	1	25.0%
Other	1	25.0%
Don't believe it makes any difference	0	0.0%
Don't know where to report	0	0.0%
Total Respondents	4	100%

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.*

C.

C. Public Review

The draft AI was made available for a 30-day public review in between March 22, 2018 and April 23, 2018 at the following locations:

- City website
- Public Library

Notice of the public review was published in San Gabriel Tribune.

D. Public Hearings

The City conducted two public hearings to receive public input on the AI on March 13 and April 24, 2018. No public comments were received.

Community Profile

This section provides background information on demographics, housing, employment, community facilities, and transportation services in Glendora. All of these factors can affect housing choice, housing opportunities, and the type of fair housing issues a community may encounter.

A. Demographic Profile

Demographic changes, such as rapid population growth or changes in the racial/ethnic composition of a community may affect a household’s access to housing or raise fair housing concerns. Thus, this section of the AI provides an overview of the population, including the age, race and ethnic characteristics of Glendora residents.

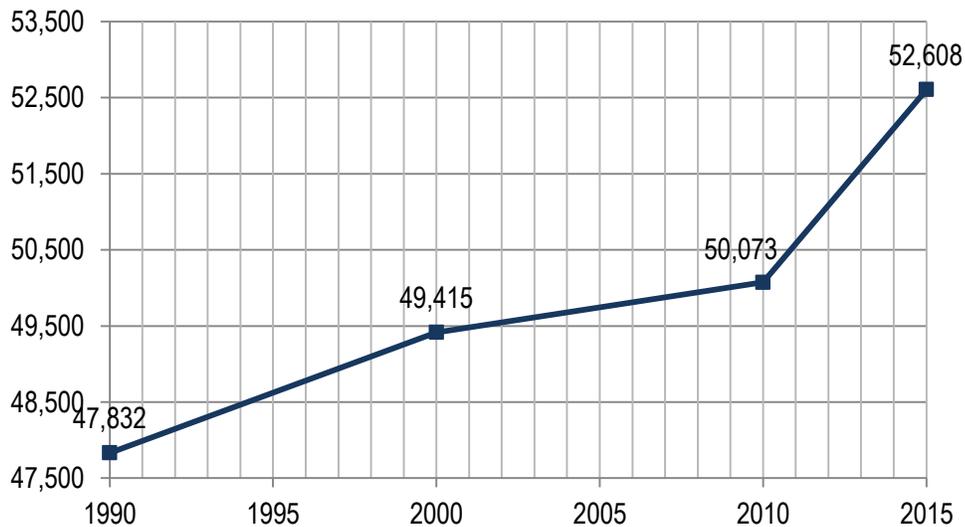
1. Population Trends

Located at the base of the San Gabriel Mountains in the eastern San Gabriel Valley, Glendora began as a small citrus-producing community. By the 1950s, however, the City had transformed into a more diverse residential community. Since Glendora’s incorporation in 1911, the City has grown from 2,000 people to a suburb with over 50,000 residents. Table 3 presents population growth trends over the past 27 years in Glendora and nearby jurisdictions. The California Department of Finance recorded Glendora’s 2017 population at 52,608 persons, a five-percent increase from 2010. The County of Los Angeles and Glendora’s neighbors also grew at slightly slower rates during this time period.

Jurisdiction	1990	2000	2010	2017	Percent Change		
					1990-2000	2000-2010	2010-2017
Glendora	47,832	49,415	50,073	52,608	3%	1%	5%
Arcadia	48,284	53,054	56,364	57,374	10%	6%	2%
Covina	43,332	46,837	47,796	49,011	8%	2%	2%
San Dimas	32,398	34,980	33,371	34,231	8%	-5%	3%
Los Angeles County	8,863,052	9,519,330	9,818,605	10,241,278	7%	3%	4%

Sources:
 1. Bureau of the Census (1990, 2000, 2010).
 2. California Department of Finance (2017).

Figure 1: Population Growth (1990-2017)



Source: Bureau of the Census (1990, 2000, 2010); California Department of Finance (2017).

2. Age Characteristics

Glendora's housing needs are determined largely by the age characteristics of residents. For instance, each age group has distinct lifestyles, family type and size, income levels, and housing preferences. As people move through each stage, their housing need and preferences also change. As a result, evaluating the age characteristics of a community is an important factor in addressing housing needs of residents.

Table 4 illustrates the age characteristics of residents in 1990, 2000 and 2010. Between 1990 and 2010, Glendora evidenced a significant decline in both Preschool Age children (1,113 persons, 31 percent decline) and Young Adults (3,873 persons, 25 percent decline). These trends correspond to a decrease in the number of families with children in Glendora (refer to Table 12 later in this Section), and may be indicative of the shortage of more modestly priced housing attractive to young families.

Like many communities nationwide, Glendora's population is growing older, as evidenced by a continued increase in the median age from 33.7 years (1990) to 36.9 years (2000) to 40.2 years (2010). Large numerical increases were evident over the past two decades among the Middle-Age population, which grew by 4,449 persons (44 percent increase), and the Senior population, which grew by 2,000 persons (39 percent increase). Middle-aged adults typically prefer larger homes as they form families and raise children. Seniors typically live in single-family homes, but may begin to require more supportive housing options as they age and become more frail. Senior citizens can be expected to continue to comprise a growing segment of Glendora's population as the City's middle age "baby boomers" (45 to 64) age in place. This anticipated shift in the age demographic could lead to less pressure on the housing market for larger homes and greater need for smaller, more affordable rental and ownership housing.

Table 4: Age Characteristics and Trends

Age Groups	1990		2000		2010		1990-2010 Change	
	Persons	%	Persons	%	Persons	%	Persons	%
Preschool (under 5)	3,619	7%	3,103	6%	2,506	5%	-1,113	-31%
School Age (5-17)	9,007	19%	10,546	21%	9,131	18%	+124	+1%
College Age (18-24)	4,374	9%	3,737	8%	5,032	10%	+658	+15%
Young Adults (25-44)	15,715	33%	14,373	29%	11,842	24%	-3,873	-25%
Middle Age (45-64)	10,034	21%	11,473	23%	14,483	29%	+4,449	+44%
Senior Adults (65+)	5,079	11%	6,183	13%	7,079	14%	+2,000	+39%
Total	47,828	100%	49,415	100%	50,073	100%	+2,245	+5%
Median Age	33.7		36.9		40.2			

Source: Bureau of the Census (1990, 2000, 2010).

3. Race/Ethnic Composition

A person's racial or ethnic background can, in some cases, affect his or her ability to find housing and obtain home financing. The City of Glendora, like most communities throughout the San Gabriel Valley, has become more racially and ethnically diverse over time, as illustrated in Table 5.

The 2015 American Community Survey found that Whites continue to make up the majority of Glendora's population, comprising 55 percent of City residents. However, since 1990, the City's White population has decreased by 25 percent. Meanwhile, Glendora's Hispanic (124 percent increase) and Asian (68 percent increase) populations have grown significantly during this time period.

Table 5: Racial and Ethnic Composition

Race/ Ethnicity	1990		2000		2010		2015		1990-2015 Change	
	#	%	#	%	#	%	#	%	#	%
White	37,414	78%	33,564	68%	28,565	57%	28,105	55%	-9,309	-25%
Hispanic	6,988	15%	10,740	22%	15,348	31%	15,673	31%	+8,685	+124%
Asian/Pacific Islander	2,603	5%	3,003	6%	3,940	8%	4,367	9%	+1,764	+68%
Black	482	1%	704	1%	834	1%	1,260	2%	+778	+161%
Other	341	1%	1,404	3%	1,386	3%	1,732	3%	+1,391	+408%
Total	47,828	100%	49,415	100%	50,073	100%	51,137	100%	+3,309	+7%

Sources: Bureau of the Census (1990, 2000, 2010); American Community Survey (2015).

4. Linguistic Isolation

Reflective of the City's diverse demographics, approximately 26 percent of all Glendora residents spoke languages other than English at home, according to the 2011-2015 American Community Survey (ACS). Specifically, about 31 percent of these residents spoke English "less than very well." Comparatively speaking, linguistic isolation in the City appears to affect Asian households more than Hispanic households. Approximately 14 percent of

Glendora residents speak “Spanish or Spanish Creole²” at home while about six percent speak “Asian and Pacific Islander languages.” Among “Spanish or Spanish Creole” speaking households approximately 25 percent spoke English “less than very well.” By comparison, nearly half (47 percent) of Asian speaking households spoke English “less than very well.” Language barriers can be an impediment to fair housing. A linguistically isolated household may well face discrimination based on national origin as well as challenges related to obtaining housing, such as communicating effectively with a rental agent, real estate agent, mortgage lender, or insurance agent.

5. Race/Ethnic Concentration

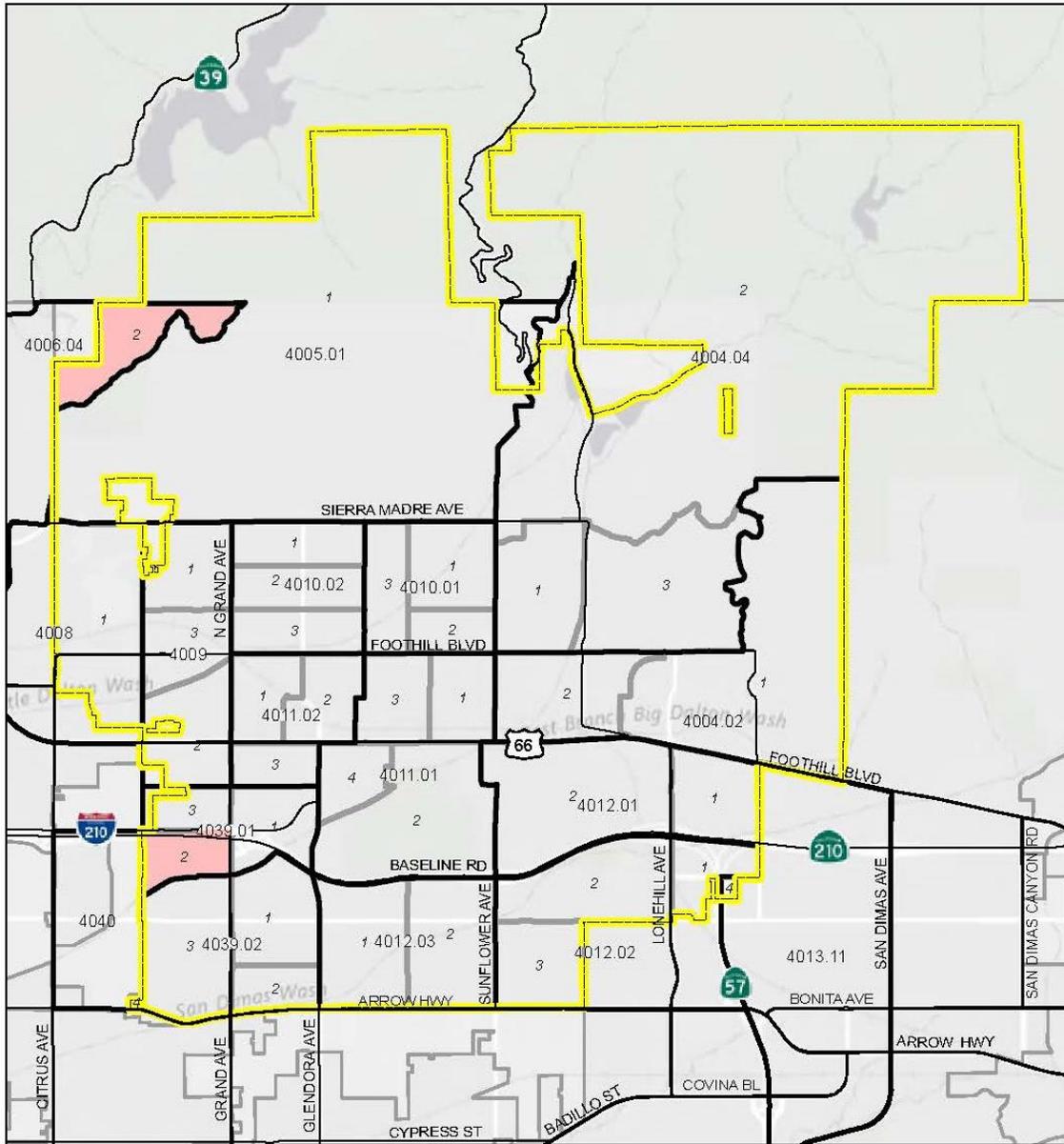
Figure 2 shows concentrations of minority³ households by Census block group in Glendora. A minority concentration area is defined as a Census block group whose proportion of minority households is greater than the countywide proportion (72.2 percent).⁴ Only two block groups within Glendora qualify as minority concentration areas. These areas correspond to the low and moderate income areas north of Sierra Madre Avenue and west of Grand Avenue and immediately south of the 210 Freeway (see Figure 2).

2 American Community Survey offers the following sub-categories for members of the population that “Speak a language other than English”: “Spanish or Spanish Creole”; “Other Indo-European languages”; “Asian or Pacific Island languages”; and “Other languages”

3 Minority: Non-white and/or Hispanic

4 This definition of concentration is derived from the concept of Location Quotient (LQ), which is calculated by comparing the proportion of one group in a smaller geographic unit (e.g. block group) to the proportion of that group in the larger population (e.g. county).

Figure 2: Minority Concentration Areas



City of Glendora

- Minority Concentration*
- Block Group
- Census Tract
- Glendora Boundary
- Other City Boundary
- Major Road

* Non-Hispanic white population less than 27.8%
Source: 2010 Census Summary File 1
Race, Combination of Two Races, and
Not Hispanic or Latino: 2010

6. Residential Segregation

Residential segregation refers to the degree to which groups live separately from one another. The term segregation historically has been linked to the forceful separation of racial groups. Modern segregation is complex, difficult to generalize, and is influenced by many factors. As more minorities move outside of traditional urban enclaves, some modern segregation is becoming increasingly self-imposed. Individual choices can certainly be a cause of segregation. Many residents choose to live among people of their own race/ethnic group. This does not mean that they prefer ethnically homogeneous neighborhoods, but that they feel more comfortable where members of their group are commonly found. This attitude is widespread and typically more frequently found among recent immigrants, who often depend on nearby relatives, friends, and ethnic institutions to help them in their adjustment.⁵ However, individual choices may be constrained by factors outside an individual's control. A large factor in residential segregation is related to housing market dynamics such as availability of affordable housing and housing discrimination can also affect residential segregation.

The dissimilarity index is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration of that group. An index score can range in value from 0 percent, indicating complete integration, to 100 percent, indicating complete segregation. An index number above 60 is considered high similarity and segregated. An index number of 40 to 50 is considered moderate segregation and values of 30 or below are considered low levels of segregation.

Table 6 presents dissimilarity indices for the City of Glendora. Overall the City has low levels of segregation. Segregation is highest between White and Hispanic residents and between White and Black residents. Since 1980, segregation between racial groups has fluctuated. It should be noted that while numerically there were changes in the indices over time, demographers interpret changes below five points in one decade as a small change or no real change at all. The only changes of greater than five points recorded since 1980 were between the City's Asian and Hispanic residents.

Table 6: Dissimilarity Indices in Glendora

Dissimilarity Index	1980	1990	2000	2010
White/Black	30.9	26.1	24.4	29.9
White/Hispanic	16.7	17.3	24.4	23.7
White/Asian	18.5	11.7	21.7	13.2
Hispanic/Black	23.7	15.3	13.9	8.0
Hispanic/Asian	17.4	11.2	13.6	21.8
Black/Asian	19.4	20.2	13.6	14.1

Source: Project US2010, <http://www.s4.brown.edu/us2010/index.htm> accessed September 16, 2015.

⁵ Allen, James P. and Turner, Eugene. "Changing Faces, Changing Places: Mapping Southern California." California State University, Northridge, (2002).

B. Income Profile

Household income is an important factor that affects 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. While economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships between household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns. This section presents a profile of the income of Glendora residents.

1. Income Definitions

To facilitate the analysis of income distribution among households in communities, the Department of Housing and Urban Development (HUD) groups households into categories by income level, as depicted in Table 7. The associated 2017 Los Angeles County income thresholds for extremely low, low, and moderate income categories are also presented (HUD does not publish income thresholds for above moderate income households as federal housing programs are not eligible to households earning greater than 80 percent of the AMI).

Table 7: HUD Income Categories

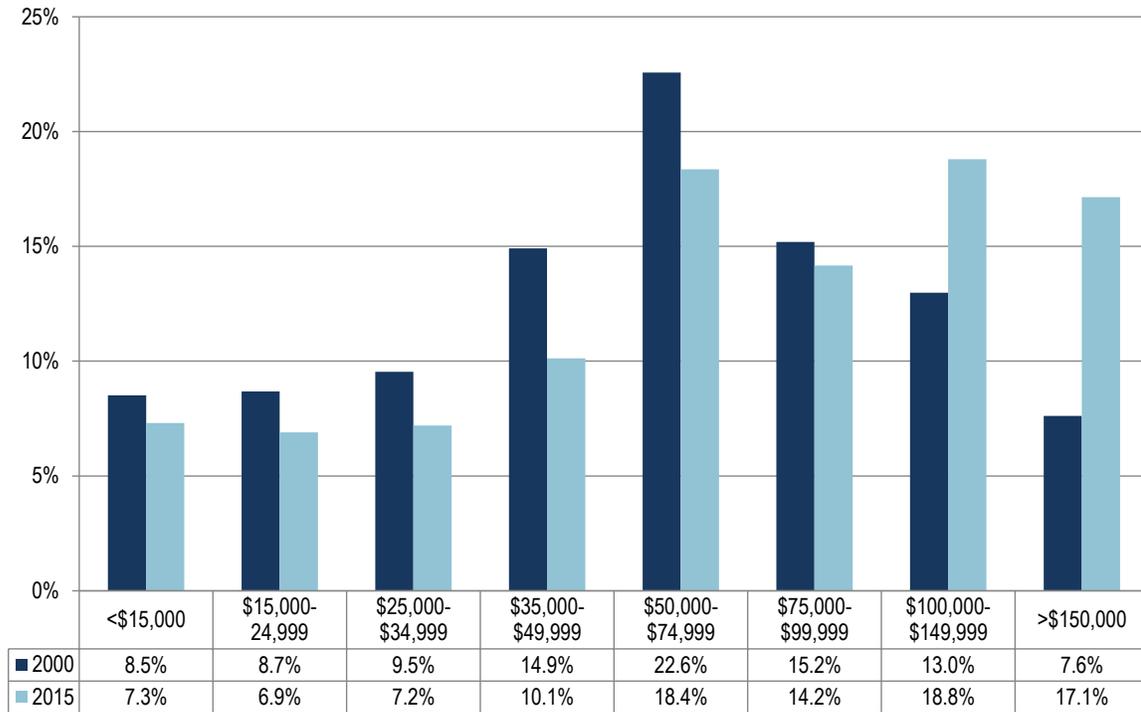
Income Group	Percent Area Median Income (AMI)	2017 Income Threshold (LA County)
Extremely Low	< 30%	\$27,050
Low	31% - 50%	\$45,050
Moderate	51% - 80%	\$72,100
Above Moderate	>80%	--

Source: 24 Code of federal Regs Part 91 91.305
<https://www.huduser.gov/portal/datasets/il/11/2017/2017summary.odn>,
accessed December 5, 2017.

2. Household Income

Glendora had a median income of \$75,148 between 2011 and 2015. Figure 3 shows the distribution of the City's households by income during this time. Glendora households generally earned higher incomes with nearly 36 percent of the City's households earning more than \$100,000 in 2015 (Figure 3). The City's median income in 2015 was also 33 percent higher than the median income of Los Angeles County (\$56,196). Table 8 compares Glendora's median household income with that of surrounding jurisdictions, Los Angeles County, and the State of California. Overall, median household income in the City was moderately higher than the region. However, when adjusted for inflation, the City's median household income in 2015 was eight percent less than the inflation adjusted income in 2000.

Figure 3: Household Income



Source: Bureau of the Census, 2000; American Community Survey (ACS), 2011-2015

Table 8: Median Household Income

Jurisdiction	Median Household Income 2000 (Not Adjusted for Inflation)	Median Household Income 2000 Inflation-Adjusted \$ to 2015)	Median Household Income (Inflation-Adjusted \$ to 2015)	% Change 2000 in 2015 (Inflation-Adjusted \$ to 2015)
City of Glendora	\$59,244	\$82,025	\$75,148	-8.38%
City of Arcadia	\$56,531	\$78,268	\$79,934	2.13%
City of Covina	\$49,288	\$68,240	\$72,701	6.54%
City of San Dimas	\$62,058	\$85,920	\$92,928	8.16%
Los Angeles County	\$42,030	\$58,191	\$56,196	-3.43%
State of California	\$47,288	\$65,471	\$61,818	-5.58%

Source: Bureau of the Census, 2000; American Community Survey (ACS), 2011-2015; U.S. Department of Labor, Bureau of Labor Statistics

3. Income Distribution

HUD periodically receives "custom tabulations" of Census data from the U.S. Census Bureau that are largely not available through standard Census products. The most recent estimates are derived from the 2010-2014 ACS. This dataset, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrates the extent of housing problems and needs, particularly for lower-income households, within a community. The CHAS cross-tabulates the Census data to reveal household income in a community in relation to the Area Median Income (AMI). As defined by CHAS, housing problems include:

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

For the purpose of using housing and community data, HUD has also established the following income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA):⁷

- Extremely Low Income (0-30 percent of AMI)
- Low Income (31-50 percent of AMI)
- Moderate Income (51-80 percent of AMI)
- Middle/Upper Income (above 80 percent of AMI)

According to the CHAS data in Table 9, approximately 21 percent of the Glendora households were within the lower income (50 percent or less of the AMI) categories and 17 percent were within the moderate income (80 percent AMI) category. The majority of the City’s households (62 percent) were within the middle/upper income category (greater than 80 percent AMI). The proportion of middle/upper income households in the City is higher than that for Los Angeles County as a whole (62 percent in the City versus 49 percent in the County).

Table 9: Income Distribution

Jurisdiction	Total Households	Extremely Low Income (0-30%)	Low Income (31-50%)	Moderate Income (51-80%)	Middle/Upper Income (80%+)
City of Glendora	16,610	10.7%	10.7%	16.7%	61.8%
Los Angeles County	3,242,390	19.0%	14.8%	17.6%	48.7%

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

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2010-2014

4. Income by Household Type and Race/Ethnicity

Household income often varies by household type. As shown in Table 11, senior-headed households had the highest proportion of lower and moderate income households (i.e. households earning less than 80 percent of AMI). About 51 percent of senior households were categorized as lower and moderate income households.

Household income can also vary by race/ethnicity. Overall, lower income households comprised about 21 percent of all households in Glendora in 2010-2014. However, certain groups had higher proportions of lower income households. Specifically, Hispanic (24

⁷ Income limits established by the State of California Department of Housing and Community Development (HCD) are different from those set by HUD. HCD income limits are as follows: Extremely Low Income (30 percent AMI); Very Low Income (50 percent AMI); Low Income (80 percent AMI); Moderate Income (120 percent AMI); and Above Moderate Income (greater than 120 percent AMI).

percent) households had a higher proportion of lower income households other racial/ethnic groups in the City (Table 10).

Table 10: Income by Race/Ethnicity

Income Level	All Households		Non-Hispanic White	Hispanic	Black	Asian
Extremely Low Income (0-30% AMI)	1,770	10.7%	10.7%	11.8%	10.8%	8.3%
Low Income (31-50% AMI)	1,785	10.7%	10.5%	12.3%	6.2%	8.3%
Moderate Income (51-80% AMI)	2,780	16.7%	15.0%	20.7%	18.5%	16.1%
Middle/Upper Income (81% + AMI)	10,284	61.9%	63.7%	55.2%	64.6%	67.3%
Percent of Total Households	16,619	100.0%	66.2%	23.5%	2.0%	6.5%

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

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2010-2014

5. Concentrations of Lower and Moderate Income Populations

HUD defines a “Low and Moderate Income Area” as a Census tract or block group where over 51 percent of the population is lower and moderate income. However, the City of Glendora is considered an exemption city by HUD, where the threshold for determining low and moderate income area is set at below the typical 51 percent. Specifically, the threshold for Glendora is 50.18 percent. Figure 4 depicts the census block groups which meet this 50.18 percent threshold and are considered low and moderate income areas. As shown in Figure 4, Low and Moderate Income Areas are all located in the western half of the City—specifically west of Loraine Avenue. Two of the Low and Moderate Income Areas are also identified as minority concentration areas, an indication that certain parts of the City have a disproportionate number of lower income minority residents.

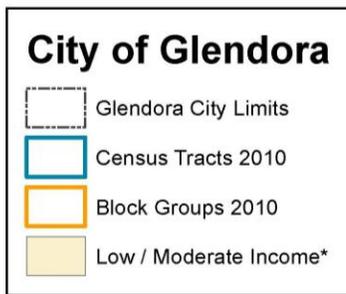
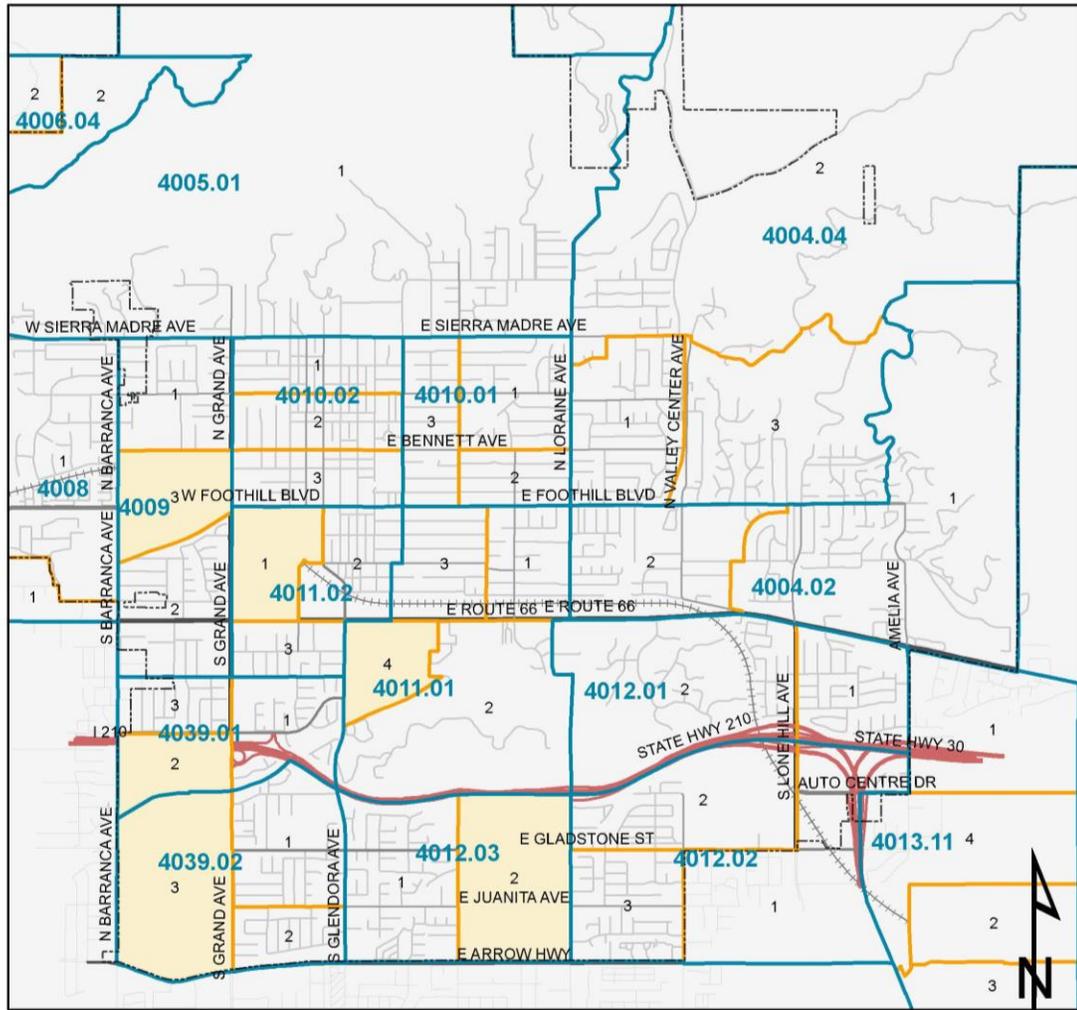
Table 11: Housing Assistance Needs of Low and Moderate Income Households

Household by Type, Income & Housing Problem	Renters				Owners				Total Households
	Elderly	Small Families	Large Families	Total Renters	Elderly	Small Families	Large Families	Total Owners	
Ext. Low Income (0-30% MFI)	305	270	75	260	910	460	250	70	90
with any housing problems	59.0%	81.5%	93.3%	67.3%	70.9%	77.2%	78.0%	85.7%	38.9%
with cost burden > 30%	59.0%	81.5%	93.3%	59.6%	68.7%	78.3%	76.0%	84.3%	38.9%
with cost burden > 50%	52.5%	72.2%	93.3%	59.6%	63.7%	64.1%	64.0%	78.6%	27.8%
Low Income (31-50% MFI)	225	535	90	130	980	465	180	115	45
with any housing problems	77.8%	85.0%	100.0%	100.0%	86.7%	39.8%	88.9%	60.9%	44.4%
with cost burden > 30%	77.8%	85.0%	100.0%	103.8%	87.2%	36.6%	88.9%	60.9%	44.4%
with cost burden > 50%	57.8%	56.1%	77.8%	80.8%	61.7%	18.3%	77.8%	21.7%	22.2%
Moderate Income (51-80% MFI)	195	540	200	200	1,135	655	640	240	105
with any housing problems	38.5%	77.8%	87.5%	57.5%	69.2%	28.2%	76.6%	91.7%	71.4%
with cost burden > 30%	38.5%	71.3%	85.0%	57.5%	65.6%	28.2%	76.6%	81.3%	71.4%
with cost burden > 50%	0.0%	18.5%	15.0%	25.0%	15.9%	9.2%	32.0%	18.8%	47.6%
Middle/Upper Income (81% + MFI)	295	1,240	215	425	2,175	1,890	4,575	1,030	605
with any housing problems	15.3%	22.6%	34.9%	4.7%	19.3%	18.0%	28.9%	38.8%	41.3%
with cost burden > 30%	13.6%	22.2%	18.6%	3.3%	17.0%	17.7%	28.9%	35.0%	38.8%
with cost burden > 50%	0.0%	0.0%	0.0%	0.0%	0.0%	2.9%	5.0%	5.8%	3.3%
Total Households	1,020	2,585	580	1,015	5,200	3,470	5,645	1,455	845
with any housing problems	46.6%	53.2%	70.7%	43.3%	51.9%	30.7%	38.4%	51.5%	45.0%
with cost burden > 30%	46.1%	51.6%	63.8%	41.3%	49.9%	30.2%	38.3%	47.0%	43.2%
with cost burden > 50%	28.4%	23.0%	29.3%	30.5%	26.3%	14.2%	13.0%	12.7%	12.4%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2010-2014.

Note: HUD CHAS (Comprehensive Housing Affordability Strategy) data is based on tabulations from the American Community Survey (ACS) and has a smaller sample size than the Decennial Census. Due to the smaller sample size, the data presented may have significant margins of error, particularly for smaller geographies. The intent of the data is to show general proportions of household need, not exact numbers.

Figure 4: Concentration of Low and Moderate Income Households



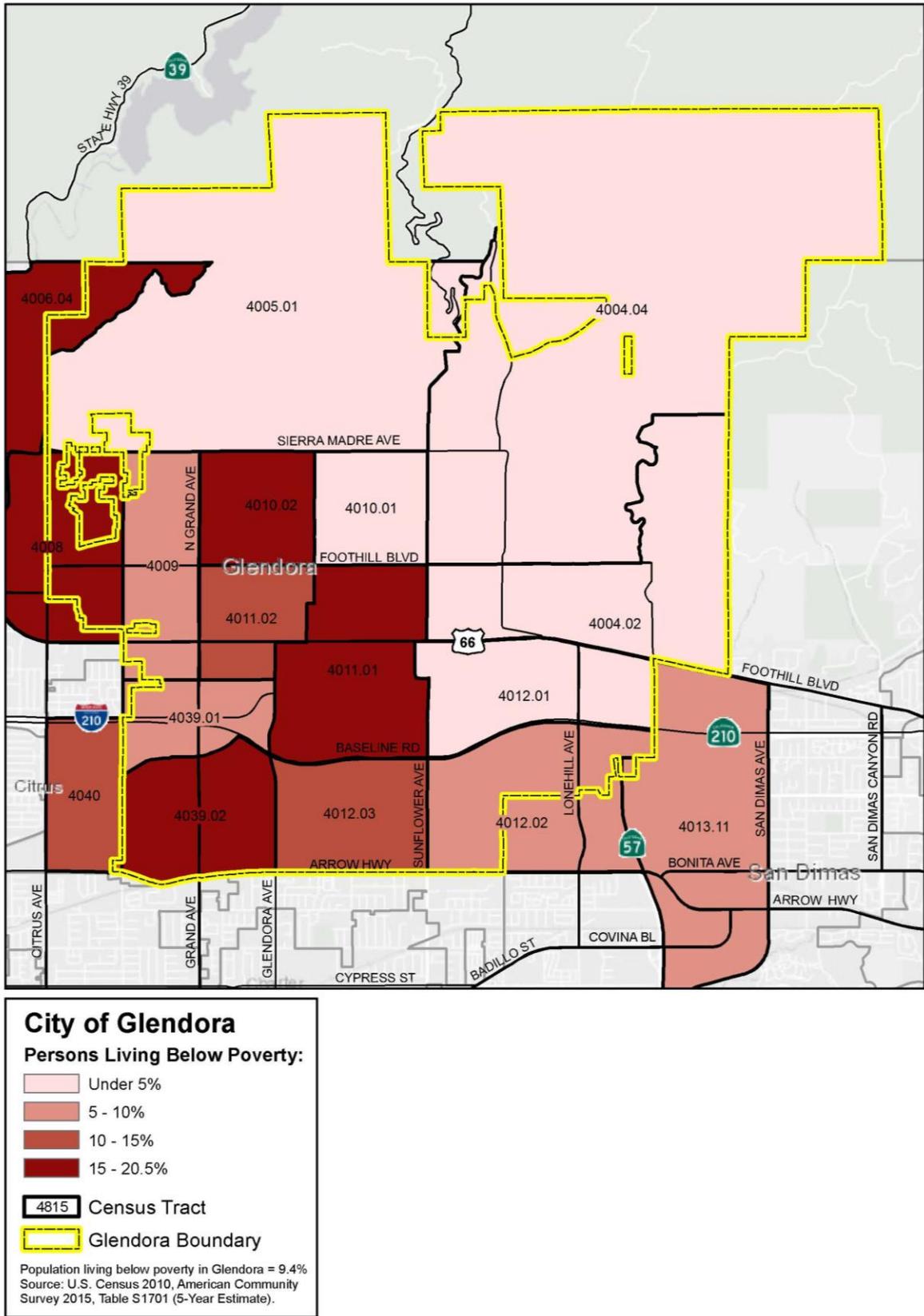
*Low/Moderate Income population greater than 50.18%. Source: U.S. Census 2010, American Community Survey

6. Concentrations of Poverty

In Glendora, nine percent of residents (4,740 persons) were found to be living below the poverty level (according to 2011-2015 ACS data).⁸ Poverty was more common among Black (18 percent) and Hispanic (12 percent) residents, as well as adults with less than a high school education (23 percent). The proportion of residents living in poverty in Glendora was significantly lower than the countywide proportion (18 percent). Figure 5 shows the geographic concentration of poverty in Glendora. Generally the highest concentrations of residents living in poverty could be found in the western half of the City.

⁸ The U.S. Census Bureau determines poverty status by comparing annual income to a set of dollar values called poverty thresholds that vary by family size, number of children, and age of householder. If a family's before tax money income is less than the dollar value of their threshold, then that family and every individual in it are considered to be in poverty. For people not living in families, poverty status is determined by comparing the individual's income to his or her poverty threshold.

Figure 5: Poverty Concentration Areas



C. Household Profile

Household type, composition and size, and the presence of special needs populations are all factors that can affect access to housing in a community. This section identifies the characteristics of Glendora's households.

1. Household Type

The 2010 Census reported 17,141 households in Glendora, representing an increase of approximately two percent since 2000. Family households comprised the majority (76 percent) of Glendora households, a higher proportion than the County as a whole (Table 12). Families with children accounted for 33 percent of all households in the City. Over 28 percent of households had at least one elderly (65+ years) member and households comprised of seniors living alone made up about eight percent of all households.

Over three quarters of the City's households are family households. Families with children often face housing discrimination by landlords who fear that children will cause property damage, or the landlords have cultural biases against children of opposite sex sharing a bedroom. While the language in federal law about familial status discrimination is clear, the guidelines landlords can use to establish occupancy can be very vague. Although landlords can create occupancy guidelines based on the physical limitations of the housing unit, landlords often impose strict occupancy limitations precluding large families with children. Nationally, HUD data shows that familial status discrimination ranks fourth in discrimination of protected classes, behind discrimination due to disability and race.⁹

Over one-quarter of households in Glendora had at least one senior member and six percent of households were female-headed households with children. Single-parent households with children and households headed by seniors have unique fair housing issues discussed later in this chapter.

⁹ U.S. Department of Housing and Urban Development. "Annual Report on Fair Housing FY 2016."

Table 12 : Household Characteristics

Household Type	City of Glendora	Los Angeles County
Household Growth		
Households (2010)	17,141	3,241,204
Households (2000)	16,819	3,133,774
% Change 2000-2010	1.9%	3.4%
Household Type		
Families	75.9%	67.7%
Families with Children	33.2%	32.5%
Married Families With Children	25.2%	22.3%
Male Headed Families with Children	2.1%	2.8%
Female Headed Families with Children	5.9%	7.4%
Non Family Households	24.1%	32.3%
Senior Living Alone	8.3%	7.6%
Households with elderly (65+ years) members	28.2%	24.4%
Household Size		
Average Household Size	2.88	2.98
Average Household Size - Owners	2.93	3.16
Average Household Size - Renters	2.73	2.81
Large Households (5+)	14.2%	18.2%
Large Households – Owners	10.5%	9.4%
Large Households - Renters	3.7%	8.8%

Source: Bureau of the Census, 2000 and 2010

2. Special Needs Populations

Certain households, because of their special characteristics and needs, may require special accommodations and may have difficulty finding housing due to special needs. Special needs groups include seniors, persons with disabilities, families with children, single-parent households, large households, homeless persons and persons at-risk of homelessness, farm workers, and persons with HIV/AIDS.

Senior Households

Seniors (persons age 65 and above) are gradually becoming a more substantial segment of a community's population. Americans are living longer and having fuller lives than ever before in our history and are expected to continue to do so. Elderly households are vulnerable to housing problems and housing discrimination due to limited income, prevalence of physical or mental disabilities, limited mobility, and high health care costs. The elderly, particularly those with disabilities, may face increased difficulty in finding housing accommodations and may become victims of housing discrimination or fraud. Seniors sometimes face discrimination in the rental housing market, often based on the perception of increased risks and liabilities associated with the frail conditions or disabilities of senior tenants. A senior on a fixed income can face great difficulty finding safe and affordable housing. Subsidized housing and federal housing assistance programs are increasingly challenging to secure and often involve a long waiting list.

According to the 2010 Census, 14 percent of Glendora’s population (7,079 persons) was comprised of seniors, defined as 65 years and older (Table 4) and 24 percent of Glendora’s households were headed by seniors. The majority of Glendora’s senior-headed households (80 percent) are homeowners. Between 2011 and 2015, nearly eight percent of all Glendora seniors were living in poverty and about 43 percent of disabled residents in the City were seniors.

Some of the special needs of Glendora’s seniors are as follows:

- Disabilities: Over 43 percent have a disability.
- Limited Income: Almost 40 percent earned extremely low or very low incomes.
- Overpayment: About 46 percent of senior renter-households and 50 percent of senior owner-households were overpaying for housing (>30% income on housing costs)

Table 13 identifies affordable housing opportunities for seniors in Glendora.

Table 13: Senior Developments

Name	Address	Units
Heritage Oaks	1000 S. Glendora Avenue Glendora, CA 91740	157
Glendora Gardens	340 North Wabash Avenue Glendora, CA 91741	105

Furthermore, according to Community Care Licensing Division records (December 2017), 21 licensed residential care facilities for the elderly are located in Glendora with a total capacity of 254 beds. The locations of these licensed residential care facilities are shown in Figure 10 on page 48.

Persons with Disabilities

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

While housing discrimination is not covered by the ADA, the Fair Housing Act prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS. In their 2017 Fair Housing Trends Report, the National Fair Housing Alliance indicated that disability complaints were the most prevalent type of housing discrimination complaints, representing 55 percent of all complaints reported.¹⁰ Discrimination against persons with disabilities continues to be the largest category (58 percent) of complaints HUD receives each year.¹¹

¹⁰ National Fair Housing Alliance. "Fair Housing Trends Report 2017."

¹¹ U.S. Department of Housing and Urban Development. "Annual Report on Fair Housing FY 2016."

Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment." In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.¹²

The U.S. Census Bureau classifies disabilities into the following categories:

- **Hearing difficulty:** Deaf or having serious difficulty hearing
- **Vision difficulty:** Blind or having serious difficulty seeing, even when wearing glasses
- **Cognitive difficulty:** Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions
- **Ambulatory difficulty:** Having serious difficulty walking or climbing stairs
- **Self-care difficulty:** Having difficulty bathing or dressing
- **Independent living difficulty:** Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping

According to the 2011-2015 ACS, almost 12 percent of Glendora's population (5,777 persons) suffered from one or more disabilities. Table 14 provides detailed information on the specific types of disabilities affecting Glendora residents. Seniors were the most likely to be affected by a disability and ambulatory difficulties were the most common type of disability reported.

Table 14: Disability Characteristics

Disability by Age and Type	5 to 17 years	18 to 64 years	65 years and over	Total
Total Persons with a Disability	4.3%	8.8%	34.9%	11.5%
Disability Type				
Hearing Difficulty	0.2%	1.7%	11.9%	2.8%
Vision Difficulty	0.2%	1.0%	4.9%	1.4%
Cognitive Difficulty	3.7%	4.4%	8.8%	4.9%
Ambulatory Difficulty	0.3%	5.3%	21.1%	6.4%
Self-Care Difficulty	0.7%	1.9%	8.8%	2.6%
Independent Living Difficulty ¹	--	3.9%	15.4%	4.6%

Note 1: Tallied only for persons 18 years and over

Source: American Community Survey (ACS), 2011-2015, S1810

The living arrangement of persons with disabilities depends on the severity of the disabilities. Many persons live at home in an independent arrangement or with other family members. To maintain independent living, persons living with disabilities may need assistance. This can include special housing design features to accommodate wheelchairs and persons with mobility limitations, income support for those not able to work, and in-

¹² U.S. Department of Housing and Urban Development. "Disability Rights in Housing." http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/inhousing. Accessed December 23, 2014.

home supportive services for persons with medical conditions among others. Services can be provided by public or private agencies.

Due to their specific housing needs, persons with disabilities are vulnerable to discrimination by landlords who may not be familiar with the reasonable accommodation protections contained in the Fair Housing Act. Similarly, some landlords may be hesitant to rent to persons with an assistive animal, such as a guide dog.

Persons with more severe disabilities may require supportive housing. For those who may require additional care and supervision, licensed community care facilities offer special residential environments for persons with disabilities including physical, mental and emotional disabilities. As of December 2017, 37 licensed community care facilities were located in Glendora (Figure 10).

Persons with Developmental Disabilities

As defined by federal law, “developmental disability” means a severe, chronic disability of an individual who:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22¹³;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency; and
- Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. This equates to just over 751 persons in the City of Glendora, based on the 2010 Census population.

The San Gabriel/Pomona Regional Center is a community-based, private nonprofit corporation funded by the State of California to serve people with developmental disabilities, as required by the Lanterman Developmental Disabilities Services Act (aka Lanterman Act). The Lanterman Act is part of California law that sets out the rights and responsibilities of persons with developmental disabilities. San Gabriel/Pomona Regional Center is one of 21 regional centers throughout California and serves individuals and their families who reside within the cities of Glendora, El Monte, Monrovia, and Pomona. The Regional Center provides diagnoses and assessments of eligibility and helps plan, access, coordinate, and monitor the services that are needed by persons with a developmental disability. As of December 2017, the Regional Center had about 520 clients from Glendora.

¹³ The State of California defines developmental disabilities slightly differently than federal law. The main difference is at the manifestation age, where California established that threshold at age 18.

Families with Children and Single Parent Households

Single-parent households often require special consideration and assistance as a result of their greater need for affordable housing, accessible day care, health care, and other supportive services. Because of their relatively lower incomes and higher living expenses, single-parent households usually have more limited options for affordable, decent, and safe housing. As a result, single parents are considered to be among the most at-risk groups facing poverty.

In 2010, approximately 3,166 single-parent households resided within Glendora, representing 18 percent of the City's households. In 2010, an estimated 1,005 female-headed, single-parent households with children under age 18 lived in the City, representing approximately six percent of all households in the City. Of particular concern are single-parent households with lower incomes. The 2011-2015 ACS shows that approximately 29 percent (623 households) of the City's female-headed households with children had incomes below the poverty level. By comparison, about 11 percent of all households had incomes below the poverty level.

Large Households

Large households are defined as those with five or more members residing in the home. These households can be families with two or more children, or families with extended family members such as in-laws or grandparents. It can also include multiple families living in one housing unit in order to save on housing costs. To save for necessities such as food, clothing, and medical care, lower and moderate income large households may reside in smaller units, resulting in overcrowding. Furthermore, families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex, confine them to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether, which would violate fair housing laws. Housing discrimination against families with children can also be categorized as issues faced by overcrowded households.

According to the 2010 Census, 14 percent of all households in Glendora had five or more members (2,437 households). The majority of these large households were owner-households (75 percent) and the remaining 25 percent were renter-households. The proportion of large households in Glendora was lower than for the County overall (14 percent versus 18 percent). The primary housing need of large households is adequately sized larger housing units. Typically housing units with three or more bedrooms are considered adequate for accommodating large households. According to the 2011-2015 ACS, Glendora had 10,175 owner-occupied units and 1,952 renter-occupied units with three or more bedrooms that could reasonably accommodate large families without overcrowding (see Table 18 on page 36). Overcrowding, however, was still common because a vast majority of these larger units were for sale and generally more expensive.

Homeless Persons

The 2017 Greater Los Angeles Homeless Count counted 4,127 homeless individuals in Service Planning Area (SPA) 3 (designated as the San Gabriel Valley) during their one night point-in-time count.¹⁴ This represents an 31 percent increase from 2015 when the count was

¹⁴ Los Angeles Homeless Service Authority, "2017 Greater Los Angeles Homeless Count." (2017).

reported at 3,093 persons. The point-in-time count also identified 201 sheltered and 25 unsheltered homeless individuals in the City of Glendora. The 226 homeless individuals identified in the count made up seven percent of the homeless population in the San Gabriel Valley.

The San Gabriel Valley Council of Governments (SGVCOG) completed a comprehensive survey and strategy on homelessness in 2014. The 2014-2017 SGVCOG Strategic Plan prioritizes reducing and preventing homelessness by ensuring adequate services for homeless populations, providing coordinated resources for homeless populations and complying with State mandates.

Glendora also participates in the East San Gabriel Valley Coalition for the Homeless Winter Shelter Program provided through area churches during the months of December through March. Many organizations located in nearby jurisdictions offer shelter for homeless in Glendora and the greater Eastern San Gabriel Valley (Table 15).

Table 15: Homeless Facilities

Agency/Program	Beds	Clients	Type	Location
Emergency Shelter				
East San Gabriel Valley Coalition for the Homeless: Winter Shelter	varies	Men, Women and Families with Children	Opens on December 1st and operates continuously until March 1st. The Coalition contacts and arranges for the different church sites for a two-week stay and transports the clients to each site.	Local Churches
CHCADA: Year-Round Shelter	60	Single Women (18+ years)	Emergency Shelter	1171 Durfee Ave. El Monte, 91733
House of Ruth	55	Victims of Domestic Violence	Provides emergency shelter, assistance, advocacy, counseling and outreach services to women and children who are victims of domestic violence. Temporary restraining order clinics available as well as community education in issues involving domestic violence	Confidential
Our House Shelter	16	Families with Children	Emergency Shelter	1753 N. Park Ave. Pomona, CA 91768
Pomona Neighborhood Center	145	Single Men and Women (18+ years with no children)	Winter Shelter	600 S. Park Ave. CA, Pomona 91766
Women in Need Growing Strong (WINGS)	31	Victims of Domestic Violence	Emergency Shelter	Confidential

Table 15: Homeless Facilities

Agency/Program	Beds	Clients	Type	Location
Transitional, Permanent, and Supportive Housing				
California Hispanic Commission on Alcohol and Drug Abuse (CHCADA): Pathway Homes	15	Victims of Domestic Violence	Transitional Housing	Confidential
Casitas Esperanza	12	Single Men and Women (18+ years with no children)	Transitional Housing	11927 Elliott Ave. El Monte, CA 91732
Casitas Tranquilas	30	Single Men and Women (18+ years with no children)	Adult transitional (18 mos.), residential treatment and social rehab program for ages 18-59 years with substance abuse history and chronic mental illness.	11927 Elliott Avenue El Monte, CA 91732
Prototypes – S. Mark Taper Foundation Family Living Center	34	Families with Children	Transitional and permanent housing for single parents (men and women) and their children.	837 East Arrow Hwy Pomona, CA 91767
Prototypes –Housing Project for Disabled Women	50	Disabled Women	Permanent housing	837 East Arrow Hwy Pomona, CA 91767
Prototypes Women’s Center Residential Program	134	Single Women (18+ years)	Substance abuse treatment facility for women and their children offering comprehensive residential, outpatient and day treatment programs. Mental health and HIV/AIDS services available.	845 E. Arrow Hwy Pomona, CA 91767
Tri-City Mental Health Center	28	Single Men and Women (18+ years with no children)	Permanent supportive housing.	200 N. Garey Ave, Pomona, CA 91767
Rental and Support Services				
Catholic Charities	NA	Mixed Populations	Provides utility assistance and motel voucher assistance when funding is available. Homeless Prevention Programs 1) HPRP and 2) ESG for Rental Assistance. Please Call for requirements to these programs.	1460 E. Holt Ave Ste. 98 Pomona, CA 91767

Source: Los Angeles Homeless Services Authority Continuum of Care, Housing Inventory Count (HIC) 2016 Dataset,

Persons with HIV/AIDS

The County's Department of Public Health HIV Epidemiology Program releases an Annual Surveillance Summary that reports AIDS statistics in the County. As of December 2014, the County estimates 3,418 persons living with HIV in the San Gabriel Valley.

Short-term housing needs for persons with AIDS may include hospice facilities, shelters or transitional housing. Long-term needs include affordable housing in close proximity to public transportation and health care facilities. As with other persons with disabilities, persons with HIV/AIDS may face discrimination that affects their access to housing due to fear, the need for reasonable accommodations or other factors.

Summary of Services

Table 16 below summarizes the variety of services and resources in Glendora available to serve the City's special needs populations.

Table 16: Resources for Special Needs Groups

Special Needs Group	Program	Description
Seniors	Human Services Department	Information and referral, educational activities and leisure trips, social activities, nutrition program, legal aid, notary service, tax preparation assistance, and volunteer opportunities.
	La Fetra Center	Recreational activities, social services, educational programming, clubs and groups, travel opportunities, and information and referral. The Senior Nutrition Program is also offered at this location.
	Project Sister – Senior Safety Program	Strives to increase awareness by seniors on being victims of crime including sexual assault, robbery, burglary and financial exploitations. Project Sister also provides a 24-hour crisis hotline, hospital and court accompaniment and individual and group counseling as needed.
Seniors and Persons with Disabilities	Glendora Mini-Bus	Curb-to-curb transportation services for senior citizens and permanently disabled persons. (Cost: 50¢ each way)
Persons with Disabilities	Glendora Library Homebound Delivery	Adults, who are temporarily or permanently homebound due to illness or disability, can have books, magazines or audio books on cassette or CD delivered to their front door.
	Eye-DAS (Eye Diseases Are Serious) by Eye-DAS Foundation	Provides educational and social environment for adults with vision disorders. Visually impaired members meet on a regular basis so that they can be informed about medical and social issues related to their visual problems and made aware of available resources.
Persons with Disabilities and Persons in Poverty	Meals on Wheels	Offered through the La Fetra Center, this program provides two nutritious meals Monday through Friday to Glendora residents who are homebound.
	Glendora Reads! - Community Adult Literacy	Provides adult literacy services including tutoring to adults over 16 years of age, especially low income adults and at risk older teens. They also sponsor outreach programs for adults who are homebound or disabled in health care-retirement facilities.
Persons in Poverty	Glendora Welfare Association	Intervenes with assistance in cases of financial emergency. Examples of financial emergencies include: food vouchers, motel vouchers, gasoline vouchers, bus tokens, rental assistance and utility payments.
Single Parent Households and Large Households	Teen Center	Free drop-in recreation center for teens.
	Recreation Department	Special events, youth sports leagues, educational classes, fitness classes, and leisure activities and trips
	Citrus College Orfalea Family Children's Center	Provides low and moderate income Glendora households with access to licensed family day care and pre-school services for their children.
	Charter Oak USD Washington School Language Arts Workshop	Provide Students in grades 2 through 5 with supplemental instruction in reading, writing and grammar for Title I, and Free and Reduced lunch for Students.
Female Headed Households	YWCA – Wings	Provides battered women and their children up to age 18 with emergency shelter and prevention and intervention services.

Source: City of Glendora, 2017

D. Housing Profile

This section provides an overview of the characteristics of the local and regional housing markets. It also assesses various housing characteristics and conditions that affect the well-being of City residents. Housing factors evaluated include the following: housing stock and growth; tenure and vacancy rates; age and condition; and housing costs and affordability.

1. Housing Growth

The City experienced rapid housing growth in the 1980s, the majority of which was due to annexation of adjacent unincorporated land. Since 1990, however, residential housing development slowed significantly, due primarily to the scarcity of vacant land. Between 2000 and 2010, the number of housing units in the City increased by four percent, from 17,145 units to 17,778 units. Housing growth in Glendora during this time was similar to that of surrounding areas and the County of Los Angeles overall. According to the State Department of Finance, the housing stock in Glendora was estimated at 18,204 units, as of January 1, 2017, representing a two-percent increase since 2010, consistent with the countywide growth.

Table 17: Housing Unit Growth

City/County	1990	2000	2010	2017	Percent Change		
					1990-2000	2000-2010	2010-2017
Glendora	16,876	17,145	17,778	18,204	1.6%	3.7%	2.4%
Azusa	13,232	13,013	13,386	14,277	-1.7%	2.9%	6.7%
Covina	16,110	16,364	16,576	16,649	1.6%	1.3%	0.4%
San Dimas	11,479	12,503	12,506	12,788	8.9%	0.02%	2.3%
Los Angeles County	3,163,343	3,270,909	3,445,076	3,527,312	3.4%	5.3%	2.4%

Sources: Bureau of the Census, 2000 and 2010 Census, H1; 2017 State Department of Finance Housing Estimates

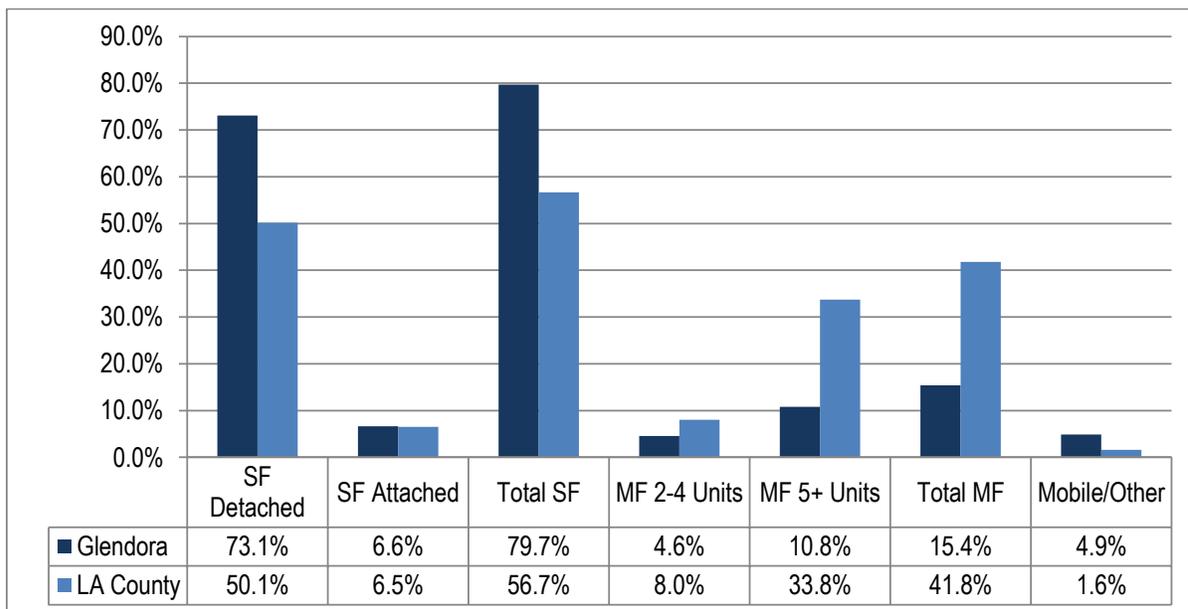
2. Housing Type

A region's housing stock is generally comprised of three major housing types: single-family dwelling units, multi-family dwelling units, and other types of units such as mobile homes. Single-family units comprise a substantial majority of the City's housing stock (80 percent) (Figure 6). The proportion of multi-family housing in the City is about 15 percent and mobile homes comprise the remaining five percent of the housing stock. Compared to Los Angeles County as a whole, Glendora has a significantly higher proportion of single-family housing.

What is a Housing Unit?

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.

Figure 6: Housing Type



Note: SF: Single Family, MF: Multi-Family
 Source: American Community Survey, 2011-2015

3. Tenure and Vacancy

A person may face different housing issues in the rental housing market versus in the for-sale housing market. Residential stability is also influenced by tenure with ownership housing evidencing a much lower turnover rate than rental housing. Tenure preferences are primarily related to household income, composition, and age of the householder. Communities need to have an adequate supply of units available both for rent and for sale in order to accommodate a range of households with varying incomes, family sizes, composition, life styles, etc. According to the 2010 Census, 72 percent of Glendora households were homeowners and 28 percent were renters. These figures have remained essentially unchanged from the prior decade (73 percent and 27 percent, respectively).

What is Housing Tenure?

Housing tenure describes the arrangement by which a household occupies a housing unit; that is, whether a housing unit is owner-occupied or renter-occupied.

Table 18 summarizes housing unit size by tenure. Glendora had 1,952 rental units with three or more bedrooms, more than adequate to house the 636 large renter-households that resided in the City. However, market-rate rents for larger apartments and homes are well beyond the reach of lower income large households who were renters (see Table 23).

Table 18: Bedroom Mix By Tenure

# Bedrooms	Owned Units	Rental Units	Total
Studio	56	243	299
One-Bedroom	99	1,041	1,140
Two-Bedrooms	1,196	1,960	3,156
Three- or More Bedrooms	10,175	1,952	12,127
Total	11,526	5,196	16,722

Source: American Community Survey, 2011-2015

As mentioned previously and detailed in Table 19, the majority of Glendora’s housing is owner-occupied (72 percent). This is significant because vacancy rates and household incomes vary noticeably by tenure in the City. A certain number of vacant units are needed to moderate the cost of housing, allow sufficient choice for residents and provide an incentive for unit upkeep and repair. Vacancy rates are generally higher among rental properties, as rental units have greater attrition than owner-occupied units. A healthy vacancy rate — one which permits sufficient choice and mobility among a variety of housing units — is considered to be two to three percent for ownership units and five to six percent for rental units. Low vacancy rates can indicate a heightened likelihood of housing discrimination as the number of house-seekers increases while the number of available units remains relatively constant. Managers and sellers are then able to choose occupants based on possible biases because the applicant pool is large. The overall vacancy rate for Glendora was reported at 3.6 percent in 2010. However, the rental vacancy rate was recorded at 5.5 percent while the homeowner vacancy rate was much lower (at only 1.0 percent), indicating limited housing options and mobility for residents.

Table 19: Tenure and Vacancy

City/Area	Percent Owner-Occupied	Percent Renter-Occupied	Homeowner Vacancy Rate	Rental Vacancy Rate
Glendora	72.3%	27.7%	1.0%	5.5%
Los Angeles County	47.7%	52.3%	1.7%	5.8%

Sources: Bureau of the Census, 2010 Census

Table 20 also indicates that Glendora renters were more likely to be lower and moderate income and experience housing problems, such as cost burden and substandard housing conditions, compared to homeowners.

Table 20: Income by Tenure

Tenure	Percent of All Households	Percent Low and Moderate Income	Percent with Housing Problems
Renters	31.3%	58.2%	51.9%
Owners	68.7%	29.0%	38.2%
All Households	100.0%	38.2%	42.5%

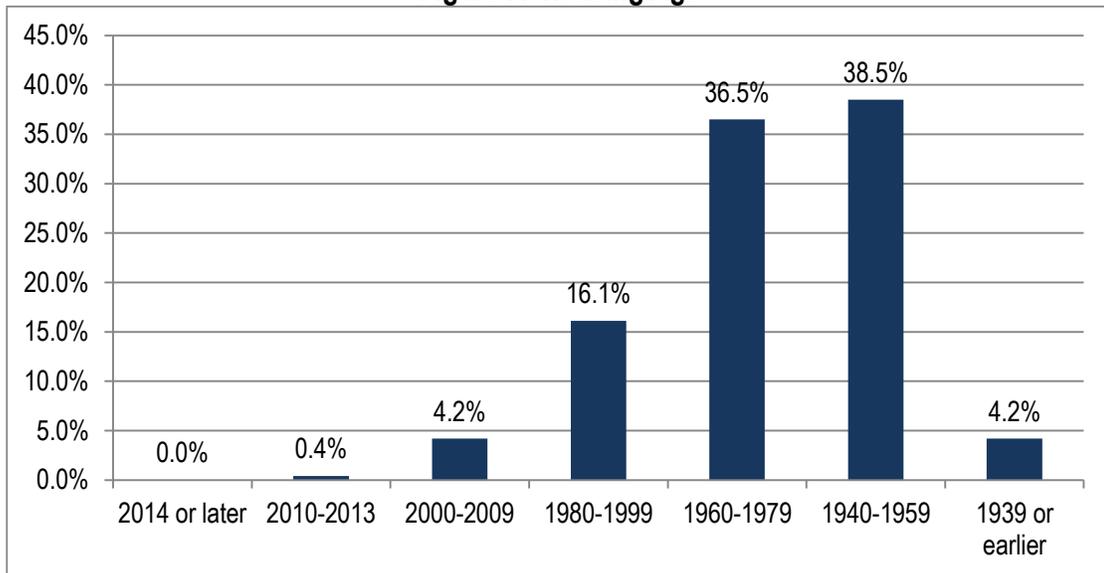
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2010-2014

4. Housing Condition

Housing age is an important indicator of housing condition within a community. Like any other tangible asset, housing is subject to gradual deterioration over time. If not maintained, housing can deteriorate and depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Thus, maintaining and improving housing quality is an important goal for the City.

State and federal housing programs typically consider the age of a community's housing stock when estimating rehabilitation needs. In general, most homes begin to require major repairs or have significant rehabilitation needs at 30 or 40 years of age. Furthermore, housing units constructed prior to 1979 are more likely to contain lead-based paint. The City's housing stock is older with a majority of the housing units (79 percent) built before 1979 (Figure 7). Given the age of the City's housing stock, housing rehabilitation needs in Glendora will increase substantially in the upcoming decade.

Figure 7: Housing Age



Source: Bureau of the Census, 2000; American Community Survey (ACS), 2011-2015

Lead-Based Paint Hazard

Housing age is also the key variable used to estimate the number of housing units with lead-based paint (LBP). Starting in 1978, the federal government prohibited the use of LBP on residential property. Housing constructed prior to 1978, however, is at risk of containing LBP. According to the 2011-2015 ACS, an estimated 13,685 units (representing 79 percent of the housing stock) in Glendora were constructed prior to 1980.

The potential for housing to contain LBP varies depending on the age of the housing unit. National studies estimate that 75 percent of all residential structures built prior to 1970 contain LBP. Housing built prior to 1940, however, is much more likely to contain LBP (estimated at 90 percent of housing units). About 62 percent of housing units built between 1960 and 1979 are estimated to contain LBP. Table 21 estimates the number of housing units in Glendora containing LBP utilizing the assumptions outlined above. It should be noted, however, that not all units with LBP present a hazard. Properties most at risk include

structures with deteriorated paint, chewable paint surfaces, friction paint surfaces, and deteriorated units with leaky roofs and plumbing.

Table 21: Lead Based Paint Estimates

Year Built	Housing Units	LBP Estimates	Estimated # of Units with LBP
1960-1979	6,281	62% ±10%	3,894 ± 10%
1940-1959	6,637	80% ±10%	5,309 ± 10%
Before 1940	767	90% ±10%	690 ± 10%
Total Units	17,320	62% ±10%	8,484 ± 10%

Source: American Community Survey (ACS), 2011-2015

E. Housing Costs and Affordability

The cost of housing is directly related to the extent of housing problems in a community. If housing costs are relatively high in comparison to household income, there will be a correspondingly higher prevalence of overpayment and overcrowding. This section provides current information on housing sales prices and rents in Glendora, and assesses the affordability of the housing stock to Glendora residents.

1. Housing Cost

Table 22 displays median home prices for Glendora and neighboring jurisdictions within Los Angeles County. For October 2017, the median sales price for a home in Glendora was \$583,750, an increase of six percent from the previous year. The price of for-sale housing in the City is similar to the rest of the region.

Table 22: Median Home Prices

Jurisdiction	# Sold	Median Price October 2017	Median Price October 2016	% Change 2016-2017
Glendora	53	\$583,750	\$549,000	6.3%
Arcadia	71	\$1,010,000	\$950,000	6.3%
Covina	68	\$515,000	\$448,500	14.8%
San Dimas	28	\$602,000	\$565,000	6.5%
Los Angeles County	6878	\$565,000	\$525,000	7.6%

Source: DQNews.com, California Home Sale Activity by City, October 2017. Accessed December 2017.

Information on current rental rates in the City was obtained through a review of advertisements on Craigslist.org and Apartments.com during December 2017. Available rental housing ranged from one-bedroom to four-bedroom units. Two-bedroom apartments and three-bedroom homes are the most available types of rental. Table 23 summarizes average rents by unit size and type. Overall, 51 units of varying sizes were listed as available for rent with an average overall rent of \$2,522.

Table 23: Average Rent by Unit Size and Type

	1-BR	2-BR	3-BR	4+ BR
Apartment	\$1,439	\$1,765	\$3,020	---
Condo	---	\$2,375	\$2,630	\$2,850
Home	\$1,700	\$1,750	\$2,630	\$3,956
Overall	\$1,483	\$1,857	\$2,648	\$3,735

Sources: www.craigslist.org and www.apartments.com, accessed December 22, 2017

2. Housing Affordability

Housing affordability can be inferred by comparing the cost of renting or owning a home in a community with the maximum affordable housing costs for households at different income levels. Taken together, this information can generally show who can afford what size and type of housing and indicate the type of households most likely to experience overcrowding and overpayment. While housing affordability alone is not a fair housing issue, fair housing concerns may arise when housing affordability interacts with factors covered under the fair housing laws.

The federal Department of Housing and Urban Development (HUD) conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Table 24 shows annual household income by household size and the maximum housing payment a household can afford to make, based on the cost burden threshold of 30 to 35 percent of household income (see Housing Cost B discussion). These calculations take into account the assumption that households in the lower end of each income category can afford less by comparison than those at the upper end. General cost assumptions for utilities, taxes, and property insurance are also shown.

The median home price of \$583,750 (in 2017) places homeownership out of the reach of the City's lower and moderate income households (Table 24). Given the high costs of homeownership, lower income households are usually confined to rental housing, where affordability problems also persist. The situation is exacerbated for large households with lower and moderate incomes and for seniors or single-parent households with limited or fixed incomes.

Table 24: Housing Affordability

Income Group	Annual Income Limits	Affordable Housing Payments		Utilities		Taxes & Insurance (Owner)	Maximum Affordable Price	
		Renter	Owner	Renter	Owner		Home (purchase price)	Rental (per month)
Extremely Low (0-30% AMI)								
1-Person	\$18,950	\$474	\$474	\$117	\$86	\$166	\$51,653	\$222
2-Person	\$21,650	\$541	\$541	\$136	\$107	\$189	\$56,976	\$245
3-Person	\$24,350	\$609	\$609	\$153	\$127	\$213	\$62,533	\$269
4-Person	\$27,050	\$676	\$676	\$180	\$157	\$237	\$65,762	\$283
5-Person	\$29,250	\$731	\$731	\$180	\$194	\$256	\$65,471	\$281
Low (31-50% AMI)								
1-Person	\$31,550	\$789	\$789	\$117	\$86	\$276	\$99,305	\$427
2-Person	\$36,050	\$901	\$901	\$136	\$107	\$315	\$111,436	\$479
3-Person	\$40,550	\$1,014	\$1,014	\$153	\$127	\$355	\$123,800	\$532
4-Person	\$45,050	\$1,126	\$1,126	\$180	\$157	\$394	\$133,837	\$575
5-Person	\$46,900	\$1,173	\$1,173	\$180	\$194	\$410	\$132,222	\$568
Moderate (50%-80% AMI)								
1-Person	\$50,500	\$680	\$794	\$117	\$86	\$278	\$100,069	\$430
2-Person	\$57,700	\$778	\$907	\$136	\$107	\$318	\$112,336	\$483
3-Person	\$64,900	\$875	\$1,021	\$153	\$127	\$357	\$124,837	\$536
4-Person	\$72,100	\$972	\$1,134	\$180	\$157	\$397	\$135,009	\$580
5-Person	\$77,900	\$1,050	\$1,225	\$180	\$194	\$429	\$140,122	\$602
Median (80%-100% AMI)								
1-Person	\$45,350	\$1,021	\$1,191	\$117	\$86	\$417	\$160,111	\$688
2-Person	\$51,850	\$1,166	\$1,361	\$136	\$107	\$476	\$180,956	\$778
3-Person	\$58,300	\$1,312	\$1,531	\$153	\$127	\$536	\$202,034	\$868
4-Person	\$64,800	\$1,458	\$1,701	\$180	\$157	\$595	\$220,784	\$949
5-Person	\$70,000	\$1,575	\$1,837	\$180	\$194	\$643	\$232,758	\$1,000
Above Moderate Income (100%-120% AMI)								
1-Person	\$54,450	\$1,247	\$1,455	\$117	\$86	\$509	\$200,139	\$860
2-Person	\$62,200	\$1,426	\$1,663	\$136	\$107	\$582	\$226,702	\$974
3-Person	\$70,000	\$1,604	\$1,871	\$153	\$127	\$655	\$253,498	\$1,089
4-Person	\$77,750	\$1,782	\$2,079	\$180	\$157	\$728	\$277,967	\$1,194
5-Person	\$83,950	\$1,925	\$2,245	\$180	\$194	\$786	\$294,516	\$1,265

Assumptions: California Department of Housing and Community Development 2017 income limits; 30 - 35% gross household income as affordable housing costs (depending on tenure and income level); 20% of monthly affordable cost for taxes and insurance; 5% downpayment, 4% interest rate for a 30-year fixed rate mortgage loan; utilities based on Housing Authority of County of Los Angeles 2017 Utility Allowance.

Sources: California Department of Housing and Community Development, 2017; Housing Authority of the County of Los Angeles, 2017.

F. Housing Problems

1. Cost Burden (Overpayment)

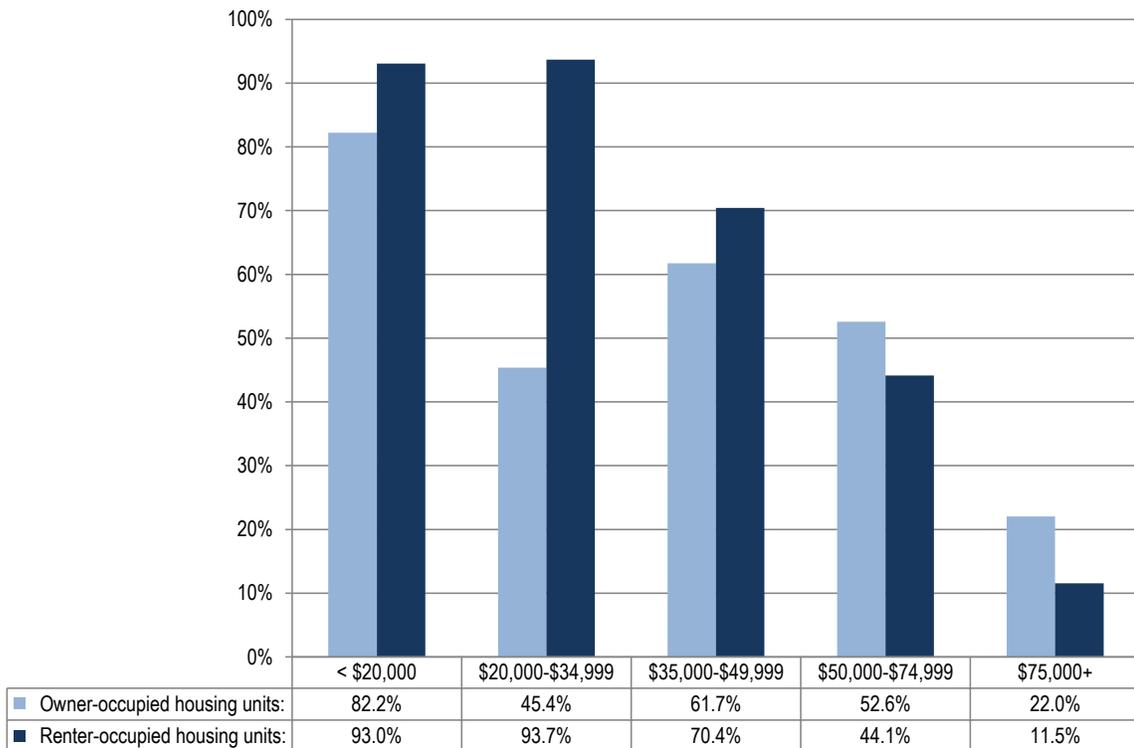
Cost burden is an important housing issue because paying too much for housing leaves less money available for other basic necessities, such as food and health care. Housing cost burden is typically linked to household income. Generally, the proportion of a household's income dedicated to housing costs increases as overall income decreases. Cost burden by low income households tends to occur when housing costs increase faster than income.

What is Housing Cost Burden?

According to the federal government, when a household spends more than 30 percent of income on housing, they are considered cost-burdened. A cost burden of 30 to 50 percent is considered moderate; payment in excess of 50 percent of income on housing is considered a severe cost burden.

Figure 8 shows how dramatically household income levels affect housing cost burden for owner- and renter-households. Among the City's lower income residents (less than \$35,000), the vast majority of households overpaid for housing. This rate of cost burden, however, declined sharply as household incomes increased. Cost burden also varied by tenure and household type. More than half of Glendora's renters (52 percent) had a housing cost burden, compared to 36 percent of homeowners.

Figure 8: Housing Cost Burden by Income and Tenure



Source: American Community Survey (ACS), 2011-2015

Lower and moderate income renters (<80% AMI) were the most affected by cost burden, with 4,234 of these households (or 67 percent) paying more than 30 percent of their incomes on housing. Among Glendora’s approximately 4,490 elderly households, 34 percent experienced housing cost burden and 17 percent were severely cost burdened (i.e. spent more than 50 percent of their income on housing costs).

Table 25: Housing Cost Burden by Tenure

Household	Cost Burden (30%+)	Severe Cost Burden (50%+)
Low and Moderate Income Households		
Owner-Occupied	60.6%	34.8%
Renter-Occupied	73.6%	45.1%
All Households	66.8%	39.7%
All City Households		
Owner-Occupied	37.3%	13.3%
Renter-Occupied	49.9%	17.4%
All Households	41.2%	17.4%

Note: Cost burden (30-50%) is not available for specific income categories, cost burden (30%+) is shown instead.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2010-2014

2. Overcrowding

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

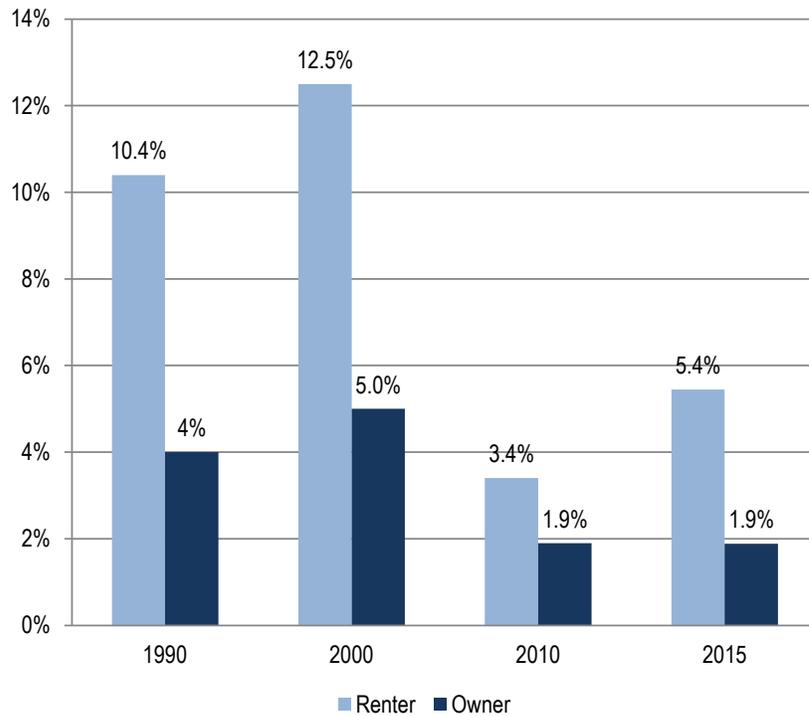
How is Overcrowding Defined?

According to State and federal guidelines, an overcrowded housing unit is defined as a unit with more than one person per room, including dining and living rooms but excluding bathrooms, kitchens, hallways, and porches. Severe overcrowding is described as households with more than 1.5 persons per room.

Household overcrowding is reflective of various living situations: (1) a family living in a home that is too small; (2) a family choosing to house extended family members; or (3) unrelated individuals or families 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. As a result, some landlords or apartment managers may be more hesitant to rent to larger families, thus making access to adequate housing even more difficult. Overcrowding in Glendora dropped significantly between 2000 and 2010, but renter overcrowding saw an increase between 2010 and 2015 (Figure 9).

Between 2011 and 2015, approximately three percent of all households in Glendora were overcrowded and less than one percent were severely overcrowded. Overcrowding was noticeably less common in Glendora than the County as a whole (Table 26).

Figure 9: Overcrowded Households



Sources: Bureau of the Census (1990-2010) and American Community Survey (2011-2015).

Table 26: Overcrowding by Tenure

Jurisdiction	Overcrowded (1+ occupants per room)			Severely Overcrowded (1.5+ occupants per room)		
	Renter	Owner	Total	Renter	Owner	Total
Glendora	5.4%	1.9%	3.0%	0.9%	0.5%	0.6%
Los Angeles County	17.4%	5.7%	11.9%	7.7%	1.5%	4.8%

Source: American Community Survey (ACS), 2011-2015

G. Public and Assisted Housing

Public and assisted housing address a critical need for affordable rental housing and are discussed in the following section.

1. Conventional Public Housing

There are no conventional public housing units located in Glendora.

2. Housing Choice Vouchers Program

Tenant-based rental assistance is a portable form of housing assistance. The Housing Choice (Section 8) Voucher Program is funded by HUD and administered by the Housing Authority of the County of Los Angeles (HACoLA) on behalf of Glendora. With this program, an income-qualified household can use the voucher at any rental complex that accepts

Housing Choice vouchers. Voucher recipients pay a minimum of 30 percent of their income for rent and HACoLA pays the difference, up to the payment standard established by HACoLA. HACoLA establishes payment standards based on HUD-established Fair Market Rents (FMR). The owner’s asking price must be supported by asking rents in the area, and any rental amount in excess of the payment standard is paid for by the tenant. Based on current HUD regulations, of those new households admitted to the Housing Choice Voucher program, three-fourths must have incomes of less than 30 percent of the area median, while one-quarter may have incomes up to 80 percent of the median.

As of January 2018, 35 households received Section 8 vouchers from HACoLA. Table 27 describes the race, ethnicity, and household characteristics of voucher holders.

Table 27: Demographics of Housing Choice Voucher Participants

Characteristic	City of Glendora
Special Needs	
Senior	46%
Disabled	51%
Veteran Status	6%
Race	
White	74%
Black	17%
American Indian	3%
Asian	3%
Native Hawaiian	3%
Other/Declined to Answer/Multi-Race	N/A
Ethnicity	
Hispanic	49%
Non-Hispanic	51%

Source: Housing Authority, County of Los Angeles, January 2018

To ensure that all members of the community are made aware of the availability of Housing Choice Vouchers and public housing, HACoLA staff provides language assistance to all Limited English Proficient (LEP) applicants and participants who have difficulty communicating in English, who identify themselves as LEP or who request language assistance. Applicants are asked at the time of application and again during annual reexaminations to designate their primary language for both oral and written services and whether LEP services are needed. Once a person is identified as LEP, interpreter services will be made available in all communication with or from the Housing Authority. All documents deemed “vital” by the Housing Authority will also be translated into threshold languages—which is defined as a language spoken by five percent (or 1,000 persons, whichever is less) of the population of persons eligible to be served.

To increase the awareness of Section 8 resources among families of races and ethnicities with disproportionate needs, as well as to the elderly and disabled, HACoLA has adopted the following strategies:

- Affirmatively market to race/ethnicities shown to have disproportionate housing needs.

- Counsel Section 8 tenants as to location of units outside of poverty or minority concentration and assist them to locate those units.
- Market the Section 8 program to owners outside of areas of poverty/minority concentration.
- Apply for special purpose vouchers targeted to the elderly and families with disabilities, should they become available.
- Advertise and market the Section 8 program at Social Security offices, senior centers, and neighborhood centers.
- Affirmatively market to local non-profit agencies that assist families with disabilities.

Section 8 Admission Policies

According to HACoLA, 65 Glendora residents were on the waiting list for assistance (January 2018). Since the demand for housing assistance far exceeds the limited resources available, long waiting periods are common. The amount of time on the wait list can disproportionately impact the elderly, who may be frail and have health problems. Table 28 describes the race, ethnicity, and household characteristics of Glendora residents on the Section 8 waiting list.

Table 28: Demographics of Section 8 Waiting List

Characteristic	City of Glendora
Special Needs	
Senior	38%
Disabled (Head of Household or Spouse)	45%
Disabled (Head of Household Only)	8%
Veteran Status	2%
Race	
White	68%
Black	5%
American Indian	0%
Asian	2%
Native Hawaiian	0%
Other/Declined to Answer/Multi-Race	26%
Ethnicity	
Hispanic	43%
Non-Hispanic	48%

Source: Housing Authority, County of Los Angeles, January 2018.

HUD allows Housing Authorities to develop local preferences to prioritize Section 8 assistance. HACoLA has developed the following preferences which it uses to prioritize the Section 8 waiting list (local preferences are weighted highest to lowest, in the following order):

- **Targeted, and Special Programs:** Families who qualify for Targeted or Special Programs administered by the Housing Authority will be admitted before all other eligible applicants or applicants on the waiting list.

- Families previously assisted by the Housing Authority whose assistance was terminated due to insufficient funding.
- Families who live or work in the jurisdiction in the following categories that are subject to the approval by the Executive Director:
 - Victims of Declared Disasters
 - Displacement Due to Government Actions
 - Referrals from law enforcement agencies, including:
 1. Victims of domestic violence,
 2. Involuntarily displaced to avoid reprisals, or
 3. Displaced due to being a victim of a hate crime.
- **Homeless Families Referred by an Eligible Organization:** To qualify for this preference, homeless families must be referred by County agencies with a contract or Memorandum of Understanding (MOU) in place with the Housing Authority, or by Community Based Organizations (CBO's) contracted with the Housing Authority.
- **Jurisdictional Preference:** Families who live and/or work in the Housing Authority's jurisdiction will be admitted before families outside of the Housing Authority's jurisdiction.
- **Date and Time of Registration:** Families will be selected from the waiting list based on the preferences for which they qualify, and then by date and time.

3. Other Affordable Housing Projects

Three assisted rental housing projects are located in Glendora (Table 29):

- Glendora Gardens has 105 units that are rent-restricted as a result of a HUD Section 8 contract. The City former Redevelopment Agency also assisted in financing the acquisition of this site, the relocation of the school facilities, and the improvement of off-site public facilities. Pursuant to a negotiated development agreement with Glendora, the project's affordability is set to expire in 2034.
- Heritage Oaks apartment has a total of 157 units, of which 47 are rent-restricted through an agreement with the City. The Glendora former Redevelopment Agency also committed 20 percent set-aside funds to ensure affordability controls for the Heritage Oaks project. Given that the project was built in 1991 with the use of RDA funds, the affordability restrictions will not expire until 2045.
- Elwood Family Apartments has 87 units reserved for extremely low, very low, and low income families. It was funded through a combination of redevelopment funds, HOME funds, and Low Income Housing Tax Credits (LIHTC).

Table 29: Inventory of Assisted Housing

Project Name	Total Units	Affordable Units	Unit Mix (Bedrooms)	Funding Source(s)	Expiration of Affordability
Glendora Gardens 340 North Wabash Ave. Glendora, CA 91741	105	105 Very Low	28 (0-bedroom) 76 (1-bedroom) 1 (2-bedroom)	Glendora RDA set-aside funds, CHFA and Section 8	2034
Heritage Oaks 1000 S Glendora Ave. Glendora, CA 91740	157	31 Low 16 Moderate	10 (2-bedroom) 37 (1-bedroom)	Glendora RDA set-aside funds	2045
Elwood Family Apartments 635 Elwood Ave. Glendora, CA 91740	87	9 Extremely Low 52 Low 25 Moderate 1 Manager	33 (2-bedroom) 42 (3-bedroom) 12 (4-bedroom)	Glendora RDA HOME Funds LIHTC	2062

Source: City of Glendora, 2018.

H. Licensed 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.

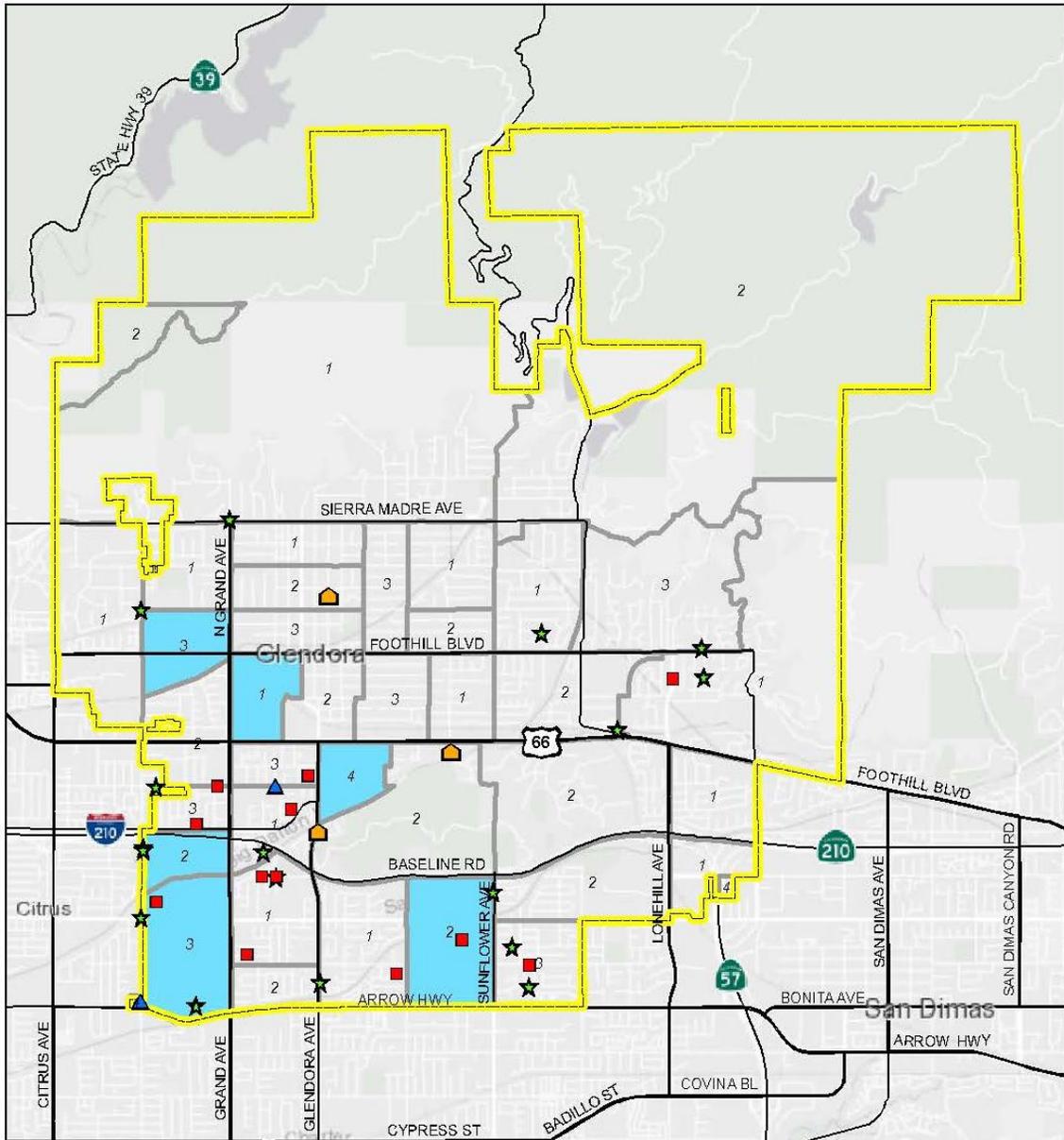
According to the California Department of Social Services, Community Care Licensing Division, there are 21 State-licensed residential care facilities for the elderly, 14 adult residential facilities, and two adult day care facilities in Glendora. These 37 licensed care facilities have a combined capacity of 531 beds/persons (Table 30). The locations of these facilities are shown in Figure 10.

Table 30: Licensed Community Care Facilities

Type of Facility	# of Facilities	Total Capacity
Residential Care for the Elderly	21	254
Adult Day Care	2	190
Adult Residential Facility	14	87
Total	37	531

Source: State Department of Social Services, Licensing Division, December 2017.

Figure 10: Affordable Housing and Licensed Residential Care Facilities



City of Glendora
Affordable Housing and Licensed Care Facilities

- ▲ Adult Day Program
- Adult Residential
- ★ Residential Care Elderly
- 🏠 Affordable Housing Project
- Low/Moderate Income Area
- Glendora Boundary

Source: California Dept. of Social Services
 Community Care Licensing Division

I. Accessibility to Public Transit and Services

Having access to good schools, quality jobs, effective public transportation, and other social services helps facilitate a good quality of life and improved life outcomes. Unfortunately, research has shown that racial and ethnic minorities, individuals with disabilities, and other protected classes often have restricted access to these vital amenities. This section addresses access to public transit and employment as well as disparities in exposure to adverse community factors.

1. Public Transit

Employment and transportation relate to housing because they help to indicate where more affordable housing could be placed, along with more efficient public transportation programs. The vast majority of Glendora’s employed residents commute alone to work by car. Only about three percent take advantage of public transportation and another one percent walk to work (Table 31). This preference for commuting by car is likely due to the fact that relying on public transit in Glendora typically means longer commute times. The majority of commuters who *do not use* public transit travel less than 30 minutes to work (51 percent); however, the majority of those who *do use* public transit report commute times of 60 minutes or more (80 percent) (Figure 11).

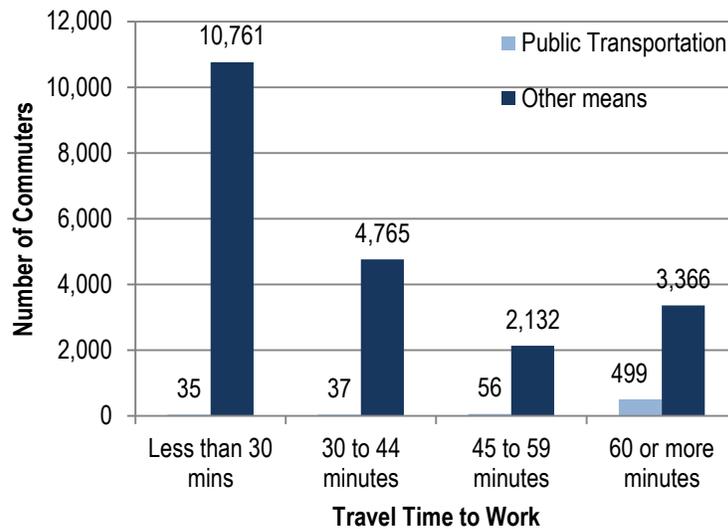
Table 31: Means of Transportation to Work for Workers 16 Years and Over

Means of Transportation	2009-2013	
	Population	Percentage
Car, Truck, or Van	20,493	91.0%
Drove Alone	18,396	81.7%
Carpooled	2,097	9.3%
Public Transportation (excluding taxicab)	627	2.8%
Taxicab, Motorcycle, Bicycle or Other	284	1.3%
Walked	247	1.1%
Worked at Home	876	3.9%
Total	22,527	100.0%

Source: U.S. Census Bureau, American Community Survey 2011-2015

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 among public transit, employment opportunities, and affordable housing may impede fair housing choice because persons who depend on public transit will have limited choices regarding places to live. In addition, elderly and disabled persons also often rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Public transit that provides a link between job opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs.

Figure 11: Commute Times



Source: U.S. Census Bureau, American Community Survey 2011-2015

Public transit options in Glendora include:

- The City of Glendora and Crowther Teen & Family Center offer transportation services to students who attend Sandburg Middle School, Goddard Middle School, Royal Oak Middle School, Charter Oak High School or Glendora High School. This public, fixed route service has two lines that make stops in Downtown Glendora/Glendora Library and the Teen Center.
- Glendora Mini-Bus, Dial-A-Ride service is a shared ride, curb-to-curb, transportation service administered by the City of Glendora, Community Services Department, Transportation Division. The Dial-A-Ride service is available to Glendora Residents who are 55 years of age or older, as well as residents who are younger than 55 who are unable to independently use the public transportation system due to permanent disability.
- Another transportation option is Foothill Transit (wheelchair accessible), which has seven lines serving Glendora. These routes as well as transfers allow anyone in Glendora to access the entire San Gabriel Valley and beyond.
- The Glendora Mini-Bus Metrolink Shuttle is available for transportation to and from the Covina Metrolink Station. The Metrolink Shuttle operates during morning and afternoon peak hours and is intended to provide a link to public transportation for residents and employees of Glendora businesses. The shuttle runs on a fixed route from the Glendora Transportation Park and Ride at Mountain View and Dalton Avenues to the Covina Metrolink Station located at 600 N. Citrus in Covina, and makes stops at designated shuttle stops along the way.

2. Employment

Education and employment also have an important impact upon housing needs to the extent that housing affordability is tied to household income. According to the California Employment Development Department (EDD), a total of 26,200 Glendora residents were in the labor force as of November 2017, with approximately 900 unemployed residents. Glendora's unemployment rate (3.5 percent) was slightly lower than the overall unemployment rate for Los Angeles County (4.1 percent) during the same time.

The educational level of Glendora residents was higher than that of the overall population in Los Angeles County. The County had over twice the percentage of residents over age 25 without a high school diploma. Glendora also had a higher percentage of residents with some college education and Associate degrees, which usually translate into greater income-earning potential. The percentage of residents holding four-year degrees and graduate or professional degrees was relatively equal between the City and County.

Table 32 describes the type of occupations held by Glendora residents. As of 2015, the largest proportion of residents were employed in management and professional occupations (42 percent), followed closely by residents employed in sales and office occupations (28 percent). Individuals employed in management and professional positions typically have higher incomes. Over the 2000-2015 period, the number of residents with service jobs increased by the highest amount (18 percent). (The significant percentage increase in farming/fishing/forestry occupations is skewed due to the small number of residents employed in this category.)

Table 32: Employment Profile

Occupations	1990		2000		2011-2015		Percent Change 1990-2000	Percent Change 2000-2015
	Person	%	Person	%	Person	%		
Management/Professional	7,526	31.1%	9,470	39.9%	9,792	42.0%	+25.8%	+3.4%
Sales and Office	8,516	35.2%	6,810	28.7%	6,550	28.1%	-20.0%	-3.8%
Service	2,471	10.2%	2,921	12.3%	3,456	14.8%	+18.2%	+18.3%
Production/Transportation	3,077	12.7%	2,348	9.9%	1,882	8.1%	-23.7%	-19.8%
Construction/Maintenance	2,348	9.7%	2,104	8.9%	1,638	7.0%	-10.4%	-22.1%
Farming, Fishing, Forestry	248	1.0%	58	0.2%	159	0.7%	-76.6%	+174.1%
Total	24,186	100%	23,711	100%	23,318	100%	-2.0%	-1.7%

Sources: Bureau of the Census (1990 and 2000), and American Community Survey 2011-2015.

3. Major Employers

Major employers in Glendora include educational institutions, government offices, and medical facilities (Table 33).

Table 33: Major Employers in Glendora - 2017

Employer Name	Location	Employees
Citrus Community College District	1000 W Foothill Blvd, Glendora, CA 91741	807
Glendora Unified School District	500 N. Loraine Ave, Glendora, CA 91741	747
Foothill Presbyterian Hospital	250 S. Grand Ave., Glendora, CA 91741	638
County of Los Angeles – DCFS	725 S Grand Ave, Glendora, CA 91740	600
Glendora Grand	805 E Arrow Hwy, Glendora, CA 91740	401
Ormco Corporation	1332 S Lone Hill Ave, Glendora, CA 91740	350
Wal-Mart Stores, Inc.	1950 Auto Centre Dr, Glendora, CA 91740	309
Glendora Community Hospital	150 W Rte 66, Glendora, CA 91740	294
City of Glendora	116 E. Foothill Blvd., Glendora, CA 91741	291
Sam's Club	1301 Lone Hill Ave. Glendora, CA 91740	198

Source: City of Glendora Comprehensive Annual Financial Report, 2017

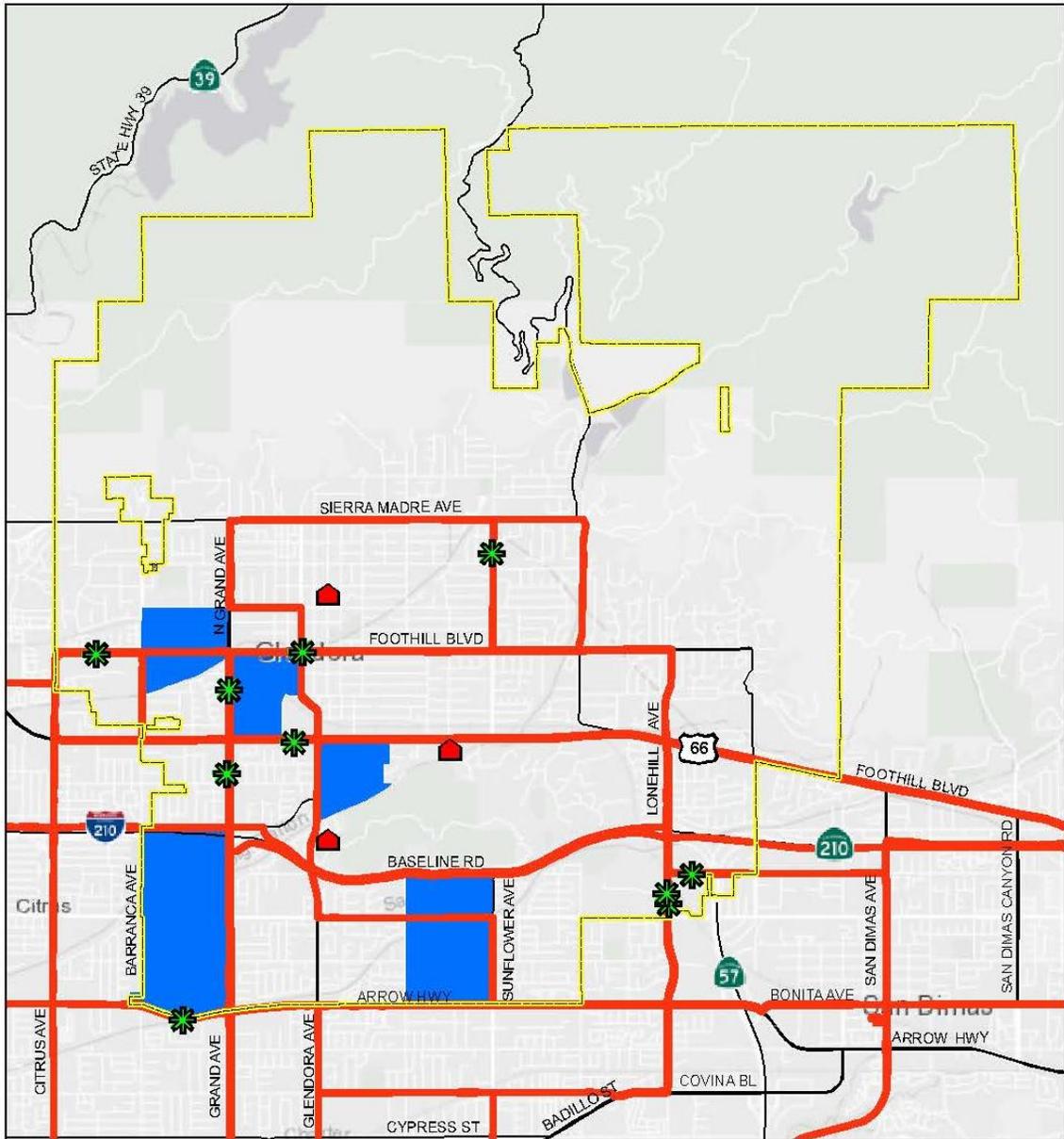
4. Affordable Housing, Employment, and Public Transit

Limited access to public transit may counteract some of the benefits of affordable housing. Current research indicates a strong connection between housing and transportation costs. Housing market patterns in parts of California with job-rich city centers are pushing lower income families to the outskirts of urban areas, where no transit is available to connect them with jobs and services. In lower income communities with underserved city centers, many residents must commute out to suburban job-rich areas. In an attempt to save money on housing, many lower-income households are spending disproportionately higher amounts on transportation. A study conducted by the Center for Housing Policy revealed that families who spend more than half of their income on housing spend only eight percent on transportation, while families who spend 30 percent or less of their income on housing spend almost 24 percent on transportation.¹⁵ This equates to more than three times the amount spent by persons living in less affordable housing.

The location of the City's affordable housing projects and major employers in relation to regional transit services can be seen in Figure 12. As shown, all affordable housing projects and major employers in the City are situated along transit routes.

¹⁵ Lipman, Barbara J. "A Heavy Load: The Combined Housing and Transportation Burdens of Working Families." Center for Housing Policy, (October 2006).

Figure 12: Affordable Housing/Major Employers and Transportation Routes



City of Glendora
Affordable Housing, Major Employers and Transit

-  Major Employer
-  Affordable Housing
-  Transit Route
-  Low/Moderate Income Area
-  Glendora Boundary

Source: U.S. Census, American Community Survey (2017), Foothill Transit, City of Glendora

J. ADA-Compliant Public Facilities (Section 504 Assessment)

Access to civic life by people with disabilities is a fundamental goal of the Americans with Disabilities Act (ADA). To ensure that this goal is met, Title II of the ADA requires State and local governments to make their programs and services accessible to persons with disabilities. This requirement extends not only to physical access at government facilities, programs, and events -- but also to policy changes that governmental entities must make to ensure that all people with disabilities can take part in, and benefit from, the programs and services of State and local governments.

The development of an ADA Transition Plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities. The Transition Plan (also known as a Program Access Plan) identifies physical obstacles that limit the accessibility of facilities to individuals with disabilities, describes the prescribed methods to make the facilities accessible, provides a schedule for making the access modifications, and identifies the public officials responsible for implementation of the transition plan.

The City of Glendora has not prepared a Transition Plan; however, the City has been making ADA improvements to public and community facilities. Table 34 shows the facilities in the City's Capital Improvement Plan for ADA improvements between FY 2014-2015 and FY 2016-2017:

Table 34: ADA Improvements

Target Area	Project Titles	Description	Status
Citywide	City Wide Concrete Repair Project #1144	Removal and replacement of broken concrete along: Plymouth, Newburgh, Bruning, Greer	Completed
Citywide	ADA Bathroom Improvements	ADA restrooms at: <ul style="list-style-type: none"> ▪ City Library ▪ Finkbiner Park ▪ La Fetra Senior Center ▪ Gladstone Park ▪ South Hills Park 	Completed

Source: City of Glendora, 2017

K. Exposure to Adverse Community Factors

Communities must consider fair housing when addressing environmental concerns because either the problems themselves, or treatment of the problems, may have a disproportionate effect on some residents. Of particular concern are environmental risks to vulnerable populations, including pregnant women, young children, and individuals with disabilities—all of whom are protected under fair housing law.

1. Public Schools

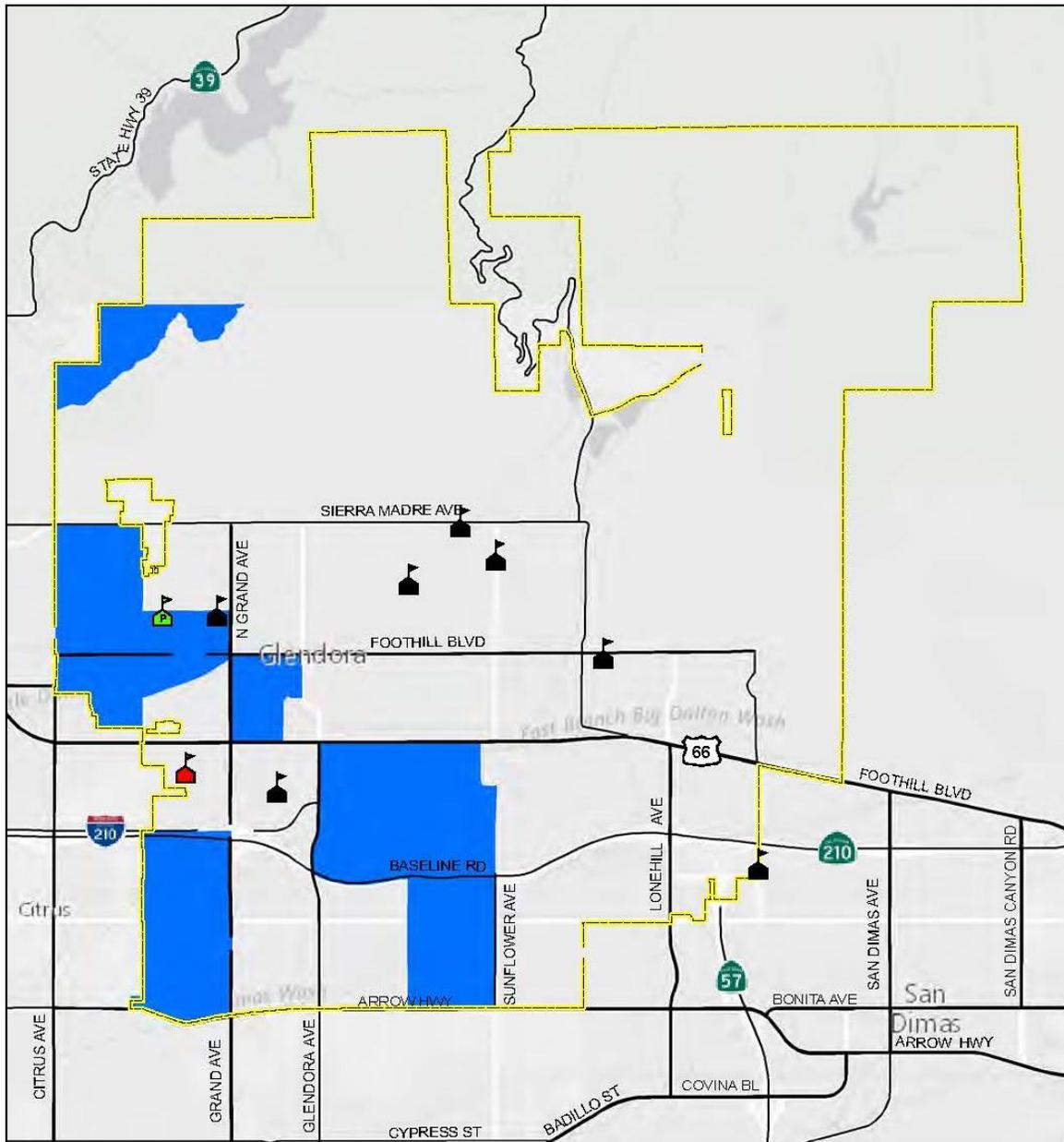
As part of President Johnson’s “War on Poverty,” the Elementary and Secondary Education Act (ESEA) was passed in 1965. It is often regarded as the most far-reaching federal legislation affecting education ever passed by Congress. The act is an extensive statute that funds primary and secondary education, 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 provides financial assistance to states and school districts to meet the needs of educationally at-risk students. To qualify as a Title I school, a campus typically must have around 40 percent or more of its students coming from families who are low income. The goal of Title I is to provide extra instructional services and activities which support students identified as failing or most at risk of failing the state’s challenging performance standards in mathematics, reading, and writing.

Public education in the City of Glendora is administered by the Glendora Unified School District. Figure 13 illustrates the location of public schools in the City of Glendora. Two schools in the City are designated a Title I school (one out of nine K-12 schools in the district).

Additionally, in California, PI is the formal designation for Title I-funded schools and local education agencies (LEAs) that fail to make Adequate Yearly Progress (AYP) for two consecutive years. Once in PI, a school that fails to make AYP will advance further in PI status (e.g., Year 1, Year 2, Year 3, Year 4, or Year 5)—with Year 5 schools being the most under-performing schools. Those that fail to make AYP toward statewide proficiency goals are subject to improvement and corrective action measures. In Glendora, of the two schools designated as Title I, one has been identified for PI and is in Year 1.

Title I schools in the City, and those that have a Year 1 PI status, serve low and moderate income areas of the City. Improving access to higher achieving schools is important as studies have shown that low income children who live in low-poverty neighborhoods and consistently attend high-quality schools perform significantly better academically than those who do not.

Figure 13: Title I Schools



City of Glendora

Title I Schools

-  Not in PI
-  Year 1
-  Non-Title I School
-  Low/Moderate Income Area
-  Glendora Boundary

Source: U.S. Census, American Community Survey (2015), Glendora Unified School District

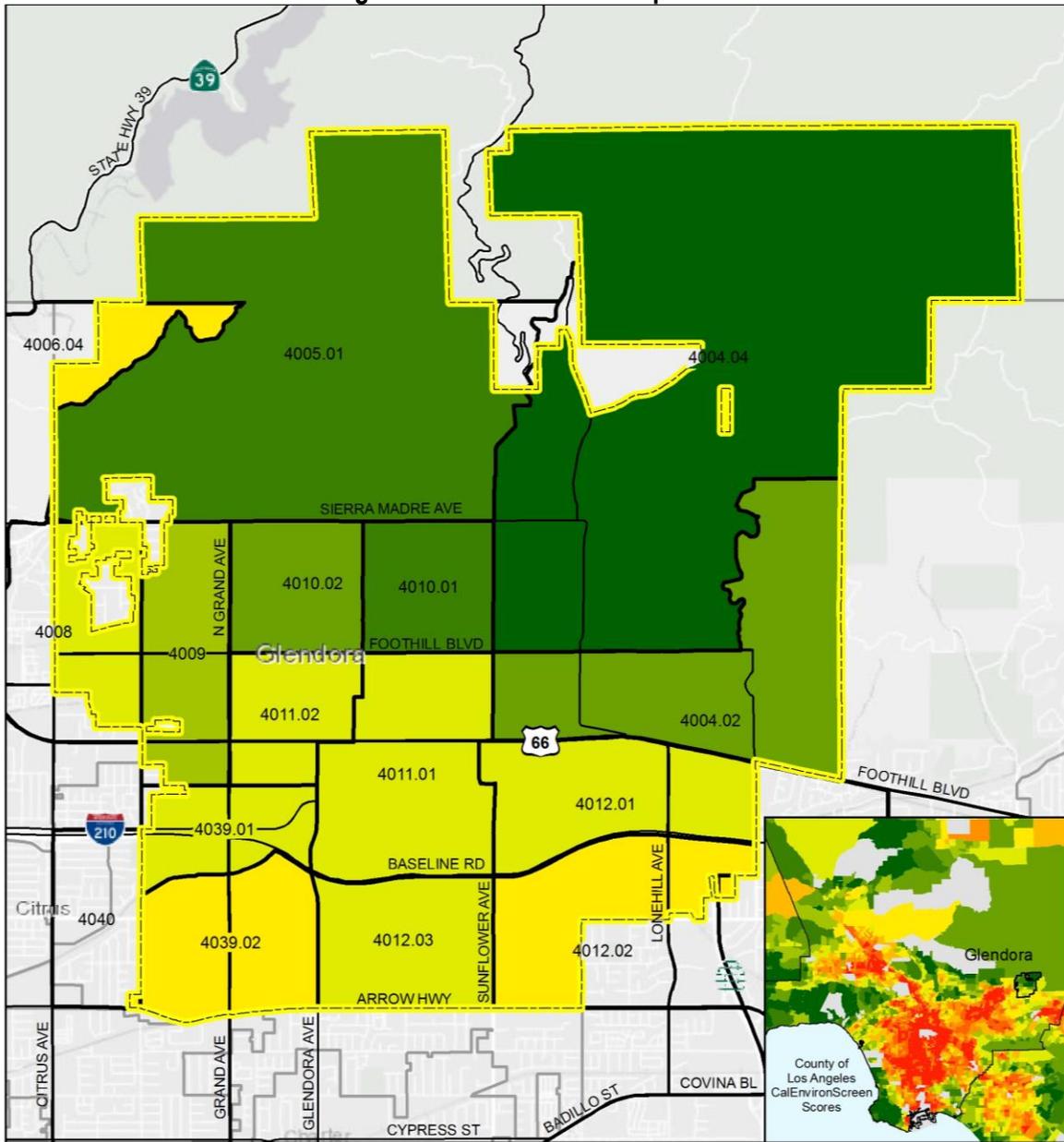
2. Environmental Exposure

California state law defines environmental justice to mean “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.”¹⁶ As a first step to assuring that all persons have access to environmental justice, the State of California is working to identify the areas of the State that face multiple pollution burdens so programs and funding can be targeted appropriately toward improving the environmental and economic health of impacted communities. Many residents live in the midst of multiple sources of pollution and some people and communities are more vulnerable to the effects of pollution than others. The California Environmental Protection Agency and the Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities that are disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen 2.0). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (elderly, children, persons with asthma, and low birth weight infants), CalEnviroScreen 2.0 also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. A growing body of literature shows a heightened vulnerability of people of color and lower socioeconomic status to environmental pollutants. For example, a study found that individuals with less than a high school education who were exposed to particulate pollution had a greater risk of mortality.

Figure 14 shows the City’s CalEnviroScreen scores. High scoring areas tend to be more burdened by pollution from multiple sources and most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status. Countywide, northern and central/inland areas of the County had higher EnviroScreen scores. In Glendora, no neighborhoods are designated with high EnviroScreen scores. Areas indicated as having moderate EnviroScreen scores overlap with some of the concentrations of low and moderate income, minority populations and poverty concentrations.

¹⁶ [California](#) Senate Bill 115 (Chapter 690, Statutes of 1999).

Figure 14: Environmental Exposure



City of Glendora
Environmental Exposure
CalEnviroScreen Scores

Lowest Scores Highest Scores

4815 Census Tract

 Glendora Boundary

*Each color represents 10% of the scores
 Blank = No Data*

Source: California Office of Health Hazard Assessment and California Environmental Protection Agency, CalEnviroScreen 3.0 (2017)

Lending Practices

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent tightening of lending/credit markets. This section 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 in the last five to six decades. In the 1940s and 1950s, racial discrimination in mortgage lending was easy to spot. From government-sponsored racial covenants to the redlining practices of private mortgage lenders and financial institutions, minorities were denied access to home mortgages in ways that severely limited their ability to purchase a home. Today, discriminatory lending practices are more subtle and tend to take different forms. While mortgage loans are readily available in low income minority communities, by employing high-pressure sales practices and deceptive tactics, some mortgage brokers push minority borrowers into higher-cost subprime mortgages that are not well suited to their needs and can lead to financial problems. Consequently, minority consumers continue to have less-than-equal access to loans at the best price and on the best terms that their credit history, income, and other individual financial considerations merit.

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.

Community Reinvestment Act and Home Mortgage

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.

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.

Conventional versus Government-Backed Financing

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

Financial Stability Act

The Financial Stability Act of 2009 established the Making Home Affordable Program, which assists eligible homeowners who can no longer afford their home with mortgage loan modifications and other options, including short sale or deed-in-lieu of foreclosure. The program is targeted 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.

Helping Families Save Their Homes Act

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

The Act targets underwater borrowers by easing restrictions on refinance and requiring principal write-downs to help these homeowners increase the equity in their homes. The new law also provides federally guaranteed Rural Housing loans and FHA loans as part of the Making Homes Affordable Program. In addition to expanding the Making Homes Affordable Program, the Act extends the temporary increase in deposit insurance, increases the borrowing authority of the FDIC and National Credit Union Administration (NCUA), and creates a Stabilization Fund to address problems in the corporate credit union sector.

Under this bill, tenants also have the right to stay in their homes after foreclosure for 90 days or through the term of their lease. The bill also provides similar protections to housing voucher holders. Prior to this bill, tenants were only guaranteed 60 days of notice before eviction and any current lease was considered terminated in the event of a foreclosure. This Act extends the 60-day notification period to 90 days and requires banks to honor any existing lease on a property in foreclosure.

Fraud Enforcement and Recovery Act

The Fraud Enforcement and Recovery Act (FERA) enhances the criminal enforcement of federal fraud laws by strengthening the capacity of federal prosecutors and regulators to hold accountable those who have committed fraud. FERA amends the definition of a financial institution to include private mortgage brokers and non-bank lenders that are not directly regulated or insured by the federal government, making them liable under federal bank fraud criminal statutes. The new law also makes it illegal to make a materially false statement or to willfully overvalue a property in order to manipulate the mortgage lending business. In addition, FERA includes provisions to protect funds expended under TARP and the Recovery Act and amends the Federal securities statutes to cover fraud schemes involving commodity futures and options. Additional funds were also made available, under FERA, to a number of enforcement agencies in order to investigate and prosecute fraud.

B. Overall Lending Patterns

1. Methodology and Data

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

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 35 summarizes the disposition of loan applications in 2012 and 2016 (most recent HMDA data available) for home purchase, refinance, and home improvement loans in Glendora. As indicated in Table 35, between 2012 and 2016, there was a decrease in the total number of loan applicants. The number of loan applications decreased 13 percent overall during this time—from 5,701 applicants in 2012 to 4,989 applicants in 2016.

Table 35: Disposition of Home Loans (2012 and 2016)

Loan Type	Total Applicants		Percent Approved		Percent Denied		Percent Other	
	2012	2016	2012	2016	2012	2016	2012	2016
Conventional Purchase	819	1,033	64.7%	68.3%	9.8%	7.4%	9.5%	12.1%
Gov't-Backed Purchase	493	293	53.3%	57.7%	7.7%	5.8%	7.7%	9.9%
Home Improvement	127	250	48.8%	62.8%	24.4%	19.6%	5.5%	9.2%
Refinance	4,262	3,413	58.6%	55.4%	12.0%	15.7%	13.2%	17.6%
Total	5,701	4,989	58.8%	58.6%	11.6%	13.6%	12.0%	15.6%

Note: Other - Withdrawn/Incomplete

Source: www.lendingpatterns.com by ComplianceTech, 2018.

2. Home Purchase Loans

In 2016, 1,033 households applied for conventional loans to purchase homes in Glendora, an increase of 26 percent from 2012. The approval rate in 2016 for conventional home purchase loans was approximately 68 percent, while seven percent of applications were denied. Approval rates were slightly higher in 2016 than in 2012, when 65 percent of conventional home loan applications were approved and ten 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.

Government-backed loans generally have more lenient credit score requirements, lower downpayment 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. From 2012 to 2016, the demand for government-backed loans decreased drastically. In 2012, 493 households in Glendora applied for government-backed loans; in 2016, the number decreased 41 percent to 293 applications received. Approval rates for these loans increased though from 53 percent in 2012 to 58 percent in 2016.

3. Home Improvement Loans

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

The number of applications for home improvement loans increased steeply (by 97 percent) from 127 applications in 2012 to 250 applications in 2016. Of the applications in 2016, 55 percent were approved and 18 percent were denied.

4. Refinancing

The majority of loan applications submitted by Glendora households in 2016 were for home refinancing (3,413 applications), but still a significant decline from 2012 (4,262 applications). Approval rate also declined from 59 percent in 2012 to 55 percent in 2016).

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 a perfect situation, the applicant pool for mortgage lending should generally be reflective of the demographics of a community. When one racial/ethnic group is overrepresented or underrepresented in the total applicant pool, it could be an indicator of unequal access to opportunities. As shown in Table 36, Asian applicants were noticeably overrepresented in the loan applicant pool during 2016.

Table 36: Demographics of Loan Applicants vs. Total Population (2016)

	Percent of Applicant Pool	Percent of Total Population	Variation
White	46.0%	55.0%	-9.0%
Black	1.5%	2.5%	+1.0%
Hispanic	22.7%	30.6%	-7.9%
Asian	14.7%	8.5%	+6.2%
Other	15.1%	3.4%	+11.7%

Note: Percent of total population estimates are based on 2016 applicant data and compared to total population estimates from the 2010 Census.

"Other" includes Native American, Hawaiian, MultiRace, Unknown/NA.

Source: U.S. Census Bureau, U.S. Census 2010; www.lendingpatterns.com by ComplianceTech, 2018.

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. Generally speaking, approval rates for loans tend to increase as household income increases; however, lending outcomes should not vary significantly by race/ethnicity among applicants of the same income level.

Table 37 below summarizes lending outcomes in the City by race/ethnicity and income. In Glendora, Asian applicants generally had the highest approval rates in 2012 and 2016. Hispanic applicants of Upper Income consistently had lower approval rates than White and Asian applicants in the same income level. Data also shows that Black applicants had some high approval rates; however, data may be misrepresented as this population made up a very small proportion of the applicant pool.

While this analysis provides a more in-depth look at lending patterns, it does not conclusively explain any of the discrepancies observed. Aside from income, many other factors can contribute to the availability of financing, including credit history, the availability and amount of a down payment, and knowledge of the home buying process. HMDA data does not provide insight into these other factors.

Table 37: Lending Patterns by Race/Ethnicity (2012 and 2016)

	Approved		Denied		Withdrawn/ Incomplete	
	2012	2016	2012	2016	2012	2016
White						
Low (0-49% AMI)	58.5%	36.2%	21.3%	41.4%	20.2%	22.4%
Moderate (50-79% AMI)	66.5%	56.7%	17.3%	28.9%	16.2%	14.4%
Middle (80-119% AMI)	72.2%	67.5%	13.0%	18.1%	14.8%	14.3%
Upper (≥120% AMI)	76.0%	71.4%	10.7%	12.2%	13.4%	16.4%
Unknown/NA	70.8%	64.3%	11.3%	9.5%	17.9%	26.2%
Black						
Low (0-49% AMI)	66.7%	--	33.3%	--	0.0%	--
Moderate (50-79% AMI)	66.7%	60.0%	0.0%	20.0%	33.3%	20.0%
Middle (80-119% AMI)	50.0%	80.0%	22.2%	20.0%	27.8%	0.0%
Upper (≥120% AMI)	76.2%	46.7%	14.3%	40.0%	9.5%	13.3%
Unknown/NA	--	100.0%	--	0.0%	--	0.0%
Hispanic						
Low (0-49% AMI)	51.4%	31.6%	35.1%	47.4%	13.5%	21.1%
Moderate (50-79% AMI)	70.6%	51.8%	17.6%	30.2%	11.8%	18.1%
Middle (80-119% AMI)	68.7%	63.5%	16.9%	18.4%	14.4%	18.1%
Upper (≥120% AMI)	67.0%	69.5%	16.3%	13.4%	16.8%	17.1%
Unknown/NA	69.0%	67.3%	19.0%	9.1%	12.1%	23.6%
Asian						
Low (0-49% AMI)	71.4%	37.5%	21.4%	50.0%	7.1%	12.5%
Moderate (50-79% AMI)	67.5%	60.0%	15.0%	32.0%	17.5%	8.0%
Middle (80-119% AMI)	81.2%	68.0%	9.4%	16.0%	9.4%	16.0%
Upper (≥120% AMI)	83.1%	73.2%	9.3%	12.9%	7.7%	13.9%
Unknown/NA	81.0%	70.0%	9.5%	10.0%	9.5%	20.0%

Notes: It should be noted that Black applicants were highly under-represented in all income categories. "--" if zero applicants in category.

Source: www.lendingpatterns.com by ComplianceTech, 2018.

D. Lending Patterns by Census Tract Characteristics

1. Income Level

To identify potential geographic differences in mortgage lending activities, an analysis of the HMDA data was conducted by census tract. Based on the Census, HMDA defines the following income levels¹⁸:

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

No loan applications in both 2012 and 2016 were submitted by residents from low income census tracts, as defined by HMDA. The majority of loan applications were submitted by residents from the City’s middle and upper income tracts. Table 38 summarizes approval and denial rates by census tract income level in 2012 and 2016. Home loan approval rates have been fairly consistent and comparable between the middle and upper income tracts.

Table 38: Outcomes Based on Census Tract Income (2012 and 2016)

Tract Income Level	Total Applicants	Approved		Denied		Other	
	#	#	%	#	%	#	%
2012							
Low	0	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0	0.0%	0	0.0%	0	0.0%
Middle	1,670	959	57.4%	218	13.1%	200	12.0%
Upper	4,031	2393	59.4%	441	10.9%	484	12.0%
NA	0	0	0.0%	0	0.0%	0	0.0%
Total	5,701	3,352	100.0%	659	100.0%	684	100.0%
2016							
Low	0	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0	0.0%	0	0.0%	0	0.0%
Middle	1,614	931	57.7%	234	14.5%	260	16.1%
Upper	3,375	1,993	59.1%	447	13.2%	518	15.3%
NA	0	0	0.0%	0	0.0%	0	0.0%
Total	4,989	2,924	100.0%	681	100.0%	778	100.0%

Source: www.lendingpatterns.com by ComplianceTech, 2018.

Notes: Unknown/NA- Income data not available for one household.

¹⁸ These income definitions are different from those used by HUD to determine Low and Moderate Income Areas.

2. Minority Population

HMDA also tracks lending outcomes by the proportion of minority residents within a census tract. Table 39 summarizes the approval and denial rates of census tracts in the City by the proportion of minority residents in 2012 and 2016. In 2012, approval rates were generally consistent among tracts with different levels of minority population. However, a slight discrepancy in approval rates was more apparent in 2016.

Table 39: Outcomes Based on Minority Population of Census Tract (2012 and 2016)

	Total Applicants		Approved		Denied		Other	
	#	#	%	#	%	#	%	
2012								
0-19% Minority	0	0	0.0%	0	0.0%	0	0.0%	
20-39% Minority	2,344	1,408	60.1%	242	10.3%	295	12.6%	
40-59% Minority	2,443	1,404	57.5%	297	12.2%	291	11.9%	
60-79% Minority	914	540	59.1%	120	13.1%	98	10.7%	
80-100% Minority	0	0	0.0%	0	0.0%	0	0.0%	
Unknown/NA	0	0	0.0%	0	0.0%	0	0.0%	
Total	5,701	3,352	58.8%	659	11.6%	684	12.0%	
2016								
0-19% Minority	0	0	0.0%	0	0.0%	0	0.0%	
20-39% Minority	1,818	1,087	59.8%	231	12.7%	273	15.0%	
40-59% Minority	2,257	1,326	58.8%	300	13.3%	359	15.9%	
60-79% Minority	914	511	55.9%	147	16.1%	146	16.0%	
80-100% Minority	0	0	0.0%	0	0.0%	0	0.0%	
Unknown/NA	0	0	0.0%	0	0.0%	0	0.0%	
Total	4,989	2,924	58.6%	678	13.6%	778	15.6%	

Source: www.lendingpatterns.com by ComplianceTech, 2018.

Note: NA=Minority tract percentage data was not available for one household.

E. Major Lenders

In 2016, the top ten mortgage lenders in Glendora captured approximately 41 percent of the total market share in the City. Among these top lenders, Wells Fargo received the most applications – accounting for 7.6 percent of all loan applications. Wells Fargo was also the top lender in 2012, although its share then was much higher at 13 percent. Table 40 summarizes the top lenders in the City as well as their underwriting outcomes in 2012 and 2016.

Approval rates among the top lenders varied significantly, ranging from 23.9 percent for Loandepot.com to 84.5 percent for Flagstar. Overall, Wells Fargo and Bank of American had outcomes that were more consistent with the citywide average; whereas Flagstar had significantly higher than average approval rates in 2012 and 2016. While high approval rates do not necessarily indicate wrongdoing by a specific institution, they can be a sign of

aggressive lending practices on the part of the lender. In particular, smaller, less prominent financial institutions with significantly high approval rates may be a concern.

During 2016, one of the top lending institutions had significantly higher than average rates of withdrawn and incomplete applications— Nationstar Mortgage (58 percent). A significant disparity in fallout could be an indicator of an overly complicated application process for a particular lender or suggest something even more troubling, such as screening, differential processing, HMDA Action misclassification, and/or the potential of discouragement of minority applications.

Table 40: Top Lenders (2008 and 2014)

	Overall Market Share		Approved		Denied		Withdrawn or Closed	
	2012	2016	2012	2016	2012	2016	2012	2016
Wells Fargo Bank	13.4%	7.6%	61.1%	65.9%	16.1%	18.1%	22.8%	16.0%
Loandepot.com	---	5.7%	---	23.9%	---	63.3%	---	12.7%
Impac Mortgage	---	5.6%	---	64.8%	---	19.3%	---	16.0%
Broker Solutions	---	4.7%	---	53.1%	---	19.8%	---	27.1%
Bank of America	5.5%	3.8%	69.0%	63.9%	20.9%	15.7%	10.1%	20.5%
Quicken Loans	---	3.6%	---	73.7%	---	25.0%	---	1.3%
JPMorgan Chase	6.2%	3.2%	72.9%	72.7%	24.1%	7.2%	3.1%	20.1%
Nationstar Mortgage	---	2.4%	---	31.1%	---	11.3%	---	57.5%
Flagstar Bank	3.8%	2.4%	84.2%	84.5%	5.6%	13.6%	10.2%	1.9%
Finance of America	---	2.1%	---	69.9%	---	11.8%	---	18.3%
All Lenders	100%	100%	66.60%	63.80%	14.00%	15.50%	19.40%	20.70%

Source: www.lendingpatterns.com by ComplianceTech, 2018.

Note: The table identifies the top ten lenders of 2016. Some of these lenders were not top lenders in 2012.

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. According to a joint HUD/Department of the Treasury report,

subprime lending generally has the following characteristics: higher risk, lower loan amounts, high costs to originate, faster prepayments, and higher fees.²⁰

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.²¹

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 number of loans (frequency) with a reported spread increased between 2012 and 2016 (Table 41), particularly among Hispanic and Asian applicants. The frequency of spread for both groups more than doubled during those five years. Furthermore, the average spread for Hispanic applicants also increased significantly while that for other groups decreased.

Table 41: Reported Spread on Loans by Race/Ethnicity (2012 and 2016)

	Frequency of Spread		Average Spread	
	2012	2016	2012	2016
White	0.93	1.20	3.30	2.69
Black	0.00	0.00	0.00	0.00
Hispanic	1.43	3.19	2.23	3.76
Asian	1.70	4.31	2.37	2.02
Total	1.09	2.00	2.70	2.89

Source: www.lendingpatterns.com by ComplianceTech, 2018.

²⁰ U.S. Department of Housing and Urban Development. Unequal Burden In Los Angeles: Income and Racial Disparities in Subprime Lending. April 2000.

²¹ 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.

G. Review of Lending Patterns by Specific Lender

Because the applicant profiles of some of the top lenders in Glendora differ so significantly, this section looks at the underwriting outcomes of some of the major lenders in 2016. In most cases, White and Hispanic applicants had the highest approval rates from these lenders.

1. Wells Fargo

Wells Fargo was a top lender in the City in both 2012 and 2016. This lender's 2016 average approval rate of 66 percent was higher than the citywide average of 58 percent. Approval rate by race/ethnic group: Black (86 percent); White (66 percent); Hispanic (71 percent); and Asian (62 percent).

2. Loandepot.com

While this lender captured a lot of applications in 2016, its approval rate was extremely low at 24 percent. Approval rate by race/ethnic group: White (27 percent); Asian (23 percent); Hispanic (19 percent); and Black (zero percent).

3. Impac Mortgage

Impac Mortgage was the third most prolific lender in the City in 2016. The average approval rate for this lender (65 percent), higher than that for all lenders (58 percent). Approval rate by race/ethnic group: White (68 percent); Asian (68 percent); Hispanic (59 percent); and Black (zero percent).

4. Broker Solutions

Broker Solutions' approval rate (53 percent) was lower than the average for all lenders (58 percent). Approval rate by race/ethnic group: White (60 percent); Hispanic (50 percent); Asian (33 percent); and Black (zero percent).

5. Bank of America

Bank of America was the fifth most prolific lender in the City in 2016. The average approval rate for this lender (64 percent) was higher with the average for all lenders (58 percent). However, approval rates varied by race/ethnic group: White (68 percent); Hispanic (63 percent); Asian (59 percent) and Black (33 percent).

Public Policies

Public policies established at the regional and local levels can affect housing development, and therefore, may impact the range and location of housing choices available to residents. Fair housing laws are designed to encourage an inclusive living environment, active community participation, and an assessment of public policies. An assessment of public policies and practices can help determine potential impediments to fair housing opportunity. This section presents an overview of government regulations, policies, and practices implemented by Glendora that may impact fair housing choice.

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 zoning ordinance, which implements the General Plan, 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 seven 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 California Department of Housing and Community Development (HCD) for compliance with State law. Enacted in 1969, 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, 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 extremely low, very low, low, and moderate income households;
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities;
- Conserve and improve the condition of the existing affordable housing stock; and
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

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 Glendora's Housing Element was certified by HCD and adopted on November 12, 2013.

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. Glendora's General Plan, known as "Community Plan 2025," was created between 2006 and 2008 with extensive community input. This update was the first comprehensive update of the City's General Plan since 1992 and establishes the community's vision for the development of the City through 2025. The majority of developed land area within the City (approximately 42 percent) is developed as residential. Most of the existing residential uses are single-family homes developed in the 1960s through the 1980s when Los Angeles County was experiencing the most residential building permit activity. With a strong demand for high end housing, new development is occurring in the hillside areas, which are typically more difficult to develop. Higher density infill development is also planned within the Route 66 Corridor Specific Plan area as the City implements new land use policies that take advantage of planned transit infrastructure and create more pedestrian oriented land uses near the colleges and in the downtown Village.

Residential Densities

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, and offer a variety of housing options that meet the needs of the community. 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.

The General Plan establishes density standards by land use designation (Table 42). The City is almost completely developed with less than one percent of developable land remaining vacant (as of 2008). Land use designations for the 2025 Community Plan were re-examined from the 1992 General Plan to accommodate recent market demands, community needs, city goals and environmental restraints in Glendora.

These density standards do not imply that development projects will be approved at the maximum density specified for each land use designation. Zoning regulations consistent with General Plan policies and/or site conditions may reduce development potential within the stated ranges and more than one zoning district may be consistent with a single General Plan designation.

Table 42: Residential General Plan Designations and Zoning Districts

General Plan	Corresponding Zoning District(s)	Purpose	Density (du/ac)
Hillside Very Low Residential	RHR, E-7	A new designation for the 2025 Community Plan to separate open space and residential uses and to adequately address these issues and incorporate requirements appropriate for foothill conservation while still allowing development.	0.1-1.0
Low Density Residential	E-5, E-6	Primarily for larger single-family subdivisions. Intended to maintain the character of existing neighborhoods.	1.1-3.0
Low/Medium Density Residential	E-3, E-4, R-1		3.1-6.0
Medium Density Residential	GA, LGA	These designations are dispersed throughout the City interior, primarily along more intense land uses, major and secondary arterials and between lower density residential and non-residential uses. Development can consist of single- and multiple-family attached housing, duplexes, townhouses, apartments and patio homes.	6.1-11.0
Medium/High Density Residential	R-2		11.1-15.0
High Density Residential	R-3		15.1-25.0*
Village Mixed Use	Specific Plans	A new land use designation for the area surrounding the downtown Village that will allow for a mix of uses.	15.0-30.0

Source: Glendora Community Plan 2025.

* In the Grand-Foothill Multi-Family Residential Overlay Zone the residential density maximum may reach up to 30 dwelling units per acre.

3. Zoning Ordinance

The zoning ordinance 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). The Fair Housing Act does not pre-empt local zoning laws. However, the Act applies to municipalities and other local government entities and prohibits them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons, including individuals with disabilities. Another way that discrimination in zoning and land use may occur is when a seemingly neutral ordinance has a disparate impact, or causes disproportional harm, to a protected group. Land use policies such as density or design requirements that make residential development prohibitively expensive, limitations on multi-family housing, or a household occupancy standard may be considered discriminatory if it can be proven these policies have a disproportionate impact on minorities, families with children, or people with disabilities.

Several aspects of the zoning ordinance that may affect a person’s access to housing or limit the range of housing choices available are described below.

Definition of Family

A community’s zoning ordinance can potentially restrict access to housing for households failing to qualify as a “family” by the definition specified in the zoning ordinance. For

instance, a landlord may refuse to rent to a “nontraditional” family based on the zoning definition of a family.²⁴ 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.

Zoning laws that are "facially neutral" (that is, they apply to all persons, not just those with disabilities) will violate the Fair Housing Act if they have a disparate impact or discriminatory effect on people with disabilities. One type of zoning law that often has been held to have a disparate impact on people with disabilities is a definition of the term "family" that allows any number of related persons to live together but limits the number of unrelated persons who may live together. Although applicable to groups of unrelated and non-disabled persons (e.g., college students, nuns, etc.), these laws may be deemed to have a disparate impact on persons with disabilities who often need to live in group settings for both programmatic and financial reasons.²⁵

California court cases²⁶ 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) defines a group of not more than a certain number of unrelated persons as a single housekeeping unit is invalid. Court rulings stated that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the jurisdiction, and therefore violates rights of privacy under the California Constitution. A zoning ordinance also cannot regulate residency by discriminating between biologically related and unrelated persons. Furthermore, a zoning provision cannot regulate or enforce the number of persons constituting a family. The City of Glendora removed its definition of “family” from the Zoning Code in 2010.

Density Bonus Ordinance

California Government Code Section 65915 provides that a local government shall grant a density bonus of at least 20 percent (five percent for condominiums) and an additional incentive, or financially equivalent incentive(s), to the developer of a housing development agreeing to provide at least:

- Ten percent of the units for lower income households;
- Five percent of the units for very low income households;
- Ten percent of the condominium units for moderate income households;
- A senior housing development; or
- Qualified donations of land, condominium conversions, and child care facilities.

The density bonus law also applies to senior housing projects and projects which include a child care facility. In addition to the density bonus stated above, the statute includes a sliding scale that requires:

- An additional 2.5 percent density bonus for each additional increase of one percent Very Low income units above the initial five percent threshold;

²⁴ Most Zoning Ordinances that define families limit the definition to two or more individuals related by kinship, marriage, adoption, or other legally recognized custodial relationship.

²⁵ Discriminatory Zoning and the Fair Housing Act. Disability Rights Network of Pennsylvania, 2007.

²⁶ City of Santa Barbara v. Adamson (1980), City of Chula Vista v. Pagard (1981), among others.

- A density increase of 1.5 percent for each additional one percent increase in Low income units above the initial 10 percent threshold; and
- A one percent density increase for each one percent increase in Moderate income units above the initial 10 percent threshold.

These bonuses reach a maximum density bonus of 35 percent when a project provides either 11 percent very low income units, 20 percent low income units, or 40 percent moderate income units. In addition to a density bonus, developers may also be eligible for one of the following concessions or incentives:

- Reductions in site development standards and modifications of zoning and architectural design requirements, including reduced setbacks and parking standards;
- Mixed used zoning that will reduce the cost of the housing, if the non-residential uses are compatible with the housing development and other development in the area; and
- Other regulatory incentives or concessions that result in "identifiable, financially sufficient, and actual cost reductions."

The City's density bonus provisions were updated in May 2016 to achieve compliance with State law.

Parking Requirements

Communities that require an especially high number of parking spaces per dwelling unit can negatively impact the feasibility of producing affordable housing 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.

Glendora's parking standards are presented in Table 43. These standards generally vary by housing type, unit size, and residential zone. The City's parking standards are comparable to those of surrounding jurisdictions. Requirements for multifamily developments are equal to, or less than, requirements for single-family detached dwellings. Guest space requirements for multi-family developments are reasonable because these types of developments do not have private driveways for each unit to accommodate parking for guests.

To encourage mixed-use development within the BG and TCMU zoning subdistricts of the Route 66 Corridor Specific Plan area, the City offers reduced parking standards. The City also adheres to State density bonus law requirements to provide density bonuses and regulatory incentives, including parking requirement reductions, for senior housing projects and projects that set aside a portion of the units as housing affordable to lower and moderate income households.

Table 43: Parking Requirements

Residential Use/Zoning District	Required Number of Parking Spaces
Community Care Facilities	1 space per each 3 beds plus 1 space per each 3 employees
Second Kitchen Unit	1 space per bedroom in garage or carport
Mobilehome Park	9 spaces for every 4 mobilehome units
Single-Family Dwellings	2 garage spaces
Multiple-Family Dwellings	1 enclosed and 1 open space or additional enclosed space/unit + 0.2 spaces per bedroom per unit for units with over 2 bedrooms
Guest Spaces	0.4 spaces per unit for multiple-family units and mobilehomes
Senior Housing	1 covered parking space per unit plus 1 guest space for every 2 units

Source: City of Glendora, Zoning Ordinance, accessed 2015.

B. Variety of Housing Opportunity

To ensure fair housing choice in a community, a zoning ordinance should provide for a range of housing types, including single-family, multi-family, second dwelling units, mobile homes, licensed community care facilities, employee housing for seasonable or migrant workers as necessary, assisted living facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. Table 44 provides a summary of Glendora’s zoning ordinance as it relates to ensuring a variety of housing opportunities.

Table 44: Housing Types by Residential Zones

Zone	Single Family	Duplex	Multi Family (3+ units)	Manu-factured Housing	Second Kitchen Unit	Single Room Occ- upancy (SRO)	Residential Care and Service Facilities		Emergency Shelters*	Transitiona l/Supportiv e Housing	Mixed Use
							Small	Large			
RHR	P	--	--	P	P	--	P	--	--	--	--
E-3, E-5, E-6, E-7	P	--	--	P	P	--	P	--	--	--	--
R-1	P	--	--	P	P	--	P	--	--	--	--
LGA, GA	P	P	P	P	P	--	P	--	--	P	--
R-2	P	P	P	P	P	--	P	--	--	P	--
R-3	P	P	P	P	P	--	P	--	--	P	--
MHP	--	--	--	--	--	--	--	--	--	--	--
MS	--	--	--	--	--	--	--	--	--	--	--
Route 66 SP	--	--	P	--	--	P	--	C	--	--	P
Civic Center Area Plan (CCAP)											
T-4	P	--	P ²	P	P	--	P	--	--	--	--
T-5	--	--	P ^{1,2}	P	P	--	P	--	--	--	C ¹
T-5A	P	--	P ¹	P	P	--	P	--	--	--	C

Notes:

* Allowed in specific locations within the City.

1. For properties fronting on Glendora Avenue, only allowed on second and third floors. The use may be permitted in the T5 District if the entrance is at the rear of the building
2. Permitted with approval of a development plan review pursuant to Section 21.02.040

1. Single- and Multiple-Family Uses

Single- and multiple-family housing types include detached and attached single-family homes, duplexes or half-plexes, town homes, condominiums and rental apartments. Development codes should specify the zones in which each of these uses would be permitted by right. Glendora permits the development of single-family housing in all of its residential zones, with the exception of the MHP zone. Multi-family housing developments are permitted by right in the LGA, GA, R-2, and R-3 zones.

2. Accessory Dwelling Units

Accessory dwelling units 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. Second 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 second units are permitted. The State's second unit law requires use of ministerial, rather than discretionary, process for reviewing and approving second units.

The City amended its Zoning Code in 2017 to comply with the State Accessory Dwelling Unit regulations.

3. Manufactured Housing and Mobilehomes

State law requires local government to permit manufactures or mobile homes meeting federal safety and construction standards on a permanent foundation in all single-family residential zoning districts (Section 65852.3 of the California Government Code). A local jurisdiction's zoning ordinance or development code should be compliant with this law.

Manufactured or factory built units meeting State and federal standards and installed on permanent foundations are treated as regular residential units and permitted wherever residential uses are permitted in Glendora. The Glendora Zoning Ordinance also permits mobilehomes within a specially designated Mobilehome Overlay Zone. The MHP Overlay Zone was designed to protect existing mobile home uses. Specific development standards have also been established to promote an orderly and pleasant residential environment in harmony and compatible with surrounding land uses. Lower income individuals and/or families occupy many of these homes.

4. Residential 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 these types of facilities from locating in a community impede equal access to housing for the special needs groups.

The Lanterman Development Disabilities Services Act (Section 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 City’s Zoning Code differentiates between small residential care facilities (that serve six or fewer persons) and large residential care facilities (that serve seven or more people). Pursuant to the Lanterman Act, licensed residential care facilities for six or fewer persons are treated as a regular residential use and permitted where residential uses are permitted. Larger community care facilities, convalescent homes, and other similar uses for more than six persons are permitted in the Medical Services (MS) Zone and in the TCMU and CRR subdistricts of the Route 66 Corridor Specific Plan, subject to a conditional use permit.

5. Emergency Shelters

An emergency shelter is a facility that provides temporary shelter and feeding of indigents or disaster victims, operated by a public or non-profit agency. 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 (Section 65583(c)(1) of the Government Code). California law requires that local jurisdictions make provisions in the zoning ordinance to permit emergency shelters by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish standards to regulate the development of emergency shelters.

In response to changes in the State Housing Element law, the City amended the Zoning Code in 2011 to specifically identify emergency shelters as a permitted use at two locations in the City. The two locations include 12 parcels, with a total area of 2.8 acres. The Zoning Code provides objective standards for emergency shelters to regulate the following, as permitted under State law, including:

- The maximum number of beds permitted;
- Parking based on demonstrated need;
- The size/location of exterior and interior onsite waiting and client intake areas;
- The provision of onsite management;
- The proximity of other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart; and
- The length of stay.

6. Transitional and Supportive Housing

State law (SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, transitional housing” means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance (California Government Code Section 65582(h)).

Supportive housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists 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. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (California Government Code Sections 65582(f) and (g)).

Accordingly, State law establishes transitional and supportive housing as a residential use and therefore local governments cannot treat it differently from other similar types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). The City of Glendora amended the Zoning Code to address transitional housing and supportive housing in 2011. For transitional and supportive housing facilities that operate as regular housing developments, meeting the Health and Safety Code definition, such uses are permitted by right where housing is permitted. For transitional and supportive housing facilities that operate as group quarters, such facilities are permitted as community care facilities. Potential conditions for approval of transitional and supportive housing for more than six persons in a group quarters setting may include hours of operation, security, loading requirements, noise regulations, and restrictions on loitering. Conditions would be similar to those for other similar uses and would not serve to constrain the development of such facilities.

7. Single-Room Occupancy (SRO) Units

State Housing Element law mandates that local jurisdictions address the provision of housing options for extremely low-income households, including Single Room Occupancy units (SRO). SRO units are one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. The City of Glendora amended the Zoning Code to permit SRO units by-right in the CRR subdistrict of the Route 66 Corridor Specific Plan.

8. Farmworker and Employee Housing

The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units be treated as an agricultural use and permitted where agricultural uses are permitted.

Farmworkers comprise less than one percent of the City's population. The need for farmworker housing is less than significant since the City is not a center of agricultural production. Furthermore, the City does not have any properties designated for agricultural uses. The City amended the Zoning Code in 2016 to include provisions for Employee Housing for six or fewer employees.

C. Building, Occupancy, Health and Safety Codes

1. Building Codes

Building codes, such as the California Building Standards Code²⁷ and the Uniform Housing Code are necessary to protect public health, safety, and welfare. However, local codes that require substantial improvements to a building might not be warranted and deter housing construction and/or neighborhood improvement. The California Building Standards Code is published every three years by order of the California legislature. The Code applies to all jurisdictions in the State of California unless otherwise annotated. Adoption of the triennial compilation of Codes is not only a legal mandate, it also ensures the highest available level of safety for citizens and that all construction and maintenance of structures meets the highest standards of quality. The City of Glendora has adopted and implements the California Building Code, 2016 Edition.

Building codes and their enforcement increase the cost of housing investment and can impact the viability of rehabilitating older properties required to be upgraded to current code standards. To the extent this makes the cost of housing production or rehabilitation economically infeasible, it could serve as a constraint. However, these regulations are similar to other cities in the region, provide minimum standards for safe and accessible housing and thus are not considered to be an undue constraint upon housing investment.

2. Occupancy Standards

Disputes over occupancy standards are typical tenant/landlord and fair housing issues. Families with children and large households often face discrimination 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 jurisdiction or by landlords on the rental agreements may be a violation of fair housing practices.

In general, no State or federal regulations govern occupancy standards. The State Department of Fair Employment and Housing (DFEH) uses the "two-plus-one" rule in

²⁷ California Building Standards Code, adopted by the a Building Standards Commission, is actually a set of uniform building, electrical, mechanical, and other codes adopted by professional associations such as the International Conference of Building Officials, and amended to include California-specific requirements.

considering an appropriate number of persons to occupy a 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. While DFEH also uses other factors, such as the age of occupants and size of rooms, to consider the appropriate standards, the two-plus-one rule is generally followed. Other guidelines are also used as occupancy standards. The Uniform Housing Code (Section 503.2) requires that a dwelling unit have at least one room which is not less than 120 square feet in area. Other habitable rooms, except kitchens, are required to have a floor area of not less than 70 square feet. The Housing Code further states that where two persons occupy a room used for sleeping purposes, the required floor area should be increased at a rate of 50 square feet for each occupant in excess of two. There is nothing in the Housing Code that prevents people from sleeping in the living or dining rooms, as long as these rooms have an operable window or door meeting all the provisions of the California Building Code for emergency egress. The Fire Code allows one person per 150 square feet of “habitable” space. These standards are typically more liberal than the “two-plus-one” rule. For example, a one-bedroom apartment where the bedroom is at least 120 square feet, three people could sleep there; and where the living/dining area is at least 170 square feet, another three people could sleep there. Therefore a 290-square foot one-bedroom apartment can accommodate up to six persons.

The Glendora Zoning Ordinance has not established any occupancy standards that would conflict with the Uniform Housing Code or California Building Code.

D. Affordable Housing Development

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

1. Siting of Affordable Housing

The City of Glendora’s inventory of affordable housing includes a total of three multi-family housing projects providing a combined total of 349 affordable units. Two of the three affordable housing sites are located within low and moderate income areas. As in typical urban environments throughout the country, 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 (Figure 10).

2. Development Fees

Housing construction imposes certain short- and long-term costs upon local government such as the cost of providing planning services and inspections. Processing fees and development exactions, therefore, are necessary to recover the costs of providing services for new development. Glendora collects fees from developers to cover the costs of processing permits and providing the necessary services and infrastructure related to new development. A summary of these fees can be found in Table 45. Fees are calculated based on the average cost of processing a particular type of case. The City regularly performs a full cost analysis to update user fees and periodically assesses ways to streamline organizational processes. Glendora’s fees are not high relative to other cities in the region and are not an overly burdensome constraint to housing development. Overall, the City’s fees have not increased since 2014.

Table 45: City of Glendora Planning Fees

Description	Fee
Conditional Use Permit	\$2,425
Conditional Use Permit (Minor)	\$1,315
Development Agreement	\$3,555 per application plus \$1,500 deposit
Development Plan Review	\$2,483 per application
Development Plan Review – Multiple Family Residential	\$3,297 per application
Environmental Review	Categorical Exemption: \$214 Initial Study: \$1,770 Environmental Impact Report: \$6,171
Final Parcel Map	\$1,805 per application
Final Tract Map	\$1,954 per application plus \$13 per lot over four lots
General Plan Amendment- Residential	\$3,645 per application
Lot Line Adjustment	\$1,554 per application
Planned Development	\$3,275 per application plus \$10,000 deposit
Second Unit Plan Review	\$1,315
Specific Plan Amendment	\$3,243 per application
Tentative Parcel Map Review	\$4,006 per application
Tentative Tract Map (Subdivision)	\$5,286 per application plus \$85 per lot over four lots
Variance	\$2,224 per application
Zone Change	\$3,126 per application

Source: City of Glendora, 2017.

In addition to planning fees, most communities also charge development impact fees to cover the cost of added services required by new residential development. Until 1978 property taxes were the primary revenue source for financing the construction of infrastructure and improvement required to support new residential development. The passage of Proposition 13 in 1978 has limited a local jurisdiction’s ability to raise property taxes and significantly lower the ad valorem tax rate, increasing reliance on other funding sources to provide infrastructure, public improvements and public services. An alternative funding source widely used among local governments in California is the development

impact fee which is collected for a variety of improvements including water and sewer facilities, parks and transportation improvements. To enact an impact fee, State law requires that local jurisdiction demonstrate the “nexus” between the type of development in question and the impact being mitigated by the proposed fee must be roughly proportional to the impact caused by the development. Nevertheless, development impact fees today have become a significant cost factor in housing development.

Impact fees charged by the City of Glendora and other agencies include: a school fee (\$3.36 per square foot of living area), a park development fee \$2,273 per single-family unit and \$1,591 per multiple-family unit) and a sanitation connection fee (\$4,450 per single-family unit, \$3,338 per condominium unit, and \$2,670 per other multiple-family unit). These fees are set by outside agencies beyond the control of the City. However, rate studies are required by law to justify increases.

E. Growth Management Programs

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 and 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.

State housing law mandates a jurisdiction facilitate the development of a variety of housing to meet the jurisdiction’s fair share of regional housing needs. Any growth management measure that would compromise a jurisdiction’s ability to meet its regional housing needs may have an exclusionary effect of limiting housing choices and opportunities of regional residents or concentrating such opportunities in other areas of the region. The City of Glendora does not have building moratoriums or growth management plans that limit housing construction.

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

Local government policies could result in displacement or affect representation of minorities or persons with disabilities.

1. Reasonable Accommodations

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 Ordinance. The failure to allow for reasonable

accommodations in policies to allow persons with disabilities to live in the community will violate the Fair Housing Act regardless of whether or not there is discriminatory intent.²⁸

The Glendora City Council adopted Ordinance No. 1904 in September 2008 to establish a process and procedure to consider and approve development requests to accommodate persons with disabilities. Pursuant to the ordinance, the following criteria are considered when evaluating a request for reasonable accommodation:

- (1) Whether the request for accommodation is reasonable and necessary to afford the applicant with an equal opportunity to access publicly funded buildings, facilities and programs, or privately funded housing, including single and multiple-family units, and public accommodations on an equal basis with citizens who are not disabled;
- (2) Whether there are feasible alternatives to the requested accommodation that may provide an equivalent level of benefit;
- (3) The physical attributes of and any proposed changes to property and structures;
- (4) Whether the requested accommodation will impose an undue financial or administrative burden on the City;
- (5) Whether the requested accommodation will require a fundamental alteration of the city's rules, policies, practices or procedures;
- (6) If a zoning related issue, whether the requested accommodation would result in a detriment of the residential character of that neighborhood; and
- (7) Any other factor(s) that may have a bearing on the request.

The conditions for approval include:

- (1) Inspection of the affected premises periodically, as specified in the conditions, to verify compliance with any applicable conditions of approval;
- (2) Prior to any transfer of interest in the premises, notice to the transferee of the existence of the modification, the personal status of the modification and the requirement that the transferee apply for a new modification is necessary;
- (3) Removal of the improvements, where removal would not constitute an unreasonable and unfair financial burden, if the need for which the accommodation was granted no longer exists;
- (4) Time limits and/or expiration of the approval if the need for which the accommodation was granted no longer exists;
- (5) Other necessary conditions deemed necessary to protect the public health, safety and welfare.

Reasonable accommodations requests are reviewed and determined by the appropriate department head(s). There is no fee for the City to consider a request for reasonable accommodation other than any necessary building permit fees.

In addition, a jurisdiction's definition of a disabled person can be considered an impediment to fair housing if it is not consistent with the definition of disability provided under the Fair

²⁸ Discriminatory Zoning and the Fair Housing Act. Disability Rights Network of Pennsylvania, 2007.

Housing Act. The Act defines disabled person as “those individuals with mental or physical impairments that substantially limit one or more major life activities.” The City does not define disabled person in its Zoning Code.

2. Access to Transit

As outlined in the Community Profile of this AI, equal provision of transit services is indirectly a fair housing issue if transit-dependent populations are not adequately served by public transit, thereby limiting their housing choice. One way to measure this is to compare the relationship between existing transit routes, employment centers and areas where the proportion of residents using transit regularly. As depicted in Figure 12, nearly all of the City’s top employers are located directly on public transit routes and within walking distance of a bus stop.

3. Local Housing Authority

The availability and use of Housing Choice Vouchers (HCV) and public housing units must also adhere to fair housing laws. In Glendora, the HUD HVC program is administered by the Housing Authority of the County of Los Angeles (HACOLA).

Section 16(a)(3)(B) of the United States Housing Act mandates that public housing authorities adopt an admission policy that promotes the de-concentration of poverty in public housing. HUD emphasizes that the goal of de-concentration is to foster the development of mixed-income communities with public housing. In mixed-income settings, lower-income residents are provided with working family role models and greater access to employment and information networks. This goal is accomplished through the policy’s income-targeting and de-concentration.

For Housing Choice Vouchers, the Housing act mandates that not less than 75 percent of new admission must have incomes at or below 30 percent of the Area Median Income. The remaining balance of 25 percent may have incomes up to 50 percent of the Area Median Income. For public housing, the Housing Act mandates that not less than 40 percent of new admissions must have incomes at or below 30 percent of the Area Median Income. The balance of 60 percent of new admissions may have incomes up to 80 percent of the Area Median Income.

4. Community Participation

Adequate community involved 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. City residents elect the City Council to guide the policy affairs of the community. Five City Council members are elected at large and serve four-year (staggered) terms of office. Following each election, the Council selects from its membership a Mayor and Mayor Pro Tem.

The City also has six Commissions and Boards acting in an advisory capacity to assist the City Council and City staff in the management of City affairs:

- Planning Commission

- Community Services Commission
- Business Improvement District (BID) Advisory Board
- Board of Library Trustees
- San Gabriel Valley Mosquito & Vector Control
- Water Commission

Appointments to these Commissions and Boards are made by City Council. The length of term varies for each commission or board. Notwithstanding the fixed term of office, members of Commissions and boards serve at will and at the pleasure of City Council. The City solicits applications from persons interested in actively participating in local government.

The Planning Commission has the most direct influence on the provision of housing choices in the City. The Commission is responsible for making discretionary decisions in compliance with the City's General Plan and Zoning Ordinance, including Zone Change requests, amendments to the Zoning Ordinance, Conditional Use Permits, Variances, environmental documents, Tentative Tract and Parcel Maps and other land use and development matters.

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.

Pursuant to California Assembly Bill 1234, all board, commission and committee members are required to complete two hours of ethics training for every two years of service.

Current Fair Housing Profile

This section provides an overview of the institutional structure of the housing industry with regard to fair housing practices. In addition, this section discusses the fair housing services available to residents in the City of Glendora, 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. Not all Americans, however, have always enjoyed equal access to homeownership due to credit market distortions, "redlining," steering, and predatory lending practices.

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.

Advertising

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

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

In a survey of online listings for homes available for purchase in Glendora in January 2018, a significant percentage of advertisements included potentially discriminatory language. Of a total of 60 listings reviewed, 25 listings (42 percent) included references to something other than the physical description of the available home and included amenities and services that cater to specific groups (Table 46). Nearly all of the potentially discriminatory advertisements were targeted specifically at families through the identification of quality school districts, nearby schools, and available family amenities. A number of advertisements also appeared to indicate a preference for college students (i.e., an age preference).

Table 46: Potential Discrimination in Listings of For-Sale Homes

Discrimination Type	Number of Listings	Potentially Discriminatory Language ¹
No Discriminatory Language	35	<ul style="list-style-type: none"> ▪ n/a
Household Size/ Family Related	24	<ul style="list-style-type: none"> ▪ Charter Oak Unified School District ▪ Community amenities for the whole family. Enjoy a pool and spa area, for outdoor grilling, tot lot for the children ▪ community amenities for the whole family. Enjoy a pool and spa area, for outdoor grilling, tot lot for the children ▪ community amenities for the whole family. Enjoy a pool and spa area, for outdoor grilling, tot lot for the children ▪ 2 blocks to Willow Elementary (8 on Greatschools and a California Distinguished School, in the coveted Glendora School District) and walkable to 2 great parks ▪ Executive style Family Home ▪ walking distance to Glendora High School ▪ Conveniently located to schools ▪ Close to highly desirable Glendora schools ▪ Near all amenities, including Shopping, Schools ▪ The community is included within the highly rated Glendora Unified School District, an important consideration for family-oriented homebuyers ▪ Walking distance to shops, market, post office, family-friendly parks, biking and hiking trails, great schools district, and close to new Gold-line Light Rail station ▪ Take advantage of the entire 2,526 sq ft living space with your large family in the very desirable Glendora Unified School District. ▪ Custom designed and built for the large family; family and childrens den/teenroom ▪ close to shopping, schools, fwy access ▪ Great for elderly parents or that Millennial that just moved back in private garages and community amenities for the whole family. ▪ Walking distance to everything dining, shopping entertainment, parks, top ranked schools and fitness centers. ▪ HOME SITS IN THE AWARD WINNING GLENDORA SCHOOL DISTRICT ▪ community amenities for the whole family ▪ This house includes four full bedrooms Plus Loft and will suit all of your family needs ▪ Excellent schools ▪ GLENDORA UNIFIED SCHOOL DISTRICT. SELLERS ELEMENTARY, GODDARD JR. HIGH, GLENDORA HIGH SCHOOL. CLOSE TO ST. LUCY'S HIGH SCHOOL, CITRUS COLLEGE AND AZUSA PACIFIC UNIVERSITY
Age	2	<ul style="list-style-type: none"> ▪ close access to the Gold Line, hiking trails, downtown Glendora, Citrus College & APU ▪ GLENDORA UNIFIED SCHOOL DISTRICT. SELLERS ELEMENTARY, GODDARD JR. HIGH, GLENDORA HIGH SCHOOL. CLOSE TO ST. LUCY'S HIGH SCHOOL, CITRUS

Table 46: Potential Discrimination in Listings of For-Sale Homes

Discrimination Type	Number of Listings	Potentially Discriminatory Language ¹
		COLLEGE AND AZUSA PACIFIC UNIVERSITY.
Arbitrary	1	▪ Executive style

Source: *www.realtor.com*, accessed, January 2018.

Note: Examples are direct quotes from the listings (including misspellings, punctuation and emphasis).

Advertising has become a sensitive area in real estate. 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. Litigation has also set precedence for violations in advertisements that hold publishers, newspapers, Multiple Listing Services, real estate agents, and brokers accountable for discriminatory ads.

Lending

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA). The previous section of this AI provides a detailed analysis of HMDA data for Glendora.

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.

Real Estate Agents

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

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

Covenants, Conditions, and Restrictions (CC&Rs)

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

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

Homeowners Insurance Industry

Without insurance, banks and other financial institutions lend less. For example, if a company excludes older homes from coverage, lower income and minority households who can only afford to buy in older neighborhoods may be disproportionately affected. Another example includes private mortgage insurance (PMI). PMI obtained by applicants from Community Reinvestment Act (CRA) protected neighborhoods is known to reduce lender risk. Redlining of lower income and minority neighborhoods can occur if otherwise qualified applicants are denied or encouraged to obtain PMI.³⁰

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® in ensuring equal professional services for all people. The term REALTOR® identifies a licensed professional in real estate who is a member of the NAR; however, not all licensed real estate brokers and salespersons are members of the NAR.

Code of Ethics

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

³⁰ “Borrower and Neighborhood Racial Characteristics and Financial Institution Financial Application Screening”; Mester, Loretta J; Journal of Real Estate Finance and Economics; 9 241-243; 1994

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.” Nevertheless, as shown earlier, many advertisings still contain potentially discriminatory language.

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. 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 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.

5. REALTOR® Associations Serving the City of Glendora

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 Citrus Valley Association of REALTORS® (CVAR) serves the City of Glendora. Currently, CVAR uses California Regional Multiple Listing Service, Inc.

Complaints against members are handled by the associations. 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.

B. Fair Housing Practices in the Rental Housing Market

1. Rental Process

Advertising

A large number of rental listings in Glendora contain potentially discriminatory language, such as encouraging or discouraging family living, or potentially discouraging persons with disabilities by emphasizing a no-pet policy without clarifications that service/companion animals are allowed.

Like with ad listings for for-sale homes, rental advertisements cannot include discriminatory references. Of a total of 60 rental listings reviewed in January 2018, 25 advertisements (42 percent) were found to contain potentially discriminatory language (Table 47). Most of the problematic language typically involved references to Citrus College, Azusa Pacific University and Glendora Unified schools – indicating a preference for local students or university employees and references to schools or children – indicating a preference for families.

Persons with disabilities are one of the protected classes under fair housing law, and apartments must allow “service animals” and “companion animals,” under certain conditions. Service animals are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other

special tasks. Service animals are working animals, not pets. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living and as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment. Of all ads reviewed, many have a no-pet policy or indicate only small pets or breed-specific allowed, but only one indicates that ADA service animals allowed but makes no mention to companion animals.

Table 47: Potential Discrimination in Listings of Homes for Rent

Discrimination Type	Number of Listings	Potentially Discriminatory Language ¹
No Discriminatory Language	36	<ul style="list-style-type: none"> ▪ n/a
Age	2	<ul style="list-style-type: none"> ▪ Citrus College and Azusa Pacific University
Household Size/ Family Related	21	<ul style="list-style-type: none"> ▪ Close distance to downtown close to shopping centers freeways and schools ▪ Good for a couple and baby ▪ Its located near schools and shopping centers ▪ with our convenient location to schools ▪ Great neighborhood- close to schools! ▪ Good for a couple and baby ▪ Glendora School District! Sutherland elementary Goddard Middle Glendora High ▪ Award-winning Glendora Unified School District Schools; La Fetra Eementary Sandburg Middle School and St. Lucy s Private School all within a few minutes away ▪ awarded Glendora School district. ▪ Awarding wining Glendora School Districts ▪ large grass area for kids to play
Arbitrary	3	<ul style="list-style-type: none"> ▪ No Evictions, Judgement, Felonies, or Bankruptcies. ▪ First time homebuyer ▪ No evictions; Stable income, 2 months paystubs, 2 years tax returns, and proof of move-in funds; 40% debt to income ratio

Sources: www.craigslist.com, accessed January 2018

Note: Examples are direct quotes from the listings (including punctuation and emphasis).

Responding to Ads

Differential treatment of those responding to advertisements is a growing fair housing concern. In a 2011 study conducted nationally, comprehensive audit-style experiments via email correspondence were used to test for racial discrimination in the rental housing market. This study was particularly unique because it tested for two variables – discrimination based on race *and* social class. By responding to online rental listings using names associated with a particular racial/ethnic group and varying message content grammatically to indicate differing levels of education and/or income (i.e. social class), researchers found that, overall, Blacks continued to experience statistically significant levels of discrimination in the rental housing market. This discrimination was even more pronounced when the housing inquiry was made to look like it originated from a Black individual of a lower social class.³¹

³¹ Do Landlords Discriminate in the Rental Housing Market? Evidence from an Internet Field Experiment in U.S. cities. Andrew Hanson and Zackary Hawley. May 2011.

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.

In a follow up to the study discussed above, researchers developed an experiment to test for subtle discrimination. Subtle discrimination is defined as unequal treatment between groups that occurs but is difficult to quantify, and may not always be identifiable through common measures such as price differences. Researchers found that, in general, landlords replied faster and with longer messages to inquiries made from White names. The study also found that landlords were more likely to use descriptive language, extend invitations to view a unit, invite further correspondence, use polite language, and make a formal greeting when replying to e-mail inquiries from a White home seeker.³²

Credit/Income Check

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

The study on subtle discrimination mentioned earlier found no statistically significant evidence of discrimination in using language related to fees, asking for employment or rental history, or requesting background information.

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.³³ This rule applies to lease terms of one month or longer and whether the negotiations are oral or in writing.

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

³² Subtle Discrimination in the Rental Housing Market: Evidence from E-mail Correspondence with Landlords. Andrew Hanson, Zackary Hawley, and Aryn Taylor. September 2011.

³³ California Civil Code Section 1632(b)

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.

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. Apartment Association of California

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

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

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

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

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

3. The National Association of Residential Property Managers (NARPM)

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

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

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

- Residential Management Professional, RMP ®
- Master Property Manager, MPM ®
- Certified Residential Management Company, CRMC ®

Various educational courses are offered as part of attaining these designations including the following fair housing and landlord/tenant law courses:

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

4. Western Manufactured Housing Communities Association (WMA)

Western Manufactured Housing Communities Association (WMA) is a nonprofit organization 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 manufactured home communities.

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

C. Fair Housing Services and Statistics

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 Glendora, the nature and extent of fair housing complaints, and results of fair housing testing/audits.

1. Housing Rights Center

The Housing Rights Center (HRC) is under contract with the City of Glendora to provide fair housing services in the City. HRC is a nonprofit agency whose mission is to eliminate housing discrimination and to ensure that everyone has an equal opportunity to live in housing they desire and can afford regardless of race, color, familial status, religion, sex, mental and physical disabilities (including AIDS & HIV), national origin, marital status, age, source of income, and sexual orientation. Fair housing laws protect the rights of all home seekers to equal opportunity in the sale, rental, financing, insuring, appraising and advertising of housing. HRC staff provides direct services in the following areas and is available to counsel both home seekers and housing providers on their rights and responsibilities under fair housing laws:

- Housing Discrimination Complaint Investigation
- Fair Housing Outreach and Education
- Tenant and Landlord Counseling

Overall Clients Served

Between Fiscal Year (FY) 2012-13 and FY 2016-17, HRC provided fair housing services to a total of 309 Glendora residents. The number of Glendora residents served has remained fairly constant annually and appears to be declining.

Table 48: Clients Served (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total
Glendora	67	64	61	59	58	309

Source: Housing Rights Center, 2012-2017.

Clients Served by Race and Ethnicity

Between FY 2012-13 and FY 2016-17, White residents represented nearly 40 percent of HRC's clients. Residents of Hispanic origins comprised about one-third (35 percent). The "Hispanic" category includes all persons identifying themselves as ethnically "Hispanic," regardless of what race sub-category was also chosen.

The "Other/Multi-racial" category includes those who are two or more races. The racial/ethnic distribution of HRC's clients is not consistent with the City's demographics. According to the 2010 Census, Black residents made up just one percent of Glendora's population but about seven percent of all fair housing clients, and similarly American Indian/Alaskan residents made up 0.3 percent of the population but made up nine percent of

HRC clients—indicating that Black and American Indian/Alaskan residents may be disproportionately impacted by housing discrimination.

Table 49: Clients Served by Race/Ethnicity (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total	Percent
American Indian or Alaskan	23	4	1	1	0	29	9.4%
Asian	4	0	2	1	1	8	2.6%
Black/African American	4	6	4	3	4	21	6.8%
Pacific Islander	0	0	1	1	0	2	0.6%
White	29	40	25	35	28	157	39.2%
Other/Multi-Racial	7	14	28	18	25	92	29.8%
Total Clients	67	64	61	59	58	309	100.0%

Source: Housing Rights Center, 2012-2017.

Table 50: Clients Served by Ethnicity (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total	Percent
Mexican/Chicano	17	13	17	17	14	78	25.2%
Not Hispanic/Latino	42	46	36	33	40	197	63.8%
Other/Hispanic Latino	8	5	8	9	4	34	11.0%
Total	67	64	61	59	58	309	100.0%

Source: Housing Rights Center, 2012-2017.

Clients Served by Income

As with most jurisdictions, statistics reported for the City of Glendora indicate that lower income persons, regardless of race, are the most heavily impacted by fair housing issues. Between FY 2012-13 and FY 2016-17, 89 percent of those served by the HRC were lower income, with most clients falling in the extremely low-income category (62 percent).

Table 51: Clients Served by Income Level (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total	Percent
Extremely Low	49	36	36	38	33	192	62.1%
Very Low	10	15	12	9	12	58	18.8%
Low	4	6	4	5	7	26	8.4%
Moderate	4	7	9	7	6	33	10.7%
Total Clients	67	64	61	59	58	309	100.0%

Source: Housing Rights Center, 2012-2017.

Clients Served by Other Characteristics

A large portion of HRC's Glendora clients (39 percent) were also persons with special needs. Between FY 2012-13 and FY 2016-17, disabled households comprised about 19 percent of HRC's clients. In addition, approximately nine percent of HRC clients were female-headed households and eight percent were seniors.

Table 52: Clients Served by Household Characteristics (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total	Percent
Female-Headed Households	3	6	8	4	8	29	9.4%
Senior Households	4	6	3	8	3	24	7.8%
Disabled Households	11	21	9	3	14	58	18.8%
Government Subsidized Households	1	3	1	0	3	8	2.6%
Special Needs Total	19	36	21	15	28	119	38.5%
Total Clients	67	64	61	59	58	309	100.0%

Source: Housing Rights Center, 2012-2017.* Represents a percentage of total clients, not only special needs clients.

Note: These characteristics are not mutually exclusive. Each client can identify multiple characteristics. For example, a senior client may have disabilities and receive government subsidies for housing.

Housing Discrimination Complaints

Between FY 2012-13 and FY 2016-17, 28 complaints of housing discrimination were reported by Glendora residents (Table 53). The majority of allegations were related to physical disability (75 percent). It is important to note that not all allegations of discrimination evolve into actual fair housing cases. Of the 28 complaints of discrimination received between 2012 and 2017, only 4 (14 percent) were deemed to have reasons to suspect discrimination to turn into fair housing cases (Table 54). Of those cases, two were settled through successful conciliation (Table 55).

Table 53: Discrimination Complaints by Protected Classification (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total	Percent
Physical Disability	5	7	4	1	4	21	75.0%
Familial Status	1	0	1	0	0	2	7.1%
Mental Disability	0	0	0	0	1	1	3.6%
National Origin	0	0	0	0	0	0	0.0%
Race	0	0	0	0	0	0	0.0%
Discrimination General Information	1	0	0	0	1	2	7.1%
Gender	0	1	0	0	0	1	3.6%
Source of Income	0	1	0	0	0	1	3.6%
Total	7	9	5	1	6	28	100.0%

Source: Housing Rights Center, 2012-2017.

Table 54: Findings (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total	Percent
Sustains Allegation	0	2	0	0	0	2	50.0%
Inconclusive Evidence	0	0	0	0	0	0	0.0%
Pending	1	1	0	0	0	2	50.0%
Total	1	3	0	0	0	4	100.0%

Source: Housing Rights Center, 2012-2017.

Table 55: Dispositions (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total	Percent
Successful Conciliation	0	2	0	0	0	2	50.0%
No Enforcement Action Possible	0	0	0	0	0	0	0.0%
Client Withdrew	0	0	0	0	0	0	0.0%
Pending	1	1	0	0	0	2	50.0%
Total	1	3	0	0	0	4	100.0%

Source: Housing Rights Center, 2012-2017.

Tenant Landlord Counseling

In addition to reporting potential instances of housing discrimination, a number of Glendora residents also contacted HRC for assistance with landlord/tenant issues and complaints. Concerns regarding tenant/landlord issues ranged from eviction to substandard conditions and questions on how to get repairs made. From 2012 to 2017, the most common issues the HRC encountered were clients seeking assistance with eviction notices (22 percent), general information (14 percent), lease terms (11 percent) or rent increases (ten percent) (Table 56).

Table 56: Summary of Housing Issues (2012-2017)

	2012-13	2013-14	2014-15	2015-16	2016-17	Total	Percent
Eviction	5	4	7	4	3	23	8.2%
Harassment	3	1	2	1	3	10	3.6%
Late Fees	1	0	1	0	0	2	0.7%
Lease Terms	8	6	7	5	4	30	10.7%
Lockout	1	1	0	0	0	2	0.7%
Notices	15	16	12	7	13	63	22.4%
Pets	0	0	1	0	0	1	0.4%
Relocation	0	0	0	0	0	0	0.0%
Rent Increase	5	6	2	6	8	27	9.6%
Repairs	7	3	2	3	5	20	7.1%
Section 8 Information	0	0	1	0	1	2	0.7%
Security Deposit	6	4	5	3	2	20	7.1%
Seeking Housing	1	3	2	5	3	14	5.0%
Substandard Conditions	2	0	3	6	5	16	5.7%
Utilities	0	2	0	0	0	2	0.7%
Landlord/Tenant General Information	6	7	8	16	3	40	14.2%
Other Issue	0	2	3	2	2	9	3.2%
Total	60	55	56	58	52	281	100.0%

Source: Housing Rights Center, 2012-2017.

Education and Outreach Efforts

Education is one of the most important components of providing fair housing services. It is also believed to be 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. The following briefly looks at some of the educational outreach efforts provided by the HRC.

Outreach efforts provided by the HRC in Glendora include distribution of literature at community meetings and special events including the Los Angeles County Fair Housing Forum. During these events, residents are provided counseling, literature is distributed, and other general information and services are provided. Other outreach activities conducted in Glendora by the HRC include:

- Fair Housing workshops at the La Fetra Senior Center
- Literature distribution of fair housing brochures to the Glendora City Hall, Glendora Public Library, Glendora Chamber of Commerce and La Fetra Senior Center.
- Media advertisements, press releases, and public service announcements.
- Presentations and mailings to agencies, educational institutions, law enforcement, the community, religious groups, government officials and staff, and the housing industry
- Tester Training in Los Angeles including in-depth coverage of various testing methods used in housing discrimination complaint investigation.
- Presentations to Landlords regarding their rights and responsibilities under Landlord/Tenant, Fair Housing laws, and rental screening procedures.

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

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

Between 2012 and 2017, four persons from Glendora filed fair housing complaints with DFEH. Four of these cases involved discrimination based on disability; two cases also involved discrimination based on familial status. Other complaints also documented discrimination on the basis of source of income, race, and national origin (Table 57).

A person can file fair housing complaints on multiple bases and multiple acts of discrimination. Therefore, the enumeration of complaint bases and acts of discrimination usually exceeds the number of persons filing complaints. A total of six acts of discrimination were recorded during this time period. Denied reasonable accommodation (three instances) and denied rental/lease/sale (2 instances) were the most common discriminatory acts recorded (Table 58).

Three cases in the City were investigated and dismissed with no basis to proceed and another was found to have no probable cause by DFEH and subsequently closed. Only one case was closed after arriving at a successful settlement (Table 57).

**Table 57: Basis for Discrimination of Complaints
Filed with DFEH in Glendora (2012-2017)**

Basis of Complaints	# of Complaints
Disability	4
Familial Status	2
Source of Income	1
Race	1
National Origin	1
Total	9

Source: California Department of Fair Employment & Housing, January 2018.

Note: Persons can file complaints on multiple bases

A search of the files and computer records maintained by DFEH found no recorded complaints for 2012, 2013, and 2015.

**Table 58: Acts of Discrimination for Complaints
Filed with DFEH (2012-2017)**

Act of Discrimination	# of Acts
Denied Reasonable Accommodation	3
Denied rental/lease/sale	2
Evicted	1
Total	6

Source: California Department of Fair Employment & Housing, January 2018.

Note: Persons can file complaints based on multiple acts of discrimination

A search of the files and computer records maintained by DFEH found no recorded complaints for 2012, 2013, and 2015.

**Table 59: Disposition of Fair Housing Complaints
Filed with DFEH (2012-2017)**

Closing Category	# of Cases
Investigated and Dismissed – Insufficient Evidence	3
Settlement – Settled by Enforcement	1
Total	4

Source: California Department of Fair Employment & Housing, January 2018

Note: A search of the files and computer records maintained by DFEH found no recorded complaints for 2012, 2013, and 2015.

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

If the investigative findings do not show a violation of the law, DFEH will close the case. If investigative findings show a violation of law, the DFEH schedules a formal conciliation conference. During the conciliation conference, the DFEH presents information supporting its belief that there has been a violation and explores options to resolve the complaint. If formal conciliation fails, the DFEH Housing Administrator may recommend litigation. If litigation is required, the case may be heard before the Fair Employment and Housing Commission (FEHC) or in civil court. Potential remedies for cases settled by the FEHC include out-of-pocket losses, injunctive relief, access to the housing previously denied, additional damages for emotional distress, and civil penalties up to \$10,000 for the first violation. Court remedies are identical to FEHC remedies with one exception; instead of civil penalties, a court may award unlimited punitive damages.

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

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

From 2012 to 2017, five fair housing cases from Glendora were filed with HUD. The majority of cases filed included multiple bases of complaints and cases involving discrimination based on disability (45 percent) were the most common (Table 60); although incidences concerning race, familial status, retaliation, and national origin, were also reported.

A total of 14 discriminatory issues were recorded during this time period. Denied rental/sale/lease (three instances), denial of a reasonable accommodation (three instances), and denial of equal terms/conditions (three instances) were the most common discriminatory acts recorded (Table 58).

All five of the fair housing cases were closed between 2012 and 2016, according to HUD. Three of these cases were found to have no probable cause and subsequently closed. One additional case was withdrawn without resolution and one other case reached a successful conciliation/settlement (Table 62).

Table 60: Basis for Discrimination of Cases filed with HUD (2012-2017)

Year	Race	Disability	Familial Status	Retaliation	National Origin	Total
2012	0	0	0	0	0	0
2013	0	1	0	0	0	1
2014	0	1	0	1	0	2
2015	1	1	1	1	0	4
2016	0	2	1	0	1	4
2017	0	0	0	0	0	0
Total	1	5	2	2	1	11

Note: Cases filed included multiple bases of complaints.

Source: Department of Housing and Urban Development (HUD), 2018.

Table 61: Issues of Discrimination for Complaints Filed with HUD (2012-2017)

Act of Discrimination	# of Issues
Denied rental/lease/sale	3
Denied reasonable accommodation	3
Denied equal terms and conditions	3
Harassment/Coercion	2
Discriminatory refusal to negotiate for rental	2
Subjected to discriminatory statements/advertisements	1
Total	14

Note: Persons can file complaints based on multiple discriminatory issues.

Source: Department of Housing and Urban Development (HUD), 2018

Table 62: Disposition of Fair Housing Cases Filed with HUD (2012-2017)

	No Cause	Withdrawn Without Resolution	Conciliation/Settlement Successful	Open	Total
2012	0	0	0	0	0
2013	1	0	0	0	1
2014	0	1	0	0	1
2015	1	0	0	0	1
2016	1	0	1	0	2
2017	0	0	0	0	0
Total	3	1	1	0	5

Source: Department of Housing and Urban Development (HUD), 2018.

D. Hate Crimes

Hate crimes are crimes 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 by the Federal Bureau of Investigation (FBI) show that two hate crimes were committed in Glendora between 2012 and 2016. The hate crimes committed in the City were motivated by race (Table 63). In Los Angeles County as a whole, race/ethnicity-based hate crimes were also the most common (61 percent).

Table 63: Hate Crimes (2012-2016)

	Race	Religion	Sexual Orientation	Ethnicity	Disability	Gender	Gender Identity	Total
Glendora								
2012	0	0	0	0	0	0	0	0
2013	1	0	0	0	0	0	0	1
2014	0	0	0	0	0	0	0	0
2015	1	0	0	0	0	0	0	1
2016	0	0	0	0	0	0	0	0
Total	2	0	0	0	0	0	0	2
Los Angeles County								
2012	152	52	85	45	0	0	0	334
2013	20	3	17	10	0	0	0	40
2014	7	3	3	5	0	0	0	18
2015	16	2	9	0	1	0	0	28
2016	17	3	6	0	0	0	0	26
Total	212	63	120	60	1	0	0	446

Note: Categories "Gender" and "Gender Identity" were included as of 2013.

Source: U.S. Department of Justice Federal Bureau of Investigation, 2012-2016

Progress Since Previous AI

This section summarizes key findings of the previous AI document (completed in 2016) and reports the City’s progress toward addressing the impediments previously identified. This section, along with analyzes conducted in the previous sections, will form the basis for the City’s new Fair Housing Action Plan.

Impediment 1: Education and Outreach

Action	Progress
Continue proactive fair housing outreach to Glendora residents, real estate professionals, apartment owners/managers, bankers and advocacy groups.	HRC has established an effective and comprehensive outreach and public education program designed to raise awareness of the fair housing laws that protect individuals, often in traditionally underserved communities, against housing discrimination. The agency’s Outreach Department develops and distributes educational literature and resources that describe ways to prevent housing injustices and the applicable laws that protect against discrimination. Materials are made available to the public, free of cost, in various languages including English, Spanish, Korean, Mandarin, Armenian, Cantonese and Russian. HRC continues to host annual fair housing workshops at the La Fetra Center in order to educate Glendora landlords and tenants about their housing rights and responsibilities. The agency’s workshops include an overview of the state and federal fair housing laws. And, depending on the audience, the presentations can be translated by staff into Armenian, Mandarin, Spanish, or Russian.
Continue focused outreach and education to small property owners/landlords on fair housing, and reasonable accommodation issues in particular.	
Continue multi-lingual fair housing mailings to buildings with concentrations of minority and lower income tenants. Continue to provide tenants with contacts for additional fair housing information including how to file a complaint, and provide copies of State HCD’s Landlord/Tenant Rights booklet in Spanish and English.	
Continue open representation on Glendora’s numerous Boards, Commissions and Committees which address housing issues for residents to voice their concerns	The City continues to foster community participation through representation on its boards and commissions. Applications and appointments to these commissions are conducted in a transparent manner and are open to all members of the community.

Impediment 2: Housing Discrimination

Action	Progress
Continue to provide investigation and response to allegations of illegal housing discrimination through the HRC.	The number of fair housing complaints has continued to decline over the years, a sign of improved awareness.
Continue to review HRC quarterly discrimination reports to assess Glendora trends and patterns over time, and tailor fair housing education and outreach accordingly.	
Coordinate review of hate crime data on an annual basis between the Glendora Police Department and HRC, and evaluate as a potential fair housing issue.	Hate crimes have been limited in Glendora in recent years.
Continue to provide general counseling and referrals over the phone regarding tenant-landlord issues through the Glendora Housing Division and the HRC.	Ongoing

Impediment 3: Land Use Policies and Zoning

Action	Progress
Amend the City's density bonus provisions to be consistent with State law.	Completed in 2016
Amend the City's processing of Second Kitchen Unit to be consistent with State law.	Completed in 2017
Amend the Zoning Code to address the provision for employee housing.	Completed in 2016

Impediment 4: Lending Practices

Action	Progress
The fair housing service contractor(s) should monitor lending activities in the City and identify potential issues regarding redlining, credit steering, predatory lending, and fraudulent activities.	The City continues to contract with HRC to provide fair housing services for Glendora residents. HRC assists in preventing or reducing housing discrimination, predatory lending and hate crimes in Glendora.

Action	Progress
<p>Work with the fair housing service contractor(s) to ensure that Glendora residents are educated about predatory lending schemes and practices and know where to seek information and report concerns regarding these practices.</p>	<p>Evaluation of HMDA data as part of this AI update shows that discrepancies in lending patterns among various racial/ethnic groups have narrowed.</p> <p>However, the incidence of subprime lending has increased for White, Hispanic, and Asian applicants between 2012 and 2016. Specifically, for Hispanic applicants, the average spread also increased significantly. Therefore, continued monitoring of lending activities is needed.</p>
<p>Help protect homeowners from mortgage rescue fraud by promoting the use of HUD-certified, non-profit mortgage counseling agencies on the City's website and other means.</p>	<p>The City of Glendora's fair housing and homeless prevention strategy can assist those facing unfair evictions and foreclosure frauds. HRC's Housing Counselors are well versed on issues regarding rent increases, evictions, security deposits, and repairs.</p>
<p>Promote the rights of tenants in properties undergoing foreclosure, including dissemination of a Fact Sheet via the City's website and in public locations throughout the Glendora community.</p>	<p>Ongoing, However, the rate of foreclosures has decreased in recent years.</p>
<p>Continue to monitor real estate advertisements in the local newspapers for contents and compliance with HUD fair housing guidelines.</p>	<p>Ongoing. As part of this AI development, real estate advertisements were reviewed. Similar potentially discriminatory languages persist.</p>
<p>Continue to include non-discriminatory and fair housing language in all City and Housing Authority affordable housing contracts and agreements. Monitor property management firm of HOME project for adherence with affirmative marketing actions and compliance with applicable regulations in the advertisement of available units.</p>	<p>Ongoing</p>

Impediment 5: Real Estate Advertisements

Action	Progress
<p>Continue to monitor real estate advertisements in the local newspapers for contents and compliance with HUD fair housing guidelines. If issues persist, contact local newspapers and websites (such as craigslist.com) and encourage their participation in fair housing workshops by HRC.</p>	<p>Ongoing</p>

Fair Housing Action Plan

The previous sections evaluate the conditions in the public sector and private market that may impede fair housing choice in Glendora, as well as reports on the City’s progress in addressing impediments previously identified. This section builds upon the previous analyses, summarizes conclusions and presents a list of recommendations to help address the impediments. When identifying recommendations, this AI focuses on actions that are directly related to fair housing issues and can be implemented within the limited financial and staffing resources, and legal authority of the City of Glendora.

1. Education and Outreach

The Housing Rights Center (HRC) is currently the City’s fair housing service provider. HRC consistently assists approximately 60 Glendora residents regarding a variety of fair housing issues. Persons with disabilities continue to represent a significant proportion of HRC clients. Also, Black residents represent a disproportionate share of HRC’s client profile.³⁴ Continued outreach and education, as well as fair housing investigation and enforcement services are needed.

Multi-lingual fair housing education and outreach is also a need in Glendora. Language barriers can be an impediment to fair housing. Linguistic isolation appears to be slightly more severe among Asian than Hispanic residents. While approximately 14 percent of Glendora residents speak “Spanish or Spanish Creole” at home, six percent speak “Asian and Pacific Islander languages.” However, among “Spanish or Spanish Creole” speaking households approximately 25 percent spoke English “less than very well,” compared to nearly one-half (47 percent) of Asian speaking households.

Action	Timeline
Continue proactive fair housing outreach to Glendora residents, real estate professionals, apartment owners/managers, bankers and advocacy groups.	Annually assist 50 persons with fair housing services
Continue multi-lingual fair housing mailings to buildings with concentrations of minority and lower income tenants. Continue to provide tenants with contacts for additional fair housing information including how to file a complaint, and provide copies of State HCD’s Landlord/Tenant Rights booklet in Spanish and English.	Ongoing

³⁴ While Native Americans constituted a significant proportion of HRC clients in Glendora back in 2012, their number continues to decline over the years. This may be an indication that the 2012 profile was a result of classifying Hispanic residents as Native Americans. This is evidenced that in the same year, Other/Multi-Racial clients accounted for only a small portion of the clients but their proportion increased significantly in later years.

2. Real Estate Advertisements

As part of this AI update, for-sale and for-rent listings were reviewed for discriminatory languages. Both types of listings show strong preferences for families.

Action	Timeline
Continue to monitor real estate advertisements in the local newspapers for contents and compliance with HUD fair housing guidelines. If issues persist, contact local newspapers and websites (such as craigslist.com) and encourage their participation in fair housing workshops by HRC.	Annually

3. Housing Discrimination

Fair housing complaints based on disabilities continue to represent the majority of the complaints filed. HRC cites the continued need to educate landlords on reasonable accommodation.

Action	Timeline
Continue to provide investigation and response to allegations of illegal housing discrimination through the HRC.	Annually assist 50 persons with fair housing services
Continue to review HRC quarterly discrimination reports to assess Glendora trends and patterns over time, and tailor fair housing education and outreach accordingly.	Quarterly
Continue to provide general counseling and referrals over the phone regarding tenant-landlord issues through the Glendora Housing Division and the HRC.	Annually assist 50 persons with tenant/landlord counseling

4.

4. Lending Practices

As part of the 2018 AI development, an extensive analysis of lending patterns in Glendora was conducted. The following are some of the key findings:

- Between 2012 and 2016, the total number of applications decreased 12 percent.
- Over 16 percent of all loan applications were withdrawn or deemed incomplete, indicating a potential lack of understanding in the homebuying and lending processes.
- Asian applicants were noticeably overrepresented in the loan applicant pool during 2016, while Hispanics and Whites were underrepresented in the homebuying market.
- The number of loans (frequency) with a reported spread (subprime lending) increased between 2012 and 2016, particularly among Hispanic and Asian applicants. The frequency of spread for both groups more than doubled. Furthermore, the average spread (discrepancies in interest rates) for Hispanic applicants also increased significantly while that for other groups decreased.

- There were major discrepancies in approval rates among various lending institutions, ranging from a low approval rate of 23.9 percent for Loandepot.com to an exceptionally high rate approval at 84.5 percent for Flagstar Bank.

Action	Timeline
The fair housing service contractor(s) should monitor lending activities in the City and identify potential issues regarding redlining, credit steering, predatory lending, and fraudulent activities.	Annually
Continue to monitor real estate advertisements in the local newspapers for contents and compliance with HUD fair housing guidelines.	Ongoing
Continue to include non-discriminatory and fair housing language in all City and Housing Authority affordable housing contracts and agreements. Monitor property management firm of HOME project for adherence with affirmative marketing actions and compliance with applicable regulations in the advertisement of available units.	Ongoing

Appendix A – Citizen Participation

A. Community Workshop Flyer (English and Spanish)

City of Glendora

Consolidated Plan and Fair Housing Community Workshop



The City of Glendora invites your participation in a workshop to discuss community development, housing, and fair housing issues.

The City of Glendora receives approximately \$250,000 from the U.S. Department of Housing and Urban Development (HUD) in Community Development Block Grant (CDBG) funds each year for housing and community development projects. We need your input to help determine housing and community needs in Glendora for future funding.

Date: Wednesday, February 21, 2018

Time: 6:00 pm – 8:00 pm

Location: *Friends Room*
Glendora Public Library
140 S. Glendora Ave.
Glendora, CA 91741



Please also assist us by filling out this survey, found online at:
<https://www.surveymonkey.com/r/GlendoraCP>

For questions or additional information, please contact:

Katie Savant, Management Analyst
(626) 914-8278 | KSavant@ci.glendora.ca.us



The City of Glendora will provide reasonable accommodations toward the inclusion of all participants, including language accommodations. Please contact Katie Savant at (626) 914-8278. Ample time is required to determine the needs of each request.

Ciudad de Glendora

Taller Comunitario para el Plan Consolidado y la Vivienda Justa



La ciudad de Glendora le invita a participar en una serie de talleres para discutir temas relacionados con el desarrollo de la comunidad, viviendas, y vivienda justa.

La Ciudad de Glendora anualmente recibe aproximadamente \$250,000 del Departamento de Vivienda y Desarrollo Urbano (HUD, por sus siglas en inglés) en fondos del Community Development Block Grant (CDBG) para la vivienda y proyectos de desarrollo para la comunidad. La Ciudad desea saber su opinión sobre las necesidades comunitarias y de vivienda para la inversión de fondos en el futuro.

Date: Miércoles, 21 de Febrero 2018
Time: 6:00 pm – 8:00 pm
Location: *Friends Room*
Glendora Public Library
140 S. Glendora Ave.
Glendora, CA 91741



Por favor complete una breve encuesta para ayudar con este esfuerzo, se encuentra en línea en:

https://es.surveymonkey.com/r/GlendoraCP_SPANISH

Para preguntas, o información adicional, por favor póngase en contacto con:

Katie Savant, Management Analyst
(626) 914-8278 | KSavant@ci.glendora.ca.us



La ciudad de Glendora proveera acomodación razonable para incluir a todos los que deseen participar. Por favor póngase en contacto con Katie Savant al (626) 914-8278. Se requiere suficiente tiempo para determinar las necesidades de cada solicitud.

B. Outreach List

Management
Alosta Gardens
745 E. 5th St.
Azusa , CA 91702

President
Azusa-Glendoria Soroptimists
P.O. Box 1960
Glendora, CA 91740

Jeff Barnes - Mortgage Loan Specialist
Bank of America
1030 E Route 66
Glendora, CA 91740

Attn: Elias Saucedo
Mortgage Loan Specialist
Bank of America
152 East Foothill Blvd.
Azusa, CA 91702

Management
Casitas Esperanza
11927 Elliott Ave.
El Monte, CA 91732

Attn: Jane A. Bock, President
Charter Oak Unified Schools
P.O. Box 9
Covina, CA 91723

Randa Farah - Mortgage Banker
CHASE
1905 E. Rte 66
Glendora, CA 91740

Patricio H. Gonzalez
Mortgage Banker
CHASE
805 W. Foothill Blvd.
Claremont, CA 91711

Gloria I. Munoz - Mortgage Banker
CHASE
925 N. Hacienda Blvd.
La Puente, CA 91744

Attn: Susy Flores, Ex. Director
The Children's Advocacy Center
1650 E. Old Badillo St. #C3
Covina, CA 91724

Management
Arrow Plaza
20644 E. Arrow Highway
Covina, CA 91724

Director
Azusa Health Services
472 South Citrus Ave.
Azusa, CA 91702

Jason Jaime - Mortgage Loan Specialist
Bank of America
150 S. California Ave.
West Covina, CA 91790

Attn: Kathleen Barajas
Californians for Disability Rights, Inc.
1193 17th Street
Los Osos, CA 93402

President
Catholic Charities of Los Angeles, Inc.
1531 James M. Wood, P.O. Box 15095
Los Angeles, CA 90015

President
Charter Oak Council of PTAs
20350 E Cienega St. Suite E3
Covina, CA 91724

Nerses Boyadjian - Mortgage Banker
CHASE
2086 Foothill Blvd.
La Verne, CA 91750

Sherry Wang - Mortgage Banker
CHASE
300 N. Lemon Ave.
Walnut, CA 91789

Isabel Reyes - Mortgage Banker
CHASE
1198 Via Verde Ave.
San Dimas, CA 91773

Pastor
Church of the Brethren
151 S. Glendora Ave.
Glendora, CA 91741

Management
Azusa Park Apartments
363 North Calera Ave.
Azusa , CA 91702

Samantha Wei
Mortgage Loan Specialist
Bank of America
1399 Foothill Blvd.
La Verne, CA 91750

Larry Jeong Hwang
Mortgage Loan Specialist
Bank of America
843 E. Arrow Hwy
Glendora, CA 91740

Management
Cameron Properties
333 N. Rockvale Ave. # 12
Azusa, CA 91702

President
Century 21 Masters
140 S Grand Ave.
Glendora, CA 91741

Sergio Silva - Mortgage Banker
CHASE
1188 E. Alosta Ave.
Azusa, CA 91702

Vivi Hoang - Mortgage Banker
CHASE
1000 Huntington Drive
Duarte, CA 91010

Jim Bolander - Mortgage Banker
CHASE
690 W. Huntington Drive
Monrovia, CA 91016

Nate Dang - Mortgage Banker
CHASE
334 S. Diamnod Bar Blvd.
Diamond Bar, CA 91765

Management
Cienega Gardens Apartments
1211 Lyman Ave.
Covina, CA 91724

Attn: Christina M. Garcia
Citrus College Foundation
1000 West Foothill Blvd.
Glendora, CA 91741

Attn: Frances Gilek
Cory's Kitchen, Inc.
1418 Arrow Hwy
Irwindale, CA 91706

Program Director
East San Gabriel Valley
Coalition for the Homeless
P.O. Box 93256
City of Industry, CA 91715

Pastor
First Christian Church
P.O. Box 698
Glendora, CA 91740

Program Director
Foothill Family Shelter
1501 W. Ninth Street, Suite D
Upland , CA 91786

Attn: Bonnie Singleton
Foothill Hospital Auxiliary
660 Hunters Trail
Glendora, CA 91740

Attn: Michelle Anderson
General Federation of Women's Club -
East Valley
1020 E. Rte 66
Glendora, CA 91740

President
Glendora Community Conservancy
P.O. Box 963
Glendora, CA 91740

President
Glendora Historical Society
P.O. Box 532
Glendora, CA 91740

President
Kiwans Club of Glendora
P.O. Box 353
Glendora, CA 91740

Attn: Mark Epstein, CEO
Citrus Valley Association of Realtors
504 E. Rte 66
Glendora, CA 91740

Management
Covina Manor
20420 E. Arrow Hwy
Covina, CA 91791

Management
Elwood Family Apartments
635 Elwood Ave.
Glendora, CA 91740

Program Director
Foothill AIDS Project
233 W. Harrison Ave.
Claremont, CA 91711

Program Director
Foothill-de Anza Foundation
12345 El Monte Road
Los Altos Hills, CA 94022

Attn: Miki Carpenter, Community
Education Department
Foothill Presbyterian Hospital
427 W. Carroll Ave.
Glendora, CA 91741

Attn: Sheila McClure, President
Glendora Chamber of Commerce
224 N. Glendora Ave.
Glendora, CA 91741

President
Glendora Community
Coordinating Council
P.O. Box 693
Glendora, CA 91740

Attn: Randall K. Johnson
Glendora Housing Investors, LP
4299 Macarthur Blvd Ste 215
Newport Beach, CA 92660

President
Glendora Lions Club
P.O. Box 311
Glendora, CA 91740

Attn: Yulanda Davis-Quarrie, CEO
Citrus Valley Health Foundation
1115 S. Sunset Ave.
West Covina, CA 91790

Program Director
Crowther Teen & Family Center
241 W. Dawson Ave.
Glendora, CA 91740

Attn: Steve Slakey
EYE-DAS
P.O. Box 1422
Glendora, CA 91740

Attn: Robert Gutzwiller
Foothill Christian School
901 South Grand Ave.
Glendora, CA 91740

Program Director
Foothill Presbyterian Hospital
250 South Grand Ave.
Glendora, CA 91741

Attn: Mechell Knight
General Federation of Women's Club -
Charter Oak Women's Club
316 W. Alostia Ave.
Glendora, CA 91741

Attn: Rev. Susan Scranton
Glendora Church Homes, Inc.
555 E. Mountain View Ave.
Glendora, CA 91741

Management
Glendora Gardens
340 North Wabash Ave.
Glendora, CA 91741

President
Glendora Kiwaniannes
P.O. Box 1953
Glendora, CA 91741

Attn: Linda Jaramillo
Glendora Newcomers Club
1642 Larch Place
La Verne, CA 91751

President
Glendora Preservation Foundation
P.O. Box 394
Glendora, CA 91740

Attn: Mary Pat Dodson
Glendora Public Library
140 South Glendora Ave.
Glendora, CA 91741

Attn: Gene Morrill
Glendora Rotary Club
P.O. Box 776
Glendora, CA 91740

Management
Glendora Senior Housing
340 N. Wabash Ave.
Glendora, CA 91741

President
Glendora Sister City Association
P.O. Box 1821
Glendora, CA 0

Attn: Melissa Germann
Glendora Unified School District
500 North Loraine Ave.
Glendora, CA 91741

Attn: Rev. Dr. Hillary Chrisley
Glendora United Methodist Church
201 East Bennett Ave.
Glendora, CA 91741

Director of Services
Glendora Welfare Association
114 N. Glendora Ave., Suite 218
Glendora, CA 91741

Attn: Carolyn Cunningham
Glendora Women's Club
P.O. Box 672
Glendora, CA 91740

Attn: Andrew Hanna, President & CEO
Global Premier Development Inc.
2010 Main St # 1250
Irvine, CA 92614

Management
Heritage Oaks Senior Oaks
1000 S Glendora Ave.
Glendora, CA 91740

Attn: Tamara Carter
Hope Resource Group
415 W. Foothill Blvd., #208
Claremont, CA 91711

Program Director
House of Ruth
599 N. Main St.
Pomona, CA 91768

Program Director
Inland Valley Hope Partners - Our
House Shelter
1753 N. Park
Pomona, CA 91768

Management
Iris Gardens
341 N. Rockvale Ave.
Azusa, CA 91702

President
Jamboree Housing Corporation
17701 Cowan Ave.
Irvine, CA 92614

Program Director
La Casita Residential Care
700 N. Grand Ave.
Glendora, CA 91741

Program Director
La Fetra Center for Seniors
333 E. Foothill Blvd.
Glendora, CA 91741

President
Landview Properties Inc.
903 E. Rte 66, Suite B
Glendora, CA 91740

President
Ludwick Family/Arsalyn Foundation
P.O. Box 1796
Glendora, CA 91740

Attn: David Diaz
New Beginning Community Ministries
13020 Francisquito Ave., Suite 10
Baldwin Park, CA 91706

Attn: Nicoletta Wingert
Nurses for Christ
P.O. Box 1028
Glendora, CA 91740

President
One Stop Property Management, Inc.
642 S. Barranca Ave.
Glendora, CA 91741

Attn: Dr. Mickie Allen
Orfalea Family Children's Center at
Citrus College
1000 West Foothill Blvd.
Glendora, CA 91741

President
Podley Properties Glendora
755 E. Rte 66
Glendora, CA 91740

Attn: Julie Boynton
Project Sister Family Services
363 S. Park Ave., Suite 303
Pomona, CA 91766

Management
Prototypes-Pomona Apartments
837 E. Arrow Hwy
Pomona, CA 91767

Attn: Mark Peterson
Re/Max Masters Realty
1340 E. Rte 66 #110
Glendora, CA 91740

President
Regent Property Management
730 N. Azusa Ave
Azusa, CA 91702

Program Director
Salvation Army
1444 N. Citrus Ave.
Covina, CA 91722

Attn: Amanda Gonzales
San Gabriel Children's Center
2200 E. Route 66, Suite 100
Glendora, CA 91740

Program Director
San Gabriel Valley Habitat for Humanity
400 S. Irwindale Ave.
Azusa, CA 91702

Program Director
Service Center for Independent Life
107 S. Spring St.
Claremont, CA 91711

Director
Southland Properties
Real Estate Services, Inc.
211 N. Glendora Ave
Glendora, CA 91741

Attn: Michael L. Fowler, President
SunAmerica Affordable
Housing Partners, Inc.
1999 Avenue of the Stars, 36th floor
Los Angeles, CA 90067

Director
Tri-City Mental Health Center
2008 N. Garey Ave.
Pomona, CA 91767

President
Watkins Management
1100 E. Rte 66
Glendora, CA 91740

Home Mortgage Consultant
Wells Fargo Home Mortgage
16163 Whittier Blvd.
Whittier, CA 90603

Attn: Ana Interiano, Interim Chief
Executive Officer
YWCA – Wings Program
943 North Grand Ave.
Covina, CA 91724

Attn: Jan Cicco,
Regional Homeless Coordinator
San Gabriel Valley Council of Governments
1000 S. Fremont Avenue, Suite 10-210,
Unit #42 Alhambra, CA 91803

Program Director
San Gabriel Valley YMCA
1225 E. Cameron St.
West Covina, CA 91790

Attn: Carol Lane, CEO
Services for Independent Living
109 South Spring St., P.O. Box 1296
Claremont, CA 91711

Pastor
St. Dorothy's Church
241 South Valley Center
Glendora, CA 91741

Attn: Tom Provencio, Vice President
TELACU
5400 E. Olympic Blvd, Third Floor
Los Angeles, CA 90022

Management
United Way Greater Los Angeles
1150 S. Olive Street, Suite T500
Los Angeles, CA 90015

Home Mortgage Consultant
Wells Fargo Home Mortgage
175 E. Badillo St 2nd Floor
Covina, CA 91723

Rebecca Carreon- Mortgage Consultant
Wells Fargo Home Mortgage
17800 Castleton Street Suite 450
City of Industry, CA 91748

Meals on Wheels
YWCA San Gabriel Valley
943 North Grand Avenue
Covina, CA 91724

Attn: Anne Croissant, Director
San Gabriel Mountains Regional
Conservancy
P.O. Box 963
Glendora, CA 91740

Director
Safety Center Incorporated Locations
109 South Spring Street
Claremont, CA 91711

Attn: Phil Huisman
Shepherd's Pantry
657 E. Arrow Hwy. #J
Glendora, CA 91740

Principal
St. Lucy's Priory High School
655 West Sierra Madre Avenue
Glendora, CA. 91741

Attn: Joseph Colletti, Ph.D.
The Institute for Urban Research &
Development
1719 Monte Vista St.
Pasadena, CA 91106

Management
Villa San Dimas
249 S. Acacia St
San Dimas, CA 91773

Home Mortgage Consultant
Wells Fargo Home Mortgage
675 Placentia Ave. Suite 325
Brea, CA 92821

Director
Women's and Children's Crisis Shelter, Inc.
13203 Hadley St. #103
Whittier, CA 90601

C. Sign-In Sheets

City of Glendora Community Workshop for CP/AI		February 21, 2018	
Name	Resident (Y or N)	Organization	Email Address
Jessica Pedroza	Y	Buckingham Property Management	elwood@buckinghampm.com
Natasha James	N	Buckingham Property Management	njames@buckinghampm.com
Kathleen Sawar	N	City of Glendora	

D. Community Workshop Meeting Notes

Attendees of the Community Workshop provided the following comments:

- There is a need for affordable housing. Waiting list for publicly assisted affordable housing is long.
- Community services are needed to assist low income households, homeless, persons with disabilities, particularly those with mental health issues, and victims of domestic violence. A resource guide would be useful for making referrals for services.
- Fair housing outreach and education is an important service.

E. Public Hearings

The City conducted two public hearings to receive public comments on the AI on March 13 and April 24, 2018. No comments were received.

F. Housing and Community Development Needs Survey



CITY OF GLENDORA – RESIDENT SURVEY

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

The City of Glendora receives approximately \$250,000 from the U.S. Department of Housing and Urban Development (HUD) in Community Development Block Grant (CDBG) funds each year for housing and community development projects. The City wants you to have a voice in how the City invests this money. Please assist us by filling out this survey.

1. Please enter your ZIP Code: _____

TELL US SOMETHING ABOUT YOURSELF (Questions #2-8 are optional)

Please select a response:						
2. Ethnic Categories:	<input type="checkbox"/> Hispanic or Latino			<input type="checkbox"/> Not-Hispanic or Latino		
3. Racial Categories:	<input type="checkbox"/> American Indian or Alaska Native	<input type="checkbox"/> Asian		<input type="checkbox"/> Black or African American		
	<input type="checkbox"/> Native Hawaiian or Other Pacific Islander	<input type="checkbox"/> White		<input type="checkbox"/> Other _____		
4. Do you rent or own your home?	<input type="checkbox"/> Rent			<input type="checkbox"/> Own		
5. Do you currently reside in a subsidized housing unit?	<input type="checkbox"/> YES			<input type="checkbox"/> NO		
6. Age:	<input type="checkbox"/> 18-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54	<input type="checkbox"/> 55-64	<input type="checkbox"/> 65+
7. Do you have a disability?	<input type="checkbox"/> YES			<input type="checkbox"/> NO		
8. Do you have children under the age of 18 years old in your home?	<input type="checkbox"/> YES			<input type="checkbox"/> NO		

HOUSING AND COMMUNITY DEVELOPMENT NEEDS SURVEY

Rank the following in order of importance to you. (1 = highest, 5 = lowest)					
Note: Please assign each topic a priority level (Each number should be used only once in this segment – e.g. community facilities - #1, highest)					
	1	2	3	4	5
Community Facilities (e.g. community centers, parks and recreation facilities, etc.)	<input type="checkbox"/>				
Public Services (e.g. fair housing, graffiti removal, legal services, etc.)	<input type="checkbox"/>				
Public Infrastructure (e.g. sidewalk improvements, street & alley improvements, accessibility improvements, etc.)	<input type="checkbox"/>				
Housing (e.g. code enforcement, homeowner's rehabilitation financial assistance, etc.)	<input type="checkbox"/>				
Business & Jobs (e.g. programs to attract/retain business, technical assistance, etc.)	<input type="checkbox"/>				

FAIR HOUSING SURVEY

Federal and State Fair Housing laws prohibit discrimination in all aspects of housing, including home sales, rentals, housing policies and financing. Each person 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.

9. Have you personally ever experienced discrimination in housing? YES NO
- a) 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): _____
- b) How were you discriminated against? _____
- c) Have you reported the incident? YES NO
- i. If NO – Why?
- Don't Know Where to Report Don't Believe it Makes Any Difference
 Afraid of Retaliation Too Much Trouble
 Other _____
- ii. If YES, how did you report the incident?

10. 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 Glendora
 Other _____
11. Have you ever seen or heard a Fair Housing Public Service Announcement (PSA) on TV/ Radio/ Online/ Flyer? YES NO
12. Please provide any comment regarding community needs or fair housing not discussed above:

THANK YOU!

Please return surveys to: Katie Savant, Community Development Department, City of Glendora,
116 E. Foothill Boulevard, Glendora, CA 91741
This Survey is also available online at: <https://www.surveymonkey.com/r/GlendoraCP>



CUIDAD DE GLENDORA – ENCUESTA PARA RESIDENTES
CUALES SON LAS NECESIDADES DE VIVIENDA Y DESARROLLO
COMUNITARIO EN SU VECINDARIO?

La Ciudad de Glendora anualmente recibe aproximadamente \$250,000 del Departamento de Vivienda y Desarrollo Urbano (HUD, por sus siglas en inglés) en fondos del Community Development Block Grant (CDBG) para la vivienda y proyectos de desarrollo para la comunidad. La Ciudad desea saber su opinión sobre como la Ciudad puede invertir este dinero. Por favor ayúdenos a llenar esta encuesta.

1. Por favor anote su código postal: _____

DIGANOS ALSO SOBRE USTED (Las preguntas #2-8 son opcionales)

Seleccione la respuesta apropiada:						
2. Categorías étnicas:	<input type="checkbox"/> Hispano o latino		<input type="checkbox"/> No hispano o latino			
3. Categorías raciales:	<input type="checkbox"/> Indio americano o Nativo de Alaska	<input type="checkbox"/> Asiático	<input type="checkbox"/> Negro o Afroamericano			
	<input type="checkbox"/> Nativo de Hawái u otra Isla del Pacifico	<input type="checkbox"/> Blanco	<input type="checkbox"/> Otro _____			
4. ¿Paga renta o es dueño de vivienda?	<input type="checkbox"/> Renta		<input type="checkbox"/> Dueño			
5. ¿Reside en una unidad de vivienda de asistencia pública?	<input type="checkbox"/> SI		<input type="checkbox"/> NO			
6. Edad:	<input type="checkbox"/> 18-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54	<input type="checkbox"/> 55-64	<input type="checkbox"/> 65+
7. ¿Tiene alguna discapacidad?	<input type="checkbox"/> SI		<input type="checkbox"/> NO			
8. ¿Tiene hijos menores de 18 años?	<input type="checkbox"/> SI		<input type="checkbox"/> NO			

ENCUESTA DE NECESIDADES DE VIVIENDAS Y DESARROLLO DE LA COMUNIDAD

Seleccione lo siguiente en su orden de preferencia. (1 = el más alto, 5 = más bajo)					
Nota: Por favor asigne a cada tema una prioridad (Cada número debe ser usado solo <u>una</u> vez en este segmento — p. ej. instalaciones comunitarias - #1, el más alto)					
	1	2	3	4	5
Instalaciones Comunitarias (p. ej. centros comunitarios, instalaciones de parques y recreación, etc.)	<input type="checkbox"/>				
Servicios Públicos (p. ej. vivienda justa, programas anti-grafiti, servicios legales etc.)	<input type="checkbox"/>				
Infraestructura Pública (p. ej. mejoramientos de: banquetas, calles y callejones, y de la accesibilidad para incapacitados etc.)	<input type="checkbox"/>				
Viviendas (p. ej. aplicación del código de leyes, rehabilitación de casas de familia, asistencia financiera, etc.)	<input type="checkbox"/>				
Negocios y trabajos (p. ej. programas para atraer/retener nuevos negocios, asistencia técnica, etc.)	<input type="checkbox"/>				

ENCUESTA SOBRE DISCRIMINACION DE VIVIENDA

Las leyes estatales y federales de vivienda justa prohíben la discriminación en todos los aspectos de vivienda incluso en las ventas y alquileres de viviendas, en las políticas de vivienda y en el financiamiento de viviendas. Todo residente tiene derecho a un acceso equitativo a las oportunidades de vivienda, independientemente de su raza, color, religión, género, origen nacional, discapacidad/condición médica, estado familiar, estado civil, edad, herencia ancestral, orientación sexual, identidad de género, expresión de género, fuente de ingreso o de cualquier otra razón arbitraria.

9. ¿Ha experimentado usted personalmente discriminación en materia de vivienda? SI NO
- a) ¿Por qué motivo cree usted que le discriminaron? *(Indique todas las opciones que correspondan)*
- Raza Color Religión Origen Nacional Edad
 - Genero Herencia ancestral Estado civil Orientación sexual
 - Estado familiar (por ejemplo, padre o madre soltera con hijos, familia con hijos)
 - Fuente de ingreso (por ejemplo, asistencia social, seguro por desempleo)
 - Discapacidad/condición médica (ya sea usted o alguien cercano a usted)
 - Otro (favor de explicar): _____
- b) ¿Cómo fue la discriminación? _____
- c) Si usted cree que ha sido discriminado, ¿reportó usted el incidente? SI NO
- i. Si respondió NO, ¿por qué?
 - No sabe dónde reportarlo No creo que haga diferencia alguna
 - Temo de represalias Demasiado problema
 - Otro _____
 - ii. Si respondió SÍ, ¿cómo reportó el incidente?

10. ¿Ha asistido alguna vez una instrucción sobre Vivienda Justa? SI NO
- a) Si respondió SI, ¿fue gratis o requirió pago? Gratis Requirió pago
- b) Si respondió SI, ¿dónde fue la instrucción? Casa Trabajo Ciudad de Glendora
- Otro _____
11. ¿Ha visto u oído un anuncio de servicio al público sobre el tema de Vivienda Justa en TV/radio/en el internet? SI NO
12. Por favor, proporcione cualquier comentario sobre las necesidades de la comunidad o la vivienda justa que no se discutió anteriormente:
- _____
- _____
- _____

GRACIAS!

Favor de enviar la encuesta a: Katie Savant, Community Development Department, City of Glendora, 116 E. Foothill Boulevard, Glendora, CA 91741
Encuesta también está disponible en: https://es.surveymonkey.com/r/GlendoraCP_SPANISH

G. Survey Results

TELL US SOMETHING ABOUT YOURSELF (Questions #2-8 are optional)
DIGANOS ALSO SOBRE USTED (Las preguntas #2-8 son opcionales)

1. Please enter your ZIP code: <i>Por favor anote su código postal</i>		
Answer Options	Response Percent	Response Count
	120	
	answered question	120
	skipped question	0
2. Ethnic Categories (select one) <i>Categorías étnicas (seleccione una opción)</i>		
Answer Options	Response Percent	Response Count
Hispanic or Latino <i>Hispano o latino</i>	24.0%	23
Not-Hispanic or Latino <i>No hispano o latino</i>	76.0%	73
	answered question	96
	skipped question	24
3. Racial Categories (select one or more) <i>Categorías raciales (seleccione una o más opciones)</i>		
Answer Options	Response Percent	Response Count
American Indian or Alaska Native <i>Indio Americano o Nativo de Alaska</i>	1.0%	1
Native Hawaiian or Other Pacific Islander <i>Nativo de Hawái u otra Isla del Pacífico</i>	1.0%	1
Asian <i>Asiático</i>	7.3%	7
White <i>Blanco</i>	82.3%	79
Black or African American <i>Negro o Afroamericano</i>	1.0%	1
Other (please specify)/ <i>Otro (especifique):</i>	7.3%	7
	answered question	92
	options selected	96
	skipped question	24
4. Do you rent or own your home? <i>¿Paga renta o es propietario de vivienda?</i>		
Answer Options	Response Percent	Response Count
Rent <i>Renta</i>	13.7%	14
Own <i>Dueño</i>	86.3%	88

<i>answered question</i>		102
<i>skipped question</i>		18
5. Do you currently reside in a subsidized housing unit? <i>¿Reside en una unidad de vivienda de asistencia pública?</i>		
Answer Options	Response Percent	Response Count
Si <i>Sí</i>	3.9%	4
No <i>No</i>	96.1%	98
<i>answered question</i>		102
<i>skipped question</i>		18
6. Age: <i>Edad:</i>		
Answer Options	Response Percent	Response Count
18-24	1.0%	1
25-34	14.3%	14
35-44	27.6%	27
45-54	25.5%	25
55-64	20.4%	20
65+	11.2%	11
<i>answered question</i>		98
<i>skipped question</i>		22
7. Do you have a disability? <i>¿Tiene alguna discapacidad? (elige una opción)</i>		
Answer Options	Response Percent	Response Count
Yes <i>Sí</i>	7.9%	8
No <i>No</i>	92.1%	93
<i>answered question</i>		101
<i>skipped question</i>		19
8. Do you have children under the age of 18 years old in your home? <i>¿Tiene hijos menores de 18 años? (elige una opción)</i>		
Answer Options	Response Percent	Response Count
Yes <i>Sí</i>	47.1%	48
No <i>No</i>	52.9%	54
<i>answered question</i>		102
<i>skipped question</i>		18

HOUSING AND COMMUNITY DEVELOPMENT NEEDS SURVEY
ENCUESTA DE NECESIDADES DE VIVIENDAS Y DESARROLLO DE LA COMUNIDAD

9. Rank the following in order of importance to you. (1 = highest, 5 = lowest) <i>Seleccione lo siguiente en su orden de preferencia. (1 = el más alto, 5 = más bajo)</i>							
Answer Options	1	2	3	4	5	Rating Average ¹	Response Count
Community Facilities/ <i>Instalaciones Comunitarias</i>	26	19	14	8	19	3.29	86
Public Services/ <i>Servicios Públicos</i>	13	22	23	13	15	3.06	86
Public Infrastructure/ <i>Infraestructura Pública</i>	25	22	20	12	7	3.53	86
Housing/ <i>Viviendas</i>	10	9	10	40	17	2.48	86
Business & Jobs/ <i>Negocios y trabajos</i>	12	14	19	13	28	2.64	86
<i>answered question</i>							86
<i>skipped question</i>							34

Note: "Rating Average" calculated so that **highest** score represents **highest** prioritization.

FAIR HOUSING SURVEY

ENCUESTA SOBRE DISCRIMINACION DE VIVIENDA

10. Have you personally ever experienced discrimination in housing? <i>¿Ha experimentado usted personalmente discriminación en materia de vivienda?</i>		
Answer Options	Response Percent	Response Count
Yes/Si	8.1%	7
No/No	91.9%	79
answered question		86
skipped question		34
a. On what basis do you believe you were discriminated against? (check all that apply) <i>¿Por qué motivo cree usted que le discriminaron? (Indique todas las opciones que correspondan)</i>		
Answer Options	Response Percent	Response Count
Race <i>Raza</i>	7.7%	1
Gender <i>Género</i>	7.7%	1
Color <i>Color</i>	0.0%	0
Ancestry <i>Herencia ancestral</i>	0.0%	0
Religion <i>Religión</i>	7.7%	1
Marital Status <i>Estado civil</i>	15.4%	2
National Origin <i>Origen nacional</i>	0.0%	0
Sexual Orientation <i>Orientación sexual</i>	7.7%	1
Age <i>Edad</i>	15.4%	2
Family Status (e.g. single-parent with children, family with children or expecting a child) <i>Estado familiar (por ejemplo, padre o madre soltero con hijos, familia con hijos)</i>	15.4%	2
Source of Income (e.g. welfare, unemployment insurance) <i>Fuente de ingreso (por ejemplo, asistencia social, seguro por desempleo)</i>	7.7%	1
Disability/Medical Conditions (either you or someone close to you) <i>Discapacidad/condición médica (ya sea usted o alguien cercano a usted)</i>	0.0%	0
Other (please explain) <i>Otro (favor de explicar):</i>	15.4%	2
answered question		6
options selected		13
skipped question		114
b. How were you discriminated against? <i>¿Cómo fue la discriminación?</i>		

Open-ended responses:	Response Percent	Response Count
<ul style="list-style-type: none"> Retaliation harassment ...I'm disabled denied parking..my Christian faith Given higher price than other applicants at the same time Denied repair funds from Al Alvarado because I wasn't Latina and he asked for a bribe Wouldn't give me help because I have a job Refusal to rent to single parent, multiple times By a realtor 	5.3%	6
answered question		6
skipped question		114
c. If you believe you have been discriminated against, have you reported the incident? Si usted cree que ha sido discriminado, ¿reportó usted el incidente?		
Answer Options	Response Percent	Response Count
Yes Sí	33.3%	2
No No	66.7%	4
answered question		6
skipped question		114
i. If NO – Why? Si respondió NO, ¿por qué?		
Answer Options	Response Percent	Response Count
Don't Know Where to Report No sabe dónde reportarlo	0.0%	0
Don't Believe it Makes Any Difference No cree que haga diferencia alguna	0.0%	0
Afraid of Retaliation Temor de represalias	25.0%	1
Too Much Trouble Demasiado problema	50.0%	2
Other (please specify)/ Otro (especifique)	25.0%	1
answered question		4
skipped question		116
ii. If YES, how did you report the incident? Si respondió SI, ¿cómo reportó el incidente?		
Open-ended responses:	Response Count	
<ul style="list-style-type: none"> the correct way so it doesn't continue Went to city hall. Spoke to Stan Wong and 3 other men. They chuckled and said it sounds like him 	1.7%	2
answered question		2
skipped question		118
11. Have you ever attended a Fair Housing Training? ¿Ha asistido alguna vez una instrucción sobre Vivienda Justa?		

Answer Options	Response Percent	Response Count
Yes/ Si	4.7%	4
No/ No	95.2%	80
answered question		84
skipped question		36
a. If YES, was it free or was there a fee? Si respondió SI, ¿fue gratuita o requirió pago?		
Answer Options	Response Percent	Response Count
Free/ Gratis	100.0%	4
Required a Fee/ Requirió pago	0.0%	0
answered question		4
skipped question		
b. If YES, where was the training? Si respondió SI, ¿dónde fue la instrucción?		
Answer Options	Response Percent	Response Count
Home/ Casa	0.0%	0
Work/ Trabajo	75.0%	3
City of Glendora/ Ciudad de Glendora	25.0%	1
Other (please specify)/ Otro (especifique)	0.0%	0
answered question		4
skipped question		116
12. Have you ever seen or heard a Fair Housing Public Service Announcement (PSA) on TV/Radio/Online/Flyer? ¿Ha visto u oído un anuncio de servicio al público sobre el tema de Vivienda Justa en TV/radio/en el internet/volantes?		
Answer Options	Response Percent	Response Count
Yes - Sí	28.6%	24
No - No	71.4%	60
answered question		84
skipped question		36
13. Please provide any comment regarding community needs or fair housing not discussed above: Por favor, proporcione cualquier comentario sobre las necesidades de la comunidad o la vivienda justa que no se discutió anteriormente:		
Open-ended responses:	Response Count	
<ul style="list-style-type: none"> City of Glendora is FAKE the city doesn't care about homeless low income people of color .The city of 	17.5%	21

<p>Glendora has standards they MUST live up to SO THE PLAY THE PART TO GET THE FUNDING WHICH THE FUNNY THING IS THERES NO HELP ONLY A BANDAIDE FIX ..</p> <ul style="list-style-type: none"> • Where can one read about these programs? • Need senior classes in aquatics exercise • Outreach is fine as is- focus funds on services • We do not need or want tenements. Adds to traffic, overcrowding, takes away from schools and ALL other services. • We need more exposure of community resources for the south side of Glendora. Make the neighborhood feel more inclusive in city wide events. Bring special events to the south side of Glendora. • more road & pothole repairs • our streets need repaving badly- especailly streets off of Gladstone. • Way too many new high density homes being built in Glendora. • Please stop section 8 housing. • We need more parks and more funding for schools • I am being taxed to death, so am I getting fair housing, no! • People need to live where they can afford to, no one is owed the city of their choice. I can't afford Malibu and no one else should be expected to pay my way. If you cannot afford to live in Glendora, you need to move somewhere else or change your finances. Stop spending or get a second job. • Lights in our parks and fields to have expanded use of them. • Glendora is a beautiful town and fair housing makes it so that anyone can enjoy it..unfortunately fair housing doesn't seem to happen in glendora...it's unfortunate that we can't provide beautiful housing in our safe neighborhoods for even those with less money can enjoy • The city needs to do a better job advertising purchase of new home properties for low income families to help diversify our community. • More handicap parking in the village. Accessible parking for community events. • We don't need it • "Fair housing" is crap. Our city is going to hell because the people who "need" fair housing and section 8 don't care because they earn nothing just take. • Stop approving huge buildings in town. • Too many businesses with not enough community around them attract crime and drive property values down. We need more people in our community that know and trust each other. Stop the mixed housing/commercial buildings and make homes! Make this a city to be envied again. The empty commercial buildings can be made into homes or condos. 		
	<i>answered question</i>	21
	<i>skipped question</i>	99

H. Proof of Public Notice

San Gabriel Valley Examiner
1160 Englewild Dr.
Glendora, CA 91741
626-852-3374

City of Glendora
Attn: City Clerk
116 E. Foothill Blvd.
Glendora, CA 91741

**PROOF OF PUBLICATION
(201 5.5 C.C.P.)**

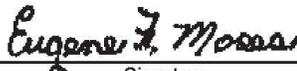
STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States and a resident of the county aforesaid. I am over the age of eighteen years, I am not a party to the above-entitled matter. I am the principal clerk of the Publisher of the San Gabriel Valley Examiner, an adjudicated newspaper of general circulation printed and published weekly in the City of Glendora, County of Los Angeles. The San Gabriel Valley Examiner has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of July 19, 1999, case Number KS 005341. The notice, of which the annexed is a true printed copy, has been published in each regular and entitled issue of said newspaper and not any supplement thereof on the following dates to wit:

March 1, 2018

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

Executed in the City of Glendora, Los Angeles County, California
On this 1st day of March 2018.



Signature

(PLEASE SEE PAGE 2 FOR AD COPY)

PAGE 1

NOTICE OF PUBLIC HEARING
GLENDDORA CITY COUNCIL

NOTICE IS HEREBY GIVEN that the Glendora City Council will hold a public hearing in the City Council Chamber of City Hall, 116 E. Foothill Boulevard, Glendora, California, on Tuesday, March 13, 2018 at 7:00 p.m. to receive and consider public input on needs and resources related to the Five-Year (2018-2023) Consolidated Plan, One-Year Action Plan for Fiscal Year 2018-2019, and the Analysis of Impediments (AI) to Fair Housing Choice.

PUBLIC HEARING MEETING LOCATION AND DATE

The City of Glendora is requesting public input on its Community Development Block Grant (CDBG) Program at 7:00 P.M. at its March 13, 2018 City Council meeting. The draft Consolidated Plan, Annual Action Plan, and Analysis of Impediments documents will be available on March 22, 2018 for a 30-day public review, ending April 23, 2018. A second public hearing will be held on April 24, 2018 to approve submittal of the Plans to the U.S. Department of Housing and Urban Development (HUD).

In compliance with the American with Disabilities Act, if you need special assistance to participate in the meeting, please contact the City of Glendora's City Clerk's Office at (626) 914-8210. Notification 48 hours prior to the March 13, 2018 City Council meeting will enable the City to make reasonable arrangements to ensure accessibility to the meeting.

BACKGROUND

Consolidated Plan: Every five years, the CDBG program requires that the City adopt a "Consolidated Plan," which establishes the goals and objectives of the City's CDBG program. During the development of this 2018-2023 Consolidated Plan, which forms the basis for establishing objectives and outcomes in the Strategic Plan and five (5) subsequent Annual Action Plans, the following priority needs and objectives were established:

1. **Infrastructure and Public Facilities:** Improve and expand infrastructure and public facilities that benefit low- and moderate-income neighborhoods and residents
2. **Economic and Human Development:** Provide for the economic development needs of low- and moderate- income persons and neighborhood target areas.
3. **Fair Housing:** Promote fair and equal housing choice for all persons
4. **Administration and Planning:** Provide for administration and planning activities to carry out actions that address identified needs in the Consolidated Plan.

These established Priority Needs form the basis for allocating investments geographically within the City during the next five-year period and are a result of various community outreach efforts and consultation meetings developed under the Citizen Participation process.

Annual Action Plan: The Annual Action Plan is part of the Five-Year Consolidated Plan and serves as the City's application for funding from HUD. The City of Glendora will receive an allocation of approximately \$245,502 of CDBG funds for FY 2018-2019. As the Federal Budget has not been approved at this time and the City must meet certain statutory deadlines in submitting its annual Action Plan and allowing for citizen participation, staff has developed this allocation amount based on last year's allocation. Once the official allocation for Glendora is released from HUD, staff will revise the budget as needed and present the final figures at the April 24, 2018 meeting for the adoption of both the Consolidated Plan and Annual Action Plan.

The CDBG funding may be allocated to the following types of eligible projects:

1. **Acquisition:** by purchase, long-term lease, and donation of real property for an eligible public purpose.
2. **Disposition:** of real property acquired under the CDBG Program.
3. **Construction and Rehabilitation:** of certain publicly owned facilities, such as (a) senior citizen centers; (b) parks and playgrounds; (c) community centers; (d) fire protection facilities and equipment; (e) sidewalks and street improvements; (f) water and sewer systems.
4. **Rehabilitation of publicly and privately owned housing:** for low-and moderate-income households.
5. **Public Services:** which are new or expanding, and directed toward meeting employment, crime prevention, child care, drug abuse prevention, homeless assistance, or other community service needs.
6. **Removal of Architectural Barriers:** that restricts the mobility and accessibility of elderly or handicapped persons to publicly owned and privately owned buildings, facilities, and improvements.
7. **Special Economic Development Activities:** that provide grants, loan guarantees and other forms of necessary or appropriate support to private for-profit businesses to provide increasing employment opportunities and other public benefits.

While funding amounts are somewhat flexible, there are statutory limitations that restrict the amount of funding for Planning and Administration costs to not more than 20 percent of the annual grant allocation and limit public services to 15 percent of the annual grant allocation. The final allocations will be determined once HUD releases their budget.

Based on the limited amount of resources available to the City, statutory restrictions, and the Priority Needs established, staff recommendations for the FY 2018-2019 CDBG One-Year Annual Action Plan are as follows:

ACTIVITY	AMOUNT
General CDBG Administration	\$34,100
Fair Housing	\$15,000
	Sub-Total \$49,100
Public Improvements	\$6,500
Street Improvement Project	\$164,502
Business Assistance Program	\$25,000
	Sub-Total \$196,002

Total CDBG Allocation for Fiscal Year 2018-2019 **\$245,502**

Analysis of Impediments (AI) to Fair Housing Choice: The AI presents a demographic profile of Glendora, assesses the extent of housing needs of its residents, and evaluates the availability of a range of housing choices for all. 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. The AI includes the following key sections:

- **Community Outreach:** - Discusses the outreach efforts undertaken for the development of the AI.
- **Community Profile:** - Presents the demographic, housing, and income characteristics in the City of Glendora.
- **Lending Practices:** - Assesses the access to financing for different groups.
- **Public Policies:** - Analyzes various public policies and actions that may impede fair housing within the City.
- **Current Fair Housing Profile:** - Evaluates existing public and private programs, services, practices, and activities that assist in providing fair housing in the City.
- **Progress Since Previous AI:** - Assesses the progress the City has made since the preparation of the previous AI.
- **Fair Housing Action Plan:** - Summarizes the findings regarding fair housing issues in Glendora and provides recommendations for furthering fair housing practices.

PUBLIC REVIEW AND COMMENT PERIOD

All interested persons are invited to the Public Hearing to comment on the City's CDBG program, the Consolidated Plan priorities, Action Plan, and AI. In addition, written comments may be submitted to the City prior to the public hearing and during the 30-day public comment period.

Comments from the public hearing and those submitted to staff during the comment period will be addressed in the final version of the Plans submitted to the U.S. Department of Housing and Urban Development. Comments and questions regarding the Plans can be addressed to:

Jeff Kugel, Director of Planning
City of Glendora
116 E. Foothill Boulevard
Glendora, CA 91741
(626) 914-8210

All interested parties are invited to attend said hearing and express their views on this matter. Should you be unable to attend the public hearing, your comments must be made in writing and delivered to the City Clerk prior to the scheduled hearing date. Related documents are on file for public inspection at the Planning Department and Office of the City Clerk, 116 E. Foothill Boulevard Glendora, California, between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday, exclusive of holidays. City staff can be contacted at (626) 914-8210.

Further information on the Consolidated Plan, Action Plan, and AI may be obtained or viewed at the following locations commencing on March 22, 2018:

1. **OFFICE OF THE CITY CLERK:**
Glendora City Hall
116 E. Foothill Boulevard
Glendora, CA 91741(626) 914-8210
2. **COMMUNITY/OTHER CITY FACILITIES:**
• Planning Department, 116 E. Foothill Boulevard
• Glendora Library, 140 South Glendora Avenue
• La Petra Senior Center, 333 East Foothill Boulevard

If you challenge this action (s) in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Council at, or prior to, the public hearing.

Kathleen R. Sessman, City Clerk

CERTIFICATION

I, Kathleen R. Sessman, City Clerk of the City of Glendora, hereby certify that I posted a copy of this Notice on the bulletin board outside the City Hall Council Chamber, 116 E. Foothill Boulevard on March 1, 2018.

Kathleen R. Sessman, City Clerk

Publish in the San Gabriel Valley Examiner on March 1, 2018. #GC01

San Gabriel Valley Examiner
1160 Englewild Dr.
Glendora, CA 91741
626-852-3374

City of Glendora
Attn: City Clerk
116 E. Foothill Blvd.
Glendora, CA 91741

**PROOF OF PUBLICATION
(201 5.5 C.C.P.)**

STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States and a resident of the county aforesaid. I am over the age of eighteen years, I am not a party to the above-entitled matter. I am the principal clerk of the Publisher of the San Gabriel Valley Examiner, an adjudicated newspaper of general circulation printed and published weekly in the City of Glendora, County of Los Angeles. The San Gabriel Valley Examiner has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of July 19, 1999, case Number KS 005341. The notice, of which the annexed is a true printed copy, has been published in each regular and entitled issue of said newspaper and not any supplement thereof on the following dates to wit:

April 12, 2018

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

Executed in the City of Glendora, Los Angeles County, California
On this 12th day of April, 2018.



Signature

(PLEASE SEE PAGE 2 FOR AD COPY)

PAGE 1



NOTICE OF PUBLIC HEARING
GLENDRORA CITY COUNCIL

NOTICE IS HEREBY GIVEN that the Glendora City Council will hold a public hearing in the City Council Chambers of City Hall, 116 E. Foothill Boulevard, Glendora, California, on Tuesday, April 24, 2018 at 7:00 p.m. to receive and consider public input on the Five-Year (2018-2023) Consolidated Plan, One-Year Action Plan for Fiscal Year 2018-2019, and the Analysis of Impediments (AI) to Fair Housing Choice.

PUBLIC HEARING MEETING LOCATION AND DATE

The City of Glendora is requesting public input on its Community Development Block Grant (CDBG) Program at 7:00 P.M., at its April 24, 2018 City Council meeting. The draft Consolidated Plan, Annual Action Plan, and Analysis of Impediments documents are available between March 22, 2018 and April 23, 2018 for a 30-day review.

In compliance with the American with Disabilities Act, if you need special assistance to participate in the meeting, please contact the City of Glendora's City Clerk's Office at (626) 914-8210. Notification 48 hours prior to the April 24, 2018 City Council meeting will enable the City to make reasonable arrangements to ensure accessibility to the meeting.

BACKGROUND

Consolidated Plan: Every five years, the CDBG program requires that the City adopt a 'Consolidated Plan,' which establishes the goals and objectives of the City's CDBG program. During the development of this 2018-2023 Consolidated Plan, which forms the basis for establishing objectives and outcomes in the Strategic Plan and five (5) subsequent Annual Action Plans, the following priority needs and objectives were established:

1. **Infrastructure and Public Facilities:** Improve and expand infrastructure and public facilities that benefit low and moderate income neighborhoods and residents.
2. **Economic and Human Development:** Provide for the economic development needs of low and moderate income persons and neighborhood target areas.
3. **Fair Housing:** Promote fair and equal housing choice for all persons.
4. **Administration and Planning:** Provide for administration and planning activities to carry out actions that address identified needs in the Consolidated Plan.

These established Priority Needs form the basis for allocating investments geographically within the City during the next five-year period and are a result of various community outreach efforts and consultation meetings developed under the Citizen Participation process.

Annual Action Plan: The Annual Action Plan is part of the Five-Year Consolidated Plan and serves as the City's application for funding from HUD. The City of Glendora anticipates an allocation of \$245,502 of CDBG funds for FY 2018-2019. As the Federal Budget has not been approved at this time and the City must meet certain statutory deadlines in submitting its annual Action Plan and allowing for citizen participation, staff has developed this allocation amount based on last year's allocation as follows:

ACTIVITY	AMOUNT
General CDBG Administration	\$34,100
Fair Housing	\$15,000
	Sub-Total \$49,100
Public Improvements	\$6,500
Street Improvement Project	\$164,000
Business Assistance Program	\$25,000
	Sub-Total \$195,500
Total CDBG Allocation for Fiscal Year 2018-2019	\$245,502

Final Funding Allocation and Adjustments: As HUD announcement of final allocation may occur after the April 24, 2018 public hearing, the City recommends the following method of adjustments to the budget once the final allocation is announced:

- Fair Housing \$15,000 (no adjustment)
- General Administration Adjust to 20% of allocation inclusive of \$15,000 for Fair Housing
- Public Improvements (Library ADA Signage) \$6,500 (no adjustment)
- Business Assistance Program \$25,000 (no adjustment)
- Street Improvement Project Adjust to balance of allocation

Analysis of Impediments (AI) to Fair Housing Choice: The AI presents a demographic profile of Glendora, assesses the extent of housing needs of its residents, and evaluates the availability of a range of housing choices for all. Below is a brief summary of findings:

- **Fair Housing Complaints:** The incidents of discrimination complaints have been limited in recent years; no complaints were found to have evidence to sustain the allegations in the last three years. Disability was identified as the most frequent basis of fair housing complaints filed with HHC, the State Department of Fair Employment and Housing (DFEH), and with HUD.
- **Outreach and Education:** The number of fair housing complaints has continued to decline over the years, a sign of improved awareness.
- **Lending Practices:** Discrepancies in lending patterns among various racial/ethnic groups have narrowed over the last few years. However, the incidence of subprime lending has increased for White, Hispanic, and Asian applicants.
- **Real Estate Advertisements:** For-sale and for-rent listings were reviewed for discriminatory languages. Both types of listings show strong preferences for families.

These findings suggest that continued outreach and education would ensure residents and housing providers are aware of their fair housing rights and responsibilities.

PUBLIC REVIEW AND COMMENT PERIOD

All interested persons are invited to the Public Hearing to comment on the City's CDBG program, the Consolidated Plan, Action Plan, and AI. In addition, written comments may be submitted to the City prior to the public hearing and during the 30-day public comment period.

Comments from the public hearing and those submitted to staff during the comment period will be addressed in the final version of the Plans submitted to the U.S. Department of Housing and Urban Development. Comments and questions regarding the Plans can be addressed to:

Jeff Kugel, Director of Planning
City of Glendora
116 E. Foothill Boulevard
Glendora, CA 91741
(626) 914-8215

All interested parties are invited to attend said hearing and express their views on this matter. Should you be unable to attend the public hearing, your comments must be made in writing and delivered to the City Clerk prior to the scheduled hearing date. Related documents are on file for public inspection at the Planning Department and Office of the City Clerk, 116 E. Foothill Boulevard, Glendora, California, between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, exclusive of holidays. City staff can be contacted at (626) 914-8244.

Further information on the Consolidated Plan, Action Plan, and AI may be obtained or viewed at the following locations commencing on March 22, 2018:

- | | |
|--|---|
| 1. OFFICE OF THE CITY CLERK:
Glendora City Hall
116 E. Foothill Boulevard
Glendora, CA 91741
(626) 914-8210 | 2. COMMUNITY/OTHER CITY FACILITIES:
• Planning Department- 116 E. Foothill Boulevard
• Glendora Library- 140 South Glendora Avenue
• La Feta Senior Center- 333 East Foothill Boulevard
(626) 914-8210 |
|--|---|

If you challenge this action (s) in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Council at, or prior to, the public hearing.

Kathleen R. Sessman, MMC
City Clerk

Publish in the San Gabriel Valley Examiner on April 12, 2018. #GD06