Analysis of Impediments to Fair Housing Choice

City of Vancouver, Washington
Analysis of Impediments to Fair Housing Choice

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EXECUTIVE SUMMARY:
City of Vancouver Analysis of Impediments to Fair Housing Choice

This document is the 2011 Analysis of Impediments to Fair Housing Choice (AI) for the City of Vancouver, Washington. This document was approved by Vancouver City Council at a scheduled public hearing held on September 17, 2012.

Analysis of Impediments Background

An Analysis of Impediments to Fair Housing Choice, or AI, is a U.S. Department of Housing & Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sector. The AI is required for the City of Vancouver to receive federal housing and Community Development Block Grant funding.

The AI involves:

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

According to HUD, impediments to fair housing choice are:

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

HUD guidance. HUD has regulatory authority for enforcing the completion of AIs through the Consolidated Plan. The Consolidated Plan regulations (24 CFR 91) require each state and local government to submit a certification that it is affirmatively furthering fair housing. According to HUD, this means that the government will 1) conduct an analysis of impediments to fair housing choice; 2) take appropriate actions to overcome the effects of impediments identified through that analysis; and 3) maintain records reflecting the analysis and actions.

HUD has recently released brief guidance to communities about the department’s expectations of AIs. In this guidance, HUD clarifies that “affordable housing, in and of
itself, is not an impediment to fair housing unless it creates an impediment to housing choice because of membership in a protected class.”

HUD further defines fair housing choice as “the ability of persons of similar incomes to have available to them the same housing choices regardless of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but operate to deny or adversely affect the provisions of housing to persons (in any particular protected class) may constitute such impediments.”

This AI was contracted and prepared by BBC Research & Consulting (BBC) of Denver. BBC is an economic research and consulting firm with a specialty in housing studies, including fair housing.

Fair Housing Acts

Federal Fair Housing Act. The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.

HUD has the primary authority for enforcing the Fair Housing Act. HUD investigates the complaints it receives and determines if there is a “reasonable cause” to believe that discrimination occurred. If reasonable cause is established, HUD brings the complaint before an Administrative Law Judge. Parties to the action can also elect to have the trial held in a federal court (in which case the Department of Justice brings the claim on behalf of the plaintiff).

Washington Anti-Discrimination Law. The State of Washington’s fair housing law—the Washington Law Against Discrimination, Chapter 49.60 of the Revised Code of Washington (RCW)—offers additional protections to the Federal Fair Housing Act. These additional protections include: marital status, sexual orientation, gender identity and veteran’s status.

The Washington State Human Rights Commission enforces the state’s fair housing laws and has the authority to receive, investigate and issue findings on complaints. According to the Commission’s website (http://www.hum.wa.gov/index.html), the

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2 This is a very general description of the Fair Housing Act and the actions and properties covered by the Act. For more detailed information on the Fair Housing Act, please see the full text, which can be found on the U.S. Department of Justice’s website, www.usdoj.gov/crt/housing/title8.htm.

The role of the commission is that of “neutral fact-finder. [The Commission] gather[s] facts about the situation and then determine[s] whether there is cause to believe that discrimination occurred.”

**Vancouver Fair Housing Practices.** The City of Vancouver has deferred to the fair housing practices regulation of superseding state and federal regulations. Since the 1970’s, any requests or questions regarding potential fair housing issues are routinely referred directly to the State or Federal fair housing enforcement agencies.

The City of Vancouver Municipal Code includes a dormant 1968 ordinance (Vancouver Municipal Code Chapter 8.44) titled Fair Housing Practices. The ordinance does not reflect the updated state and federal protections provided for gender, familial status, disability and (for state law) marital status, sexual orientation, and veteran’s status. In light of the availability of greater protections under state and federal law, and the expertise and enforcement resources of state and federal fair housing agencies, the City will continue to refer potential fair housing issues to those agencies.

**Clark County Fair Housing.** Clark County’s code, Section 2.35 Fair Housing, states that “It is the policy of Clark County, within lawful limitations, to promote and maintain fair housing throughout Clark County.” To this end, the code goes on to state that the County “endorses the provisions of the Federal Fair Housing Act” and shall support through all lawful means the administration of said Fair Housing Act in Clark County, and shall fully cooperate in the investigation or prosecution of any alleged violations thereof.

**Data Collection.** The data collected and analyzed for this section were primarily gathered from the following sources: the 2000 U.S. Census for historical context; 2010 American Community Survey (ACS) for current estimates; 2010 Claritas, a provider of commercial data estimates, for census tract level estimates; and 2010 census data where available.

**Methodology**

BBC’s approach to the Vancouver AI was based on the methodologies recommended in HUD’s *Fair Housing Planning Guide, Vol. I*, our experience conducting AIs for other cities, and the workscope proposed for the study in response to the region’s request for proposals. The workscope consisted of the following:

**Public participation.** The public input portion of the AI included the following elements:

- A resident survey distributed online and on-paper—64 residents responded. The survey was available online and on paper and was promoted by City staff and stakeholders.

- An online stakeholder survey promoted by City staff—42 housing and social service professionals responded.

**Zoning, land use and housing policy review.** BBC reviewed City zoning, land use and planning and housing policies, including those of the local housing authority, for any potential barriers to fair housing and fair housing concerns.
Analysis of demographic, housing and lending data. In this task, data on mortgage lending approvals, subprime mortgages (from Home Mortgage Disclosure Act or HMDA data), recent legal cases and fair housing complaints were analyzed to detect potential discriminatory patterns. BBC also examined potential areas of racial, ethnic and low income household concentrations, as well as concentrations of persons with disabilities and female-headed households.

Identification of impediments. In this task, we compiled the fair housing concerns identified through public participation, data analysis and review of City policies into impediments to fair housing choice.

Actions to address past and current impediments. In this final task, BBC developed a recommended Fair Housing Action Plan (FHAP) for the City to use to address identified fair housing barriers.

Geographic area. This study covers the City of Vancouver. A separate AI was completed for Clark County. The maps included in this study present the data by Census block group. A map of the City and its neighborhoods appears on the next page as in Figure ES-1.
Figure ES-1 Vancouver Neighborhoods

Source: City of Vancouver.
AI Findings

There is much good news about the state of fair housing in the City of Vancouver:

**Solid policies and practices.** The City of Vancouver has many policies and practices in place to mitigate fair housing barriers. The City’s recent (2011-2030) Comprehensive Plan includes progressive goals to ensuring balanced housing opportunities for all types of residents. The Vancouver Housing Authority’s (VHA) policies and practices are easy to understand and fair. In particular, the VHA offers fair housing protections that exceed those of the Federal Fair Housing Act.

**Empowered residents.** According to the survey conducted for this AI, Vancouver residents feel empowered to find solutions when faced with housing discrimination: 64 percent of the residents surveyed for this AI said they would “File a complaint” if they experienced housing discrimination.

This is a very positive finding. In BBC’s experience, in most cities residents say they would “Do nothing” if faced with housing discrimination. Vancouver residents are clearly motivated to address fair housing violations.

**Few concentrated areas.** An analysis of racial and ethnic concentrations found very few Census tracts in the City with higher than citywide average proportions of minorities. The dissimilarity index—a measure of the “evenness” of the geographic distribution of two different population groups—in Vancouver is very minimal. The index ranges from 0 to 1, with a value of 1 representing full concentration. Vancouver’s dissimilarity index ranges from .12 (White v. Non-White comparison) to .25 (White v. Asian comparison).

**Low volume of complaints and legal cases.** Since January 2006, a total of 59 complaints were filed with HUD by residents in Vancouver. The complaints were largely filed on the basis of disability (39% of all complaints) and race discrimination (29%). About half of the complaints were found to have no reasonable cause; 20 percent of the complaints were resolved through conciliation agreement or settlement.

There was one fair housing legal case occurring in southwestern Washington in the past five years; none occurred in Vancouver.

It should be noted that in some cities, a low volume of complaints and legal cases can be indicative of limited resources for residents to address fair housing concerns. Given the number of fair housing organizations accessible to Vancouver residents and, as discussed above, residents’ intent to “do something” when faced with housing discrimination, the small number of complaints and fair housing legal cases in Vancouver is more likely a positive trend.
Fair Housing Impediments

Despite all of the good news about fair housing in Vancouver, there are opportunities for the City to improve fair housing conditions. The research conducted for this study found the following impediments to fair housing choice:

Housing has become less affordable and deeply subsidized rentals are scarce. Between 2000 and 2010, the buying and renting power of Vancouver residents declined.

Specifically, the median contract rent for apartments in the City was $820 per month in 2009. This is a 22 percent increase from the median rent in 2000 of $671. To afford the increase in the median contract rent, renters would need to earn $5,960 more per year. Instead, renter income increased by just $1,400 between 2000 and 2009.

The median-priced home in 2000 cost $70,000 more in 2010. To afford this increase, homeowners would need to earn about $25,000 more per year. Homeowner income rose by less than half of what was needed to keep up with housing value increases.

In addition, the waitlist for some public housing development and, in particular, Housing Choice (Section 8) vouchers is very long. Indeed, the housing authority is currently providing vouchers to residents who have been on the waitlist since 2004.

Stakeholders surveyed for this study identified the income levels of minority and female-headed households as the top fair housing barrier in the region, which is linked to lack of affordable housing. Residents also rated their low incomes and, secondly, lack of affordable housing to rent as the City’s top fair housing barriers.

Mortgage lending disparities exist for Hispanic applicants. In 2009, there were approximately 6,500 mortgage loan applications made by residents in Vancouver. Fifty-nine percent of the loans were originated; 19 percent were denied. Loan origination rates varied by race and ethnicity. The largest gap in denials was between Hispanic and non-Hispanic borrowers: Non-Hispanic borrowers’ origination rate was 13 percentage points higher than Hispanic borrowers’.5

In three of the City’s census tracts with high proportions of Hispanic residents 2009 mortgage loan denials exceeded City averages. These census tracts could be at risk for disinvestment and decline if access to private capital is limited.

Access to fair housing information could be improved. Fair housing information is readily accessible on many websites (e.g., Fair Housing Council of Oregon, which serves Vancouver, and the State of Washington Human Rights Commission)—but is lacking on some obvious sites. Specifically,

- Fair housing information on the City’s website is minimal and requires a search to find.

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5 It is worth noting that subprime lending was minimal in 2009, with just 86 loans carrying subprime rates; just 8 of these loans were made to minority borrowers.
The Vancouver Housing Authority (VHA) has perhaps one of the best websites for its properties we have seen (http://www.vhausa.com/housing/how_to_apply.html). The information is transparent and instructions are easy-to-follow. Vancouver residents would benefit from fair housing information listed on the VHA website in a similar context.

There is no information on the Northwest Justice Project’s (Legal Aid) website about the procedures of filing a housing complaint beyond the first step in seeking legal advice. The organization does, however, refer users to the WashingtonLawHelp.org website, which covers a variety of legal topics including fair housing.

**City fair housing law does not cover all protected classes.** The City of Vancouver has deferred to the fair housing practices regulation of superseding state and federal regulations. Since the 1970’s, any requests or questions regarding potential fair housing issues are routinely referred directly to the State or Federal fair housing enforcement agencies.

The City of Vancouver Municipal Code includes a dormant 1968 ordinance (Vancouver Municipal Code Chapter 8.44) titled Fair Housing Practices. The ordinance does not reflect the updated state and federal protections provided for gender, familial status, disability and (for state law) marital status, sexual orientation, and veteran’s status. In light of the availability of greater protections under state and federal law, and the expertise and enforcement resources of state and federal fair housing agencies, the City will continue to refer potential fair housing issues to those agencies.

**Fair Housing Action Plan**

Based on our research for this AI, BBC recommends the City of Vancouver adopt the following Action Plan and activities for reducing fair housing impediments:

**ACTION ITEM 1.** Support nonprofit and private sector efforts to increase the stock of affordable housing, especially deeply subsidized rentals.

- Monitor Vancouver’s housing plans and policies (Consolidated Plan and Comprehensive Plan) with emphasis on creating subsidized rental units.
- Locate publically funded units in high opportunity neighborhoods—those with few poverty concentrations, good schools, access to public transportation and stable pricing.
- Develop projects that include market rate housing in order to reduce affordable housing concentrations and expand housing choice for low income individuals.
Considerations—Rising rental costs during the past decade (without corresponding increases in renter income) and the very long waitlists for public housing authority units and Housing Choice vouchers—combined with residents’ and stakeholders’ views of inadequate affordable rental housing—make the lack of affordable rentals the top fair housing barrier found in this AI.

It is a difficult time for many cities to aggressively address affordable housing shortages. As the economy improves and the City’s funds become less constrained, Vancouver should closely follow its priorities identified in the Comprehensive Plan and, in particular, add more deeply subsidized rental units to its housing stock.

Ideally, such units would be located in high opportunity neighborhoods—those with few poverty concentrations, good schools and stable pricing—and developments with market rate housing to reduce affordable housing concentrations and further housing choice for low income individuals.

**ACTION ITEM 2.** Monitor potential areas of racial/ethnic concentrations and high mortgage loan denials.

- Work with neighborhood associations in Fruit Valley, Fourth Plain Village, Harney Heights and Meadow Homes to promote the investment of public dollars focused on revitalization of these neighborhoods and provide housing improvements.
- Monitor Home Mortgage Disclosure Act (HMDA) data to further understand the loan denials in the City.

Considerations—Racial and ethnic concentrations in the City are minimal, with just two block groups showing high proportions of persons of Hispanic descent. Areas where minorities live in the City are somewhat correlated with census tracts with higher-than-average mortgage loan denials. In addition, the City’s recent community survey the areas with racial and ethnic concentration are also the areas where residents report the lowest levels of the “feeling of safety walking...after dark.”

A lack of private capital investment combined with potential reluctance of residents to locate in these areas due to safety concerns could lead to neighborhood disinvestment and decline.

To better understand if disinvestment or discrimination is occurring, the City should continue to attend neighborhood meetings in these areas, distribute fair housing information and have discussions with residents to identify any fair housing concerns. The City should also continue investing public dollars in neighborhood revitalization and housing improvements in these areas.

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7 To see a copy of the 2010 Community Status and Financial Options Survey, see http://www.cityofvancouver.us/upload/images/Communications/reports/2010VancouverCommunitySurvey 4-22-10.pdf
ACTION ITEM 3. Continue to improve access to and dissemination of fair housing information.

- Regularly update the City website to include additional fair housing information including links to websites for more information on filing complaints in both Spanish and English.
- Add a “Frequently Asked Questions” (FAQ) section.
- Work with local social service agencies to include a fair housing information section with links on their web sites.

Considerations-The websites for the City, Vancouver Housing Authority, and Legal Aid should be regularly updated with fair housing information.

Fair housing pages on websites should describe fair housing laws and residents’ rights and provide links to websites for more information and filing complaints. All of this information should be provided in Spanish and English. We also recommend a Frequently Asked Questions section with answers to questions such as “If I am not a U.S. citizen but I feel that I have been discriminated against, what can I do?”
SECTION I.
Housing Policies and Land Use

This section contains an analysis of public and private sector barriers to fair housing choice in the context of housing affordability and land use policies. It begins with an analysis of the demographics and affordability of housing in Vancouver, including how the City has changed since 2000. This analysis also contains an examination of racial and ethnic concentrations in Vancouver.

The section then discusses the role of the Vancouver Housing Authority in facilitating housing affordability and fair housing choice. This section concludes with an analysis of the City’s land use and zoning policies in the context of fair housing.

The data collected and analyzed for this section were primarily gathered from the following sources: the 2000 U.S. Census for historical context; 2010 American Community Survey (ACS) for current estimates; 2010 Claritas, a provider of commercial data estimates, for census tract level estimates; and 2010 census data where available.

Housing and Land Use Summary

- The City of Vancouver’s population increased by about 18,000 between 2000 and 2010. The City grew slightly more racially and ethnically diverse during the past decade and, as of 2010, about 10 percent of residents reported Hispanic ethnicity while 20 percent reported a race other than White.

- An analysis of racial and ethnic concentrations found very few Census tracts in the City with higher than citywide average proportions of minorities. The dissimilarity index—a measure of the “evenness” of the geographic distribution of two different population groups—in Vancouver is small. The index ranges from 0 to 1, with a value of 1 representing full concentration. Vancouver’s dissimilarity index ranges from .12 (White v. Non-White comparison) to .25 (White v. Asian comparison).

- Higher than average proportions of low income and single female parent households are located in the western and some portions of the central city. These areas correlate with high proportions of affordable rental units.

- Homeowners experienced much greater increases in median income than did renters in the past decade: The median income of Vancouver’s homeowners rose by $10,685, while the median income of renters was basically flat (just a $1,146 increase). Home values and rent costs increased more aggressively, however, meaning that both homeowner and renter incomes failed to keep up with rises in median housing costs.

- A review of the City’s land use and zoning policies and the policies and practices of the housing authority found no fair housing concerns.
Demographics and Housing

The 2010 census estimates the City’s population at 161,791—about 18,000 more people than in 2000. The City’s Comprehensive Plan for 2011-2030 reports a 2011 population of 162,300\(^1\) people. Figure I-1 shows population increase in Vancouver and the surrounding area since 1986. Between 1900 and 2000, the City’s population grew from 46,380 to 143,560, or 210 percent. About 60,000 of this growth is due to an annexation from the unincorporated area of the county. As reported in the City’s recent Comprehensive Plan, the 1990s were a “particularly active period” for annexations due to the acquisition of 29 square miles of the Vancouver Mall.

![Figure I-1. Population Change, City of Vancouver and Surrounding Area, 1986 - 2010](image)

Source: Office of Financial Management.

As shown in Figure I-1, after two decades of consistent, strong growth and the annexation of unincorporated areas during the mid 1990’s, the City’s population growth is leveling. However, population growth in the incorporated and unincorporated areas outside of Vancouver is steadily increasing.

**Race and ethnic concentrations.** One of the key components of fair housing analysis is an examination of the concentration of racial and ethnic minorities within a jurisdiction to detect evidence of segregation. In some cases, concentrations are a reflection of preferences—e.g., residents may choose to live where they have access to grocery stores or restaurants that cater to them. In other cases, minority populations are intentionally steered away or discouraged from living in certain areas. Housing prices can also heavily influence where minorities live.

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\(^1\) Vancouver Comprehensive Plan 2011-2030, City of Vancouver, WA.
Vancouver is a predominately White city, but grew more racially diverse over the past decade. In the 2010 Census, residents reported their ethnicity to be predominately Non-Hispanic (about 90%). This is down from 94 percent in 2000.\(^2\)

Persons of Hispanic descent make up the City’s largest minority group at 10 percent of the population. This is followed by persons of “other” races.\(^3\) Five percent of residents report their race to be Asian; three percent report African-American; and the balance is made up of other races and ethnicities. Figure 1-2 presents the breakdown of Vancouver residents by race and ethnicity in 2010 compared to 2000.

\(^2\) It should be noted that in the 2000 Census, many Hispanics who were asked to name their race before their ethnicity chose “Other” for their race. This may have been the case in the 2010 Census as well.

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Figure 1-2.
Population by Race and Ethnicity, Vancouver, 2000 and 2010

<table>
<thead>
<tr>
<th>Race</th>
<th>2000</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>1,399</td>
<td>1.0%</td>
</tr>
<tr>
<td>Asian</td>
<td>6,470</td>
<td>4.5%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>3,593</td>
<td>2.5%</td>
</tr>
<tr>
<td>Native Hawaiian and Pacific Islander</td>
<td>779</td>
<td>0.5%</td>
</tr>
<tr>
<td>White</td>
<td>121,752</td>
<td>84.8%</td>
</tr>
<tr>
<td>Other race</td>
<td>9,567</td>
<td>6.7%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>2000</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>9,035</td>
<td>6.3%</td>
</tr>
<tr>
<td>Non-Hispanic or Latino</td>
<td>134,525</td>
<td>93.7%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2000 and 2010
Figures I-3 through I-10 show where the City’s major races and ethnicities reside in the City. The figures show both: 1) The percentage of each racial and ethnic category and any areas of concentration by census block group; and 2) The number of residents of each racial and ethnic category by census block group. According to HUD’s concentration definition, concentrations exist when the proportion of an individual racial or ethnic category exceeds 20 percentage points of that group overall in Vancouver.

Figure I-3.
Percent of Population that is Non-White by Block Group, Vancouver, 2010

Source: U.S. Census Bureau, 2000 and 2010

The overall non-white percentage in Vancouver is 19.1%. Concentrations would occur when the non-white population exceeds 39 percentage points. There are no non-white concentrations in Vancouver. This is consistent with the conclusions in the City’s Consolidated Plan. A breakdown of the number and percentage of non-white persons by Block Group is available in Appendix A.

Figure I-4.
Distribution of Population that is Non-White by Block Group, Vancouver, 2010

Source: U.S. Census Bureau, 2000 and 2010
Figure I-5.
Percent of Population that is Asian by Block Group, Vancouver, 2010

Source: U.S. Census Bureau, 2000 and 2010

The overall Asian percentage in Vancouver is 5.0%. Concentrations would occur when the Asian population exceeded 25%. There are no Asian concentrations in Vancouver.

Figure I-6.
Distribution of Population that is Asian by Block Group, Vancouver, 2010

Source: U.S. Census Bureau, 2000 and 2010
Figure I-7. Percent of Population that is Hispanic by Block Group, Vancouver, 2010

Source: U.S. Census Bureau, 2000 and 2010

The overall Hispanic concentration in Vancouver is 10.4%. Concentrations would occur when the Hispanic population exceeds 30.4%. There are two concentrations in Vancouver: Block Group 427.001 (Harney Heights) with a Hispanic percentage of 37.6% and Block Group 410.052 (Fruit Valley) with a Hispanic percentage of 34.8%.

Figure I-8. Distribution of Population that is Hispanic by Block Group, Vancouver, 2010

Source: U.S. Census Bureau, 2000 and 2010
The overall African-American percentage in Vancouver is approximately 3%. Concentrations would occur when an area exceeds 23% percentage points. There are no African-American concentrations in Vancouver.

The race and ethnicity concentration maps reveal the following:

- There are only two census block groups where racial concentrations occur; these are both concentrations of residents of Hispanic descent (see Figure I-7).

- The maps of the distribution of different racial and ethnic groups across Vancouver show that minority populations live throughout the City. Indeed, the highest level of minority occurs in a block group where 5.4 percent of the City’s Asian population resides.
Vancouver, Dissimilarity Index, 2010

The dissimilarity index is a way to measure evenness in which two separate groups are distributed across geographic units—such as census tracts—that make up a larger geographic area—such as a city.

The index compares the proportion of the total population of a minority group in a census tract and the proportion of the total number of Whites in that same census tract. The dissimilarity index is somewhere between 0 and 1. An index near 0 indicates perfect distribution of racial groups across all census tracts in a region. An index of 1 indicates perfect segregation of racial groups across the region. The index will identify the degree in which racial groups are clustered in Vancouver. As an example, the most segregated city between Whites and African Americans in the United States is Detroit, with a dissimilarity index around 0.8.

The dissimilarity indices for Vancouver between Whites and minority groups range between 0.12 and 0.25. This means that there is limited but still present segregation between census tracts and the dispersion of White and Non-White residents. The dissimilarity index suggests that segregation is worse for Asians relative to other minority groups.

Compared to Clark County, Vancouver’s racial and ethnic groups are more evenly distributed across census tracts. For example, the index of dissimilarity between Whites and African-Americans is 0.12 lower in Vancouver than in Clark County. This illustrates less segregation between Whites and Blacks in Vancouver compared to Clark County as a whole.

### Income and low income concentration.

According to the Census ACS in 2010, the City’s median household income was $47,307, up $5,689 from the median of $41,618 in 2000. Between 2000 and 2010, Vancouver saw the median household income increase by 14 percent and inflation increase by 27 percent. By comparison, between 1990 and 2000, the median income increased by 33 percent and inflation rose by 32 percent. Therefore, incomes kept up with inflation during the 1990s, but not in the 2000s.

Homeowners experienced much greater increases in median income than did renters. Homeowner median income rose from $53,441 in 2000 to $64,126 in 2010—an increase of $10,685 or 20 percent. In contrast, renter median income was mostly unchanged at $30,401 in 2000 and $31,547 in 2010 (a rise of just $1,146 or 4 percent).
Figure I-12 shows the proportion of each census block group in Vancouver with low income households—those earning less than $25,000, or a little more than half of the City's median household income. Those with proportions greater than 11 percent have low income households exceeding the citywide average (11 percent of Vancouver residents earned less than $25,000 in 2010 according to the ACS). The map shows the highest proportions of low income residents in the central and far northwest portions of the City.

Figure I-12.
Percent Low Income Households (earning less than $25,000), Vancouver, 2010

Note:
For this map, low income is defined as household income of less than $25,000.

Source:
Claritas 2010 and BBC Research & Consulting.
Figure I-13 shows how median incomes in Vancouver vary by race and ethnicity, for 2000 and 2010. The variance among racial and ethnic categories is largest between African-American residents (median income of $22,302 in 2010) and Whites and American Indians/Alaskan Natives and (median incomes of more than $50,000). The disparity in incomes among many races and ethnicities increased between 2000 and 2010: For example, the Hispanic/White median income difference was $5,610 in 2000 compared to $6,859 in 2010. Asians and African-Americans had lower median incomes in 2010 than in 2000; the change was very significant for African-Americans.

Figure I-13 also shows Clark County’s median incomes by race and ethnicity. When compared to Vancouver, the county-wide median incomes are significantly higher for each racial and ethnic group, with the exception of groups categorized as “other race” and “two or more races”. County median income for Asians is almost $10,000 higher, nearly $11,000 higher for Blacks, almost $17,000 higher for Native Hawaiian or other Pacific Islander, and $8,000 higher for Whites. Hispanic or Latino households had lower median incomes on a county-wide level compared to only Vancouver.

<table>
<thead>
<tr>
<th>Race</th>
<th>Median Income</th>
<th>2000</th>
<th>2010</th>
<th>2000</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian and Alaska Native</td>
<td>$37,935</td>
<td>$56,141</td>
<td>$46,424</td>
<td>$56,812</td>
<td></td>
</tr>
<tr>
<td>Asian</td>
<td>$47,524</td>
<td>$44,667</td>
<td>$50,625</td>
<td>$54,063</td>
<td></td>
</tr>
<tr>
<td>Black or African American</td>
<td>$37,321</td>
<td>$22,302</td>
<td>$40,048</td>
<td>$33,031</td>
<td></td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>$42,171</td>
<td>$49,286</td>
<td>$38,542</td>
<td>$66,069</td>
<td></td>
</tr>
<tr>
<td>Other Race</td>
<td>$36,535</td>
<td>$43,992</td>
<td>$38,484</td>
<td>$31,854</td>
<td></td>
</tr>
<tr>
<td>Two or more races</td>
<td>$35,365</td>
<td>$51,174</td>
<td>$38,750</td>
<td>$50,591</td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>$41,873</td>
<td>$48,177</td>
<td>$48,894</td>
<td>$56,100</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Median Income</th>
<th>2000</th>
<th>2010</th>
<th>2000</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hispanic or Latino</td>
<td>$36,297</td>
<td>$41,552</td>
<td>$37,049</td>
<td>$40,953</td>
<td></td>
</tr>
<tr>
<td>Not Hispanic or Latino: White</td>
<td>$41,907</td>
<td>$48,411</td>
<td>$49,129</td>
<td>$56,583</td>
<td></td>
</tr>
</tbody>
</table>

Overall Median Income: $41,618 $47,950 $48,376 $54,924

**Familial status and disability.** In addition to racial and ethnic minorities, single parents and persons with disabilities may also be more vulnerable than others in facing housing discrimination and/or have greater challenges in finding affordable, appropriate housing. Indeed, fair housing surveys conducted by BBC have shown that public support is lowest for fair housing laws that protect families with children and that many people believe landlords should be able to deny families with children rental units.

Many persons with disabilities require housing that has accessibility features, is near public transit and supportive services and is affordable. Persons with disabilities are also at greater risk of experiencing housing discrimination, oftentimes due to a lack of knowledge about laws governing accommodations for the disabled.
As of 2009, an estimated 7,297 households in Vancouver were made up of single-parent families. This represents about 11 percent of all households in the City. Most of these single-parent households (73 percent) were female-headed. In 2009, the percent of female-headed households was 13.2 percent, about the same as in 2000.

Figure I-14 shows where single female parent households reside in the City. The distribution of is similar to the distribution of low income households shown in Figure I-12. See Appendix A for a listing of the percent of single parent households by census tract.

Figure I-14.
Percent of Single Female Parent Households in Census Tract, Vancouver, 2010

The 2000 Census reports that about 19 percent of Vancouver’s population has a disability. 2010 Census data for people with disabilities is not yet available. Figure I-15 is based on the 2000 Census and shows that persons with disabilities resident throughout the City, with the highest concentrations in the central City. The distribution of persons with disabilities is somewhat correlated with the areas in the City with “higher proportions” of seniors shown in the Vancouver 2011-2013 Comprehensive Plan, page 1-11. See Appendix for a listing of the percent of people with disabilities by census tract.

Figure I-15. Percent of People with Disabilities by Census Tract, Vancouver, 2000

Source: Census 2000 and BBC Research & Consulting.

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3 The term “disability” for Census purposes includes persons with mental, physical, and sensory disabilities, as well as limitations of going outside of one’s home or caring for oneself.
Employment Analysis

The City of Vancouver provides most of the employment for the Vancouver/Clark County region: According to the City’s 2011-2030 Comprehensive Plan, Vancouver and the Vancouver Urban Growth Area (VUGA) account for 83 percent of the jobs in Clark County.

Jobs Vancouver's distribution of jobs by industry is diverse, as shown in Figure I-16. According to the Bureau of Labor Statistics and its Quarterly Census of Employment and Wages (QCEW), Clark County had 124,911 jobs as of the 1st Quarter of 2011. The largest employment sectors are Government (19% of jobs), Trade, Transportation and Utilities (18%) and Education and Health Services (15%).

Eighty-one percent of the region's jobs (101,295) were in the private sector and the remaining jobs were in the government sector. (QCEW data is not available for Vancouver alone). ⁴

Figure I-16 displays the private and public sector employment distribution for Clark County.

Figure I-16. Private and Public Sector Employment Distribution, Clark County, Q1 2011

Total Jobs = 124,911


---

⁴ QCEW data is only produced for counties, MSAs, states and the U.S. overall.
Figure I-17 shows average weekly wages and annual wages by industry. Two of the county’s largest industries—Government and Professional and Business Services—have wages that pay around $50,000/year.\(^5\) Manufacturing jobs pay the largest wages in the county at $55,000 per year; however, these jobs make up less than 9 percent of the region’s employment.

<table>
<thead>
<tr>
<th>Employment Sectors and Average Wages, Clark County, 2009</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Jobs</strong> = 124,911</td>
</tr>
</tbody>
</table>

Note: Average annual wages assume full-time employment and a 52-weeks/year pay. Average Weekly Wage and Average Annual Wage may not calculate exactly due to rounding.

Source: Bureau of Labor Statistics QCEW.

Clark County’s wages currently trail the U.S. as a whole and are lower than average wages in the state of Washington. Per QCEW data from the 1st Quarter of 2011, the average annual wage in Clark County was $41,600, compared with $45,559 in the U.S. and $47,470 in Washington.\(^6\) Disaggregated employment and wage data by industry was not available for Washington at the time this report was written.

**Largest employers.** The largest employers in Vancouver include a mix of educational, government, medical, retail services, and high tech manufacturing companies. Except for retail, these companies’ industries pay relatively well. According to the Columbia River Economic Development Council, the largest employers in the county include the following:

- **Vancouver, Evergreen and Battle Ground School Districts** — Education;
- **Southwest Washington Medical Center** — Medical;
- **Hewlett Packard** — R&D/Marketing;
- **Clark County and City of Vancouver** — Government;
- **Fred Meyer** — Retail;
- **WaferTech** — Silicon wafer manufacturing;

\(^5\) Average annual wage assumes full-time employment and 52 weeks/year pay.

\(^6\) Average annual wages applies a full-time, 52 week work year to average weekly wage statistics provided by the Bureau of Labor Statistics.
Wells Fargo — Financial services.

Workforce. The City’s Comprehensive Plan reports that approximately 70,000 Clark County workers—or one-third of the local labor force—are employed in Oregon. Many work in transportation and trade industries. Approximately 12,000 residents of Oregon are employed in Clark County.

The City’s Comprehensive Plan recognizes that workers will exercise their preferences for where they choose to live and work. However, the City would like to increase jobs—particularly family wage jobs—for local residents to reduce the number who commute to Oregon for work, shopping and entertainment. The City’s goal is to provide a ratio of at least one local job for every Vancouver household. To this end, the City will work to provide adequate land and public services for job growth and work with local organizations and agencies to further economic development.

Transportation

C-TRAN is the public transit provider in the Vancouver. The service provides 19 local routes in Vancouver and Clark County and seven express commuter routes into Downtown Portland. There are also four routes that connect with the Portland MAX light rail network and a reservation based connector service to other cities in Clark County. The routes follow most major roads in Vancouver and connect major employment centers, hospitals and public schools.

The highest concentrations of routes are in and around Downtown Vancouver. The service provides “Park and Ride” centers for suburban commuters to access the downtown region.

Individual adult fares are $1.55, day passes are $3.75 and monthly passes are $54. Significant discounts are offered to children, “honored” riders (seniors and those with disabilities), and Medicare cardholders. There are also discounts offered to low income earners. All recipients of discounts must qualify and have proper ID. C-TRAN offers discount passes for students and faculty of schools. There are classes available to educate those in how to use the public bus system, read maps and bus schedules.

Housing Market Conditions

The 2010 Census reported 70,005 housing units in Vancouver. The ACS estimates that about 53 percent of households in the City are owners; 47 percent are renters.

At the time the census was taken, the vacancy rate for owned units was very low at 2.3 percent. The rental vacancy rate was moderate at 6.2 percent. The 2010 ACS reports a much higher rental vacancy rate at 9.3 percent.

Of the 4,300 vacant units identified by the Census in 2010, about half (2,100) were vacant and for rent. 800 homes were vacant and for sale and 118 were sold but unoccupied. The remainder was vacant for other reasons.
**Homeowner affordability.** The 2010 ACS shows a very active housing market between 2005 and 2010: More than half of the City’s homeowners and renters, or 34,000 households, moved into their house between 2005 and 2010.

This high volume of housing activity is reflected in the rise in home values during the past decade. The median home price in Vancouver is reported as $213,400 by the 2010 ACS. In 2000 the median home value was $140,800. Between 2000 and 2010, the median home value rose by 52 percent.

The median-priced home in 2000 cost $70,000 more in 2010. To afford this increase, homeowners would need to earn about $25,000 more per year. Instead, median household income rose by just $10,685—or less than half of what was needed to keep up with housing value increases.

Figure I-18 compares the distribution of home values in 2000 and 2010. As the figure shows, the City experienced a significant decline in home values priced between $100,000 and $150,000. In 2000, almost half of the City’s homes were valued in this range; by 2010, just 11 percent were. This shift was offset by increases in homes valued between $200,000 and $300,000 and, to a lesser extent, homes valued between $300,000 and $500,000.

**Figure I-18.**
**Distribution of Home Values, Vancouver, 2000 and 2010**

Source: Census 2000 and 2010 American Community Survey.
Figure I-19 shows the median home value by census tract. The northwest portion of the City has the lowest median home values; the highest values are located in the southeast. See Appendix A for a listing of median home values by census tract.

Figure I-19. Median Home Value by Census Tract, Vancouver, 2010

Source: Claritas 2010 and BBC Research & Consulting.

**Rental affordability.** According to the 2009 ACS, the median contract rent for all apartments in the City is $820 per month. (Contract rent excludes utilities that may be covered by monthly rent). This is a 22 percent increase from the median rent in 2000 of $671.

To afford the increase in the median contract rent, renters would need to earn $5,960 more per year. As discussed earlier in this section, renter income was largely flat during the decade.
Figure I-20 compares the 2000 and 2009 contract rent distribution in the City. As the figure shows, the greatest shift in rental costs occurred in the $500 to $1,500 range. The City lost units priced between $500 and $750; this was offset by an increase in units priced between $750 and $1,500.

**Figure I-20.** Distribution of Contract Rents for Apartments, Vancouver, 2000 and 2009


Figure I-21 illustrates the percentage of rental units that are priced at below $500 in each census tract in Vancouver. Most of these units are located in the central and northwest portions of the City, which correlates with the location of low income households (Figure I-12).

**Figure I-21.** Percent Low Rent, by Census Tract, City of Vancouver, 2010

Source: Claritas 2010 and BBC Research & Consulting.

**Housing condition.** According to the Vancouver 2009-2013 Consolidated Plan, the Clark County Assessor’s office uses a system in which single family residential units receive a rating of condition based on the exterior of the building. Although an exterior assessment may not provide an accurate evaluation, it is generally indicative of the overall condition of the building. The data's greatest limitation is
that it only provides information for single family dwellings. Apartments, duplexes, and condominiums are not included. See Appendix A for a listing of low rent areas by census tract.

Figure I-22 indicates the condition of housing in Vancouver, based on the Assessor's rating system.

Generally, houses that are ranked under the "Fair" category are those most in need of rehabilitation and for which it may still be cost efficient to do so. Homes ranked under the "Badly Worn" category are generally in such a state of disrepair that it would not be financially feasible to rehabilitate.

**Figure I-22.**

**Vancouver Census Tracts with Highest Concentrations of Substandard Single family Dwellings**

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Number of Single family Units in &quot;Fair&quot; or &quot;Badly-Worn&quot; Condition</th>
<th>Percent of Total Number of Single family Units in Census Tract</th>
</tr>
</thead>
<tbody>
<tr>
<td>406.04</td>
<td>1</td>
<td>50%</td>
</tr>
<tr>
<td>406.06</td>
<td>290</td>
<td>100%</td>
</tr>
<tr>
<td>407.03</td>
<td>2</td>
<td>100%</td>
</tr>
<tr>
<td>407.06</td>
<td>1</td>
<td>100%</td>
</tr>
<tr>
<td>410.02</td>
<td>1,052</td>
<td>100%</td>
</tr>
<tr>
<td>410.03</td>
<td>438</td>
<td>38%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,784</strong></td>
<td></td>
</tr>
</tbody>
</table>

According to the plan, an indicator of condition and use of housing is the lack of a key element of housing such as kitchen or plumbing and overcrowding in occupied dwellings. In Vancouver, a relatively small percentage of the occupied units fell within these categories in 2000: about 6 percent were overcrowded and 1 percent lacked plumbing or kitchen facilities.

The 2007 ACS reported that 2 percent of housing units in the City are considered overcrowded, defined by the event of more than one person per room. This is on average with Clark County and the State of Washington.

**Subsidized and Affordable Housing**

This section discusses the policies and procedures of the Vancouver Housing Authority (VHA). As part of this study, BBC interviewed staff at the VHA, using the questions suggested by HUD in its fair housing planning guide. The interview discussed policies and procedures of placing residents in VHA developments and in distributing Section 8 vouchers, procedures to mitigate racial and ethnic segregation, and efforts to provide housing to persons who require accessibility accommodations. A summary of the discussion follows.

**Number and type of units.** VHA owns or manages 2,918 assisted housing units. Of these, 261 are subsidized housing units, 381 are public housing units, 1,862 are
designated workforce housing units, 125 are housing units with supportive services and 289 are transition or shelter units.

The vast majority of these units are located in Vancouver; 108 are located in Battle Ground and 19 are located in Camas.

The VHA also serves 2,317 total households with Housing Choice (or Section 8) Vouchers, equaling 5,519 total people.

**Households served.** Of the total people living in Section 8 housing, 14 percent are elderly, 19 percent are people with disabilities (ages 18-61), 29 percent are other adults and 38 percent are children. The vast majority live in one- to three-bedroom apartments, with almost 50 percent in two-bedroom units. Eighty-three percent earn below 30 percent of the area median income are, as such, are considered “extremely low income” households by HUD.

According to the VHA, voucher holders are 76 percent White, 17 percent Black/African American, and seven percent Hispanic or Latino.

The demographics of public housing residents are similar to voucher holders: 83 percent are extremely low income; most are White (74%); 16 percent are elderly; 13 percent are disabled; and most reside in one- to three-bedroom rental units.

Altogether, VHA provides housing to 1,227 people with disabilities (age 18-61). According to VHA staff, most of all of the units accommodate those with physical disabilities. Twenty-three public housing units are completely wheelchair accessible.

**Location of units.** Figure I-23 shows the zip codes in which the housing units are located. As the exhibit demonstrates, there is a concentration of public housing in the 98661 zip code; 66 percent of all units owned and operated by VHA are located in this zip code.

Figure I-24 shows a more specific geographic location of the public housing units. Most are located in the central portion of Vancouver.

To fully examine concentrations of subsidized and low cost rental units, the map includes affordable rental units that are owned and managed by organizations other than VHA and are located countywide. These units are also mostly located in central and western Vancouver.

---

**Figure I-23. Number and Location of Public Housing Units, Clark County, 2011**

<table>
<thead>
<tr>
<th>Zip Code</th>
<th>Public Housing Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>98607</td>
<td>14</td>
</tr>
<tr>
<td>98642</td>
<td>9</td>
</tr>
<tr>
<td>98660</td>
<td>33</td>
</tr>
<tr>
<td>98661</td>
<td>249</td>
</tr>
<tr>
<td>98663</td>
<td>4</td>
</tr>
<tr>
<td>98664</td>
<td>10</td>
</tr>
<tr>
<td>98665</td>
<td>9</td>
</tr>
<tr>
<td>98666</td>
<td>5</td>
</tr>
<tr>
<td>98668</td>
<td>12</td>
</tr>
<tr>
<td>98684</td>
<td>19</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>379</strong></td>
</tr>
</tbody>
</table>

Source: Vancouver Public Housing Authority.
Figure I-24.
Public Housing Units, Subsidized and Affordable Rental Units, Clark County, 2011

Source: Vancouver Housing Authority
Intake and waitlists. The VHA has a standard intake procedure for individuals inquiring about affordable housing that is owned or managed by VHA and Section 8 vouchers administered by VHA. First, staff determine if the potential applicant qualifies for subsidized housing. If so, staff will find a waiting list that is open for application. Completion of a pre-application is necessary to be placed on VHA’s waiting list.

VHA has easy-to-understand information about how to apply for their housing on their website. The website contains a list of all properties; description of properties available for application; links to download pre-applications; and average waitlists by type of program and property. The website also contains a number to call to find out where an applicant is on the waitlist. Applicants may send their pre-application in by mail or hand deliver to the housing authority. The website can be found at http://www.vhausa.com/housing/how_to_apply.html.

The pre-application asks if the applicant needs an interpreter and provides instructions for obtaining the application in alternative languages.

Public housing waitlist. The waitlist for public housing differs by property. At the time this report was completed, two units were open.

Preferences for residents applying for VHA housing and vouchers include:

- Graduates of transitional programs;
- Persons displaced by VHA action;
- Disability (SSI disability verification or physician verification is required);
- Elderly;
- Families with children; and
- Families not already receiving housing subsidy.

Section 8 waitlist. The waitlist for Section 8 housing vouchers currently has over 2,000 people. The list was last opened in 2006. VHA staff are currently placing families that were put on the list more than 7 years ago, in 2004. The public housing waitlist ranges between 1 to 10 years, depending on the size of unit requested with units of multiple bedrooms having higher availability.

According to gosection8.com, there are 256 total units available for rent in Clark County to Section 8 voucher holders. Of the total number, 240 are in Vancouver. Forty of the units are handicapped accessible.
Figure I-25 summarizes the characteristics of the VHA.

**Figure I-25.**
**Vancouver Housing Authority, Summary**

<table>
<thead>
<tr>
<th>HUD Performance Designation</th>
<th>Housing Choice Vouchers</th>
<th>Public Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Wait List Status</td>
<td>Wait List Length</td>
</tr>
<tr>
<td>High Performing</td>
<td>Closed</td>
<td>2,000 families, currently placing those put on list in 2004</td>
</tr>
</tbody>
</table>

Source: Vancouver Housing Authority.

**Other policies.**

**Sale/conversion of public housing.** The VHA is currently selling many of their owned and operated public housing units. Due to reduced HUD capital funds and low per unit operating funds (relative to Section 8 vouchers), the VHA is selling public housing units and offering the occupants tenant and project based vouchers. This transition from public housing to Section 8 housing choice vouchers assists the VHA financially from the sale of the properties while providing more assistance per household (e.g., $250 per unit for a public housing unit v. $500 per family for a housing voucher).

**Nondiscrimination.** The VHA Admissions and Continued Occupancy Policy manual clearly states the VHA’s nondiscrimination policy. VHA’s nondiscrimination policy exceeds the protections of the Federal Fair Housing Act by offering protections based on marital status and sexual orientation.

The VHA’s procedures for accepting reasonable accommodations are also clearly stated in the manual. In sum, VHA “will encourage the family to make its request in writing using a reasonable accommodation request form. However, the VHA will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.” The manual also states that “all information related to a person’s disability will be treated in accordance with the confidentiality policies.” These are model practices.

The manual also states the VHA’s Limited English Proficiency (LEP) plan and policies apply to the use of pets and service animals. Assistance animals are not subject to the same policies as animals considered pets (e.g., pet fees).

**Zoning Codes, Comprehensive Plans, Planning Fees and Codes**

As part of the AI, the City of Vancouver’s zoning regulations, Comprehensive Plan and planning and developed fees were examined to assess potential fair housing concerns or opportunities resulting from the development process. This section summarizes the findings from this review.
**Zoning code.** To evaluate potential fair housing concerns within the City’s zoning code, BBC utilized a “Review of Public Policies and Practices (Zoning and Planning Codes)” form recently circulated by the Los Angeles fair housing office of HUD. This section poses the questions from this checklist, along with responses about the City’s code.

*Does the code definition of “family” have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?* No, in Section 20.150.040 the City defines family as the same as household: “an individual, two or more persons related by blood or marriage, a group of two or more disabled residents protected under the Federal Fair Housing Amendment Act of 1988, adult family homes as defined under Washington State law, or a group living arrangement where six or fewer residents receive supportive services such as counseling, foster care, or medical supervision at the dwelling unit by resident or non-resident staff. Up to six residents not related by blood or marriage who live together in a single family dwelling or in conjunction with any of the above individuals or groups, shall also be considered a household. For purposes of this definition, minors living with parent or legal guardian shall not be counted as part of the maximum number of residents.”

**Zoning Regulation Impediment:** Does the Code definition of “family” have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? No, see above.

**Zoning Regulation Impediment:** Is the Code definition of “disability” the same as the Fair Housing Act? Yes. In Section 20.150.040, the City defines “functionally disabled” as: a person who has a physical or mental impairment which substantially limits one or more of such person’s major life activities; has a record of having such an impairment, or being regarded as having such an impairment.

**Practice Impediment:** Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as a “boarding or rooming house” or “hotel”? No.

**Practice Impediment:** Does the zoning ordinance deny housing opportunities for disability individuals with on site housing supporting services? No.

**Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled?** No.

**Does the jurisdiction policy not allow disabled persons to make reasonable modifications or provide reasonable accommodation for disabled people who live in municipal-supplied or managed residential housing?** No.

**Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants?** No.
Does the zoning ordinance address mixed uses? Yes, the code contains regulations on permitted mixed use properties.

How are the residential land uses discussed? In Section 2.410.010, the City describes that low-density residential districts are primarily designed to preserve and promote neighborhoods of detached single dwellings at low intensities. Medium and high density residential districts are designed to promote higher density housing sometimes with a mix of commercial uses.

What standards apply? In Section 20.410.050, the code outlines the development code for low, medium and high density residential districts. The code outlines the minimum lot sizes, setback guidelines, landscaping requirements and height constraints. The minimum lot sizes for each residential zone is shown below:

Figure I-26. Resident Zone Code Densities

<table>
<thead>
<tr>
<th>Low Density Residential</th>
<th>Residential Zone:</th>
<th>Minimum Lot Size:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>R2</td>
<td>20,000 sf</td>
</tr>
<tr>
<td></td>
<td>R4</td>
<td>10,000 sf</td>
</tr>
<tr>
<td></td>
<td>R6</td>
<td>7,500 sf</td>
</tr>
<tr>
<td></td>
<td>R9</td>
<td>5,000 sf</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Medium and High Density Residential</th>
<th>Residential Zone:</th>
<th>Minimum Lot Size:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>R18</td>
<td>1,800 sf</td>
</tr>
<tr>
<td></td>
<td>R22</td>
<td>1,500 sf</td>
</tr>
<tr>
<td></td>
<td>R30</td>
<td>1,500 sf</td>
</tr>
<tr>
<td></td>
<td>R35</td>
<td>1,200 sf</td>
</tr>
</tbody>
</table>

Lower density residential districts. The City has a minimum lot square footage requirement for single family housing that ranges from 5,000 to 20,000 square feet, depending on the dwelling district. The low-density residential zoning districts as described in Section 20.420.050 of the municipal code are shown below:

- The R-2 zoning district is designed to accommodate detached single dwellings with or without accessory residential units at a minimum lot size of 20,000 square feet and a density of 1.8 to 2.2 units/net acre. Some civic and institutional uses are permitted as limited or conditional uses.

- The R-4 zoning district is designed to accommodate detached single dwellings with or without accessory residential units at a minimum lot size of 10,000 square feet and a density of 2.3 to 4.4 units/net acre. Some civic and institutional uses are permitted as limited or conditional uses.

- The R-6 zoning district is designed to accommodate detached single dwellings with or without accessory residential units at a minimum lot size of 7,500 square feet and a density of 4.5 to 5.8 units/net acre. Some civic and institutional uses are permitted as limited or conditional uses.

- The R-9 zoning district is designed to accommodate detached single dwellings with or without accessory residential units at a minimum lot size of 5,000 square feet and a density of 5.9 to 8.7 units/net acre. Some civic and institutional uses are permitted as limited or conditional uses.
Higher density residential districts.

- The R-18 zoning district is designed to accommodate attached homes such as duplexes and rowhouses, and garden-type apartments at a minimum lot size of 1,800 square feet per unit. Professional office uses are permitted under certain circumstances. Some retail, civic and institutional uses are allowed conditionally.

- The R-22 zoning district is designed to accommodate rowhouses, garden-type apartments, and lower-density multi-dwelling structures at a minimum lot size of 1,500 square feet per unit. Professional office uses are permitted under certain circumstances. Some retail, civic and institutional uses are allowed conditionally.

- The R-30 zoning district is designed to accommodate multi-dwelling structures at a minimum lot size of 1,500 square feet per unit. Professional office uses are permitted under certain circumstances. Some retail, civic and institutional uses are allowed conditionally.

- The R-35 zoning district is designed to accommodate multi-dwelling structures at a minimum lot size of 5,000 square feet per unit. Professional office uses are permitted under certain provisions. Some retail, civic and institutional uses are allowed conditionally.

Manufactured homes. Chapter 17.25 discusses the municipal code for manufactured housing. Manufactured homes are permitted on individual lots in the R-2, R-4, R-6, and R-9 residential zones in accordance with the placement standards as set forth in this section and other provisions which apply to conventionally built dwellings. The homes must meet the development standards that apply to that residential zone. The homes must also follow structure design guidelines and are reviewed and inspected by the City at the time of installation and at the point of any sort of modification.

According to the Vancouver Consolidated Plan 2009-2013, mobile homes can be one of the most affordable ownership options. At the same time, occupants in mobile home parks are not guaranteed a space and are vulnerable to redevelopment and rezoning. The status of mobile home parks in urbanizing areas is particularly tenuous when higher economic uses of the land outweigh the less reliable income of temporary housing. Furthermore, it is not easy to obtain funding for renovation or purchase of mobile homes, which means mobile homes are increasingly threatened and sometimes in deteriorated and unsafe condition.

Future development capacity. Vancouver’s new 2011-2030 Comprehensive Plan reports that there is long term capacity for an additional 16,500 new residential units within city limits and 34,500 in the Vancouver Urban Growth Boundary. Between 2000 and 2010, the City added 18,000 new residents. If similar growth is experienced in coming decades and household sizes average 2.4 persons/housing
unit, the residential capacity within City boundaries could accommodate more than 20 years of growth. After this, the City will need to evaluate its appetite for increasing densities and maintaining growth within the City v. accommodating growth predominantly outside City boundaries.

**Does the zoning ordinance describe any areas in this jurisdiction as exclusive?** No.

**Are there exclusions or discussions of limiting housing to any of the following groups?** No. If yes, check all of the following that apply: N/A.

**Are there any restrictions for Senior Housing in the zoning ordinance?** If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)? No.

**Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities?** No, however the City has a “Facilities Transition Plan” to ensure that all public buildings comply with the Americans with Disabilities Act Accessible guidelines.

**Does the zoning ordinance establish occupancy standards or maximum occupancy limits?** No.

**Does the zoning ordinance include a discussion of fair housing?** No.

**Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking.** Section 20.420.050 states: “Where the pedestrian connection is parallel and adjacent to a parking lot or driveway, the system must be a raised path or be separated from the auto travel lane by a curb, bollards, landscaping or other physical barrier. If the connection also provides access to a parking lot, at least one access ramp from the connection to the parking lot must be provided that meets ADA standards for accessibility for the disabled.”

**Does the zoning code distinguish senior citizen housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)?** No.

**Does the zoning code distinguish handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)?** No.

**How are “special group residential housing” defined in the jurisdiction zoning code?** In Section 20.150.040, the City defines “group living” as: “Living facilities for groups of unrelated individuals that include at least one person residing on the site who is responsible for supervising, managing, monitoring and/or providing care, training or treatment or residents.”
Does the jurisdiction’s planning and building codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? Yes. Is there any provision for monitoring compliance? Yes, section 2.20.040 states: “The compliance coordinator is commissioned as a law enforcement officer and is authorized to enforce only those laws pertaining to issuing notices of civil infractions for the violation of ordinances, statutes and regulations pertaining to: disabled parking spaces; improper parking in disabled parking spaces and access areas; for improper signage of disabled parking spaces; for improper dimensions of disabled parking spaces; and for all ordinances, statutes and regulations pertaining to disabled persons accessibility to buildings and public programs located within the City limits of Vancouver, Washington.”

Comprehensive and Consolidated Plan. The Vancouver Comprehensive Plan is an important policy document in its guidance of the land use process. The Comprehensive Plan was approved in 2004 and was recently updated (2011-2030 Comprehensive Plan). Alongside the Comprehensive Plan, Vancouver also has the Consolidated Plan for Housing and Community Development necessary for housing assessment and HUD entitlements. The Consolidated Plan was updated and adopted in 2009.

Housing policies from 2011-2030 Comprehensive Plan. The City of Vancouver adopted the following policies to ensure an adequate supply of housing for all economic segments of the community. This policies prioritize providing fair and balanced housing stock for all types of residents.

H-1 Housing options. Provide for a range of housing types and densities for all economic segments of the population. Encourage equal and fair access to housing for renters and homeowners.

H-2 Affordability. Provide affordable housing by formulating innovative policies, regulations and practices, and establishing secure funding mechanisms. Target affordability programs toward below median area income.

H-3 Housing improvement. Encourage preservation, rehabilitation and redevelopment of existing housing stock. Support neighborhood based improvement efforts.

H-4 Innovative zoning. Encourage innovative housing policies that provide for affordable housing and maintain neighborhood character.

H-5 Housing placement near services and centers. Facilitate siting of higher density housing near public transportation facilities and in designated centers and corridors.

H-6 Special needs housing. Facilitate housing for special needs populations dispersed throughout Vancouver and the region. Such housing may consist of residential-care facilities, shelters, group homes, or low income housing, and should
be located near transportation and other services such as health care, schools, and stores.

H-7 Home ownership. Promote opportunities for home ownership and owner occupancy of single- and multifamily housing.

H-8 Public-private partnerships. Facilitate enhanced partnerships between public, private, and non-profit sectors to address affordable housing.

H-9 Funding for housing. Pursue funding mechanisms to support affordable housing involving local, state, and federal agencies.

Consolidated Plan. Adopted in 2009, the Vancouver Consolidated Plan provides a detailed outline of the demographic, economic and housing landscape of the City. In regards to the housing assessment, the plan discusses the current stock of housing with regards to type, age, occupancy, condition and ownership type. The plan discusses housing needs and housing affordability. The plan outlines the most critical areas of affordability demand and strategies to achieve objectives.

Specific Housing Objectives. To meet the needs the housing needs of the community and to ensure an adequate supply of decent affordable housing, the following objectives will be carried out:

- **Strategy 1**: Increase the supply of housing that is affordable to renter households earning 60 percent or less of area median income.
- **Strategy 2**: Preserve existing affordable housing threatened with loss due to condition, location, expiring federal contracts, redevelopment efforts, lead-based paint or other situations.
- **Strategy 3**: Promote homeownership opportunities for low and moderate income households, including persons with disabilities and first-time homebuyers.
- **Strategy 4**: Create additional housing opportunities for self-sufficiency for low income elderly and persons with disabilities or special needs.
- **Strategy 5**: Plan for and support strategies and initiatives to promote fair housing and increase access to housing.

Planning fees. As part of the land use review for the AI, BBC examined the level of fees for zoning changes, variance requests and the development of residential housing.

Figure I-27 on the following page shows the fees for zoning changes and variance requests.

Figure I-28 also on the following page displays the common building permits and impact fees assigned for building a $150,000 or a home that has 2,000 square feet. As the exhibit shows, Vancouver’s fees are about average compared to surrounding communities.
Figure I-27.
Change of Zoning and Variance Fees for Vancouver

<table>
<thead>
<tr>
<th>Variance *</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type I</td>
<td></td>
</tr>
<tr>
<td>Single family and duplex lots</td>
<td>$401.96</td>
</tr>
<tr>
<td>All other</td>
<td>$419.48</td>
</tr>
<tr>
<td>Type II</td>
<td></td>
</tr>
<tr>
<td>Single family and duplex lots</td>
<td>$1,284.96</td>
</tr>
<tr>
<td>All other</td>
<td>$3,049.38</td>
</tr>
<tr>
<td>Zoning change**</td>
<td>$6,252.59</td>
</tr>
</tbody>
</table>

Note:  
*Full fee for 1 variance; half cost for 2 variances; and no cost for 3 or more variances.
**Not involving Comprehensive Plan Amendment.
Source: City of Vancouver.

Figure I-28.
Common Building and Impact Fees for Vancouver and Surrounding Communities

<table>
<thead>
<tr>
<th></th>
<th>School Area Impact Fees</th>
<th>Annual Review Fee (for zoning change)</th>
<th>Traffic Impact Fee</th>
<th>Park Impact Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vancouver</td>
<td>$4,117</td>
<td>$3,030</td>
<td>$8,113</td>
<td>$1,987</td>
</tr>
<tr>
<td>Clark County</td>
<td></td>
<td></td>
<td>$8,113</td>
<td>$1,987</td>
</tr>
<tr>
<td>Battle Ground</td>
<td>$9,880</td>
<td>$3,500</td>
<td>$8,113</td>
<td>$1,987</td>
</tr>
<tr>
<td>Camas</td>
<td>$5,528</td>
<td>$3,269</td>
<td>$8,113</td>
<td>$1,987</td>
</tr>
<tr>
<td>La Center</td>
<td>$6,991</td>
<td>$2,626</td>
<td>$8,113</td>
<td>$1,987</td>
</tr>
<tr>
<td>Ridgefield</td>
<td>$4,490</td>
<td>$2,314</td>
<td>$8,113</td>
<td>$1,987</td>
</tr>
<tr>
<td>Washugual</td>
<td>$5,857</td>
<td>$4,795</td>
<td>$8,113</td>
<td>$1,987</td>
</tr>
<tr>
<td>Yacolt</td>
<td>$1,400</td>
<td>$560</td>
<td>$8,113</td>
<td>$1,987</td>
</tr>
</tbody>
</table>

Source: Respective City’s fee schedules.
SECTION II.
Complaint and Fair Lending Analysis

This section examines private barriers to fair housing choice, as well as violations of the Fair Housing Act. It analyzes the fair housing complaints received by HUD during the past five years, discusses legal cases concerning fair housing issues and ends with a quantitative evaluation of lending practices in Vancouver.

Complaint and Legal Analysis Summary

- Since January 2006, a total of 59 complaints were filed with HUD by residents in Vancouver. The complaints were largely filed on the basis of disability (39% of all complaints) and race discrimination (29%). About half of the complaints were found to have no reasonable cause; 20 percent of the complaints were resolved through conciliation agreement or settlement.

- There was one fair housing legal case occurring in southwestern Washington in the past five years; none occurred in Vancouver.

- In 2009, there were approximately 6,500 loan applications made by residents in Vancouver. Fifty-nine percent of the loans were originated; 19 percent were denied. Loan origination rates varied by race and ethnicity. The largest gap in denials was between Hispanic and non-Hispanic borrowers: non-Hispanic borrowers’ origination rate was 13 percentage points higher than Hispanic borrowers’.

- Subprime lending was minimal in 2009, with just 86 loans carrying subprime rates; just 8 of these loans were made to minority borrowers.

Fair Housing Complaints

Citizens of Vancouver who believe they have experienced discrimination may report their complaints to the following entities:

- HUD’s Office of Fair Housing and Opportunity (FHEO),
- Washington State Human Rights Commission,
- Northwest Justice Project, and
- Fair Housing Council of Oregon, which also provides services in southwestern Washington.

HUD complaint procedures. Housing discrimination complaints filed with HUD may be done online at (http://www.hud.gov/complaints/housediscrim.cfm), toll free at 1-800-669-9777, or by contacting the Office of Fair Housing and Equal Opportunity in Washington D.C. or Washington’s Fair Housing HUB located in Seattle, Washington.
When a complaint is received by HUD, HUD will notify the person who filed the complaint and will normally notify the alleged violator and allow that person to submit a response. The complaint will be investigated to determine whether there has been a violation of the Fair Housing Act.

A complaint may be resolved in a number of ways. First, HUD will try to reach an agreement between the two parties involved. A conciliation agreement must protect the filer of the complaint and public interest. If an agreement is signed, HUD will take no further action unless the agreement has been breached. HUD will then recommend that the Attorney General file suit.

If HUD has determined that a state or local agency has the same housing powers (“substantial equivalency”) as HUD, they will refer the complaint to that agency and will notify the complainant of the referral. The agency must begin work on the complaint within 30 days or HUD may take it back. If, during the investigative, review, and legal process, HUD finds that discrimination has occurred, the case will be heard in an administrative hearing within 120 days, unless either party prefers the case to be heard in Federal District Court.

**Washington State Human Rights Commission complaint procedures.** Filing a complaint with the Washington State Human Rights Commission (WSHRC) is done by visiting the WSHRC complaint webpage ([www.hum.wa.gov/CQ/Index.html](http://www.hum.wa.gov/CQ/Index.html)) or contacting the Olympia or Spokane offices. A discrimination charge may be filed by mail, online or in person.

Before filing a housing discrimination complaint, the WSHRC advises that people fill out an “online complaint questionnaire” or talk by phone with an intake officer. This helps gather information to confirm that an investigation is necessary before filing a formal complaint with the WSHRC. At the end of the form, the complainant chooses if they want to make the questionnaire a formal complaint or request to speak to a WSHRC representative before making a decision. The filing of a discrimination charge must be done within one year of the date of the alleged violation.

**Northwest Justice Project complaint procedures.** The Northwest Justice Project (NJP) is Washington’s publicly funded legal aid program. To file a complaint with the NJP, residents may call a legal hotline to speak with a representative and receive legal advice.

NJP operates a toll-free intake and referral hotline called CLEAR (Coordinated Legal Education Advice and Referral). CLEAR serves as the statewide, centralized point of access for clients seeking free legal help, including advice, education, limited legal services, self-help materials and, where available, referrals for further representation. The organization also maintains the Washington Law Help ([http://www.washingtonlawhelp.org](http://www.washingtonlawhelp.org)) website, which provides legal resources on a variety of topics including fair housing.

**Fair Housing Council of Oregon complaint procedures.** The Fair Housing Council of Oregon (FHC0) encourages people that feel they have been a victim of housing
discrimination to immediately contact the organization’s office by phone. A FHCO staff member collects information about the incident and helps the caller determine the best course of action. The organization encourages the complainant to gather as many facts and details as possible in regards to the incident prior to making any actions.

The FHCO staff will provide the options to file a lawsuit, file and agency complaint, or drop the case. Once a complaint is filed, there may be an attempt to conciliate, settle or proceed to a court hearing. Residents must file a complaint with the FHCO within one year after the discriminatory act. If a resident chooses to file a private lawsuit, they must do so within two years.

The FHCO website also provides a thorough set of frequently asked questions that define housing discrimination and common situations that warrant investigation.

**HUD complaint trends.** Complaints that were investigated by HUD between 2006 and 2011 were collected and analyzed for this AI.

From 2006 through July 2011, 59 fair housing complaints filed with HUD—or an average of about 11 complaints per year—by residents of Vancouver. A total of 61 complaints were filed in Clark County overall; complaints filed by Vancouver residents represented all but two of the county complaints (those were both filed by residents in Washougal). Therefore, about 97 percent of the complaints filed in the county were filed by Vancouver residents.

Figure II-1 shows the trends in complaint filings during the past five and one-half years.

**Figure II-1.**
**HUD Fair Housing Complaint Trends, Vancouver, January 2006 through July 2011**

Source:
U.S. Department of Housing & Urban Development, Office of Fair Housing and Equal Opportunity, Seattle Region.

Figure II-2 shows the reasons complaints were filed. Complainants may claim more than one basis of discrimination in a single complaint; therefore, the total number of reasons for the complaints exceed the number of complaints.
The most common reason fair housing complaints filed by Vancouver residents during the past five years was discrimination on the basis of disability (39% of complaints), followed by race (29%).

Figure II-2.
Basis of HUD Complaints,
Vancouver, January 2006 through July 2011

<table>
<thead>
<tr>
<th>Basis</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability</td>
<td>26</td>
<td>39%</td>
</tr>
<tr>
<td>Family status</td>
<td>6</td>
<td>9%</td>
</tr>
<tr>
<td>National Origin</td>
<td>5</td>
<td>8%</td>
</tr>
<tr>
<td>Race</td>
<td>19</td>
<td>29%</td>
</tr>
<tr>
<td>Religion</td>
<td>2</td>
<td>3%</td>
</tr>
<tr>
<td>Retaliation</td>
<td>6</td>
<td>9%</td>
</tr>
<tr>
<td>Sex</td>
<td>2</td>
<td>3%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>66</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

Note: Basis total exceeds number of complaints because complaints can have multiple reasons why filed.

Source:
U.S. Department of Housing & Urban Development, Office of Fair Housing and Equal Opportunity, Seattle Region.

Figure II-3 shows the outcomes of housing discrimination complaints filed. A little more than half were found to have no cause and dismissed. In about 20 percent of the complaints, conciliation or settlement was successful; in another 14 percent the case was closed because the complainant failed to cooperate.

Figure II-3.
Outcome of HUD Complaints,
Vancouver, January 2006 through July 2011

<table>
<thead>
<tr>
<th>Outcome</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complainant failed to cooperate</td>
<td>8</td>
<td>14%</td>
</tr>
<tr>
<td>Complaint withdrawn</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td>Conciliation/settlement successful</td>
<td>11</td>
<td>19%</td>
</tr>
<tr>
<td>No cause determination</td>
<td>31</td>
<td>53%</td>
</tr>
<tr>
<td>No reason given</td>
<td>3</td>
<td>5%</td>
</tr>
<tr>
<td>Unable to locate complainant</td>
<td>3</td>
<td>5%</td>
</tr>
<tr>
<td>Withdrawn by complainant after resolution</td>
<td>2</td>
<td>3%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>59</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

Source:
U.S. Department of Housing & Urban Development, Office of Fair Housing and Equal Opportunity, Seattle Region.

Legal Cases

As part of the AI, recent legal cases occurring in southwest Washington were reviewed to determine trends in discriminatory behavior. Searches of the Department of Justice and the National Fair Housing Advocate case databases found no cases occurring in Vancouver. One case occurred in Longview; it is discussed below.

HUD v. John E. Price and Shirley L. Price (Disability). In April 2005, William Price filed a complaint against the owners of his apartment complex in Longview, WA for violating the Fair Housing Act because of discrimination by failure to accommodate for a disability. Mr. Price has a physical disability that requires him to fully open his car door upon entering. When adjacent cars began to restrict the full opening of his car door, he requested the apartment management to allow him a parking space that would accommodate for his disability. Mr. Price drafted up an idea that would not restrict other tenants spaces but it was rejected by the apartment management. He then began to park in two spaces to allow for room for his door, to which the management responded with a change to the complex parking policy that one unit was allowed one parking space and any violation would result in eviction. Mr. Price again tried to work...
with the management company to accommodate for his disability, but they rejected his
request and continued to relay their new policy. The court found the apartment owners
to be in violation of the Fair Housing Act in discrimination towards someone for not
providing reasonable accommodations for a disability. The apartment management was
required to compensate Mr. Price for discrimination and applied a civil penalty.

Fair Lending Analysis

This section contains an analysis of home loan and community reinvestment data.
Community Reinvestment Act ratings and Home Mortgage Disclosure Act (HMDA) data
are commonly used in AIs to examine fair lending practices within a jurisdiction. As of
2004, HMDA data contain interest rates of high cost loans, which allows an analysis of
high cost lending patterns.

Community Reinvestment Act (CRA). The CRA requires that financial institutions
progressively seek to enhance community development within the area they serve. On a
regular basis, financial institutions submit information about mortgage loan
applications as well as materials documenting their community development activity.
The records are reviewed to determine if the institution satisfied CRA requirements.
The assessment includes a review of records as related to the following:

- Commitment to evaluating and servicing community credit needs;
- Offering and marketing various credit programs;
- Record of opening and closing of offices;
- Discrimination and other illegal credit practices; and
- Community development initiatives.

The data are evaluated and a rating for each institution is determined. Ratings for
institutions range from substantial noncompliance in meeting credit needs to an
outstanding record of meeting community needs.

Vancouver banks: Two banks in Vancouver were rated for Community Reinvestment
Act activity on May 5, 2008. These banks are Bank of Clark County and First
Independent Bank. Both of these institutions received a “satisfactory” rating. This was
the last time that any banks in Clark County were rated.

Mortgage lending data. HMDA data are widely used to detect evidence of
discrimination in mortgage lending. In fact, concern about discriminatory lending
practices in the 1970s led to the requirement for financial institutions to collect and
report HMDA data. The variables contained in the HMDA dataset have expanded over
time, allowing for more comprehensive analyses and better results. However, despite
expansions in the data reported, HMDA analyses remain limited because of the
information that is not reported.
As such, studies of lending disparities that use HMDA data carry a similar caveat: HMDA data can be used to determine disparities in loan originations and interest rates among borrowers of different races, ethnicities, genders, and location of the property they hope to own. The data can also be used to explain many of the reasons for any lending disparities (e.g., poor credit history). Yet HMDA data do not contain all of the factors that are evaluated by lending institutions when they decide to make a loan to a borrower. Basically, the data provide a lot of information about the lending decision—but not all of the information.

Beginning in 2004, HMDA data contained the interest rates on higher-priced mortgage loans. This allows examinations of disparities in high-cost, including subprime, loans among different racial and ethnic groups. It is important to remember that subprime loans are not always predatory or suggest fair lending issues, and that the numerous factors that can make a loan “predatory” are not adequately represented in available data. Therefore, actual predatory practices cannot be identified through HMDA data analysis. However, the data analysis can be used to identify where additional scrutiny is warranted, and how public education and outreach efforts should be targeted.

HMDA data report several types of loans. These include loans used to purchase homes, loans to make home improvements and refinancing of existing mortgage loans, as defined below.

- **Home purchase loan.** A home purchase loan is any loan secured by and made for the purpose of purchasing a housing unit.

- **Home improvement loan.** A home improvement loan is used, at least in part, for repairing, rehabilitating, remodeling, or improving a housing unit or the real property on which the unit is located.

- **Refinancing.** Refinancing is any dwelling-secured loan that replaces and satisfies another dwelling-secured loan to the same borrower. The purpose for which a loan is refinanced is not relevant for HMDA purposes.

The HMDA data are separated into two primary loan categories: conventional loans and government-guaranteed loans. Government-guaranteed loans are those insured by the Federal Housing Administration and Veterans Administration.

This section uses the analysis of HMDA data to determine:

- The geographic areas in Vancouver where high-cost lending and loan denials are concentrated and the correlation of these areas with concentrations of minority and low income households;

- Disparities in high-cost lending and loan denials across different racial and ethnic groups.

**Loan applications.** The most recent HMDA data available are for the 2009 calendar year. During 2009, there were 6,531 loan applications made in the City of Vancouver for owner-occupied homes. Seventy percent of these loan applications were for
conventional loans; 25 percent were for FHA-insured loans; and the balance was for VA- guaranteed loans, as shown in the following figure.

**Figure II-4.**
**Type of Lenders in Loan Applications, Vancouver, 2009**

Source:
Home Mortgage Disclosure Act (HMDA), 2009.

Almost three-fourths of the loan applications were for home refinancing; about one-fourth were for home purchases. The balance (just 3 percent) consisted of home improvement loans.

**Figure II-5.**
**Purpose of Loan Applications, Vancouver, 2009**

Source:
Home Mortgage Disclosure Act (HMDA), 2009.

**Loan denials.** Of all of the loan applications, 59 percent were approved and 19 percent were denied. Other loans were not initiated because of various reasons, as shown in Figure II-8.

**Figure II-6.**
**Action Taken on Loan Applications, Vancouver, 2009**

Source:
Home Mortgage Disclosure Act (HMDA), 2009.

<table>
<thead>
<tr>
<th>Action Taken</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loan originated</td>
<td>3,859</td>
<td>59%</td>
</tr>
<tr>
<td>Approved, but not accepted</td>
<td>501</td>
<td>8%</td>
</tr>
<tr>
<td>Denied by financial institution</td>
<td>1,258</td>
<td>19%</td>
</tr>
<tr>
<td>Withdrawn by applicant</td>
<td>759</td>
<td>12%</td>
</tr>
<tr>
<td>File closed for incompleteness</td>
<td>154</td>
<td>2%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>6,531</td>
<td>100%</td>
</tr>
</tbody>
</table>

Figure II-7 shows the result of the loan application by purpose of loan (home purchase, home improvement, home refinancing). Home purchase loans generally have a higher origination rate and lower denial rate than home refinancing or home improvement loans. The 59 percent loan application origination rate in Vancouver is related to the high proportion of loan applications that were for mortgage refinancing activity.
Figure II-7.
Action Taken on Loan Applications by Loan Purpose, Vancouver, 2009

Source: Home Mortgage Disclosure Act (HMDA), 2009.

Figure II-8 shows the action taken on mortgage loan application by the type of loan. FHA loan applications had higher origination rates—and lower denial rates—than conventional loans in 2009. Veterans Administration (VA) guaranteed loans had the highest percentage of originations and lowest percentage of denials than other loan types; however, these loans made up just 5 percent of the loans applied for by Vancouver residents in 2009.

Figure II-8 shows the action taken on mortgage loan application by the type of loan. FHA loan applications had higher origination rates—and lower denial rates—than conventional loans in 2009. Veterans Administration (VA) guaranteed loans had the highest percentage of originations and lowest percentage of denials than other loan types; however, these loans made up just 5 percent of the loans applied for by Vancouver residents in 2009.

Figure II-9 presents the total reasons of loan denial, including up to two reasons for each denied application. Of the loans denied in Vancouver in 2009, the highest proportion—31 percent—were denied due to insufficient collateral. The other leading causes of denial were high debt-to-income ratios (23% of loans were denied for this reason) and poor credit histories (17%). The reason for loan denials was not reported in 22 percent of the applications; these are not included in Figure II-9.
Denial rates by race and ethnicity. This section presents an analysis of denial rates by race and ethnicity, categorized by loan type and denial reason. The analysis focuses on the largest racial and ethnic groups in Vancouver: Asian, Hispanic and White.

Figure II-10 presents the results of loan applications by race and ethnicity. White loan applicants had the highest origination rates at 61 percent. However, the denial rates for non-White races were not far behind at 55 percent for Asian applicants and 59 percent for African American applicants.

The largest gap in origination rates is between Hispanic and non-Hispanic applicants: Hispanic applicants received loans 48 percent of the time compared with 61 percent for non-Hispanic applicants.

The results were similar in Clark County overall. White applicants’ loans were originated 63 percent of the time, compared to between 47 percent (American Indian and Alaskan Native) and 60 percent (Asian) for non-White applications. In Clark County, loan denial rates were higher for American Indian and Alaskan Native applicants (29% of loans were denied).

Part of the disparity in loan origination rates between Hispanic and non-Hispanic applicants is that Hispanic applicants had slightly higher rates of non-acceptance of loans and loans closed for incompleteness. This explains 3 percentage points of the 13 percentage point difference in loan origination rates between Hispanic and non-Hispanic applicants.

Denial rate by race/ethnicity by census tract. A further examination of loan approvals by race/ethnicity is provided in the two maps below. As seen in the maps, there are a handful of Census tracts with high proportions of minorities and above average denial rates; however, the high-denial areas and minority-concentrated areas are not strongly aligned.
### Figure II-10.
**Result of Mortgage Loan Applications by Race/Ethnicity, Vancouver, 2009**

<table>
<thead>
<tr>
<th>Race</th>
<th>Loan originated</th>
<th>Approved, but not accepted</th>
<th>Denied by financial institution</th>
<th>Withdrawn by applicant</th>
<th>File closed for incompleteness</th>
<th>Total Loans</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian or Alaska Native</td>
<td>50%</td>
<td>9%</td>
<td>20%</td>
<td>20%</td>
<td>2%</td>
<td>46</td>
</tr>
<tr>
<td>Asian</td>
<td>55%</td>
<td>8%</td>
<td>21%</td>
<td>13%</td>
<td>3%</td>
<td>253</td>
</tr>
<tr>
<td>Black or African American</td>
<td>59%</td>
<td>4%</td>
<td>25%</td>
<td>8%</td>
<td>4%</td>
<td>99</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>41%</td>
<td>14%</td>
<td>29%</td>
<td>14%</td>
<td>2%</td>
<td>49</td>
</tr>
<tr>
<td>White</td>
<td>61%</td>
<td>7%</td>
<td>19%</td>
<td>11%</td>
<td>2%</td>
<td>5,264</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Loan originated</th>
<th>Approved, but not accepted</th>
<th>Denied by financial institution</th>
<th>Withdrawn by applicant</th>
<th>File closed for incompleteness</th>
<th>Total Loans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hispanic or Latino</td>
<td>48%</td>
<td>8%</td>
<td>30%</td>
<td>11%</td>
<td>3%</td>
<td>195</td>
</tr>
<tr>
<td>Not Hispanic or Latino</td>
<td>61%</td>
<td>7%</td>
<td>19%</td>
<td>11%</td>
<td>2%</td>
<td>5,500</td>
</tr>
<tr>
<td>Total loan applications</td>
<td>59%</td>
<td>8%</td>
<td>19%</td>
<td>12%</td>
<td>2%</td>
<td>6,531</td>
</tr>
</tbody>
</table>

### Racial and Ethnic differences

<table>
<thead>
<tr>
<th></th>
<th>Loan originated</th>
<th>Approved, but not accepted</th>
<th>Denied by financial institution</th>
<th>Withdrawn by applicant</th>
<th>File closed for incompleteness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian/White</td>
<td>-6%</td>
<td>0%</td>
<td>2%</td>
<td>3%</td>
<td>1%</td>
</tr>
<tr>
<td>African American/White</td>
<td>-3%</td>
<td>-3%</td>
<td>7%</td>
<td>-3%</td>
<td>2%</td>
</tr>
<tr>
<td>Hispanic/Non-Hispanic</td>
<td>-13%</td>
<td>1%</td>
<td>11%</td>
<td>0%</td>
<td>1%</td>
</tr>
</tbody>
</table>

Note: In 820 loans, race was not identified.
Source: Home Mortgage Disclosure Act (HMDA), 2009.

### Figure II-11.
**Higher than Average Denials by Percent Non-White, Vancouver 2009**

Note: The denial rate for all loans in the City overall was 19 percent.
Figure II-12. Higher than Average Denials by Percent Hispanic, Vancouver, 2009

Note: The denial rate for all loans in the City overall was 19 percent.


Reasons for denial. HMDA data also contain summary information on the reasons for denial by type of loan and applicant characteristics, which can help explain some of the variation in approval rates among applicants. As demonstrated in Figure II-13, inadequate collateral is a primary reason for application denials across race and loan type. High debt-to-income ratios and credit history are other important reasons that loans are denied.

Figure II-13. Reasons for Denial by Loan Type, Vancouver, 2009

Note: Red, bolded areas show the top reasons loans were denied.

HMDA source data do not provide details about “other” denial reasons.


<table>
<thead>
<tr>
<th>Reason</th>
<th>Home Purchase</th>
<th>Home Improvement</th>
<th>Home Refinancing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Collateral</td>
<td>23%</td>
<td>18%</td>
<td>37%</td>
</tr>
<tr>
<td>Credit application incomplete</td>
<td>12%</td>
<td>0%</td>
<td>8%</td>
</tr>
<tr>
<td>Credit history</td>
<td>16%</td>
<td>58%</td>
<td>13%</td>
</tr>
<tr>
<td>Debt-to-income ratio</td>
<td>26%</td>
<td>15%</td>
<td>22%</td>
</tr>
<tr>
<td>Employment history</td>
<td>3%</td>
<td>0%</td>
<td>1%</td>
</tr>
<tr>
<td>Insufficient cash</td>
<td>3%</td>
<td>0%</td>
<td>1%</td>
</tr>
<tr>
<td>Mortgage insurance denied</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
</tr>
<tr>
<td>Employment history</td>
<td>12%</td>
<td>9%</td>
<td>11%</td>
</tr>
<tr>
<td>Unverifiable information</td>
<td>4%</td>
<td>0%</td>
<td>5%</td>
</tr>
<tr>
<td><strong>Total denials</strong></td>
<td><strong>146</strong></td>
<td><strong>55</strong></td>
<td><strong>801</strong></td>
</tr>
</tbody>
</table>

Figure II-14 shows the reason for loan denials for Hispanic and non-Hispanic applicants. For both, lack of collateral, high debt-to-income ratios and (less important for non-Hispanic applicants), poor credit histories were the primary reasons loans were denied.
Figure II-14.
Reasons for Denial by Ethnicity, Vancouver, 2009

Note:
Red, bolded areas show the top reasons loans were denied.
HMMDA source data do not provide details about “other” denial reasons.

Source:
Home Mortgage Disclosure Act (HDMA), 2009.

<table>
<thead>
<tr>
<th></th>
<th>Hispanic</th>
<th>Non-Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Collateral</td>
<td>32%</td>
<td>35%</td>
</tr>
<tr>
<td>Credit application incomplete</td>
<td>2%</td>
<td>9%</td>
</tr>
<tr>
<td>Credit history</td>
<td>28%</td>
<td>15%</td>
</tr>
<tr>
<td>Debt-to-income ratio</td>
<td>28%</td>
<td>21%</td>
</tr>
<tr>
<td>Employment history</td>
<td>0%</td>
<td>2%</td>
</tr>
<tr>
<td>Insufficient cash (downpayment, closing costs)</td>
<td>4%</td>
<td>2%</td>
</tr>
<tr>
<td>Mortgage insurance denied</td>
<td>0%</td>
<td>1%</td>
</tr>
<tr>
<td>Other</td>
<td>4%</td>
<td>12%</td>
</tr>
<tr>
<td>Unverifiable information</td>
<td>2%</td>
<td>5%</td>
</tr>
<tr>
<td><strong>Total denials</strong></td>
<td>50</td>
<td>814</td>
</tr>
</tbody>
</table>

Subprime analysis. This section examines how often minorities in Vancouver received subprime loans compared to Whites. For the purposes of this section, we define “subprime” as a loan with an APR of more than 3 percentage points above comparable Treasuries. This is consistent with the intent of the Federal Reserve in defining “subprime” in the HMDA data.

For all loan applications made in 2009, 86 loans in Vancouver were flagged as receiving subprime rates in the HMDA data. Seventy-eight of these loans were made to White borrowers; eight were made to non-White borrowers, two of whom were Hispanic.

Figure II-15.
Subprime Loans by Race and Ethnicity, Vancouver, 2009

<table>
<thead>
<tr>
<th></th>
<th>Non-subprime</th>
<th>Subprime</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td><strong>Race</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Indian or Alaska Native</td>
<td>44</td>
<td>95.7%</td>
</tr>
<tr>
<td>Asian</td>
<td>253</td>
<td>100%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>99</td>
<td>100%</td>
</tr>
<tr>
<td>Native Hawaiian or Other</td>
<td>48</td>
<td>98.0%</td>
</tr>
<tr>
<td>White</td>
<td>5,186</td>
<td>98.5%</td>
</tr>
<tr>
<td>Other</td>
<td>815</td>
<td>99.5%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>6,445</td>
<td>99.5%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Ethnicity</strong></th>
<th>Subprime</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hispanic</td>
<td>193</td>
</tr>
<tr>
<td>Non-Hispanic</td>
<td>5,422</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>5,615</td>
</tr>
</tbody>
</table>

Note: “Subprime” loans have an APR of more than 3 percentage points above comparable Treasuries.
SECTION III.
Public Outreach

This section details the public outreach process for the AI.

Public Input Elements
The public outreach for the AI consisted of two surveys:

- An online stakeholder survey targeted to the housing and social service industries, and
- A resident survey, offered online and on paper.

A total of 64 Vancouver residents and 42 stakeholders responded to the surveys. BBC designed the survey instruments and City staff distributed and promoted the surveys. The resident survey is not meant to be interpreted as a statistically valid survey of all Vancouver residents. Rather, it is meant to reflect the experiences and opinions of residents and members of protected classes who live in the City.

Participant Profile
This section provides additional detail about the stakeholders and residents who participated in the public input process.

Stakeholders. Respondents to the stakeholder survey represented a broad spectrum of housing, community and social service professionals. Industries and types of agencies represented include:

- Affordable housing;
- Corrections;
- Domestic violence;
- Education;
- Food pantry;
- Homeless services;
- Juvenile justice;
- Land use planning;
- Landlords;
- Mental health services;
- Probation/parole;
- Property management;
- Residential development;
- Sales;
- Senior services;
- Services for low income residents;
- Services for persons with disabilities; and
- Services for veterans

With respect to service area, the majority of providers serve all of Clark County. A few offer coverage throughout Washington and in parts of Oregon.

Residents. Respondents to the resident survey answered several demographic and socioeconomic questions.
Children. More than half of the residents responding to the survey have children under the age of 18, as shown in Figure III-1.

**Figure III-1. Do you have children under the age of 18?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>54.7%</td>
<td>45.3%</td>
</tr>
</tbody>
</table>

**Note:**

n=64.

**Source:**

BBC Research & Consulting from the 2011 City of Vancouver Resident Fair Housing Survey.

**Race/ethnicity.** As shown in Figure III-2, the majority of respondents to the survey identified themselves as White, and slightly more than one in five identified as African American or Black. Compared to the racial and ethnic distribution of the City, a higher proportion of African Americans and lower proportion of Hispanics responded to the survey.

**Figure III-2. Which ethnic or cultural group do you consider yourself a part of?**

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>81.3%</td>
</tr>
<tr>
<td>African American or Black</td>
<td>12.5%</td>
</tr>
<tr>
<td>Other Multi-racial</td>
<td>4.7%</td>
</tr>
<tr>
<td>American Indian or Alaska Native</td>
<td>3.1%</td>
</tr>
<tr>
<td>Hispanic/Chicano/Latino</td>
<td>3.1%</td>
</tr>
</tbody>
</table>

**Note:**

n=64.

Percentages add to greater than 100 percent due to multiple response.

**Source:**

BBC Research & Consulting from the 2011 City of Vancouver Resident Fair Housing Survey.

**Income and household size.** Regardless of household size, 92 percent of respondents report incomes of less than $24,950, as presented in Figure III-3. Survey respondents therefore represent lower income households in the City. Nearly one-third of respondents (31%) are single householders earning less than $24,950.
### Figure III-3.
**Household Size and Income, Percent of Respondents**

<table>
<thead>
<tr>
<th>Household Size</th>
<th>$24,950 or less</th>
<th>$24,951 up to $28,500</th>
<th>$28,501 up to $32,050</th>
<th>$32,051 up to $35,600</th>
<th>$35,601 up to $38,450</th>
<th>$41,301 or more</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>31%</td>
<td>0%</td>
<td>0%</td>
<td>2%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>2</td>
<td>19%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>3</td>
<td>23%</td>
<td>0%</td>
<td>2%</td>
<td>0%</td>
<td>2%</td>
<td>0%</td>
</tr>
<tr>
<td>4</td>
<td>13%</td>
<td>2%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>2%</td>
</tr>
<tr>
<td>5</td>
<td>5%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>6</td>
<td>2%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

*Note:* n=62.

*Source:* BBC Research & Consulting from the 2011 City of Vancouver Resident Fair Housing Survey.

### Disability
Half of the households represented in the survey include at least one member with a disability. In the City overall, 11 percent of residents report being disabled. As presented in Figure III-4, one in five survey respondents resides in housing that does not meet their accessibility needs.

### Figure III-4.
**Disability and Housing Accessibility**

<table>
<thead>
<tr>
<th>Yes (50.8%)</th>
<th>No (49.2%)</th>
<th>Yes (83.3%)</th>
<th>No (16.6%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you or any member of your family have a disability?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Note:* n=61 and n=30.

*Source:* BBC Research & Consulting from the 2011 City of Vancouver Resident Fair Housing Survey.

The types of improvement respondents need include:
- “Service animal.”
- “More handicapped parking and grab bars in bath.”
- “Carpets on floor so that I don’t slip and fall.”
- “Better back door steps; front door entry is a huge step, and gets difficult with walker or cane or even just being wobbly and trying to get in or out.”

### Experience with Housing Discrimination
More than one in five respondents to the resident survey stated that they had experienced housing discrimination, as shown in Figure III-5. An additional 16 percent of respondents were “not sure.”
Figure III-5.
Do you think you have ever experienced housing discrimination?

Note: n=63.

Source: BBC Research & Consulting from the 2011 City of Vancouver Resident Fair Housing Survey.

When asked for the reason they thought they were discriminated against, respondents made the following statements:

- “My age. My race. All of it. I need to find a place ASAP.”
- “Being a Section 8 housing voucher recipient.”
- “On housing, low wages and had children — teens.”
- “Criminal record. Lack of deposit.”
- “Disability, single parent of three boys.”
- “My background. My crimes were not 5 years old at the time.”
- “Poor credit.”
- “Because I was African American.”
- “My friend and I wanted to be roommates and the landlord assumed we were gay and refused to even let us look at the place. Also where I live now illegals and foreigners come first.”
- “Prior eviction over 10 years old still held against me even though I was credible and working at the time.”
- “Mental health disability.”
- “My disabilities.”

Potential Barriers to Fair Housing

This section explores residents’ and stakeholders’ opinions regarding potential barriers to fair housing. Because of their expertise, stakeholders responded to a more comprehensive number of barriers than residents.

Potential barriers — residents. Among residents, the top barriers to fair housing they report experiencing in Vancouver are:

- Low income levels;
- Lack of affordable housing to rent;
- Concentrations of affordable housing in certain areas;
- Poor credit; and
- Lack of affordable housing to rent.

The top five barriers all have an average rating of 6 or higher. Figure III-6 depicts residents’ ratings of potential barriers to fair housing.

**Figure III-6.**
Potential Barriers to Fair Housing — Residents

![Potential Barriers to Fair Housing — Residents](image)

Note: n=62.
Source: BBC Research & Consulting from the 2011

A few residents selected “other” as a potential barrier, and identified the following other barriers to fair housing:

- “I have not been on the market to buy, but to rent and be of any nationality but White has been a huge problem for friends of mine. A chief of police once told me that the cops were called because a black man was mowing my neighbor’s lawn. Then, he laughed and said it’s normal around here. Huge problem!!!”

- “I have been waiting for my case manager to help me find a place and she is taking her sweet time. I been homeless since December 16, 2010.”
“I have been waiting over 6 years to get on the housing list. I am a disabled taxpayer, and I want to know why refuges and foreigners are allowed housing without a list immediately before a citizen is. Why?”

“Racism. [My] significant other is an African American, and it all goes well on the phone but they put up the closed or no vacancy sign when they see us coming!”

“I am homeless and there is no place for a single woman who is not on drugs or alcohol.”

Potential barriers — stakeholders. Stakeholders rated the seriousness of potential barriers to fair housing within several categories:

- Economic, demographic and housing factors;
- Capacity issues;
- Land use and zoning factors;
- Lending activities, and
- Real estate activities.

Note that stakeholders’ responses apply to both the City of Vancouver and Clark County.

Economic, demographic and housing factors. Income levels of minority and female-headed households and minority borrowers’ poor credit histories were the top barriers to fair housing associated with economic, demographic and housing factors according to stakeholders (Figure III-7). These two barriers had an average rating of 7.3.

Figure III-7. Potential Economic, Demographic and Housing Barriers to Fair Housing — Stakeholders

![Diagram showing potential economic, demographic, and housing barriers with average ratings]

Note: n=33.
Source: BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.
Several stakeholders noted other potential economic, demographic and housing barriers of concern in Vancouver and Clark County, and these factors include:

- “Language seems to be the largest barrier I've seen so far. Many minority communities cannot even fill out the application because of this barrier.”

- “Some individuals in our area maintain strong prejudice against Hispanic households, falsely associating Hispanic families with increases in crime and decreases in property values.”

- “Those who are currently homeless not having the funds for first month rent plus security deposit.”

- “1. Poor credit histories are the norm for most poor people in need of housing. 2. No supported housing resources for people living with significant persistent mental illness in our community. 3. Not enough housing with rents based on income for individuals living below federal poverty line. 4. No "wet"/harm reduction housing for poor individuals who continue to use alcohol or drugs. Our Community NEEDS housing for individuals, families and people with young children that is based on household income. Excellent Renters class should develop a similar program for Excellent Renters for People in Shared Housing (it’s the norm in NY and SF), as it makes funding dollars go further and people at large lack skills to do so successfully over time.”

- “People who are on TANF do not receive enough per month to pay for even a studio apartment. The local housing authority does not even take applications anymore, so there's no hope of getting subsidized housing, which is the only way people on TANF can afford housing.”

- “It is difficult to find housing for people with criminal convictions.”

**Land use and zoning factors.** Figure III-8 presents stakeholders’ ratings of land use and zoning factors. Of the four land use and zoning factors evaluated, restrictive covenants by builders, developers or homeowners associations and limitations on density of housing had an overall average rating of about 5.0. Overall, land use and zoning are perceived to be a modest barrier.
A few respondents suggested additional zoning and land use factors that may be barriers to fair housing. These include:

- “There is not a lot of building going on right now, and there are not enough shared living situations available. Single moms or dads just don’t have a chance, let alone a single mother with four kids.”

- “Placing housing opportunities too near to schools and parks; placing housing opportunities too far from bus/transportation lines.”

- “Lack of transitional type housing.”

**Capacity issues.** Stakeholders consider the lack of transit options for low income, disabled and senior residents to be the most serious barrier to fair housing due to capacity issues (with a rating of 7.3), as shown in Figure III-9. A lack of knowledge among resident regarding fair housing law was the second most serious capacity issue. One stakeholder commented that, “I think that there is plenty of knowledge getting its way out there but fear seems to be the big item.”
Figure III-9.
Capacity Issues as Potential Barriers to Fair Housing — Stakeholders

Lending activities. Among lending activities rated, stakeholders considered lenders offering prime borrowers subprime rates (6.2 rating) and lenders targeting subprime, high risk borrowers (5.9 rating) to be the most serious potential barriers to fair housing, as depicted in Figure III-10. One stakeholder wrote, “I think that lenders — after talking to a reality agent yesterday — are being more cautious and making the buyers jump through hoops.”
While most stakeholders do not think that there are particular predatory lending practices that are a serious problem in the area, nearly 30 percent think that there are practices that pose a serious problem, as shown in Figure III-11.

Figure III-11.
Are there particular predatory lending practices that are a serious problem in Vancouver or Clark County? — Stakeholders

Note: n=21.
Source: BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.
Those who responded that particular predatory lending practices are a serious problem mentioned the following:

- “Check cashing businesses.”
- “I used to work for a refinancing company that only preyed on the financially weak.”
- “Historically, Rent to Own properties would target lower income families and single moms in our community. I do not know if currently that is the case or not.”
- “Encouraging households to continue borrowing money against their mortgage until they are no longer able to pay the monthly mortgage.”

**Real estate activities.** On average, stakeholders rated owners of mobile home parks threatening evictions unless tenants pay additional fees and rents as the most serious potential barrier to fair housing among real estate activities (rating of 6.3), followed by housing providers placing certain tenants in the least desirable units in a development (5.6 rating). Figure III-12 presents stakeholders’ ratings of the seriousness of real estate activities as barriers to fair housing.
Figure III-12.
Real Estate Activities as Potential Barriers to Fair Housing — Stakeholders

Note: n=varies by response from 14 to 33.
Source: BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.

Summary of most serious potential barriers to fair housing — stakeholders. Figure III-13 summarizes the most serious barriers to fair housing as rated by stakeholders. Based on the average rating, the following are the three most serious potential barriers to fair housing:

- Income levels of minority and female-headed households, with a rating of 7.4;
- Lack of transit options for low income, disabled, and senior residents, with a rating of 7.3; and
- Poor credit histories of minority borrowers, with a rating of 7.2.
Figure III-13.
Most Serious Potential Barriers to Fair Housing — Stakeholders

- Housing providers refusing to make reasonable accommodations for tenants with disabilities (7.4)
- Concentrations of affordable housing in certain areas (7.3)
- Poor credit histories of minority borrowers (7.2)
- Owners of mobile home parks threatening evictions unless tenants pay additional fees and rents (6.8)
- Lenders offering prime customers subprime rates (6.3)
- Lenders targeting subprime, high risk borrowers (6.2)
- Lack of knowledge among small landlords regarding fair housing (5.9)
- Limited capacity of a local organization devoted to fair housing investigation or testing (5.9)
- Limited capacity of a local organization devoted to fair housing investigation or testing (5.8)
- Housing providers placing certain tenants in the least desirable units in a development (5.6)
- Concentrations of affordable housing in certain areas (5.5)
- Housing providers refusing to make reasonable accommodations for tenants with disabilities (5.3)

0% 20% 40% 60% 80% 100%

Source: BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.
Needed Services and Housing Types
Stakeholders identified types of services and housing that they believe are missing in Vancouver or Clark County. As shown in Figure III-14, affordable housing to rent was noted as a need by nearly 80 percent of stakeholders, followed closely by services for low income residents and public transit.

Figure III-14.
Types of Services and Housing Missing in Vancouver or Clark County

Note:
n=22

Source:
BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.

The needs identified by stakeholders are discussed in more detail, in descending order of need based on Figure III-14.

Affordable housing to rent. As shown in Figure III-14, affordable housing to rent was the service that nearly 80 percent of all stakeholders reported as a need — the greatest among all needs examined. Stakeholders cited a need for affordable rental housing throughout Clark County and in Vancouver and Camas. With regards to affordable rental housing needs, stakeholder comments included:

- “Affordable housing that is near resources such as grocery stores.”
- “Affordable housing for high risk populations; those with criminal histories.”
- “Throughout Clark County for individuals and families living at or below federal poverty level.”
- “Larger units than one to two bedroom units.”

Services for low income residents. Stakeholders’ perceived service needs for low income residents ranged broadly, from daycare to affordable rental housing to access to basic necessities and transportation. Examples of the needs for low income services identified by stakeholders include:

- “Affordable, safe housing for single caregivers and their children.”
- “Bus passes are too high in cost.”
- “Resources for security deposits.”
- “Three to four bedroom apartments for the low income residents.”
- “Education and assistance with advocacy about fair housing.”
Public transit. With regard to public transit, stakeholders’ expressed a need for enhanced connectivity between the City of Vancouver and destinations within Clark County. Expanded service and hours of service, particularly within the county was mentioned. Stakeholders’ specific comments about public transit needs include:

- “Public transit is decent in City of Vancouver, poor in outer areas.”
- “Multiple locations have no service, limiting access to get folks to work and therefore restricting where they can live.”
- “Frequent bus services connecting the Vancouver downtown with outlying areas of Clark County.”
- “Low cost bus passes for low income.”
- “Medical appointment transportation assistance that is easier to access.”

Services for persons with disabilities. One-third of stakeholders identified services needed for persons with disabilities. These included mental health diagnosis services, more subsidized housing and fair housing education and advocacy.

- “There is little to no housing for adults with disabilities who became disabled after age 18 and are not yet 62.”
- “More subsidized housing for people with disabilities.”
- “Shelters which can serve homeless individuals who require caregivers, but do not have a specified caregiver.”
- “Education and assistance with advocacy about fair housing.”

Affordable housing to buy. With respect to affordable housing to buy, one in four stakeholders identified this as a need. As to where affordable housing for purchase is needed, stakeholders mentioned the City of Vancouver and throughout Clark County. One stakeholder suggested, “More agencies to assist a family to purchase a home. For example, land trust and community housing resource centers.”

Equitable distribution of neighborhood amenities. Access to grocery stores and transportation are the amenities mentioned by nearly all stakeholders who considered equitable distribution of amenities to be a need.

- “Low income housing is often in areas without groceries, transportation etc...”
- “There is a lack of sidewalks, good lighting and healthy option grocery stores in most poor areas of Clark County.”

Senior services. The few respondents who identified senior services as a need stated that seniors need fair housing education and that seating by bus stops is needed.
Fair Housing Knowledge and Communications

Residents and stakeholders responded to several questions about their knowledge of fair housing law and the best ways to communicate information about fair housing.

Response to discrimination. As presented in Figure III-15, most residents stated that they would file a complaint if they or someone they knew thought they’d been discriminated against when trying to rent or buy housing. About one in ten would move or find another place to rent or buy.

![Figure III-15 Response to Perceived Housing Discrimination](image)

Note: 
\[n=63.\]

Source: 
BBC Research & Consulting from the 2011 City of Vancouver Resident Fair Housing Survey.

Responses in the “other” category include:

- “Work it out with landlord/tenant.”
- “Washington State ignores its complaints and refuses to process them, so there is no record; the person is screwed. I say bring a sign to where they were denied and carry it around for a few days in front of the property; at least then the people will know. Be bold; put the abusers name on it.”
- “Contact Human Rights Council and don’t move there.”
- “Be honest and take the Ready to Rent class.”
- “From my experience with the system, complaints aren’t even considered or anything done about them, especially the Clark County RSN (Regional Support Networks).”

Report discrimination. About 40 percent of resident respondents stated that they knew who to contact to report housing discrimination, as shown in Figure III-16. Residents would contact HUD, the Fair Housing Council of Oregon and Southwest Washington, the Vancouver housing authority, BOLI (Bureau of Labor and Industry) and the Clark County Ombudsman. One respondent would Google “housing discrimination.”
Adequacy of fair housing resources. Stakeholders’ perspectives on whether or not there is adequate information, resources and training on fair housing law in Vancouver and Clark County were mixed. As shown in Figure III-17, about 60 percent of stakeholders believe there is adequate fair housing information.

Several of the stakeholders who did not think there was adequate information identified the types of information, resources and training needed. This included:

- “Regular Forums with up-to-date information.”
- “Landlords need more training in housing assistance programs. Social service agencies need more information on possible housing options.”
- “Brief, easy to read information could be available to share with clients and to have available in target areas (WINCO?, DSHS? WIC?).”
- “I do feel there is adequate information created...just not distributed or taught.”
- “Most trainings are offered in Seattle or Portland. Most private landlords don’t realize Fair Housing rules apply to them, nor do they understand what those rules are.”

Communicating with stakeholders. When asked about the best way to communicate to professionals in their field about fair housing issues, email and websites were the preferred method by more than 60 percent of stakeholders, as shown in Figure III-18. Suggestions in the “other” category include town hall meetings in low income neighborhoods, outreach and presentations to groups and associations, events and trainings.
Figure III-18. What is the best way to communicate with professionals in your field about fair housing issues?

Note: n=29.

Source: BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.
SECTION IV. 
Fair Housing Impediments and Action Plan

This final section of the Vancouver AI presents the findings from the AI research; identifies impediments found during the research process; and concludes with a recommended Fair Housing Action Plan for the City of Vancouver.

AI Findings
There is much good news about the state of fair housing in the City of Vancouver:

**Solid policies and practices.** The City of Vancouver has many policies and practices in place to mitigate fair housing barriers. The City’s recent (2011-2030) Comprehensive Plan includes progressive goals to ensuring balanced housing opportunities for all types of residents. The Vancouver Housing Authority’s (VHA) policies and practices are easy to understand and fair. In particular, the VHA offers fair housing protections that exceed those of the Federal Fair Housing Act.

**Empowered residents.** According to the survey conducted for this AI, Vancouver residents feel empowered to find solutions when faced with housing discrimination: 64 percent of the residents surveyed for this AI said they would “File a complaint” if they experienced housing discrimination.

This is a very positive finding. In BBC’s experience, in most cities residents say they would “Do nothing” if faced with housing discrimination. Vancouver residents are clearly motivated to address fair housing violations.

**Few concentrated areas.** An analysis of racial and ethnic concentrations found very few Census tracts in the City with higher than citywide average proportions of minorities. The dissimilarity index—a measure of the “evenness” of the geographic distribution of two different population groups—in Vancouver is very minimal. The index ranges from 0 to 1, with a value of 1 representing full concentration. Vancouver’s dissimilarity index ranges from .12 (White v. Non-White comparison) to .25 (White v. Asian comparison).

**Low volume of complaints and legal cases.** Since January 2006, a total of 59 complaints were filed with HUD by residents in Vancouver. The complaints were largely filed on the basis of disability (39% of all complaints) and race discrimination (29%). About half of the complaints were found to have no reasonable cause; 20 percent of the complaints were resolved through conciliation agreement or settlement.

There was one fair housing legal case occurring in southwestern Washington in the past five years; none occurred in Vancouver.
It should be noted that in some cities, a low volume of complaints and legal cases can be indicative of limited resources for residents to address fair housing concerns. Given the number of fair housing organizations accessible to Vancouver residents and, as discussed above, residents’ intent to “do something” when faced with housing discrimination, the small number of complaints and fair housing legal cases in Vancouver is more likely a positive trend.

**Fair Housing Impediments**

Despite all of the good news about fair housing in Vancouver, there are opportunities for the City to improve fair housing conditions. The research conducted for this study found the following impediments to fair housing choice:

**Housing has become less affordable and deeply subsidized rentals are scarce.**

Between 2000 and 2010, the buying and renting power of Vancouver residents declined.

Specifically, the median contract rent for apartments in the City was $820 per month in 2009. This is a 22 percent increase from the median rent in 2000 of $671. To afford the increase in the median contract rent, renters would need to earn $5,960 more per year. Instead, renter income increased by just $1,400 between 2000 and 2009.

The median-priced home in 2000 cost $70,000 more in 2010. To afford this increase, homeowners would need to earn about $25,000 more per year. Homeowner income rose by less than half of what was needed to keep up with housing value increases.

In addition, the waitlist for some public housing development and, in particular, Housing Choice (Section 8) vouchers is very long. Indeed, the housing authority is currently providing vouchers to residents who have been on the wait list since 2004.

Stakeholders surveyed for this study identified the income levels of minority and female-headed households as the top fair housing barrier in the region, which is linked to lack of affordable housing. Residents also rated their low incomes and, secondly, lack of affordable housing to rent as the City’s top fair housing barriers.

**Mortgage lending disparities exist for Hispanic applicants.** In 2009, there were approximately 6,500 mortgage loan applications made by residents in Vancouver. Fifty-nine percent of the loans were originated; 19 percent were denied. Loan origination rates varied by race and ethnicity. The largest gap in denials was between Hispanic and non-Hispanic borrowers: Non-Hispanic borrowers’ origination rate was 13 percentage points higher than Hispanic borrowers’.¹

In three of the City’s Census tracts with high proportions of Hispanic residents, 2009 mortgage loan denials exceeded City averages. These Census tracts could be at risk for disinvestment and decline if access to private capital is limited.

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¹ It is worth noting that subprime lending was minimal in 2009, with just 86 loans carrying subprime rates; just 8 of these loans were made to minority borrowers.
Access of fair housing information could be improved. Fair housing information is readily accessible on many websites (e.g., Fair Housing Council of Oregon, which serves Vancouver, and the State of Washington Human Rights Commission)—but is lacking on some obvious sites. Specifically,

- Fair housing information on the City’s website is minimal and requires a search to find.

- The Vancouver Housing Authority (VHA) has perhaps one of the best websites for its properties we have seen (http://www.vhausa.com/housing/how_to_apply.html). The information is transparent and instructions are easy-to-follow. Vancouver residents would benefit from fair housing information listed on the VHA website in a similar context.

- There is no information on the Northwest Justice Project’s (Legal Aid) website about the procedures of filing a housing complaint beyond the first step in seeking legal advice. The organization does, however, refer users to the WashingtonLawHelp.org website, which covers a variety of legal topics including fair housing.

City fair housing law does not cover all protected classes. The City of Vancouver has deferred to the fair housing practices regulation of superseding state and federal regulations. Since the 1970’s, any requests or questions regarding potential fair housing issues are routinely referred directly to the State or Federal fair housing enforcement agencies.

The City of Vancouver Municipal Code includes a dormant 1968 ordinance (Vancouver Municipal Code Chapter 8.44) titled Fair Housing Practices. The ordinance does not reflect the updated state and federal protections provided for gender, familial status, disability and (for state law) marital status, sexual orientation, and veteran’s status. In light of the availability of greater protections under state and federal law, and the expertise and enforcement resources of state and federal fair housing agencies, the City will continue to refer potential fair housing issues to those agencies.

Fair Housing Action Plan

Based on our research for this AI, BBC recommends the City of Vancouver adopt the following Action Plan and activities for reducing fair housing impediments:

**ACTION ITEM 1.** Support nonprofit and private sector efforts to increase the stock of affordable housing, especially deeply subsidized rentals.

- Monitor Vancouver’s housing plans and policies (Consolidated Plan and Comprehensive Plan) with emphasis on creating subsidized rental units.
- Locate publically funded units in high opportunity neighborhoods—those with few poverty concentrations, good schools, access to public transportation and stable pricing.
• Develop projects that include market rate housing in order to reduce affordable housing concentrations and expand housing choice for low income individuals.

Considerations—Rising rental costs during the past decade (without corresponding increases in renter income) and the very long waitlists for public housing authority units and Housing Choice vouchers—combined with residents’ and stakeholders’ views of inadequate affordable rental housing—make the lack of affordable rentals the top fair housing barrier found in this AI.

It is a difficult time for many cities to aggressively address affordable housing shortages. As the economy improves and the City’s funds become less constrained, Vancouver should closely follow its priorities identified in the Comprehensive Plan and, in particular, add more deeply subsidized rental units to its housing stock.

Ideally, such units would be located in high opportunity neighborhoods—those with few poverty concentrations, good schools and stable pricing—and developments with market rate housing to reduce affordable housing concentrations and further housing choice for low income individuals.

**ACTION ITEM 2.** Monitor potential areas of racial/ethnic concentrations and high mortgage loan denials.

- Work with neighborhood associations in Fruit Valley, Fourth Plain Village, Harney Heights and Meadow Homes to promote the investment of public dollars focused on revitalization of these neighborhoods and provide housing improvements.
- Monitor Home Mortgage Disclosure Act (HMDA) data to further understand the loan denials in the City.

Considerations—Racial and ethnic concentrations in the City are minimal, with just two block groups showing high proportions of persons of Hispanic descent. Areas where minorities live in the City are somewhat correlated with census tracts with higher-than-average mortgage loan denials. In addition, the City’s recent community survey the areas with racial and ethnic concentration are also the areas where residents report the lowest levels of the “feeling of safety walking...after dark.”

A lack of private capital investment combined with potential reluctance of residents to locate in these areas due to safety concerns could lead to neighborhood disinvestment and decline.

To better understand if disinvestment or discrimination is occurring, the City should continue to attend neighborhood meetings in these areas, distribute fair housing information and have discussions with residents to identify any fair housing concerns. The City should also continue investing public dollars in neighborhood revitalization and housing improvements in these areas.

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To see a copy of the 2010 Community Status and Financial Options Survey, see [http://www.cityofvancouver.us/upload/images/Communications/reports/2010VancouverCommunitySurvey4-22-10.pdf](http://www.cityofvancouver.us/upload/images/Communications/reports/2010VancouverCommunitySurvey4-22-10.pdf)
**ACTION ITEM 3.** Continue to improve access to and dissemination of fair housing information.

- Regularly update the City website to include additional fair housing information including links to websites for more information on filing complaints in both Spanish and English.
- Add a “Frequently Asked Questions” (FAQ) section.
- Work with local social service agencies to include a fair housing information section with links on their web sites.

Considerations-The websites for the City, Vancouver Housing Authority, and Legal Aid should be regularly updated with fair housing information.

Fair housing pages on websites should describe fair housing laws and residents’ rights and provide links to websites for more information and filing complaints. All of this information should be provided in Spanish and English. We also recommend a Frequently Asked Questions section with answers to questions such as “If I am not a U.S. citizen but I feel that I have been discriminated against, what can I do?”