



# **Analysis of Impediments to Fair Housing Choice**

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**County of Santa Barbara, California**

**March 2015**

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**Prepared for**

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# Section I. Executive Summary

## Analysis of Impediments to Fair Housing Choice

### Introduction

This document contains an updated Analysis of Impediments to Fair Housing Choice (AI) for the County of Santa Barbara HOME Consortium.

An AI is required by the U.S. Department of Housing and Urban Development (HUD) for any community that receives federal housing funds. At the time this report was created, HUD was in the process of revising its reporting requirements for AI documents. This AI incorporates data and information in HUD's proposed Assessment of Fair Housing, or AFH, where available.

**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 Consortium to continue to receive federal housing and community development funds.

The AI involves:

- A review of a jurisdiction'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;
- An assessment of public and private sector conditions affecting fair housing choice; and
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

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.

**Fair housing laws.** 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/sex, familial status and disability. The Fair Housing Act—Amended (FHAA) covers most types of housing including rental housing, home sales, mortgage and home improvement lending

and land use and zoning. Excluded from the FHAA are owner-occupied buildings with no more than four units, single family housing units 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.<sup>1</sup>

The State of California has a substantially equivalent law prohibiting discrimination in housing. The Fair Employment & Housing Act (FEHA) is the primary state law prohibiting discrimination in the sale, rental, lease negotiation, or financing of housing based on a person's race, religion, national origin, color, sex, marital status, ancestry, family status, disability, sexual orientation, and source of income. The state's law exceeds the protections in the Federal Fair Housing Act by including protected classes of marital status, sexual orientation and source of income. In addition, the law defines physical and mental disability as a condition that limits a major life activity; this definition of disability is broader than the federal definition, which requires a "substantial limitation." The FEHA also incorporates the protections of the Unruh Act which includes medical condition as a protected category.

**Geographic scope of analysis.** The geographic scope of this AI covers the Santa Barbara County HOME Consortium and Urban County Partnership, referred to throughout this document as "Consortium." Data presented for the Consortium as a whole reflect the entirety of the County excluding the City of Santa Barbara and the City of Guadalupe. Consortium jurisdictions are as follows:

- City of Buellton
- City of Carpinteria
- City of Goleta
- City of Lompoc
- City of Santa Maria
- City of Solvang
- Unincorporated County of Santa Barbara

**Methodology.** The impediments and observations in this AI were developed through a variety of research methods including demographic and housing market analyses; reviews of complaints and legal cases; analysis of mortgage lending data; a review of zoning and land use policies; interviews and meetings with stakeholders; as well as focus groups with residents.

## Executive Summary of Impediments and Recommendations

The following summary documents the impediments to fair housing choice identified in the research, analysis and public process conducted for the AI documented in detail in Sections II, III and IV of this report. Section V of this report discusses the impediments and the recommended action plan in greater detail.

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<sup>1</sup> "How Much Do We Know? Public Awareness of the Nation's Fair Housing Laws", The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

**Impediments to fair housing choice.** The fair housing barriers identified in the AI research are summarized below. They are discussed in greater detail in Section V.

- 1. Lack of affordable housing in the Consortium disproportionately impacts persons with disabilities and certain racial and ethnic minorities who have lower incomes and higher poverty rates.** The data in this AI demonstrate that lack of affordable housing is a critical issue in the Consortium and that certain protected classes are more likely to be affected by that lack of affordable housing than others because they have greater need for assisted and, in some cases, accessible housing.
- 2. Lack of affordable, accessible housing, limited public transportation and private barriers (discrimination, fair housing violations) disproportionately impact housing choice for persons with disabilities.** Stakeholder and public consultation indicate an inadequate supply of accessible housing—particularly affordable, accessible housing. Other constraints for persons with disabilities found in this AI are a high proportion of disability related fair housing complaints, landlords reportedly not making reasonable accommodations/needed accessibility improvements, and limited accessible transit. Stakeholders also identified a need for supportive housing for persons with cognitive disabilities and residents with mental health needs.
- 3. Housing discrimination does exist in the County, as evidenced by an analysis of fair housing complaints and by resident and stakeholder accounts.** HUD reported 43 fair housing cases in the Consortium between 2006 and 2014; 43 percent of those were related to disability, 20 percent were related to race, color or national origin and 16 percent were related to family status. Focus group reports of possible housing discrimination included non-compliance of property owners with reasonable accommodations, misuse of occupancy standards to refuse housing to families, not offering lease agreements in Spanish, and failure to return rental deposits.
- 4. Private market barriers exist in the form of high loan denials for minority loan applicants.** According to Home Mortgage Disclosure Act (HMDA) data, there are racial and ethnic disparities in mortgage loan denial rates, even after accounting for income differences. Minority groups also have a higher incidence of subprime interest rates.
- 5. Fair housing information is limited and seldom available in languages other than English.** According to stakeholders and residents there is a need for education about and enforcement of fair housing laws in the Consortium. Some reported landlords failing to comply with fair housing reasonable accommodations laws, largely because of their lack of understanding of their obligations. Residents also reported a lack of knowledge about how or where they could report housing discrimination.

Hispanic focus group participants, in particular, expressed no knowledge about legal remedies and resources; this may be related to limited information in languages other than English. Only one Consortium member website (Santa Barbara County) contains fair housing information in Spanish and housing authority program applications are not available in Spanish.

**Recommended Fair Housing Action Plan.** The following actions are recommended for consideration to the County of Santa Barbara for reducing barriers to fair housing choice in the Consortium.

- 1. Expand affordable housing opportunities.** Working to expand the supply of affordable housing throughout the County should also expand access to housing for protected classes. Potential strategies include:
  - Continue to use federal and other County administered funds to support affordable housing and explore opportunities to increase funding for affordable housing creation.
  - Support opportunities to reduce barriers to affordable housing development discussed in the County’s Housing Element.
  - Increase access to family oriented housing (e.g., units with at least two bedrooms).
  - Proactively monitor and address loss of existing affordable housing units, particularly in “high opportunity” areas.<sup>2</sup>
  
- 2. Reduce fair housing barriers for persons with disabilities.** The shortage of affordable, accessible units near transit and services coupled with landlords’ failure to provide reasonable accommodations further constrains housing choices for people with disabilities in an already tight market. Opportunities for improving the housing environment for people with disabilities include:
  - Maintain a list of resources on City and County websites for people with disabilities—for example, information about rights concerning service animals, reasonable accommodations procedures, list accessible housing.
  - Sponsor fair housing training sessions with landlords and property managers, particularly those who serve the city’s lowest income and special needs populations. A key element of the trainings would be presenting case studies on reasonable accommodations and tricky fair housing landlord/tenant situations and resolving the situations through the training. Participants would be able to offer their own situations for group discussions and explore solutions.
  
- 3. Improve access to fair housing information.** Santa Barbara County should increase the availability, access, and volume of fair housing information and educational opportunities in the County through exploring activities such as those listed below:
  - Encourage Consortium members to improve fair housing content (in both English and Spanish) on their websites. Improvements could include adding visible, easy to understand fair housing information; listing protected classes; providing clear information on how to file a fair housing complaint; and links to

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<sup>2</sup> “High opportunity areas” are communities or neighborhoods with community amenities such as good schools, access to employment, and transit, and few community stressors such as high crime, disinvestment and poverty.

"California Tenants, A Guide to Residential Tenants' and Landlords' Rights and Responsibilities" (in both English and Spanish).

- Continue and increase fair housing education efforts and trainings through local fair housing organizations such as the Legal Aid Foundation of Santa Barbara County and the Rental Housing Mediation Task Force.
- Support and/or lead regional collaboration on fair housing awareness, issues and solutions.

**4. Support efforts to improve residents' creditworthiness.** Support local credit counseling agencies in their efforts to educate residents about good personal finance practices and their understanding of mortgage loan financing. Refer residents who contact the County with personal finance or credit questions to local counseling agencies.

**5. Continue supporting programs to improve the landlord tenant relationship and consider expanding contracted fair housing services.** The County of Santa Barbara has provided funding to the Rental Housing Mediation Task Force and Legal Aid Foundation of Santa Barbara County to provide landlord tenant counseling, fair housing counseling, legal aid and fair housing education. The County should continue these types of services but also consider expanding services to include fair housing testing and more robust outreach activities.

## SECTION II.

# Community Participation Process

This section discusses the findings from the citizen and stakeholder input processes conducted for the Consolidated Plan and Analysis of Impediments to Fair Housing Choice (AI). The section is organized around the primary themes gathered through the input.

### Consultation and Citizen Input Elements

The stakeholder consultation and citizen input process for the Santa Barbara County Consolidated Plan and AI included the following:

- Community meetings, including two public meetings (one in North County and one South County), two resident focus groups, and a stakeholder focus group to discuss housing and community development needs, held over two days—November 19 and November 20, 2014. Sixteen residents and 28 stakeholders attended the meetings. The meetings were held at various times at accessible venues near public transit.
- Interviews with key stakeholders included the Public Housing Authority, homeless services providers, a domestic violence service provider serving residents in North and South Santa Barbara County, legal experts, and a tenant-landlord mediation group.

In addition to the community meetings and interviews, residents and stakeholders in Santa Barbara County were invited to communicate their opinions about the County's top housing and community development needs by phone or email to Santa Barbara County staff or the consultant.

**Public meeting advertising and outreach.** To encourage community participation in the public meetings, Santa Barbara County advertised the meetings through the following channels:

- County of Santa Barbara Housing and Community Development Department website
- Slides on the County of Santa Barbara Television (CSBTV) access channel, the County-operated cable television station
- Flyers posted in an Eastern Goleta Valley coffee shop
- City of Guadalupe website, cable access channel, and library
- City of Carpinteria website and City Council announcement
- Flyers emailed to contact persons at cities of Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Maria, and Solvang



- Provided notice to service providers for special populations, including persons with disabilities

**Resident and stakeholder focus group recruitment.** Focus group participants were recruited through targeted efforts. Two resident focus groups were held; one with persons with disabilities in the southern part of the County and another with Hispanic residents in the northern part of the County.

**Summary of response/attendance.** A local disability services organization recruited their staff and clientele for the focus group on disability issues. This focus group was held during the afternoon at a local, accessible recreation center in Santa Barbara. Six residents attended the meeting, representing a range of developmental and physical disabilities and ages, lengths of experience with their disability (i.e., persons recently disabled and persons disabled since birth), and housing experiences. Some of the participants worked for disabilities services organizations, enabling them to speak from their own experiences as persons with disabilities and to represent the experiences of their clients.

The participants of the Hispanic resident focus group were recruited by the owner and manager of the housing complex in which they lived, a low income farm worker housing apartment complex in Santa Maria built by People's Self-Help Housing Corporation. A total of ten residents participated, nine women and one man, across a range of ages. In addition, two children attended the meeting. This evening focus group was conducted in Spanish, based on the stated preference of the participants.

To recruit the participants of the stakeholder focus group, Santa Barbara County staff sent a personal email invitation to a variety of stakeholders, including stakeholders from nonprofit entities (organizations serving low and moderate income persons, housing and service providers, and local fair housing organizations) as well as private sector entities (banks and other financial institutions, housing developers, rental companies, landlords, and realtors).

A total of 28 participants representing a range of organizations and fields attended the meeting, including:

- Disability services organizations
- An economic justice organization
- A legal assistance organization
- Private and public sector developers and builders
- An independent Santa Barbara resident
- Representative of a neighborhood coalition
- Representative of a micro-lending organization
- A HOME loan monitor
- A public transit provider
- County housing authority

- Representatives of local and County government, including City of Santa Barbara planning and community development staff, Santa Barbara County Housing and Community Development staff, and Santa Barbara County Executive Office staff

**Stakeholder interviews.** In addition, in order to better understand the needs of specific special needs populations, including public housing residents, voucher holders, individuals and families experiencing homelessness, and family violence survivors and their children, key stakeholder interviews were conducted with the Santa Barbara County Public Housing Authority, the primary homeless services providers for individuals and families in the northern and southern areas of the County, and the primary domestic violence services provider for the northern and southern areas of the County.

## Themes from Citizen and Stakeholder Deliberation

Both stakeholders and citizens were asked questions—albeit in different ways—about the most pressing housing needs and how to improve housing and economic opportunity in the County. The discussions with residents focused more specifically on individual, neighborhood, and community needs, while stakeholder discussions addressed broader regional needs as well.

**Citizen deliberation themes.** Themes from the discussions with residents included affordability, accessibility issues, access to opportunity, discrimination and landlord-tenant disputes, and knowledge of fair housing information.

**Scarcity of affordable housing.** Participants in the focus groups felt that finding affordable housing in Santa Barbara County was very challenging. Participants noted that the County is a very expensive area in which to live. The vacancy rate is less than one percent and the search for a suitable unit can be lengthy and difficult.<sup>1</sup> The Section 8 and public housing waiting lists were closed at the time of the focus group meeting, so many people on limited incomes and who are priced out of the market do not have access to the Section 8 rental subsidy program.

Voucher holders reported a substantial disparity between the amount allocated through the voucher and the market rate for rentals. Residents reported low vacancy rates in the County for all rentals and noted that difficulty finding a unit is exacerbated by being low income, having bad credit and/or having accessibility needs. In North County, focus group participants expressed concern over the condition of affordable housing and the shortage of affordable housing to accommodate larger families. □ In addition to the lack of affordable units, residents reported rental requirements and qualifications as major barriers, such as income and credit rating requirements, as well as the high cost of application fees and security deposits.

**Accessibility issues.** Participants in the focus group for individuals with disabilities shared a wide range of accessibility concerns. The need for accessible, affordable units near transit (particularly wheelchair-accessible) was frequently cited, as was the difficulty of finding an accessible unit with a landlord that will also accept a voucher. The need to educate the community, landlords in particular, about what accessibility means and how they can

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<sup>1</sup> 2015-2023 Santa Barbara County Housing Element Update

accommodate persons with disabilities was also commonly mentioned. According to participants, some landlords were willing to allow minor modifications (e.g., ramps and grab bars) but were less willing to accommodate “full accessibility” (e.g., roll-in showers and wider doorways).

Participants noted that the lack of affordable accessible rentals often forces people with disabilities to “port out” of the County and look for more affordable housing elsewhere but that relocation can be very difficult and complicated for those who have support systems, health care and family nearby.

**Lack of access to opportunity.** As part of the AI public process, stakeholders were asked about areas of opportunity (good schools, job centers, transit access, etc.) and whether protected classes had equitable access to community assets. Lack of access to opportunity was discussed in detail during the Hispanic focus group. Participants expressed concern about school crowding that results in elementary children in their area to be bused to schools further away and about the need to address pedestrian safety issues, especially for children (e.g., more crosswalks, crossing guards, and speed cessation mechanisms). Participants also discussed lack of community amenities such as conveniently located health clinics. Residents noted that public transportation was used infrequently, partially due to long travel times and frequent transfers.

**Discriminatory rental practices and landlord-tenant disputes.** Concerns of discriminatory rental practices were reported in both of the resident focus groups. Individuals with disabilities expressed feeling discriminated against, that landlords did not accept their disability or understand accessibility issues, and that there were very few affordable and accessible units available. Hispanic residents talked about landlords refusing to rent to families with small children or “too many children” and being evicted upon subsequent pregnancies. Refusal to return rental deposits was an issue among the Hispanic participants. The Hispanic resident focus group, in particular, discussed the need for education about landlord-tenant rights and responsibilities, including explanation of security deposits and legal remedies when they are not returned. Hispanic residents also cited the need for interpretation or translation of lease documents, as they are often in English.

**Lack of fair housing information.** Overall, the resident focus group conversations suggest a need for education about and enforcement of fair housing laws among both landlords and tenants. Hispanic focus group participants expressed no knowledge about legal remedies and resources. These residents reported a lack of knowledge about how or where they could report housing discrimination. When facilitators brought up the names of local legal aid organizations, residents reported that they were not familiar with the organizations.

**Stakeholder deliberation themes.** Themes from the focus group discussions and interviews with stakeholders included primary housing issues, special needs populations, and community development needs.

**Primary housing needs.** Conversations with stakeholders emphasized the primary housing needs in the community, including the lack of affordable, accessible units (particularly wheelchair-accessible), and long waiting lists for public and voucher housing opportunities, and distinctions between housing and related needs in North and South County.

The two most common issues cited by stakeholders were a lack of affordable housing for low income people and families and overcrowding and substandard living conditions. Stakeholders report that barriers to finding affordable housing include the unwillingness of landlords to accept Section 8 and the concentration of affordable properties in the hands of a few property management companies (especially in South County) which keeps rents high. Stakeholders also are concerned that the County is losing available, affordable housing opportunities to college students. The University of California Santa Barbara (UCSB) is located in unincorporated Santa Barbara in the Isla Vista community and City College is located in the City of Santa Barbara.

Stakeholders also expressed that the high cost of housing in Santa Barbara County is exacerbated by the lack of subsidized options for individuals and families priced out of the market. The Housing Authority of Santa Barbara County confirmed that both Section 8 and general public housing waiting lists have been closed for five years. They were closed after the 2008 recession, when each list exceeded 6,000 names, which equaled a wait time of seven to eight years. In the past five years, the housing authority has worked through most of the waiting lists and has plans to reopen the lists some time in 2015. The housing authority expects that the number of people on each waiting list will reach 3,000-5,000 within two weeks of the lists being reopened.

Participants discussed key distinctions between the northern and southern areas of the County. The southern part of the County is much more expensive than the northern part and therefore has fewer affordable units, but the northern end of the County is still relatively expensive and housing searches can be long there, too. Residents noted that most of the jobs are in the south while the more affordable housing is in the north and regional transit options between the two areas are limited, making a move to a less expensive area of the County more difficult.

**Special needs populations.** The housing and services needs of specific special needs populations were also discussed. Stakeholders cited affordable, available units (accessible as needed) for low income populations as the primary need across all special needs populations. Single-room affordable housing, particularly for veterans and middle-aged individuals who do not yet qualify for senior benefits, are needed, especially among the homeless population (this is expressed as a particular need in North County). Domestic violence service providers reported that they do not believe that the housing needs of their clients are being met. Clients leaving domestic violence shelters in Santa Barbara find that it is “almost impossible” to find housing in the area due to high cost. Mental health services were mentioned frequently as service needs that intersect with housing issues in the community. Housing with wrap-around services was cited as a particular need for people experiencing homelessness.

Affordable units for larger families (two-bedroom units or larger) were commonly cited as a general community need, but were highlighted as a particular need of the Hispanic community. Stakeholders reported that homeless families need larger units, typically two or more bedrooms and that the “affordable units being built in the County are primarily one-bedroom units. Stakeholder agree that affordable units for families need to be located close to schools, the workplaces of parents, and within safe neighborhoods. Identified barriers to families seeking housing include landlord prejudices against renting to families with children and landlords setting occupancy limits, which limit the number of people who can live in a unit. Family housing was cited as a primary need of domestic violence survivors.

Again, participants made distinctions between the northern and southern areas of the County. Housing for farm workers, low income workers, and seniors were cited as particular needs in the northern part of the County, while housing for all low income workers was prioritized in the southern part of the County. In addition, a geographic distinction in the homeless population was repeatedly mentioned, with participants noting that there are more families experiencing homelessness in the north, while the population of individuals experiencing homelessness is larger in the south. Participants noted the need for greater in-home care options in the north for individuals with disabilities. Generally, participants said that services for individuals with disabilities are more concentrated in the south, though residents say this is improving.

**Fair housing.** Most fair housing and discrimination concerns cited by participants focused on three types of populations: families, persons with disabilities, and Hispanic individuals, and echoed the concerns cited by resident focus group participants in this area. The use of occupancy standards by landlords was cited as a way of discriminating against families and noted that habitability code violations have a disproportionate impact on Hispanic persons. There was also concern over what participants thought were unjustified evictions of victims of domestic violence and a failure of landlords to understand reasonable accommodation requests. Overall, stakeholders cited a need for education about and enforcement of fair housing laws.

In addition to overt housing discrimination, stakeholders noted that the lack of affordable housing contributes to subtle discrimination. With tight competition for the few affordable, available units, landlords are able to be highly selective without consequence.

**Community development.** Stakeholders also prioritized community development needs in the County including economic development; regional disparities in economic and housing opportunity; transit accessibility; and access to opportunity related to the supportive service needs of special needs populations. Many of these issues may have an impact on access to affordable housing.

For instance, stakeholders repeatedly emphasized the need for economic development that will create higher paying jobs in the area so that residents can afford the cost of housing. Assistance with job training and finding a job that pays sufficient wages to afford housing, as well as transportation to work and other supportive services, were needs that were cited by stakeholders as being essential to the capacity of residents to work and afford housing.

Improving regional transit between the northern and southern areas of the County was brought up numerous times, as was improving transit options in the north. Residents noted that most of the jobs are in the south while the more affordable housing is in the north and regional transit options between the two areas are limited. The perception is that there are more transportation options flowing from the south of the County to the north.

Wheelchair-accessible taxis and public transport near housing and services is needed countywide.

The need for a variety of supportive services exists across Santa Barbara County. Families need accessible and affordable childcare. Families experiencing homelessness need permanent housing with supportive services or ongoing case management. Families experiencing

homelessness, particularly children, need mental health services. Domestic violence survivors need wrap around social services such as legal services to assist with restraining orders, custody issues, and immigration status; rape crisis services; mental health services; life skills training; job training; and English as a Second Language education in addition to primary needs for safety, shelter, and food.

Individuals experiencing homelessness need health services (including both physical and mental health and substance abuse services) in addition to more single-dweller housing units with supportive services. There is a need for more collaboration between homeless service providers and Adult Protective Services. There is also a need for specialized mental health services for veterans.

Legal services such as Social Security advocacy and bilingual legal aid services are also needed.

### **Recommendations from Citizen and Stakeholder Deliberation**

This section summarizes the strategies and actions stakeholders and citizens recommend for addressing the needs they identified. Their suggestions include identifying opportunities for gathering data and information, improving community collaboration and planning, improving housing development planning and funding policies, and implementing specific suggestions to meet the needs of persons with disabilities. It should be noted that not all of these suggestions fall under the jurisdiction of the County (e.g., regional transportation recommendations would be under the purview of the Santa Barbara County Association of Governments).

**Promoting affordable housing.** Attendees made the following recommendations at a focus group for community stakeholders:

- Santa Barbara County should make allocating funds for affordable housing its top priority. According to one stakeholder, the funding allocation in the past few years has been “abysmal.”
- Participants would like to see Santa Barbara County create opportunities for affordable homeownership. Homeownership is important in terms of stability and asset-building. The County should not just assume that homeownership is too expensive and out of reach.
- Ensure sufficient investment in public transit, especially in areas where housing is critical. Also consider proximity to public transit for new development.
- Participants would like to stress to Santa Barbara County that public funds are necessary for development. Diminishing funding makes financing housing projects more difficult. Affordable housing projects should be treated differently than regular “hard loans” from a bank.

**Addressing the needs of persons with disabilities.** Attendees made the following recommendations at a focus group for persons with disabilities and a focus group for Hispanic residents:

- Participants suggest that Santa Barbara County work toward expanding public transit in the northern and southern areas of the County and make public transit between the two parts of the County easier.
- Modernize the Santa Barbara Metropolitan District Transit Center to make services more accessible to persons with disabilities.
- Expand local paratransit and taxis. Make more taxis wheelchair-accessible.
- Educate architects in universal design to make new buildings accessible from the beginning. Persons with disabilities feel that Americans with Disabilities Act building requirements are minimal and would like to see more development that implements the principles of universal design.

**Opportunities to fill the information gap.** Stakeholders identified the need to address gaps in housing market and fair housing information in Santa Barbara County to provide a baseline for addressing housing needs. Specifically, the recommendations are to:

- Provide fair housing resources, information and training for community members, including residents, landlords and community leaders.
- Conduct a community inventory of rental housing stock to identify how many units are constructed of affordable and accessible housing; where the units are located; and whether or not the property managers or landlords accept Section 8.
- The Department of Social Services should “asset map” the locations of poverty and need in the County. Asset mapping explores resources and assets, shows the interconnections among assets, and identifies ways to access assets. Asset mapping would allow planners to compare asset-rich areas with asset-poor areas to better reach target populations, promote access to services, and reduce duplication of services.

**Opportunities for community collaboration.** Stakeholders identified areas for potential collaboration between Santa Barbara County leadership and the community that could help address housing needs. Recommendations included community collaboration to encourage affordable housing development, economic development and transportation planning as well as community participation in designs for new development.

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## SECTION III.

# Demographic and Housing Profile

This section provides a demographic and housing market overview of the County of Santa Barbara and the jurisdictions participating in its HOME Consortium for the AI. Specifically, the section contains the required analysis of racial and ethnic concentrations and determines if lack of affordable housing disproportionately affects members of protected classes. The section also evaluates integrated housing opportunities for persons with disabilities.

The geographic scope of the following analysis is focused on the Consortium, defined as the County of Santa Barbara excluding the City of Santa Barbara and Guadalupe.

### Demographic Summary

The following discussion provides a demographic overview of the Consortium. Key demographic findings include:

- Population growth between 2000 and 2012 (6%) was largely driven by an increase in the Hispanic population.
- Forty-three percent of residents are of Hispanic descent (up from 33% in 2000) and 5 percent are Asian. Forty-eight percent of residents are non-Hispanic white.
- The fastest growing age cohorts in the Consortium are residents aged 18 to 24 and 45 to 64.
- Twenty-three percent of Consortium residents were born in another country and 18 percent of households have limited English proficiency.
- Ten percent of Consortium residents (33,650 people) have some type of disability.

**Population.** The 2012 American Community Survey (ACS) reports a population of 423,594 for Santa Barbara County. That represents a 6 percent increase from the 2000 population of 399,347. Growth for the Consortium was somewhat higher (9%), increasing from 301,363 in 2000 to 328,001 in 2012.

As shown in Figure III-1, Buellton and Santa Maria experienced the highest population growth, while Carpinteria and Solvang experienced population declines.



**Figure III-1.  
Total Population,  
Consortium Members,  
2000 and 2012**

Note:  
Goleta was incorporated in 2002.

Source:  
2000 Census, 2008-2012 ACS and BBC  
Research & Consulting.

	2000	2012	Percent Change
Santa Barbara County	399,347	423,594	6%
Consortium	301,363	328,001	9%
Buellton	3,828	4,786	25%
Carpinteria	14,194	13,100	-8%
Goleta	N/A	29,862	N/A
Lompoc	41,103	42,373	3%
Santa Maria	77,423	98,715	28%
Solvang	5,332	5,261	-1%

**Age.** About one quarter (24%) of Consortium residents are children and 13 percent are seniors (65 years or older). As displayed in Figure III-2, the fastest growing age cohorts in the Consortium are residents aged 18 to 24 and those aged 45 to 64. The number of children and the number of residents between 25 and 44 declined between 2000 and 2012. Growth in the senior cohort was driven by older seniors—aged 75 and older.

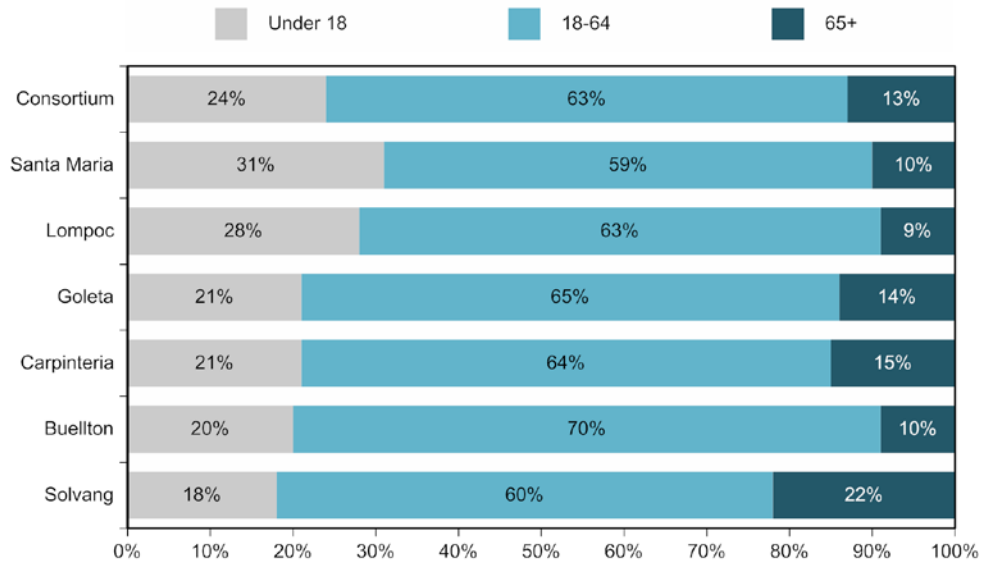
**Figure III-2.  
Population by Age, Consortium, 2000 and 2012**

	2000		2012		2000 to 2012		
	Number	Percent	Number	Percent	Num. Change	Percent Change	Percentage Point Change
Total population	301,363	100%	328,001	100%	26,638	9%	0%
Under 18	79,230	26%	78,472	24%	-758	-1%	-2%
18 to 24	39,762	13%	53,321	16%	13,559	34%	3%
25 to 44	84,326	28%	78,199	24%	-6,127	-7%	-4%
45 to 64	60,489	20%	76,698	23%	16,209	27%	3%
65 to 74	19,658	7%	20,825	6%	1,167	6%	0%
75 and older	17,898	6%	20,486	6%	2,588	14%	0%

Source: 2000 Census, 2008-2012 ACS and BBC Research & Consulting.

Figure III-3 displays the age profiles of Consortium members in 2012. Among Consortium cities, Solvang has the highest proportion of seniors (22%) followed by Goleta (14%). Lompoc has the fewest seniors (9%). Santa Maria has the highest proportion of residents that are children (31%) followed by Lompoc (28%).

**Figure III-3.  
Population by Age, Consortium Members, 2012**



Source: 2008-2012 ACS and BBC Research & Consulting.

**Family status.** In 2012, two-thirds of all Consortium households were families; of those, slightly fewer than half had children. Those figures represent a slight decline since 2000 when 70 percent of all households were families, 50 percent of which had children. Figure III-4 displays household composition for the Consortium.

**Figure III-4.  
Household Type,  
Consortium, 2012**

Source:  
2008-2012 ACS and BBC Research  
& Consulting.

	Number of Households	Percent of Households
Total Households	104,542	100%
Nonfamily households	32,422	31%
Family households	72,120	69%
Married couple households	54,930	53%
with children	24,420	23%
without children	30,510	29%
Single head of household	17,190	16%
Male householder (no wife present)	5,212	5%
with children	2,716	3%
without children	2,496	2%
Female householder (no husband present)	11,978	11%
with children	6,869	7%
without children	5,109	5%

Figure III-5 displays the number and percent of households with children for Consortium members. Overall, one-third of all Consortium households include children.

**Figure III-5.  
Households with Children,  
Consortium Members,  
2012**

Source:  
2008-2012 ACS and BBC Research &  
Consulting.

	Total Households	Number of Households with Children	Percent of Households with Children
Santa Barbara County	141,247	43,010	30%
Consortium	104,542	34,005	33%
Buellton	1,566	486	31%
Carpinteria	4,946	1,424	29%
Lompoc	13,170	5,078	29%
Santa Maria	26,991	11,525	43%
Solvang	2,350	578	25%

**Race and ethnicity.** Figure III-6 presents the racial and ethnic composition of Consortium residents and how the composition has changed since 2000.<sup>1</sup> The Hispanic population increased by nearly 40,000 residents (40% increase) while the populations of African Americans and non-Hispanic whites declined. Much of the growth in the Hispanic population can be attributed to Santa Maria, where the Hispanic population increased by 23,481 residents.

**Figure III-6.  
Racial and Ethnic Composition, Consortium, 2000 and 2012**

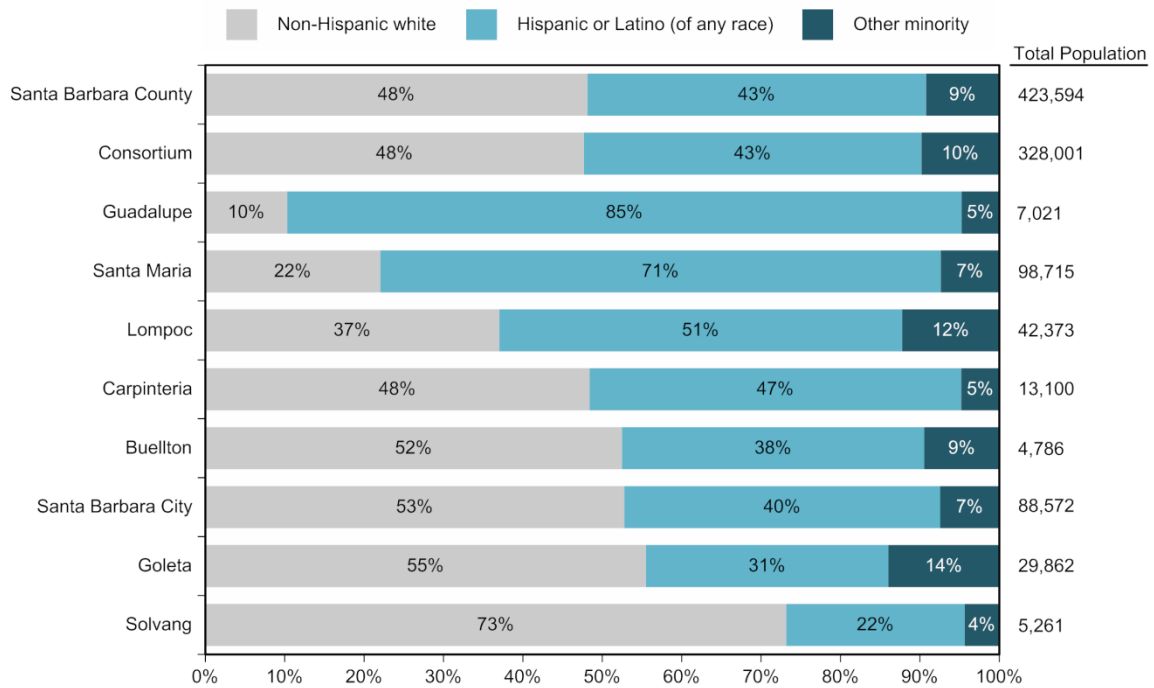
	2000		2012		2000-2012	
	Number	Percent	Number	Percent	Number Change	Percent Change
<b>Total Population</b>	301,363	100%	328,001	100%	26,638	9%
<b>Race</b>						
White	219,486	73%	252,502	77%	33,016	15%
Black or African American	7,519	2%	6,478	2%	-1,401	-14%
American Indian and Alaska Native	3,689	1%	3,882	1%	193	5%
Asian	13,457	4%	17,559	5%	4,102	30%
Native Hawaiian and Other Pac. Isl.	565	0%	696	0%	131	23%
Two or more races	13,264	4%	13,039	4%	-225	-2
<b>Ethnicity</b>						
Hispanic or Latino (of any race)	99,557	33%	139,415	43%	39,858	40%
Non-Hispanic white	172,777	57%	156,408	48%	-16,369	-9%

Source: 2000 Census, 2008-2012 ACS and BBC Research & Consulting.

<sup>1</sup> It should be noted that Census data on race and ethnic identification vary with how people choose to identify themselves. The U.S. Census Bureau treats race and ethnicity separately: the Bureau does not classify Hispanic/Latino as a race, but rather as an identification of origin and ethnicity. In 2010 the U.S. Census Bureau changed the race question slightly, which may have encouraged respondents to check more than one racial category.

Figure III-7 displays the 2012 racial and ethnic breakdown for each jurisdiction in the Consortium. The County as a whole, the City of Santa Barbara and the City of Guadalupe are also included for comparison.

**Figure III-7.**  
**Racial and Ethnic Composition, Cities in Santa Barbara County, 2012**

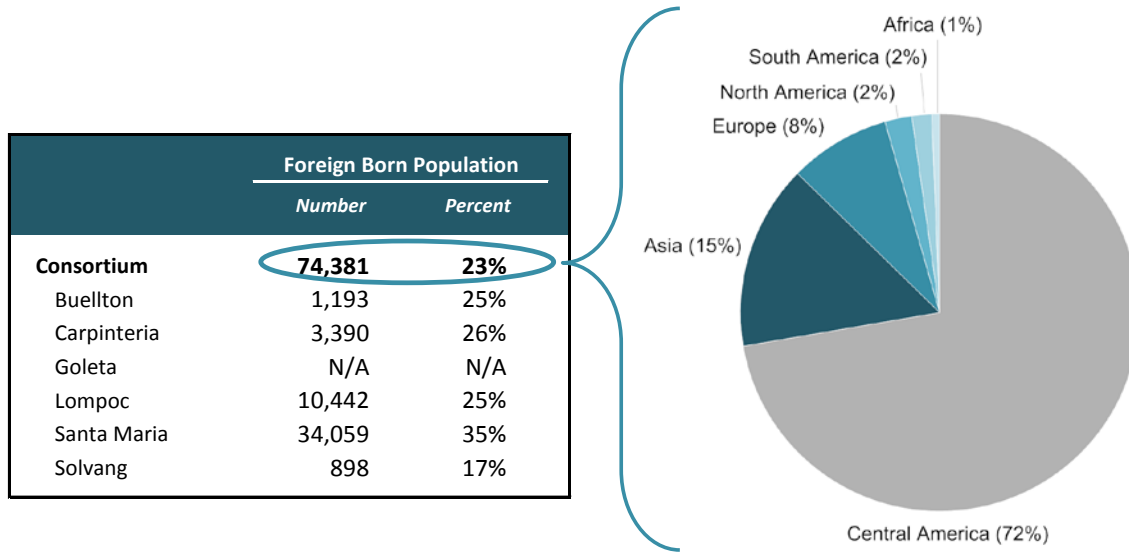


Source: 2008-2012 ACS and BBC Research & Consulting.

**National origin.** Approximately 23 percent of residents in the Consortium were born in another country—most in Latin America. This represents a slight increase from 2000, when 20 percent of residents were foreign born.

Santa Maria has the highest proportion of residents that are foreign born (35%) and Solvang has the lowest (16%). Figure III-8 displays the proportion of residents that are foreign born for each Consortium community as well as the national origin for entire Consortium foreign born population.

**Figure III-8.**  
**Foreign Born Population, Consortium, 2012**



Source: 2008-2012 ACS and BBC Research & Consulting.

**Limited English proficiency (LEP).** Nearly one in five Consortium residents (55,752) has limited English proficiency (speaks English less than “very well”). Sixty-two percent of foreign born residents speak English less than “very well.”

Of the 55,752 residents with limited English proficiency, 88 percent are Spanish speakers and 9 percent speak Asian and Pacific Islander languages. Approximately 70 percent of LEP residents in the Consortium live in the North County cities of Lompoc and Santa Maria.

**Figure III-9.**  
**Limited English Proficiency, Consortium Members, 2012**

	Consortium	Buellton	Carpinteria	Goleta	Lompoc	Santa Maria	Solvang
<b>Population 5 years and over</b>	<b>306,188</b>	<b>4,536</b>	<b>12,392</b>	<b>27,978</b>	<b>38,931</b>	<b>89,748</b>	<b>4,915</b>
Limited English Proficiency (LEP)	55,752	886	2,491	3,799	8,436	31,551	506
Percent LEP	18%	20%	20%	14%	22%	35%	10%
<b>Language other than English spoken at home</b>							
Spanish	99,575	1,502	4,610	6,626	15,575	51,514	749
LEP	48,853	695	2,357	2,591	7,864	28,944	464
Asian and Pacific Islander languages	11,281	121	59	1,976	949	3,584	37
LEP	4,805	109	20	855	352	2,040	7
Other languages	10,159	388	625	1,526	600	1,381	285
LEP	2,094	82	114	353	220	567	35

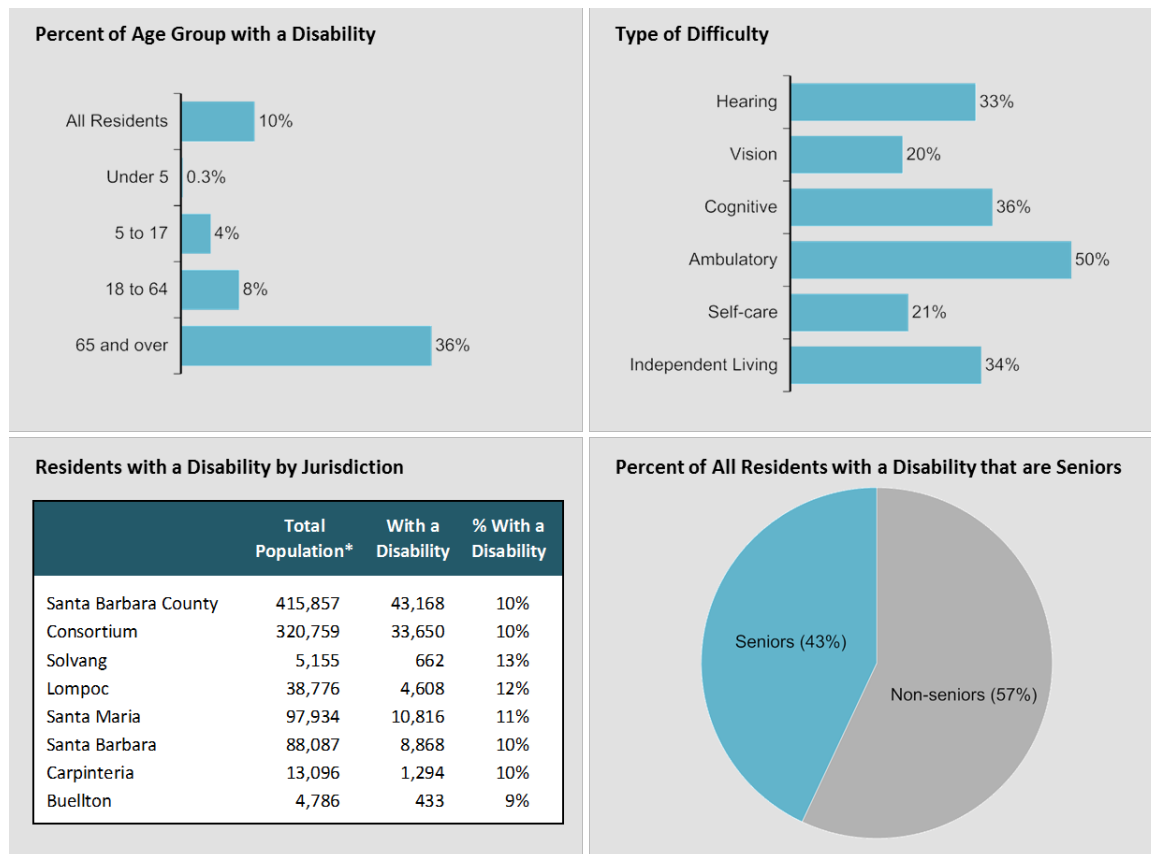
Note: Limited English proficiency is defined as residents 5 or older that self-reported speaking English less than “very well”.

Source: 2008-2012 ACS and BBC Research & Consulting.

**Disability.** According to the 2008-2012 ACS, there are 33,650 Consortium residents living with a disability (10 percent of the population). Figure III-10 presents disability characteristics for the Consortium.

- The incidence of disability is highest for residents 65 and older, 36 percent of whom have some type of disability.
- The most common type of difficulty is ambulatory (50%) followed by cognitive (36%).
- Among all residents with a disability, 43 percent are seniors and 57 percent are non-seniors.
- Solvang, Lompoc and Santa Maria have slightly higher rates of disability than the Consortium as a whole.

**Figure III-10.**  
**Disability Characteristics, Consortium, 2012**



Note: \*Total population reflects total civilian noninstitutionalized population. "Type of difficulty" reflect definitions used by the U.S. Census Bureau. "Hearing difficulty" is defined as deaf or having serious difficulty hearing. "Vision difficulty" is defined as blind or having serious difficulty seeing, even when wearing glasses. "Cognitive difficulty" is defined as having difficulty remembering, concentrating, or making decisions because of a physical, mental, or emotional problem. "Ambulatory difficulty" is defined as having serious difficulty walking or climbing stairs. "Self-care difficulty" is defined as having difficulty bathing or dressing. "Independent living difficulty" is defined as having difficulty doing errands alone such as visiting a doctor's office or shopping because of a physical, mental, or emotional problem.

Source: 2008-2012 ACS and BBC Research & Consulting.

## Segregation/Integration

This section discusses the geographic segregation/integration of protected classes throughout the County. HUD defines “integrated” geographic areas as those which do not contain high concentrations of protected classes when compared to the representation in a jurisdiction as a whole. “Segregation” occurs when concentrations of protected classes are a result of fair housing barriers or impediments.

There are two primary metrics prescribed by HUD to evaluate segregation/integration, both of which are employed in the following analysis:

- Dissimilarity index; and
- Concentration maps.

**Dissimilarity index.** 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 county.

The index typically compares the proportion of the total population of a minority group in a Census tract and the proportion of the total number of the majority population (non-Hispanic whites) in that same Census tract.

By definition, the value of the dissimilarity index falls between 0 and 1. An index value near 0 indicates perfect distribution of racial groups across all Census tracts in a region. An index value of 1 indicates perfect segregation of racial groups across the region. As an example, one of the most segregated cities for whites and African Americans in the U.S. is Detroit, which has historically had a dissimilarity index exceeding 0.80.

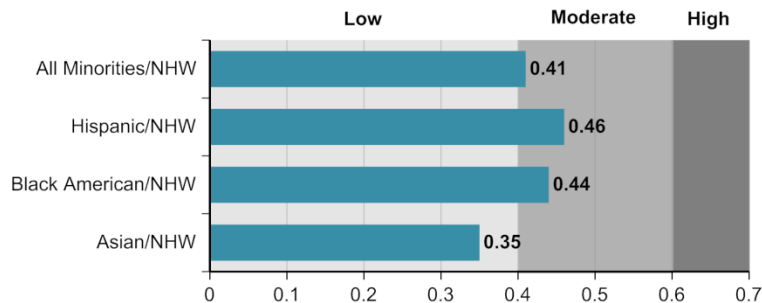
HUD categorizes the dissimilarity index into three ranges that represent the intensity of segregation: less than 0.40 indicates low segregation, between 0.40 and 0.55 indicates moderate segregation and greater than 0.55 indicates high segregation.

As shown in Figure III-11, the dissimilarity index is moderate for Hispanics and African Americans and low for Asian populations. Overall, segregation for minorities in the Consortium is moderate with a dissimilarity index of .41.

**Figure III-11.**  
**Dissimilarity Index,**  
**Consortium, 2012**

Note:  
NHW is non-Hispanic white. A  
dissimilarity index below 0.4 indicates  
low segregation and a dissimilarity index  
above 0.55 indicates high segregation.

Source:  
HUD and BBC Research & Consulting.



**Racial/ethnic concentration maps.** One of the key components of a demographic analysis is an examination of the concentration of racial and ethnic minorities within a jurisdiction to detect evidence of segregation. In some cases, minority concentrations are a reflection of preferences—e.g., minorities may choose to live near family and friends of the same race/ethnicities or 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, to the extent that there are economic disparities among persons of different races and ethnicities.

The maps on the following pages show geographically where residents of different races and ethnicities may be concentrated within Santa Barbara County. These racial and ethnic concentration maps use HUD’s definition of minority impacted areas.

According to HUD, a “minority area” (also known as a racially/ethnically-impacted area) is any neighborhood or Census tract in which:

- The percentage of households in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the housing market areas;
- The total percentage of minority persons is at least 20 percentage points higher than the total percentage of all minorities in the housing market areas as a whole; or
- If a metropolitan area, the total percentage of minority persons exceeds 50 percent of its population.

The “housing market area” is the region where it is likely that renters and purchasers would be drawn for a particular housing project. Generally the housing market area is the county.

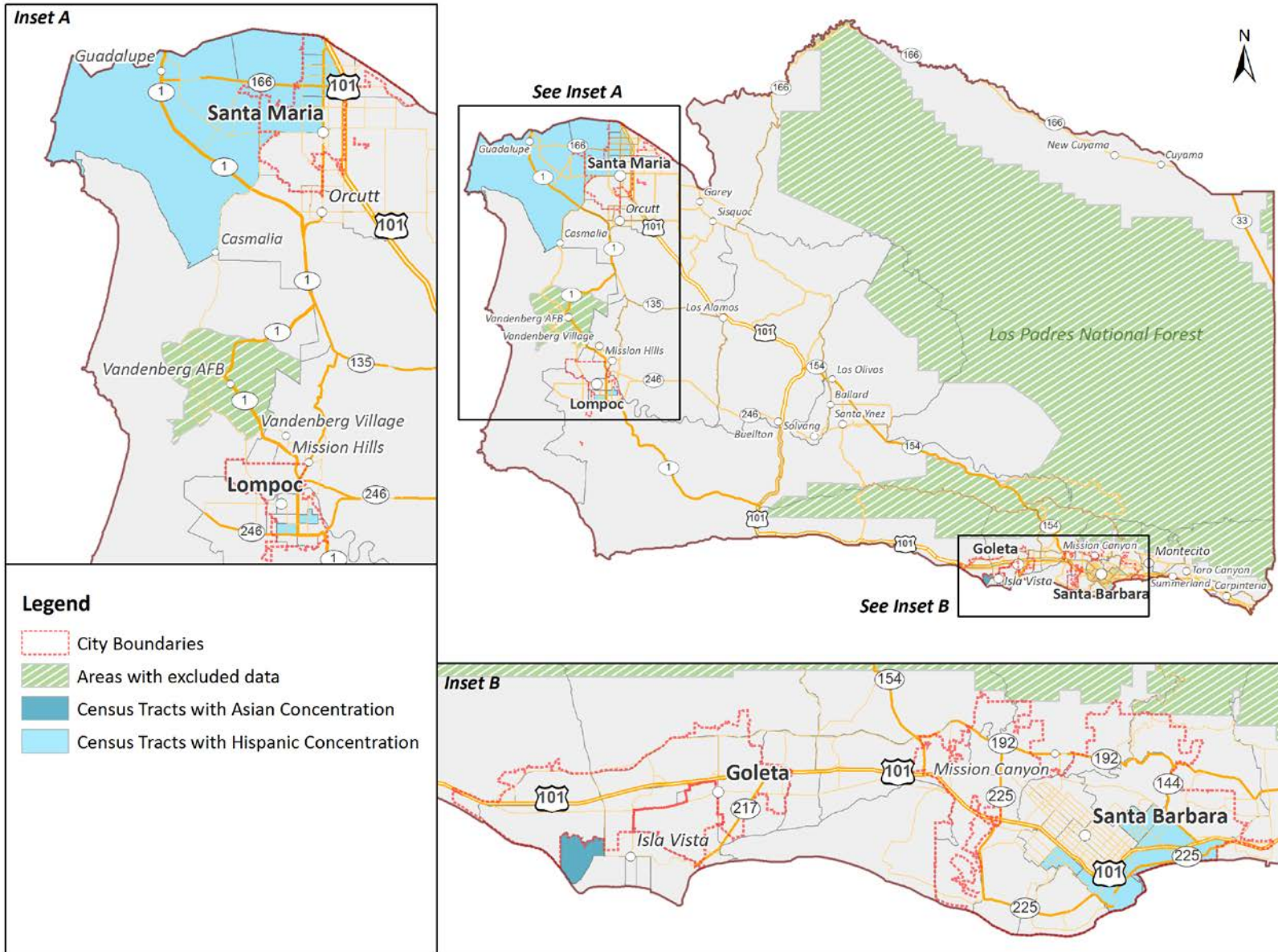
The following analysis includes maps using HUD’s 20 percentage point threshold for individual minority groups and HUD’s 50 percent definition for total minorities (discussed above).

As displayed in Figure III-12, there are areas of Hispanic concentration in the northern portion of Santa Maria, in Guadalupe and the surrounding area northwest of Santa Maria, in portions of Lompoc, and in the southeastern portion of the City of Santa Barbara. There is only one Census tract in the County with an Asian concentration (in Isla Vista) and there are no African American concentrated tracts.

Figure III-13 displays minority majority Census tracts. It should be noted that the racial/ethnic distribution of the County overall is minority majority with 48 percent of all residents identifying as non-Hispanic white and the remaining 52 percent identifying as a racial or ethnic minority. Overall, approximately 61 percent of minorities living in Santa Barbara County live in minority majority Census tracts, which are present throughout the County in Santa Maria, Lompoc, Isla Vista, Goleta, the City of Santa Barbara and Carpinteria.

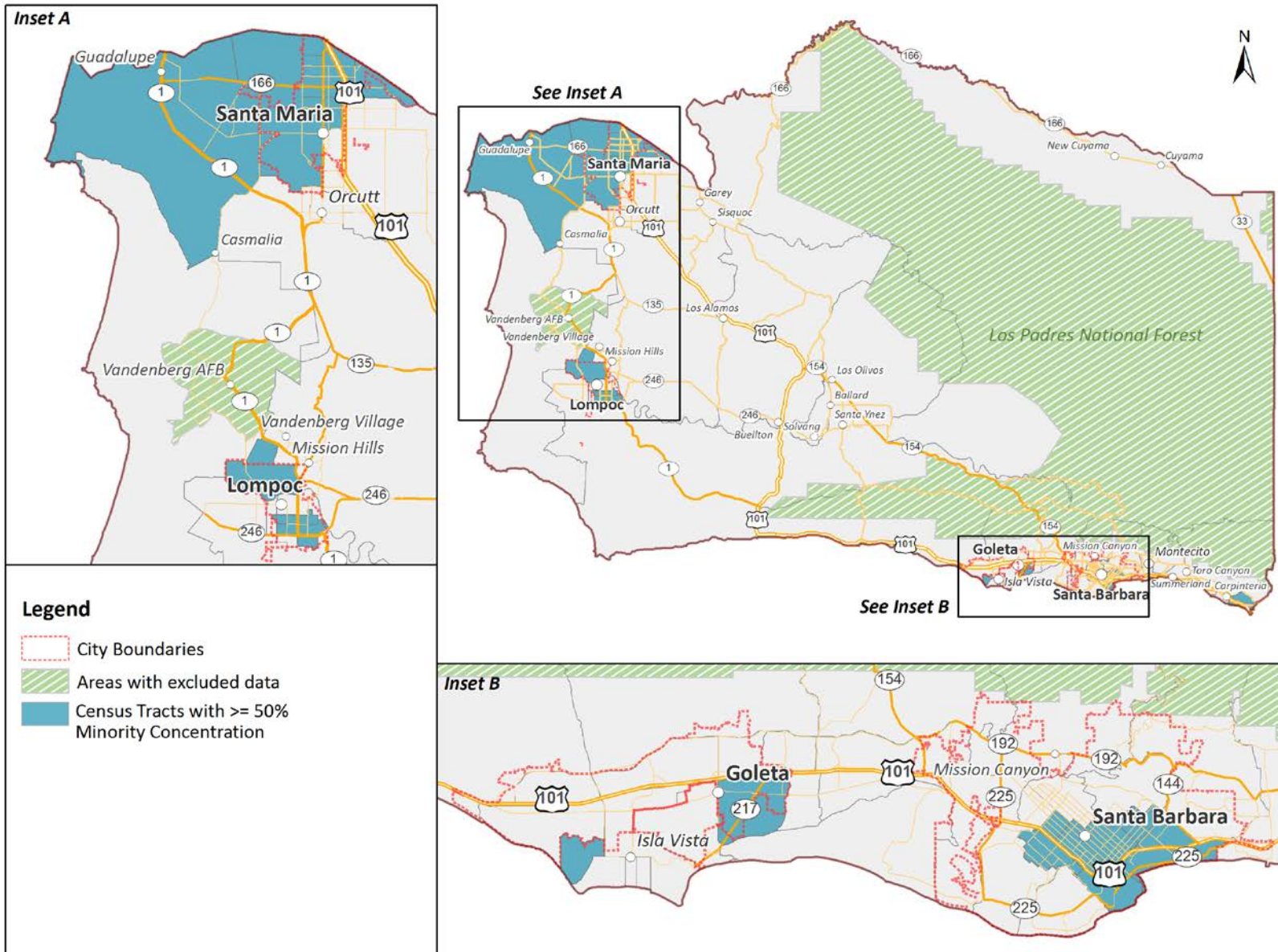


**Figure III-12.**  
**Concentration of Individual Minority Groups, Santa Barbara County, 2012**



Source: 2008-2012 ACS, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

**Figure III-13.**  
**Minority Majority Census Tracts, Santa Barbara County, 2012**



Source: 2008-2012 ACS, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

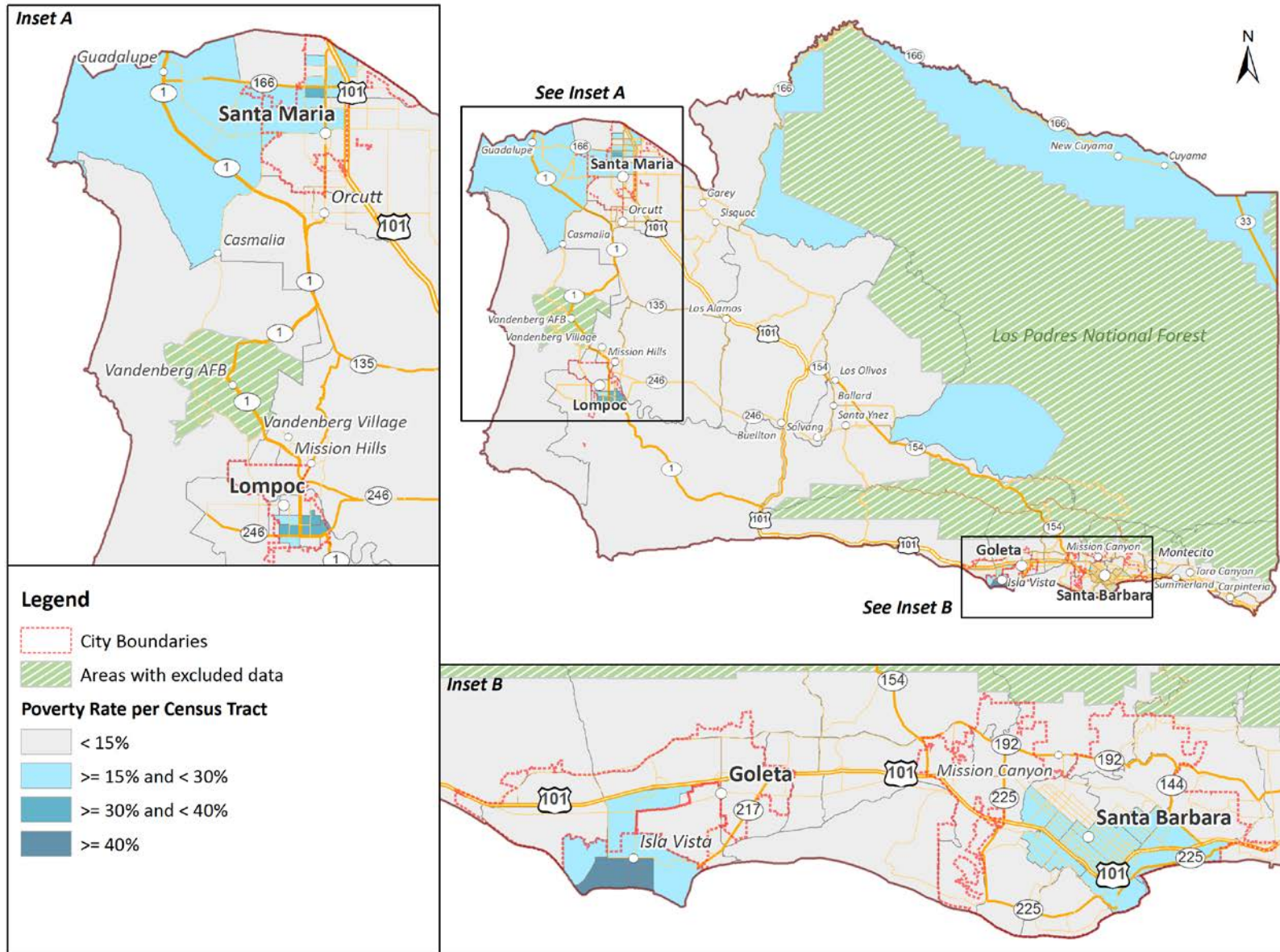
**Racially/ethnically concentrated areas of poverty.** Racially or ethnically concentrated areas of poverty also known by HUD as RCAPs or ECAPs, are areas in which there are both racial concentrations and high poverty rates. Specifically, they are Census tracts that have poverty rates exceeding 40 percent or three times the regional poverty rate and are majority minority (minorities account for 50% or more of the total population).

The poverty rate for Santa Barbara County (and the Consortium) is 15 percent, up from 14 percent in 2000. Poverty rates among protected classes in the Consortium are even higher:

- 21 percent of Hispanic residents are in poverty, compared to 11 percent of non-Hispanic whites;
- 18 percent of African American residents are living in poverty;
- 16 percent of Asian residents have incomes below the poverty line;
- 17 percent of residents with a disability are living in poverty, compared to 15 percent of residents without a disability; and
- 26 percent of female headed households with no husband present are in poverty, compared to 12 percent of all family households.

As displayed in Figure III-14, there are three Census tracts in the County with poverty rates exceeding 40 percent—all in Isla Vista. However, none of those tracts are racially or ethnically concentrated; as such, there are no RCAPs or ECAPs in the County of Santa Barbara.

**Figure III-14.**  
**Poverty Rate by Census Tract, Santa Barbara County, 2012**



Source: 2008-2012 ACS, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

**Geographic distribution of persons with disabilities.** Segregation is also an important issue for people with disabilities, including physical, developmental, and other disabilities. The Supreme Court’s Olmsted decision, and the substantial legal and policy efforts consistent with it, has begun to address the unnecessary and illegal segregation of people with disabilities.<sup>2</sup> Regulatory barriers on group living arrangements, transit access, housing accessibility and visitability, and proximity to health services are just some of the integration related issues that people with disabilities face.

As specified in federal regulations: “The most integrated setting is one that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible, consistent with the requirements of the Americans with Disabilities Act, 42 USC. 12101, et seq., and Section 504 of the Rehabilitation Act of 1973, 29 USC 794. See 28 CFR. Part. 35, App. A (2010) (addressing 25 CFR 35.130).” Under this principle, derived from the Supreme Court’s decision in Olmstead vs. L.C., institutionalized settings are to be avoided to the maximum possible extent in favor of settings in which persons with disabilities are integrated with nondisabled persons.

Different types of accommodations and/or services may be needed to allow individuals with disabilities to live in integrated settings. For example, persons with physical disabilities may need units with universal design or accessibility features specific to their needs, both within the market offerings and assisted housing stock. Persons with other types of disabilities may require access to services and support—e.g., transportation assistance, specific health services— they need to live independently. Many persons with disabilities need housing that is affordable, as well as accessible.

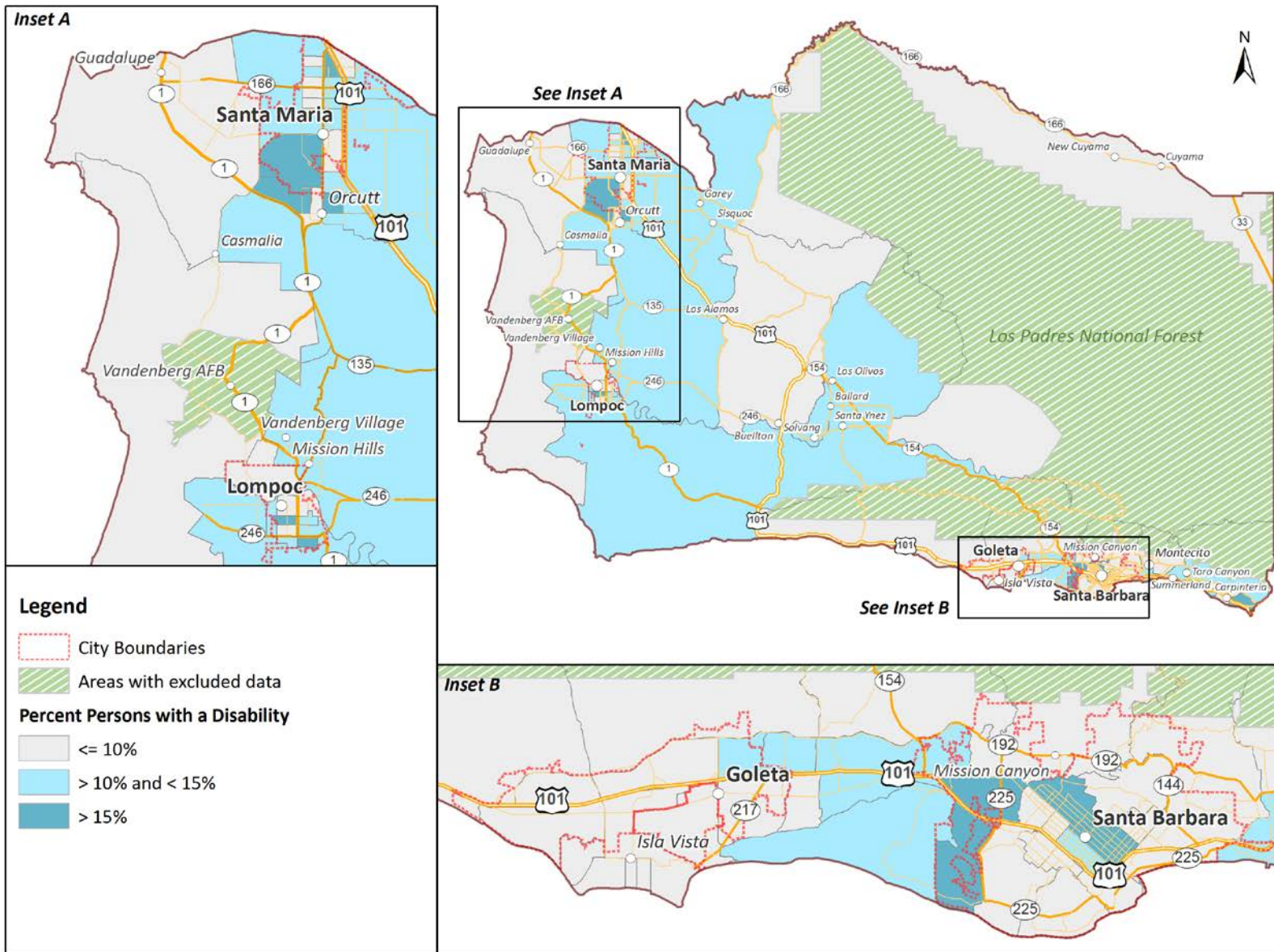
As discussed in the demographic profile, 10 percent of the Consortium population (33,650 people) has at least one type of disability. Forty-three percent of those are seniors. Among persons living with a disability, about half have an ambulatory disability, 36 percent have a cognitive disability, 33 percent have a hearing difficulty and 20 percent have a vision difficulty.

Figure III-15 displays the proportion of residents with a disability by Census tract. The subsequent maps (Figures III-16 and III-17) show the proportion of residents with cognitive and physical disabilities separately. Although there are no concentrations of persons with disabilities based on HUD’s 20 percentage point concentration definition, it is apparent that people with disabilities—particularly those with physical disabilities—are most likely to live in incorporated cities where services and/or transit may be more accessible.

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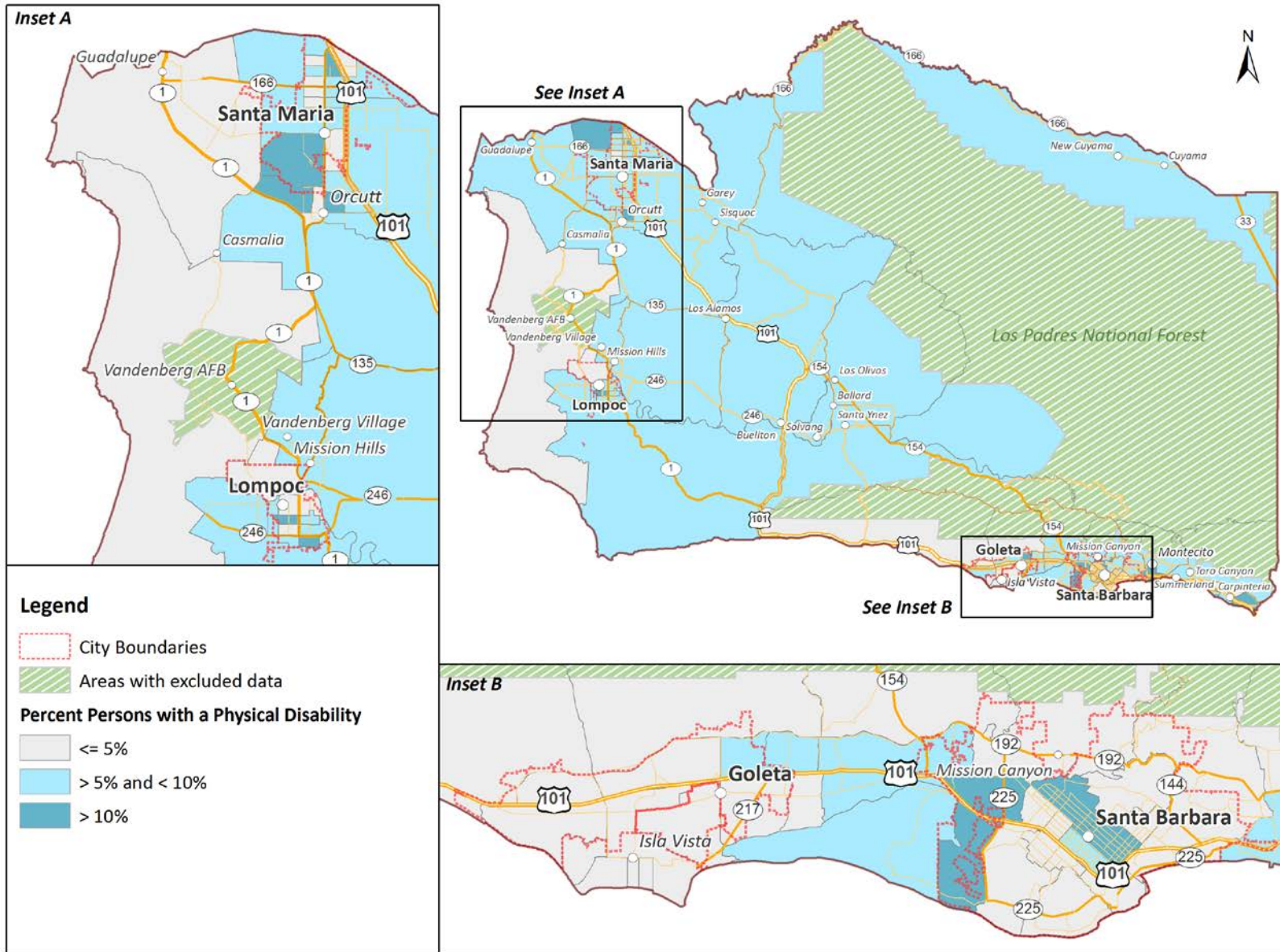
<sup>2</sup> Olmstead v L.C. is a 1999 Supreme Court case related to discrimination against people with mental disabilities. The decision acknowledged that mental illness is a form of disability under the Americans with Disabilities Act (ADA) and that institutional isolation is a form of discrimination under Title II of the ADA. Implications of the decision include efforts to integrate individuals with mental disabilities into the community at large, rather than living in institutions.

**Figure III-15.**  
**Persons with a Disability by Census Tract, Santa Barbara County, 2012**



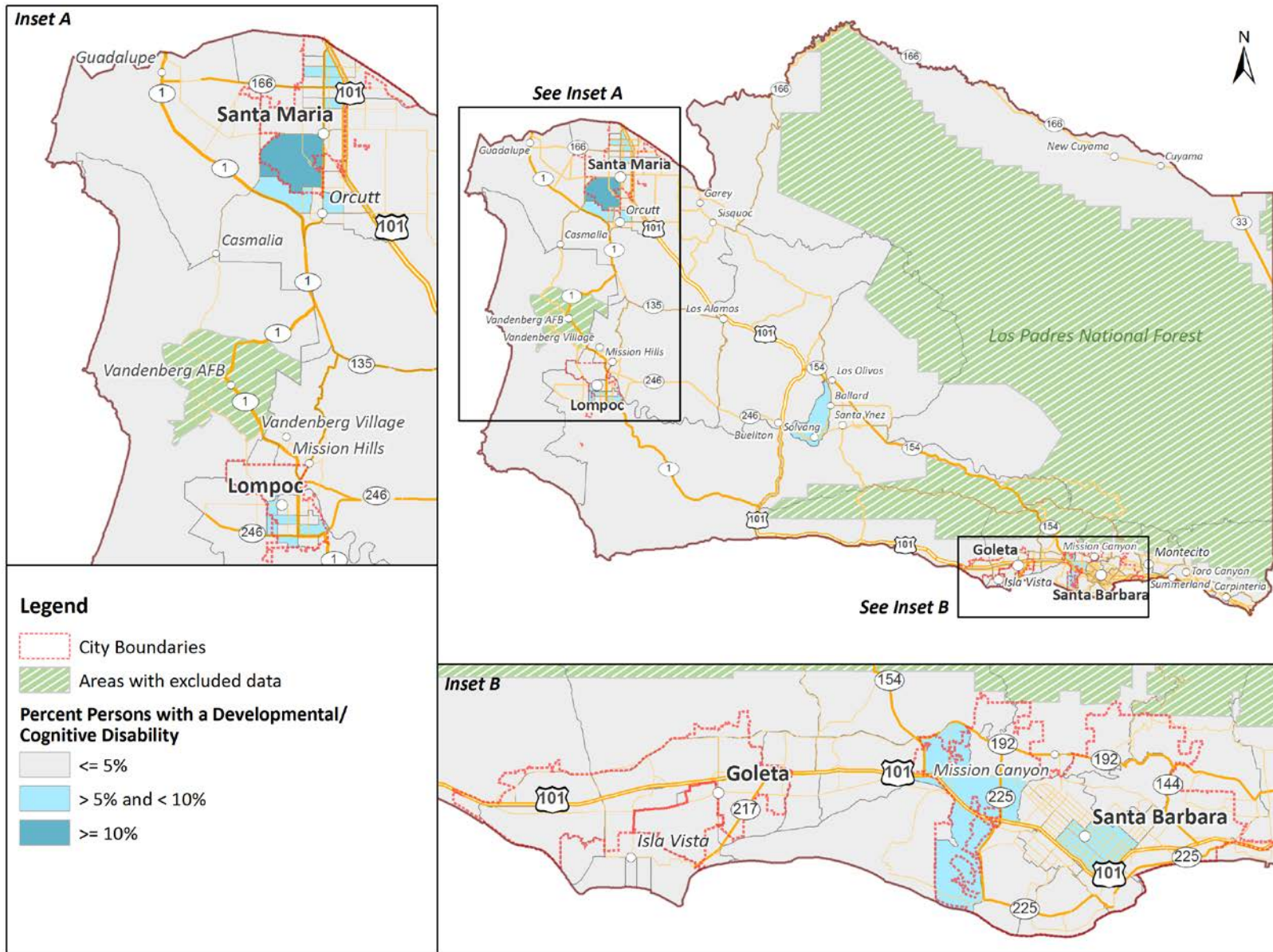
Source: 2008-2012 ACS, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

**Figure III-16.**  
**Persons with a Physical Disability by Census Tract, Santa Barbara County, 2012**



Source: 2008-2012 ACS, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

**Figure III-17.**  
**Persons with a Developmental or Cognitive Disability by Census Tract, Santa Barbara County, 2012**



Source: 2008-2012 ACS, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

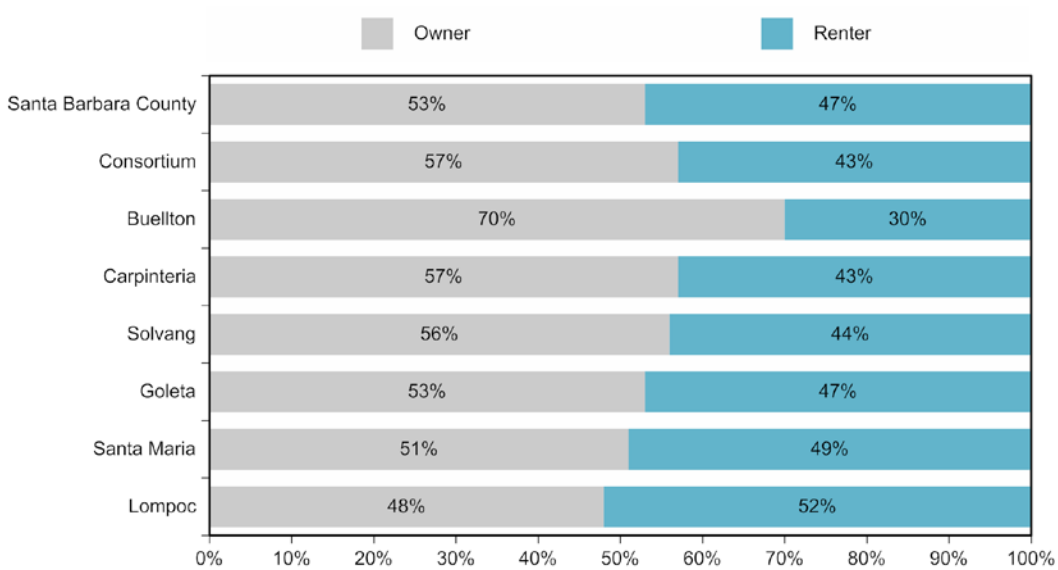


## Housing Market and Affordability

The Santa Barbara County housing market is characterized by rising rents and home prices—particularly in North County which has traditionally offered much more affordable housing than the South Coast communities.

**Tenure.** The 2012 ACS reports 112,656 households (occupied housing units) in the Consortium. Fifty-seven percent are owner occupied; 43 percent are renter occupied. Among Consortium cities, Lompoc has the lowest proportion of owners (48%) and Buellton has the highest (70%). Figure III-18 shows housing tenure by municipality.

**Figure III-18.**  
**Tenure, Consortium Members, 2012**



Source: 2008-2012 ACS and BBC Research & Consulting.

Minority householders in the Consortium have lower rates of homeownership than non-Hispanic white householders. Two-thirds (67%) of non-Hispanic white householders are owners compared to just 42 percent of minority householders. Fifty-three percent of Asian householders, 40 percent of Hispanic householders and 34 percent of African American householders are owners.

**Rental market.** Between 2000 and 2012, rental affordability declined throughout the County as renter incomes failed to keep pace with rising housing costs. Median rent (including utilities) for the County of Santa Barbara as a whole increased from \$830 per month in 2000 to \$1,326 per month in 2012—a 60 percent increase. In order to afford that increase, renter incomes would need to increase by \$19,840; however, the median income only increased by \$11,938 over the same period.

Figure III-19 displays median rent and median renter income for Consortium members and the County of Santa Barbara in 2000 and 2012. There were no communities in which renter incomes kept pace with the increase in rent.

**Figure III-19.**  
**Median Rent and Median Renter Income, Consortium Members, 2000 and 2012**

	Median Rent (with utilities)			Median Renter Income		
	2000	2008-12	Percent Change	2000	2008-12	Percent Change
Santa Barbara County	\$830	\$1,326	60%	\$32,252	\$44,190	37%
Buellton	\$725	\$975	34%	\$36,538	\$32,059	-12%
Carpinteria	\$938	\$1,398	49%	\$38,028	\$51,226	35%
Goleta	N/A	\$1,596	N/A	N/A	\$55,079	N/A
Lompoc	\$639	\$958	50%	\$27,523	\$31,096	13%
Santa Maria	\$675	\$1,117	65%	\$25,883	\$37,031	43%
Solvang	\$855	\$1,308	53%	\$32,398	\$45,417	40%

Note: Consortium median rent and income are unavailable.

Source: 2000 Census, 2008-2012 ACS and BBC Research & Consulting.

Figure III-20 shows the rental distribution for the Consortium as a whole in both 2000 and 2012. In 2000 nearly one-third of all rental units were priced between \$500 and \$750; by 2012 fewer than one tenth of all rentals were priced in that range. The number of rentals priced between \$1,000 and \$1,500 doubled and the number of rentals priced over \$1,500 quintupled.

**Figure III-20.**  
**Distribution of Rent Paid, Consortium, 2000 and 2012**

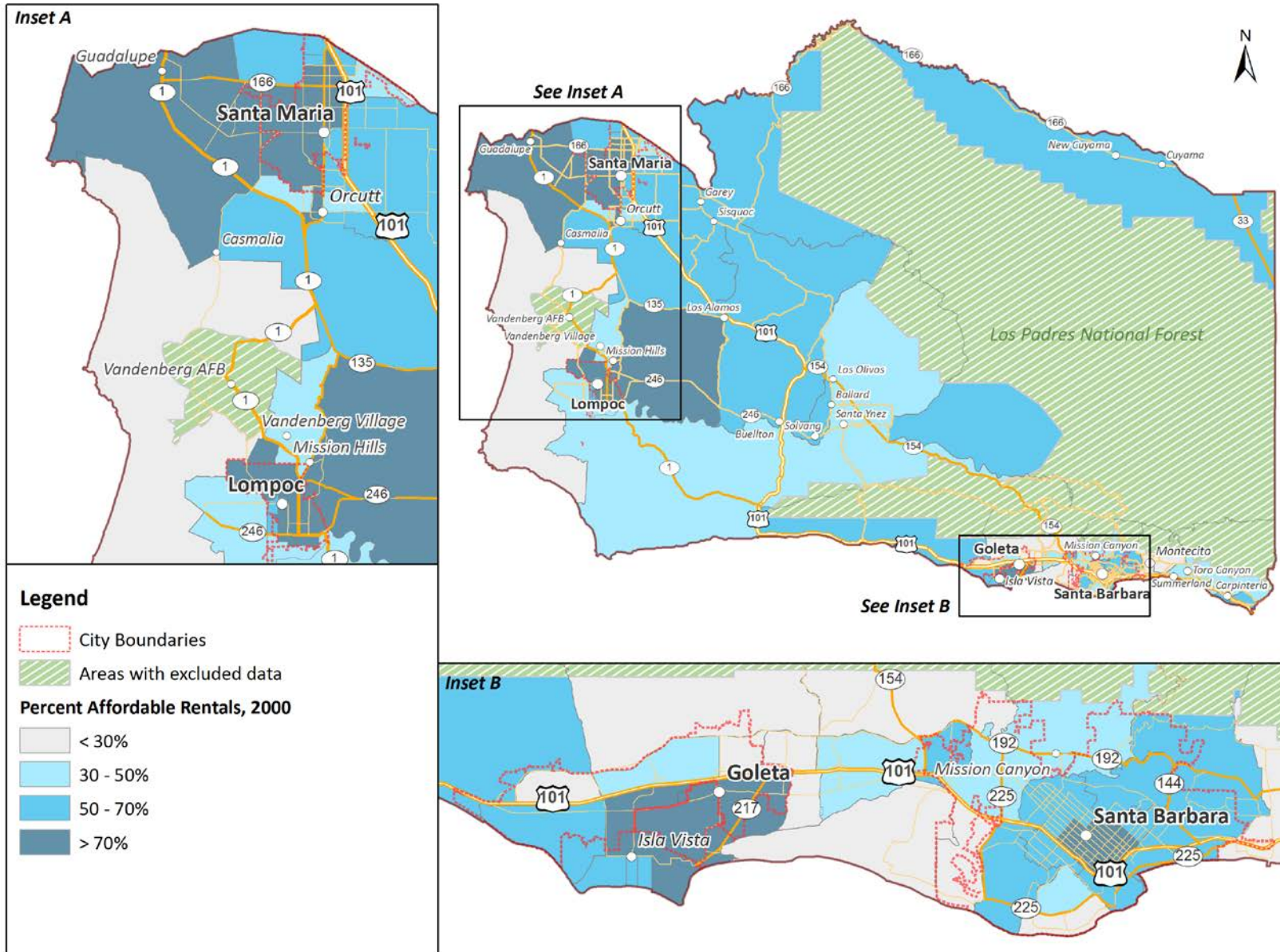
Source:  
 2000 Census, 2008-2012 ACS and  
 BBC Research & Consulting.

	2000		2012		Percent Change
	Number	Percent	Number	Percent	
Less than \$200	578	2%	322	1%	-44%
\$200 to \$299	825	2%	589	1%	-29%
\$300 to \$499	3,715	11%	1,291	3%	-65%
\$500 to \$749	11,409	32%	3,417	8%	-70%
\$750 to \$999	9,029	26%	7,555	18%	-16%
\$1,000 to \$1,499	6,594	19%	13,876	33%	110%
\$1,500 or more	3,009	9%	15,311	36%	409%

**Location of affordable rentals.** The following two maps show the proportion of rentals affordable to a household earning 80 percent of Area Median Income (AMI) in both 2000 and 2012. According to HUD income limits for those years, an 80% AMI household could afford approximately \$1,000 in rent in 2000 and approximately \$1,500 in rent in 2012.

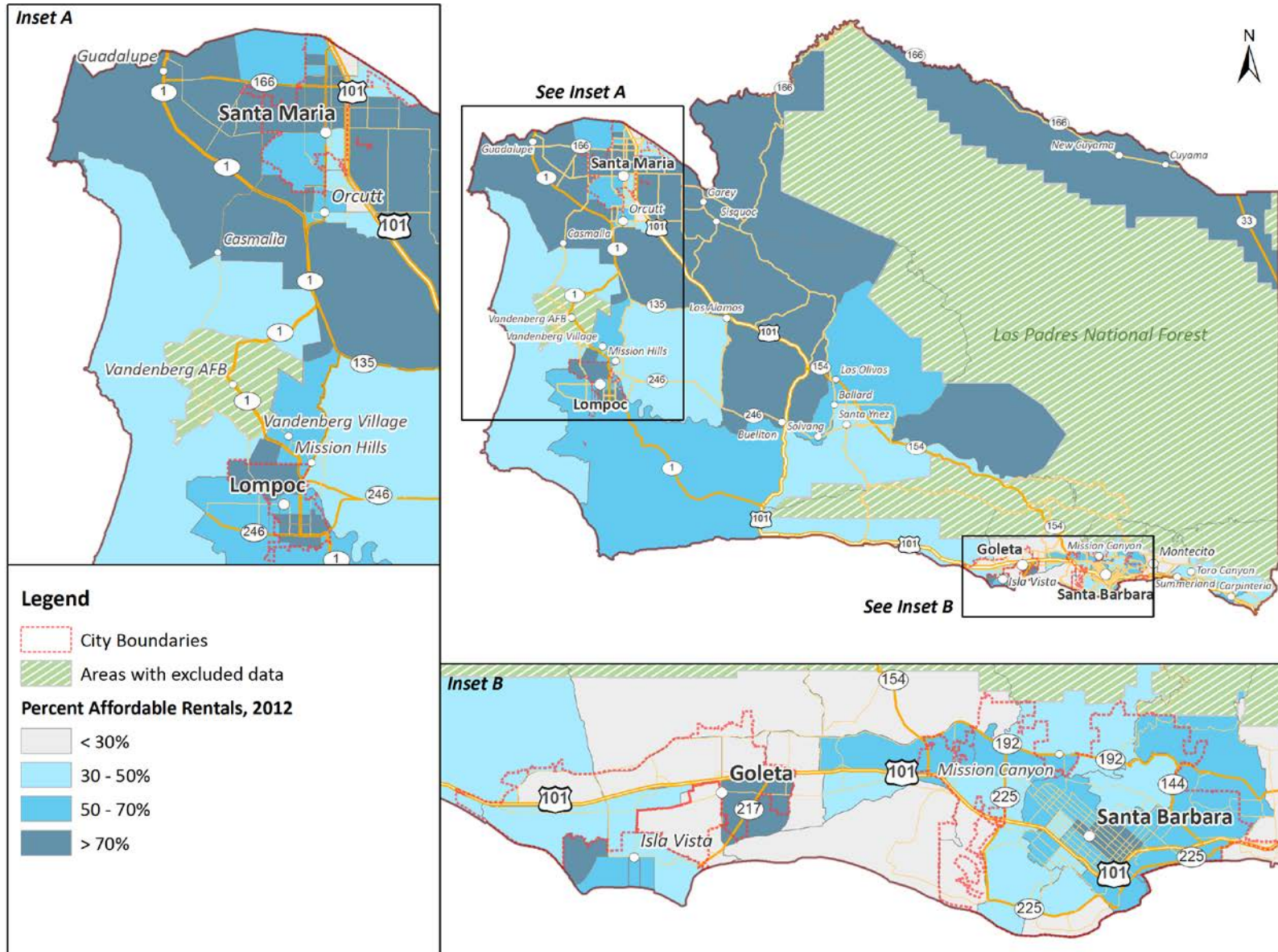
Although the maps show an increase in affordable rentals in the some unincorporated portions of the County, affordable rental housing in incorporated cities declined substantially, even after allowing for a \$500 increase in rent (from \$1,000 to \$1,500) between 2000 and 2012.

**Figure III-21.**  
**Affordable Rentals (Less than \$1,000) by Census Tract, Santa Barbara County, 2000**



Source: 2000 Census, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

**Figure III-22.**  
**Affordable Rentals (Less than \$1,500) by Census Tract, Santa Barbara County, 2012**



Source: 2012 ACS, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

**Rental gaps analysis.** To examine how well the Consortium’s current housing market meets the needs of its residents BBC conducted a modeling effort called a “gaps analysis.” The analysis compares the supply of housing at various price points to the number of households who can afford such housing. If there are more housing units than households, the market is “oversupplying” housing at that price range. Conversely, if there are too few units, the market is “undersupplying” housing.

Figure III-23 compares the number of renter households in the Consortium, their income levels, the maximum monthly rent they could afford without being cost burdened, and the number of units in the market that were affordable to them. The “Rental Gap” column shows the difference between the number of renter households and the number of rental units affordable to them. Negative numbers (in parentheses) indicate a shortage of units at the specific income level; positive units indicate an excess of units.

**Figure III-23.  
Rental Gaps, Consortium, 2012**

Income Range	Maximum Affordable Rent	Renters		Rental Units		Rental Gap	Cumulative Gap
		Number	Percent	Number	Percent		
Less than \$5,000	\$125	1,914	5%	100	0%	(1,814)	(1,814)
\$5,000 to \$9,999	\$250	1,817	4%	567	1%	(1,250)	(3,064)
\$10,000 to \$14,999	\$375	3,117	7%	873	2%	(2,244)	(5,309)
\$15,000 to \$19,999	\$500	3,051	7%	755	2%	(2,296)	(7,604)
\$20,000 to \$24,999	\$625	2,627	6%	1,511	3%	(1,116)	(8,720)
\$25,000 to \$34,999	\$875	5,320	13%	5,714	13%	394	(8,326)
\$35,000 to \$49,999	\$1,250	6,592	16%	12,044	27%	5,452	(2,874)
\$50,000 to \$74,999	\$1,875	7,400	17%	13,493	31%	6,093	3,219
\$75,000 or more	\$6,250	10,524	25%	9,096	21%	(1,428)	1,791
<b>Total/Low Income Gap</b>		<b>42,361</b>	<b>100%</b>	<b>44,152</b>	<b>100%</b>	<b>(8,720)</b>	

Source: 2012 ACS and BBC Research & Consulting.

The gaps analysis in Figure III-23 shows that:

- Sixteen percent of Consortium renters (6,849 households) earn less than \$15,000 per year. These renters need units that cost less than \$375 per month to avoid being cost burdened. Just 3 percent of rental units (1,540 units) in the Consortium—including subsidized units—rent for less than \$500/month. This leaves a “gap,” or shortage, of 5,309 units for these extremely low income households.
- Another 5,678 renters earn between \$15,000 and \$25,000 per year. There are only 2,266 rental units priced at their affordability range (less than \$625/month), leaving a shortage of 3,411 units.
- Altogether, the Consortium has a shortage of rental units priced affordably for renters earning less than \$25,000 per year of 8,720 units. These households consist of students,

working residents earning low wages, residents who are unemployed and residents who are disabled and cannot work.<sup>3</sup>

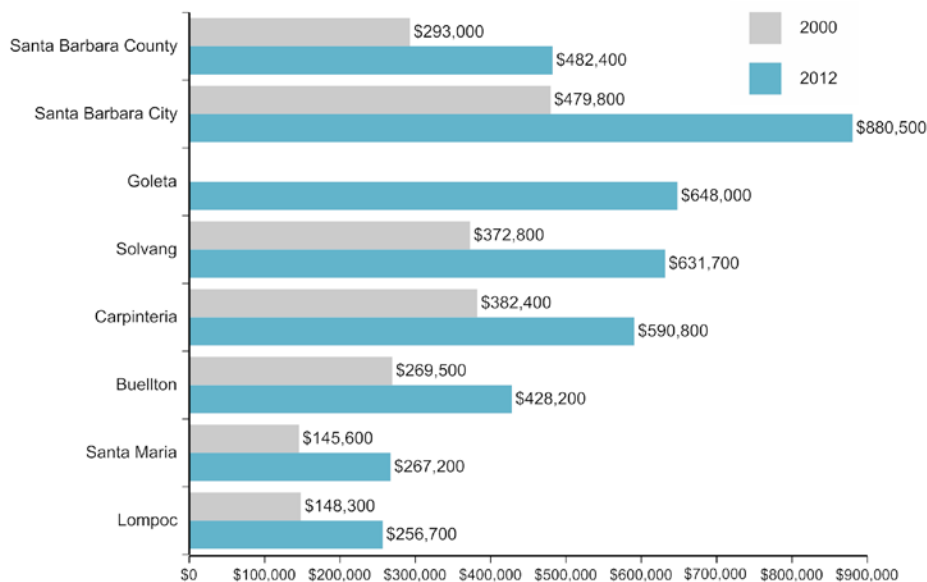
- The cumulative shortage of rental units persists for renters earning up to \$50,000 per year.

In sum, the private rental market in the Consortium largely serves renters earning \$50,000 or more per year. The market fails to adequately serve the 58 percent of renters earning less than that—even when accounting for the impact of subsidized housing programs. Renters with the most severe needs are those earning \$25,000 or less (30% of all renter households).

**Ownership market.** Affordability within the owner-occupied housing market has also declined across the County. Median home values for the County as a whole increased by 65 percent—from \$293,000 in 2000 to \$482,000 in 2012—while median incomes for both renters and owners increased by just 37 percent.

Figure III-24 displays the median home value for members of the Consortium in both 2000 and 2012. The City of Santa Barbara is also included for reference. By this measure, Lompoc is the most affordable for would-be owners and Goleta is the least affordable. Although communities in North County offer more affordable options, the home values in North County communities experienced greater percentage increases between 2000 and 2012 (84% increase in Santa Maria and 73% increase in Lompoc) compared to South County Consortium members (e.g., 54% increase in Carpinteria).

**Figure III-24.**  
**Median Home Value, Consortium Members, 2000 and 2012**



Note: Goleta was incorporated in 2002.

Source: 2000 Census, 2012 ACS and BBC Research & Consulting.

<sup>3</sup> It is important that these renters are not homeless. Those renters who cannot find affordably priced rentals are living in units that cost more than they can afford. These households are “cost burdened.”

Figure III-25 displays the distribution of Consortium home values in both 2000 and 2012. The most substantial decrease was in the number of homes valued below \$150,000 and the largest increase was in the number of homes valued between \$500,000 and \$1 million.

**Figure III-25.  
Distribution of Home  
Values, Consortium,  
2000 and 2012**

Source:  
2000 Census, 2012 ACS and BBC  
Research & Consulting.

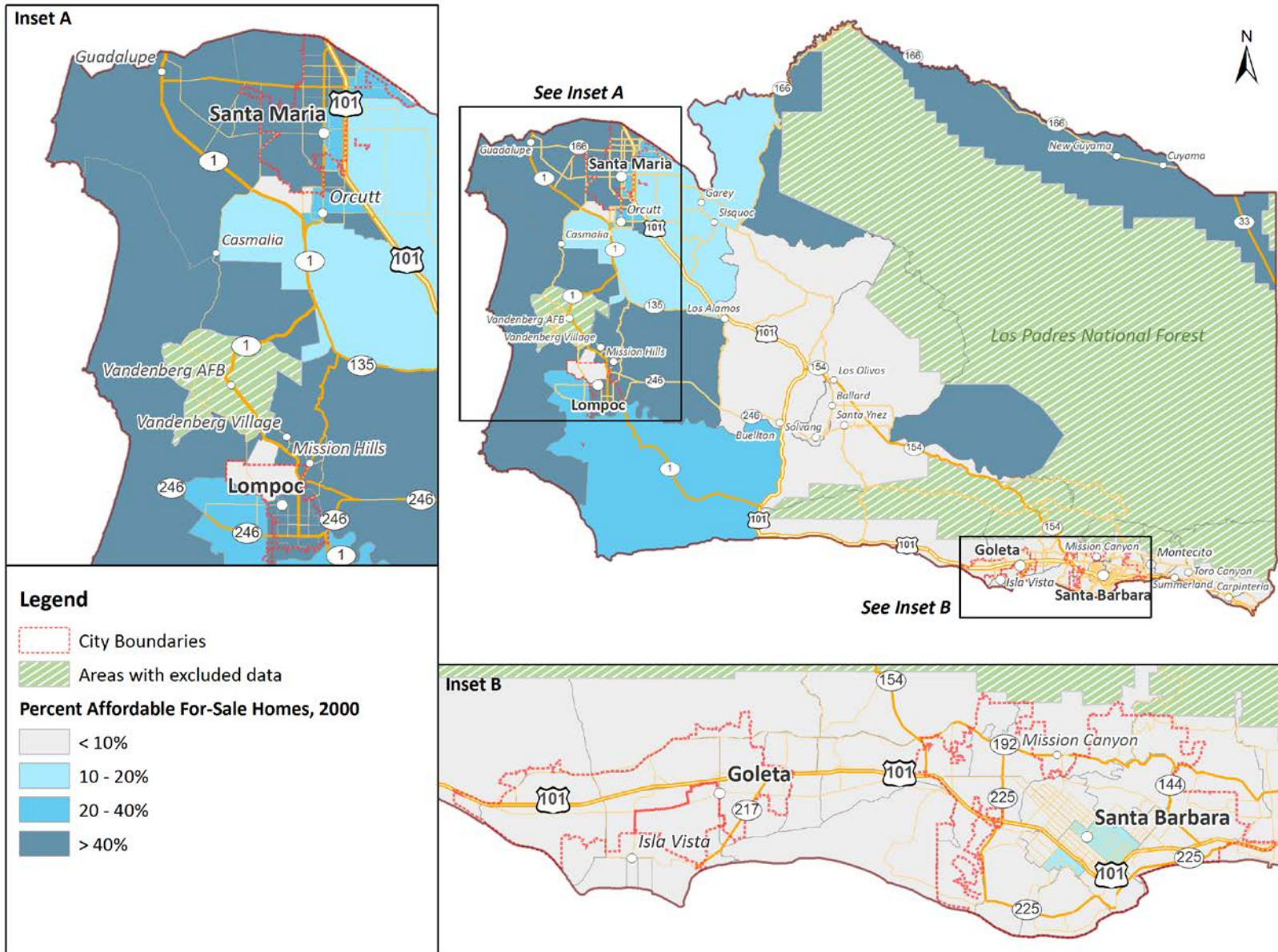
	2000		2012		Percent Change
	Number	Percent	Number	Percent	
Less than \$150,000	12,846	26%	6,302	10%	-51%
\$150,000 to \$299,999	16,178	33%	14,934	25%	-8%
\$300,000 to \$499,999	11,364	23%	14,350	24%	26%
\$500,000 to \$999,999	5,364	11%	16,146	27%	201%
\$1,000,000 or more	2,868	6%	8,306	14%	190%

The following maps show the proportion of homes affordable to 80 percent AMI households in both 2000 and 2012. Affordability is based on HUD income limits for those years; calculations assume a 5 percent downpayment, a 4.5 percent interest rate on a 30 year fixed rate mortgage and 75 percent of monthly housing costs are for the mortgage payment (the remaining 25% goes to insurance, utilities, private mortgage insurance, taxes, etc.).

Figure III-26 displays the proportion of affordable homes by Census tract in 2000 (home values below \$166,718 are considered affordable) and Figure III-27 displays the proportion of affordable homes by Census tract in 2012 (home values below \$228,420 are considered affordable).

Even allowing for a price increase matching the increase in HUD median income, the maps demonstrate a substantive decrease in for-sale affordability throughout North County. Some portions of South County show slight increases in affordability, however home values throughout the South Coast remain out of reach for most residents. According to 2012 ACS data, only 23 percent of all Consortium residents and only 10 percent of Consortium renters can afford the county-wide median home value of \$482,400.

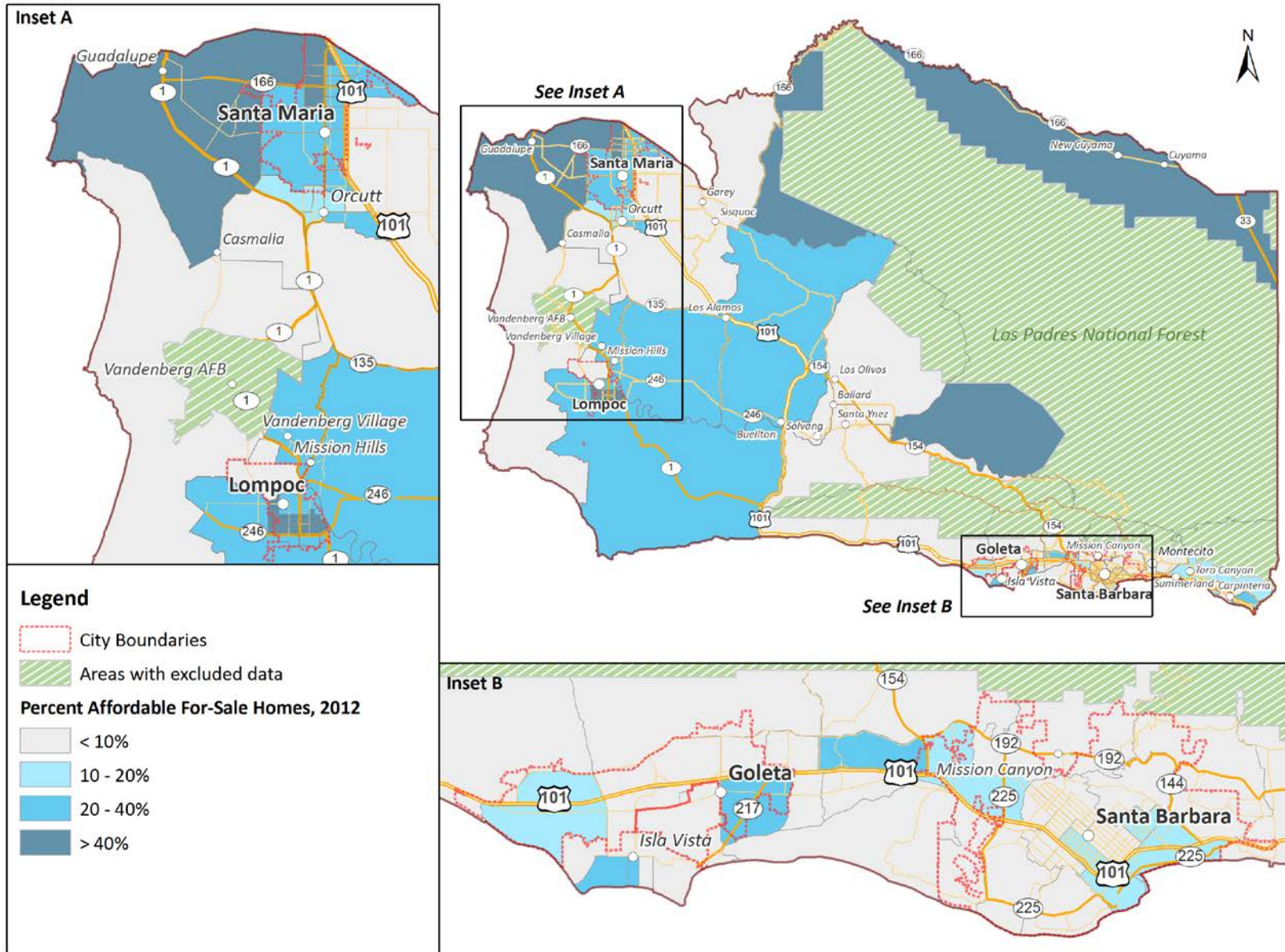
**Figure III-26.**  
**Affordable For-Sale Homes (\$166,718.24), Santa Barbara County, 2000**



Source: 2000 Census, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.



**Figure III-27.**  
**Affordable For-Sale Homes (\$228,419.57), Santa Barbara County, 2012**



Source: 2008-2012 ACS, U.S. Census TIGER/Line, ESRI and BBC Research & Consulting.

## Disproportionate Housing Needs

Lower income residents coping with high housing costs may have to double up or overcrowd small units, pay more than they can afford for housing, or live in substandard homes (lacking kitchens or plumbing facilities). These housing problems are important indicators of need in any housing market. For the purposes of an AI, it is important to consider whether those housing needs disproportionately impact any protected classes.

Figure III-28 reveals the number and percentage of households with HUD-defined housing problems (cost burden, lacking complete plumbing facilities, lacking complete kitchen facilities, or overcrowding) for each Consortium member.

**Figure III-28.**  
**Housing Problems, Consortium Members, 2012**

	Substandard Condition*		Overcrowded†		Cost Burden‡					
					Total		Owners		Renters	
	#	%	#	%	#	%	#	%	#	%
Santa Barbara County	2,074	1%	12,187	9%	65,152	47%	29,339	39%	35,813	57%
Consortium	1,420	1%	9,257	9%	47,143	46%	22,979	38%	24,164	58%
Buellton	51	3%	72	5%	635	41%	314	29%	321	68%
Carpinteria	0	0%	410	8%	2,087	42%	1,104	39%	983	46%
Goleta	181	2%	440	4%	4,749	44%	2,122	36%	2,627	53%
Lompoc	239	2%	1,239	9%	6,268	49%	2,307	37%	3,961	60%
Santa Maria	377	1%	5,117	19%	13,177	50%	5,880	43%	7,297	57%
Solvang	45	2%	25	1%	1,185	50%	494	38%	691	66%

Note: \*Lacking complete plumbing or kitchen facilities.

†More than one person per room.

‡Spending 30% or more of monthly income on housing costs.

Source: 2008-2012 ACS and BBC Research & Consulting.

Overall, about 1 percent of Consortium households are lacking kitchen/plumbing facilities, 9 percent are overcrowded and 46 percent are cost burdened. Overcrowding is highest in Santa Maria where nearly one in five households have more than one occupant per room. Cost burden is the most pervasive problem in the Consortium—38 percent of owners and 58 of renters are spending 30 percent or more of their monthly income on housing costs.

As shown in Figure III-29 Hispanic residents (56%), Asian residents (48%) and African American residents (93%) are more likely to be cost-burdened than white residents (40%). The same groups are also more likely than white residents to be severely cost burdened, spending 50 percent or more of their income on housing.

**Figure III-29.  
Cost Burden by  
Race/Ethnicity,  
Consortium, 2011**

Note:  
Cost burdened households spend 30% or more of their income on housing costs; severely cost burdened households spend 50% or more of their income on housing costs.

Source:  
2015-2020 County of Santa Barbara Consolidated Plan.

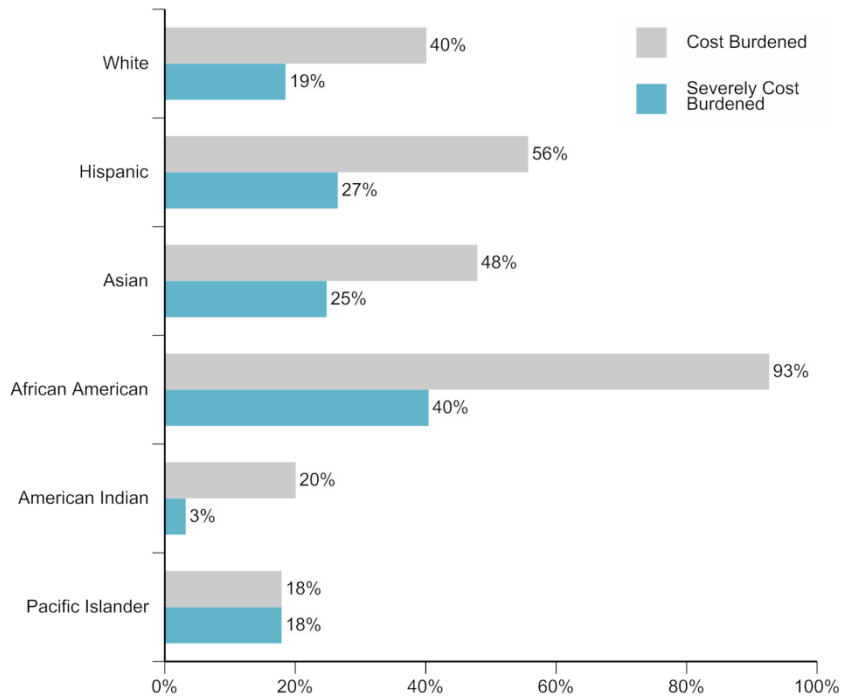


Figure III-30 displays the proportion of households with any of the four HUD-defined housing problems (cost burden, overcrowding, lacking complete plumbing facilities, or lacking complete kitchen facilities) by race/ethnicity and income as a percent of AMI. Data are shown for whites and the three largest minority groups (Hispanic, Asian and African American).

A disproportionately greater need exists when the members of a racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60% of all low-income households within a jurisdiction have a housing problem and 70% of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need.

At the lowest income levels (residents earning less than 30% AMI), housing needs are high but do not have a disproportionate impact on any particular racial/ethnic group. The same is true among residents earning between 30 percent and 50 percent of AMI, except for Asians who have a significantly lower rate of housing need than whites.

However, at incomes between 50 and 100 percent of AMI, minority groups experience a disproportionately high incidence of housing problems:

- Hispanic households earning 50 to 80 percent of AMI and 80 to 100 percent AMI have disproportionately high rates of housing need when compared to whites of the same income levels.
- Disproportionate need also exists African American households earning 50 to 80 percent of AMI and Asian households earning 80 to 100 percent AMI, compared to whites of the same income levels.

Although the data do not indicate which specific housing problem may be driving the disparities discussed above, it is worth noting that the most common housing problem in the County overall is cost burden—approximately 47,100 households are cost burdened compared to 9,300 that are overcrowded and 1,400 that are in substandard condition.

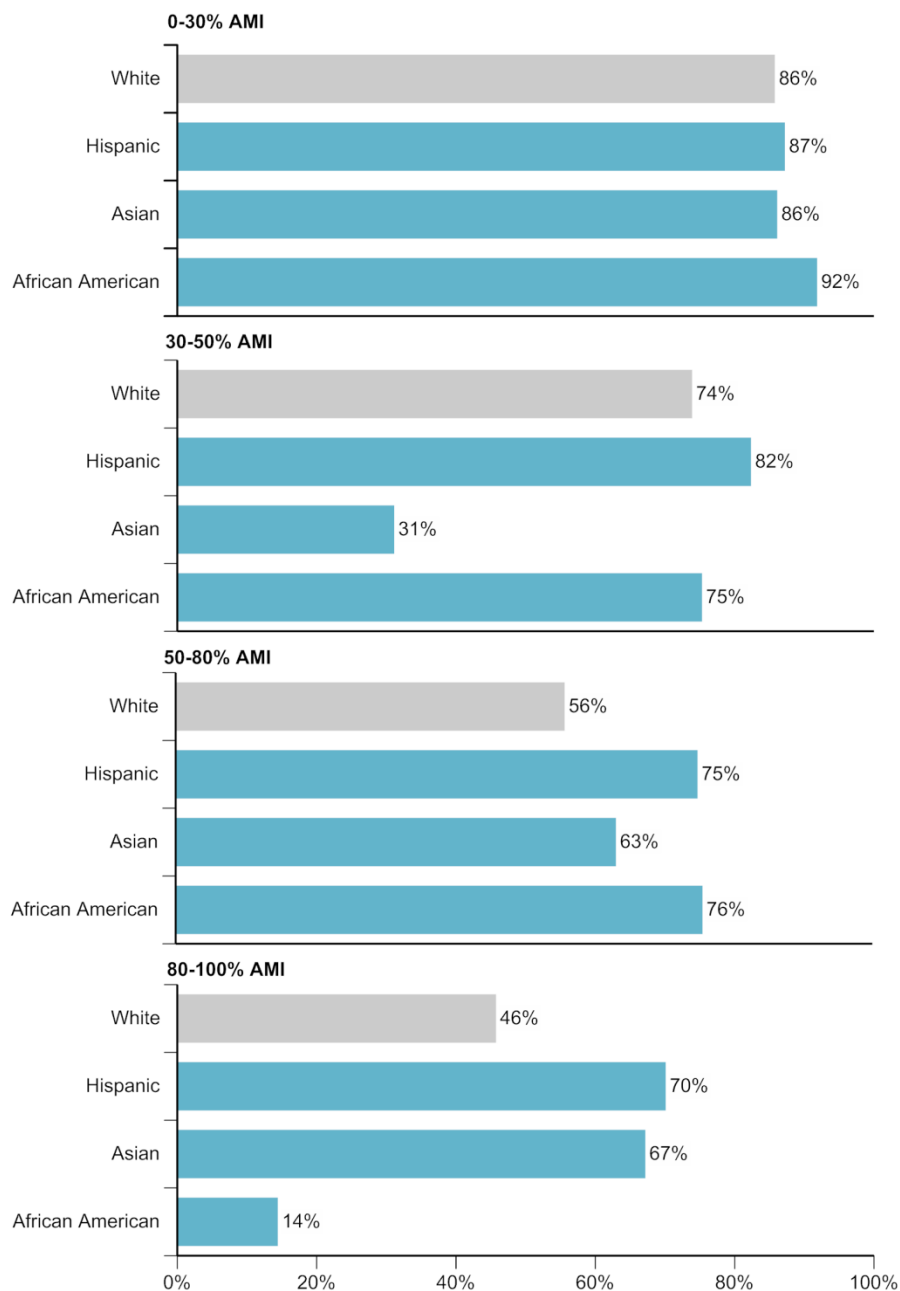
**Figure III-30.  
Proportion of  
Households with at  
Least One Housing  
Problem by  
Race/Ethnicity and  
Income,  
Consortium, 2011**

Note:

The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost burden

Source:

2015-2020 County of Santa Barbara Consolidated Plan



## Access to Opportunity

As part of the AI public process, stakeholders were asked about areas of opportunity (good schools, job centers, transit access, etc.) and whether protected classes had equitable access to community assets. Overall, residents and stakeholders felt services and assets were well distributed throughout the County. However, it was widely acknowledged that there is a jobs and housing imbalance between North and South County and a lack of transit connecting North and South County. Some residents also cited concern about overcrowding in schools, a need for more pedestrian friendly infrastructure and for local health clinics in some neighborhoods.

**Jobs-housing imbalance.** Insufficient access to employment opportunities can create barriers to housing choice and result in long commutes and increased traffic congestion. The 2014 State of the Commute Report by SBCAG and 2015-2023 Housing Element document the jobs-housing imbalance in Santa Barbara County in detail. South County has a disproportionately high share of jobs in the County but has fewer housing opportunities, particularly for lower and moderate income residents. As a result, many South County workers live in North County or Ventura County and accept long daily commutes to job opportunities. According to the 2014 State of the Commute Report nearly 8,000 workers commute from north to South County while only 2,000 workers commute from south to North County.

While a jobs-housing imbalance doesn't pose an overt fair housing impediment, it can create barriers to opportunity and lead to the development of disenfranchised areas within a jurisdiction. Increasing access to job centers either through affordable housing provision in employment areas or improved transportation connections between jobs and housing can help balance economic opportunity for all residents.

**Public transit.** Within the County of Santa Barbara there are multiple transit systems, most of which serve specific urban areas including the cities of Santa Barbara, Santa Maria, Lompoc and Santa Ynez. While local travel is provided by those systems, there is a lack of connection between cities, particularly between North and South County. Such gaps in transit provision can lead to housing choice barriers, particularly for lower income residents and residents that are unable to drive due to a disability.

North County residents noted that public transportation was used infrequently as it requires many transfers and long travel times. Residents said they are more likely to ask friends and family for rides and/or use an informal taxi service where individuals with cars charge passengers for rides around town.

South County residents were more satisfied with transit options overall, but residents with disabilities (and advocates for persons with disabilities) expressed a need for extended service hours for buses as well as more accessible alternate transportation options (van service and accessible taxis).

## SECTION IV.

# Fair Housing Environment

This section evaluates private and public compliance with existing fair housing laws, regulations, and guidance, and provides an assessment of fair housing infrastructure in the County of Santa Barbara. This analysis is informed by fair housing complaints; data on mortgage lending practices; and a review of relevant public policies.

### Housing Discrimination

This section discusses housing discrimination as evidenced by complaint filings, investigations of violations and residents' self-reported experience with discrimination. It begins with an analysis of recent fair housing complaints.

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/sex, familial status and disability. The Fair Housing Act—Amended (FHAA) covers most types of housing including rental housing, home sales, mortgage and home improvement lending and land use and zoning. Excluded from the FHAA are owner-occupied buildings with no more than four units, single family housing units 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.<sup>1</sup>

HUD has the primary authority for enforcing the FHAA. 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).<sup>2</sup>

The State of California has a substantially equivalent law prohibiting discrimination in housing. The Fair Employment & Housing Act (FEHA) is the primary state law prohibiting discrimination in the sale, rental, lease negotiation, or financing of housing based on a person's race, religion, national origin, color, sex, marital status, ancestry, family status, disability, sexual orientation, and source of income. The state's law exceeds the protections in the Federal Fair Housing Act by including protected classes of marital status, sexual orientation and source of income. In addition, the law defines physical and mental disability as a condition that limits a major life activity; this definition of disability is broader than the federal definition, which requires a “substantial limitation.” The FEHA also incorporates the protections of the Unruh Act which includes medical condition as a protected category.

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<sup>1</sup> “How Much Do We Know? Public Awareness of the Nation's Fair Housing Laws”, The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

<sup>2</sup> Ibid.

Santa Barbara County residents who feel that they might have experienced a violation of the Fair Housing Act can contact one or more of the following organizations: HUD’s Office of Fair Housing and Opportunity (FHEO); the California Department of Fair Employment and Housing (DFEH); California Rural Legal Assistance; and the Rental Housing Mediation Task Force (RHMTF).

**Fair housing complaints.** HUD was requested to provide a list of all fair housing complaints filed with HUD by citizens in Santa Barbara County for each year between 2006 and 2014. This section provides an analysis of the HUD complaint data for residents living in the Consortium (Santa Barbara County excluding the City of Santa Barbara and Guadalupe).

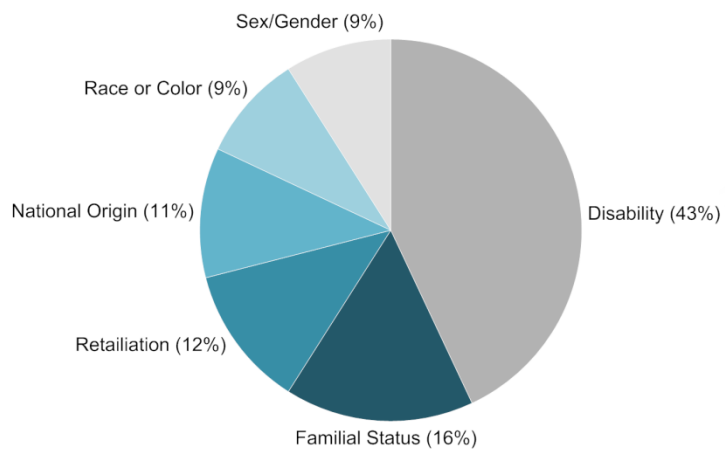
HUD reported 43 fair housing cases in the Consortium between 2006 and 2014. Just over one third of those complaints were filed by or against residents of Goleta; just over one quarter were filed by or against residents of Santa Maria.

As shown in Figure IV-1, disability was the top reason for complaint filings (43%). Familial status made up the second largest proportion of complaints (16%). Nationwide, according to HUD’s Annual Report on Fair Housing for 2012-2013, 53 percent of complaints were related to disability and 28 percent were related to race.

**Figure IV-1.  
Reason for Fair Housing  
Complaints, Consortium,  
2006-2014**

Note:  
Complaints may have more than one basis.  
This figure represents 43 complaints and  
56 bases.

Source:  
U.S. Department of Housing and Urban  
Development.

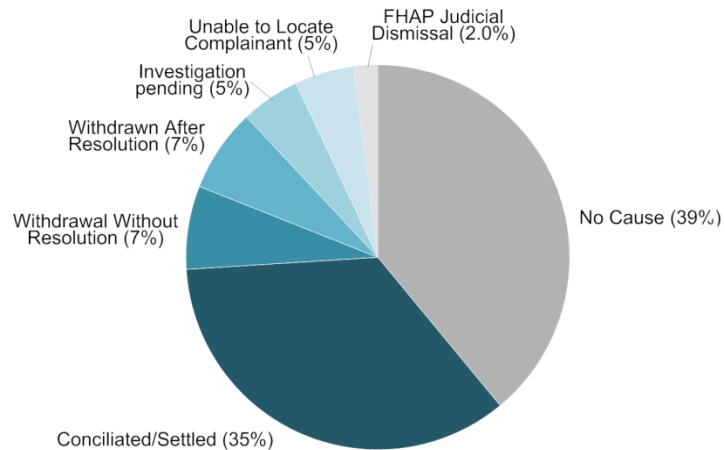


The most common types of discriminatory treatment in the HUD complaints were “failure to make reasonable accommodation,” followed by “discriminatory refusal to rent” and “discriminatory refusal to rent and negotiate for rental.”

Figure IV-2 displays the outcome of complaints filed with HUD between 2006 and 2014. Of the complaints, 35 percent were conciliated and 39 percent were found to have no cause. Three complaints (7%) were withdrawn after resolution and another 3 (7%) were withdrawn without resolution. Two complaints were still under investigation.

**Figure IV-2.  
Complaints Filed  
with HUD by  
Outcome,  
Consortium, 2006-  
2014**

Source:  
U.S. Department of Housing  
and Urban Development.



**Stakeholder and resident experience with housing discrimination.** As detailed in Section II, both residents and stakeholders discussed perceptions of housing discrimination during the community input process conducted for the Consolidated Plan and AI. Reports of possible housing discrimination included the following:

- Landlords lack understanding of reasonable accommodation requirements;
- Refusal to rent to families with small children;
- Unjustified eviction related to pregnancy;
- Refusal to return rental deposits was an issue specifically among Hispanic residents;
- Lease documents not available in Spanish; and
- Unjustified eviction of victim of domestic violence.

Participants in the public outreach process also noted that the tight rental market contributes to subtle forms of discrimination because landlords have more power than housing-seekers in such a market. Residents and stakeholders both cited a need for education about and enforcement of fair housing laws.

**Legal Cases.** As part of the evaluation of current issues in fair housing, BBC examined the databases of the National Fair Housing Advocate Online, the U.S. Department of Justice and HUD Fair Housing Act Enforcement Activity for recent fair housing lawsuits in Santa Barbara County. No recent cases were found (2006 through 2014).

## **Public and Private Sector Barriers**

This section reviews private and public barriers to housing choice, beginning with lending practices of regulated financial institutions. The section then reviews public land use policies, public housing policies, and current fair housing activities of the County and its partners.

**Analysis of mortgage lending.** The inability of residents to obtain loans for home purchases, home improvements and mortgage refinancing not only creates barriers to choice for residents,



but also has adverse effects on the neighborhoods in which private capital is limited. The Home Mortgage Disclosure Act (HMDA) data is the best source of information on lending practices to protected classes and in minority and low income neighborhoods. HMDA datasets contain loan application records with information on the race, ethnicity, gender, and income of the applicant, as well as loan terms.<sup>3</sup> The data are widely used to detect evidence of discrimination in lending practices, although analysis of the publicly available data is limited by lack of applicant credit information. In coming years, HMDA data will include information on credit scores, allowing for a more robust analysis of lending practices. HMDA data are insufficient to evaluate discrimination on the basis of disability as the data lack disability status of applicants.

**Loan denials.** As shown in Figure IV-3, 15 percent of residential loan applications were denied in 2013 in the Consortium. Home improvement loans were denied at a much higher rate (27%) than other types of loans. Refinancing loans were denied at a slighter higher rate (16%) than mortgage loans (11%).

For all loan purposes shown in Figure IV-3, denial rates were higher for Hispanics than for non-Hispanics. Home improvement loans had the highest Hispanic/non-Hispanic denial disparity (18 percentage points).

There were also disparities for African Americans in refinancing loans and for Other Minorities in home purchase loans. There was not a substantial Asian American/white denial disparity. Asian Americans had an overall denial rate of 15 percent, and whites had an overall denial rate of 14 percent in the Consortium.

**Figure IV-3.  
Loan Denials by Race  
and Ethnicity,  
Consortium, 2013**

Note:

Does not include loans for multifamily properties or non-occupants. There were too few home improvement loan applications to show denials for individual race categories other than white. Other Race includes American Indian, Alaska Native, Native Hawaiian, and Other Pacific Islander.

Source:

FFIEC HMDA Raw Data, 2013  
and BBC Research & Consulting.

	All Loan Purposes	Home Purchase	Home Improvement	Refinancing
<b>All Applicants</b>	15%	11%	27%	16%
<b>Ethnicity</b>				
Hispanic or Latino	17%	13%	40%	18%
Not Hispanic or Latino	13%	9%	22%	15%
<b>Race</b>				
Asian	15%	11%	N/A	15%
African American	16%	3%	N/A	19%
Other Race	17%	17%	N/A	14%
White	14%	10%	21%	15%
<b>Percentage Point Difference</b>				
Hispanic / Non-Hispanic	4%	4%	18%	3%
Asian / White	15%	11%	N/A	15%
Afr. Am. / White	16%	3%	N/A	19%
Other Min. / White	17%	17%	N/A	14%

BBC examined mortgage loan denial rates across different income categories to evaluate whether income differences could account for observed disparities in racial and ethnic denial rates. As shown in Figure IV-4, that analysis found that loan denial rates were higher for

<sup>3</sup> HMDA data includes information for mortgage loans, home improvement loans, and refinancing loans.

Hispanic applicants than for non-Hispanic applicants regardless of income—particularly for those earning between \$100,000 and \$150,000 per year. There was also a substantive difference between Asians and whites earning between \$100,000 and \$150,000 per year, African Americans and whites earning less than \$100,000 per year and Other Minorities and whites earning less than \$100,000 or more than \$150,000 per year.

**Figure IV-4.  
Loan Denials by Race/Ethnicity and Income, Consortium, 2013**

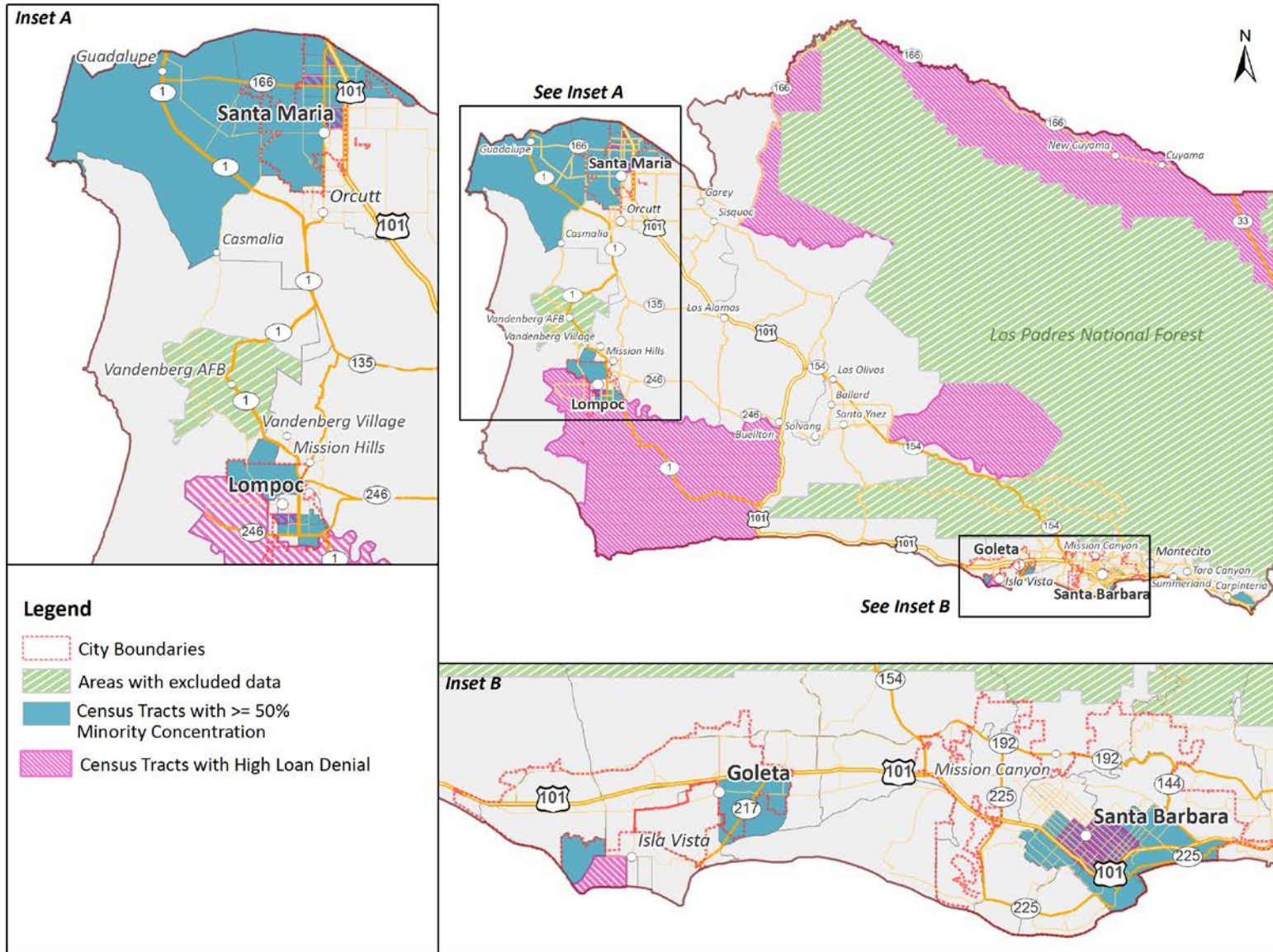
	Applicant Income less than \$100,000	Applicant income \$100,000 - \$150,000	Applicant income more than \$150,000
<b>All Applicants</b>	16%	12%	13%
<b>Ethnicity</b>			
Hispanic or Latino	18%	15%	14%
Not Hispanic or Latino	15%	11%	12%
<b>Race</b>			
Asian	16%	14%	11%
African American	21%	12%	9%
Other Race	17%	11%	19%
White	15%	11%	12%
<b>Percentage Point Difference</b>			
<i>Hispanic / Non-Hispanic</i>	3%	4%	1%
<i>Asian / White</i>	1%	3%	-1%
<i>Afr. Am. / White</i>	6%	1%	-3%
<i>Other Min. / White</i>	2%	0%	7%

Note: Does not include loans for multifamily properties or non-occupants. Other Race includes American Indian, Alaska Native, Native Hawaiian, and Other Pacific Islander.

Source: FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

Figure IV-5 shows census tracts in which at least 50 percent of the population belongs to a racial/ethnic minority group overlaid with census tracts with high loan denial rates in Santa Barbara County. A census tract is defined as having a high loan denial rate if the rate is at least five percentage points higher than the denial rate for the Consortium (15%). Nine Census tracts have higher than average denial rates; six of those are minority majority tracts (three in Santa Maria, one in Lompoc and two in the City of Santa Barbara).

**Figure IV-5.  
High Loan Denials with Minority Majority Census Tracts, Santa Barbara County, 2013**



Note: The overall denial rate for the Consortium was 15 percent. High denial census tracts are those in which the denial rate was at least 20%, or five percentage points higher than the rate for the Consortium overall.

Source: 2008-2012 ACS, FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

**Subprime lending.** In 2013 3.23 percent of mortgage loans in the Consortium were subprime (APR of more than three percentage points above comparable Treasuries).<sup>4</sup> An analysis of subprime loans by race and ethnicity found that Hispanic borrowers and African American borrowers are more likely to get subprime loans than non-Hispanic and white borrowers. Figure IV-6 displays the proportion of originated loans that are subprime by race/ethnicity for the Consortium.

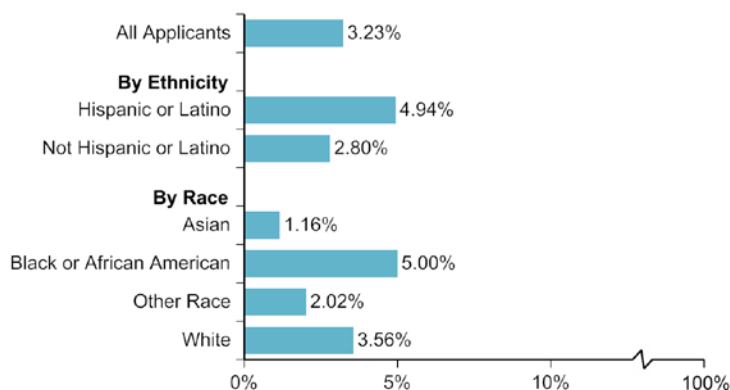
**Figure IV-6.**  
**Subprime Loans by Race and Ethnicity, Consortium, 2013**

Note:

Does not include loans for multifamily properties or non-occupants. Other Race includes American Indian, Alaska Native, Native Hawaiian, and Other Pacific Islander.

Source:

FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.



**Land use policies and practices.** BBC reviewed Santa Barbara County’s zoning and land use policies as well as the most recent Housing Element to identify fair housing issues and/or policies that could disparately impact protected classes. It is important to note that the State of California has a number of laws that influence the planning and housing policies of counties and cities. Compliance with the state’s laws helps mitigate numerous barriers to fair housing.

State laws that are related to affirmatively furthering fair housing choice through reducing barriers and promoting inclusive communities include, but are not limited to:

- The Housing Element (required by California Government Code, of GC, Section 65580)—many requirements that reduce barriers to fair housing choice. See discussion in the section that follows.
- State Density Bonus Law (GC 65915)—requires local governments to provide density increases and reduce regulatory barriers to housing to promote supply and affordability.
- Second Units Law (GC 65852)—requires local governments to establish a process to consider Accessory Dwelling Units (ADUs).
- Anti-NIMBY Law (GC 65589.5)—specifies that developments for low to moderate income households may not be denied except for under certain conditions, including a compliant Housing Element.

<sup>4</sup> This classification of subprime is consistent with the intent of the Federal Reserve in defining “subprime” in the HMDA data.

- No Net Residential Capacity Loss (GC 65863)—limits down-zoning of sites identified in Housing Element unless capacity in the community (adequate sites) can address regional housing needs.
- Limited Conditional Use for Multifamily in Multifamily Zones (GC 65589.4)—Multifamily projects must be permitted uses, not subject to a conditional use permit on any parcel zoned for multifamily housing if it meets certain criteria.
- Least Cost Zoning (GC 65863)—Requires that sufficient land be zoned for residential use with appropriate standards relative to nonresidential use and to meet the housing needs of all income groups.

**Housing Element review.** Housing Elements are required through General Plans (California Government Code Article 10.6, Section 65580-65589.8), and must be updated every eight years. The Housing Element requires local governments to plan to meet the community’s existing and future housing needs.

The state law requiring Housing Elements requires that local government adopt land use plans and regulatory systems which “provide opportunities for, and do not unduly constrain, housing development.” Housing Elements are reviewed by the state for compliance with state law.

Housing element law also requires an analysis of the needs of persons with disabilities and the existence of potential government constraints to the “development, improvement and maintenance of housing for persons with disabilities.” Local governments are also required to demonstrate local efforts to remove such constraints and provide for reasonable accommodations.

The County of Santa Barbara’s 2015-2023 Housing Element was revised in November 2014 and adopted in February 2015. The Housing Element identified some concern with the current Reasonable Accommodation Policy in that it focuses more on a given project’s impact on and compatibility with the surrounding neighborhood instead of the necessity of the requested disability accommodation. The Housing Element also suggested that the zoning code’s definition of “family” could be expanded to include “individuals residing in a dwelling for group use.”

Housing Element Programs 2.1, 2.5 and 2.7 were proposed to help mitigate constraints on the development of housing for persons with disabilities. Implementation of those programs would include revision of the existing Reasonable Accommodation Policy to ensure compliance with state law; housing consultation services to help applicants understand regulations related to the development of special needs housing; incorporation of the Reasonable Accommodation Policy into zoning ordinances; and clarification of the definition of “family” in the zoning ordinances.

**County land use and zoning code review.** The County’s land use and development codes cover three distinct portions of unincorporated County lands: the coastal zone, the Montecito planning area, and the balance of the unincorporated area. All three County planning area documents—Santa Barbara County Land Use & Development Code (LUDC), the Coastal Zoning Ordinance (Article II), and Santa Barbara County Montecito Land Use & Development Code (MLUDC)—were included in the following review.

The review was conducted using a HUD-developed checklist—the “Review of Public Policies and Practices (Zoning and Planning Code)” form produced by the Los Angeles office—that focuses on the most common regulatory barriers.

- 1. 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??** County code defines family as, “One or more persons occupying premises and living as a single non-profit housekeeping unit, as distinguished from a group occupying a boarding or lodging house, hotel, club, or similar dwelling for group use. A family shall not include a fraternal, religious, social, or business group. A family shall be deemed to include domestic servants employed by the family.”

Though this definition does not have the explicit effect of discriminating against a group of individuals with disabilities living together, the language could be improved to explicitly include such a use.

- 2. Is the Code definition of “disability” the same as the Fair Housing Act?** County code does not define “disability.” As discussed previously, the State of California has a broader definition of disability than the federal Fair Housing Act.
- 3. Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as a “boarding or rooming house” or “hotel”?** No.
- 4. Does the zoning ordinance deny housing opportunities for disability individuals with on-site housing supporting services?** No. As stated in both the LUDC and MLUDC:

*In compliance with California Health and Safety Code Section 1566, special care homes serving six or fewer clients are considered a residential and not a commercial use of property, and the clients and operators of the facility shall be considered a family... No Conditional Use Permit, Variance, or planning permit shall be required which is not required of a dwelling of the same type in the same zone.*

Special care homes serving seven or more clients—regardless of whether or not the clients are individuals with a disability—do require a minor conditional use permit.

Article II stipulates that Special Care Homes serving 14 or fewer persons are considered a residential use, subject to the regulations for any other residential dwelling. Those serving more than 14 persons require minor conditional use permits.

- 5. Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled?** No.
- 6. 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?** County code does not specifically address reasonable modification for residents with disabilities living in municipal-supplied or managed housing.

7. ***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.

For special care homes, the LUDC and MLUDC states:

- *Structural installations that are necessary to accommodate disabled residents (e.g., ramps, lifts, handrails) in compliance with the Fair Housing Act shall be allowed without having to obtain a Variance or Modification if otherwise required.*
- *The application and the requirements of this Development Code may be waived by the review authority if necessary to comply with the Federal and/or State Fair Housing and Disability Laws relating to accommodation for persons with disabilities.*

The above statements are currently included in code sections related specifically to special care homes; it may provide additional clarity to repeat such statements in the Variance and Modification sections of the code.

8. ***Does the zoning ordinance address mixed uses?*** Yes.

In the LUDC, Mixed Use zones are considered a special zone purpose and are applied to areas “that may be suited for mixed use development (i.e., residential, commercial, and/or industrial) because of their unique or unusual size, shape, natural characteristics, or location in relation to existing or planned land uses of adjacent areas.” The code also allows for mixed use projects with a residential component as a permitted use in some commercial zones; a minor conditional use permit is required in some commercial zones and there are some commercial zones in which mixed use is not allowed.

In the MLUDC, mixed use developments with more than one residential unit require a conditional use permit and are subject to specific size requirements.

9. ***How are the residential land uses discussed?*** Residential zones are discussed in Chapter 35.23 of the LUDC and Chapter 35.423 of the MLUDC. The LUDC has 13 individual residential zones with varying densities, locations and requirements:

- RR (Rural Residential) Coastal Zone
- RR (Residential Ranchette) Inland area
- R-1/E-1 (Single Family Residential) zone
- EX-1 (One-Family Exclusive Residential) zone
- R-2 (Two-Family Residential) zone
- DR (Design Residential) zone
- PRD (Planned Residential Development) zone
- SLP (Small Lot Planned Development) zone
- SR-M (Medium Density Student Residential) zone
- SR-H (High Density Student Residential) zone

- MHP (Mobile Home Planned Development) zone
- MHS (Mobile Home Subdivision) zone
- MR-O (Multi-Family Residential - Orcutt) zone

The MLUDC has four individual residential zones:

- R-1/E-1 (One-Family Residential) zone
- R-2 (Two-Family Residential) zone
- DR (Design Residential) zone
- PRD (Planned Residential Development) zone

***What standards apply?*** County code outlines permitted special and conditional uses for each district. This also includes lot and development standards, setbacks, and other general requirements.

10. ***Does the zoning ordinance describe any areas in this jurisdiction as exclusive?*** No.
11. ***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, there are no restrictions specifically applied to Senior Housing.
12. ***Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities?*** Santa Barbara County has adopted the 2013 California Building Code which includes provision for persons with disabilities and access to housing.
13. ***Does the zoning ordinance establish occupancy standards or maximum occupancy limits?*** No.
14. ***Does the zoning ordinance include a discussion of fair housing?*** County code references fair housing law only in relation to the accessibility of special care homes.
15. ***Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking.*** County code defers to state and federal law regarding handicapped parking requirements for all zones.
16. ***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?*** No.
17. ***Does the Zoning Code distinguish handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit?*** No.
18. ***How is "special group residential housing" defined in the jurisdiction Zoning Code?*** County code defines a special care home as "a residential home providing 24-hour non-medical care and supervision that is eligible for a license for a capacity of seven or more clients from the State Department of Social Services, Community Care Licensing Division or a licensing agency authorized by the Department as a 'Group Home-Children,' 'Transitional



Home,' 'Adult Residential Home,' 'Residential Care Facility for the Elderly or Handicapped,' or 'Foster Home.'"

Special care homes for six or fewer clients are considered one-family dwellings and are permitted under the same conditions as all other one-family dwellings. Special care homes for seven or more clients require a minor conditional use prior to the operation of the special care home.

- 19. 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?** Santa Barbara County has adopted the 2013 California Building Code which does make specific reference to ADA and FHA requirements.

The review yielded no overt fair housing concerns. However, there are opportunities to clarify fair housing protections in the County's zoning documents. BBC recommends the following considerations (the first two of which are also addressed in the County's Housing Element):

- Incorporate the Reasonable Accommodation Policy (Appendix A of the Housing Element) into the zoning code to increase awareness and understanding of the policy;
- Adjust the definition of "family" to explicitly include individuals with disabilities who reside together in a congregate or group living arrangement;
- Include the modification and development exemptions related to special care housing in the Variance and Modification sections of the code; and
- Incorporate a discussion of fair housing law into the zoning regulations.

**Review of other jurisdictions' codes.** A comprehensive review of the zoning and land use regulations of all member jurisdictions in the Consortium was beyond the scope of the AI. Instead, a review was conducted of the areas that have the most potential to create housing barriers. Figure IV-7 presents a summary of that analysis.

**Figure IV-7.  
Jurisdiction Code Review, Consortium Members, 2015**

	Buellton	Carpinteria	Goleta	Lompoc	Santa Maria	Solvang
<b>Definition of Family</b>	Same as County - does not specify relationship requirements and does not indicate an "unrelateds" occupancy limit	Any number of people related by blood or marriage or a group of five or fewer unrelated persons living as a single housekeeping unit	Same as County - does not specify relationship requirements and does not indicate an "unrelateds" occupancy limit	Any number of people related by blood, marriage or adoption or a group of five or fewer unrelated persons living as a single housekeeping unit	Not defined in code	Similar to County - does not specify relationship requirements and does not indicate an "unrelateds" occupancy limit
<b>Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled?</b>	No	No	No	No	No	No
<b>Is the Code definition of "disability" the same as the Fair Housing Act (FHA)?</b>	The definition in the code is in compliance with the FHA	Defers to state definition of disability, which is in compliance with the FHA.	Disability is not defined in the code	Disability is not defined in the code	Disability is not defined in the code	Disability is not defined in the code
<b>How is "special group residential housing" defined in the jurisdiction Zoning Code?</b>	The City of Buellton defines special needs housing as, "single room occupancy units, congregate care facilities and similar types of special living arrangements for persons and families who possess extraordinary housing needs by reason of economic, social, mental or physical disability." Special needs housing is permitted in all zone districts by conditional use permit. The code also states, "arrangements including supported living (e.g., in-home supportive services) and licensed community care facilities, may be occupied without regard to familial status, disability or other population segment stipulated in fair housing statutes."	The City of Carpinteria's code defines a family care home as one that is a licensed residential home providing twenty-four-hour nonmedical care and supervision (large family care homes can have four to six clients; small family care homes have three or fewer clients). Family care homes must not "detrimentally change the residential condition or appearance of the property."	The City of Goleta's Inland code defines a special care home as, "A residential home providing non-medical care and supervision. The code provides that homes serving 14 persons or less are considered residential uses, subject to regulations for residential dwellings in the applicable zone, and the residents and operators of the home are considered a family. The city's Coastal code provides a similar definition for special care home but specifies a capacity of seven or more clients (Six or fewer persons in a special care home are considered a family).	The City of Lompoc defines a rest homes as, "an institution housing more than five (5) aged or infirm persons, all of whom are ambulatory and do not require restraining, nursing, or medical care on the premises." The code also includes the provision, "care for non-related persons", which is intended to provide a healthy and safe home environment for the 24-hour care of non-related persons. Among other requirements, the provision limits the number of non-related persons to six and the total number of persons residing on the property (related and non-related) to eight.	The City of Santa Maria's zoning code defines care of seven or more nonrelated persons as a, "state-licensed care home giving nonmedical services on a twenty-four hour a day basis to seven or more mentally handicapped, physically handicapped, disabled or aged persons, or dependent and neglected children." Facilities with six or fewer persons are permitted and listed separately in the code.	The City of Solvang's zoning code defines a special care home as, A residential home providing twenty four hour nonmedical care and supervision that has a license for a capacity of seven or more clients from the state.
<b>Does the code contain restrictions on Senior Housing that are out of compliance with federal law on housing for older persons?</b>	No	No	No	No	No	No
<b>Does the zoning ordinance include a discussion of fair housing?</b>	Fair Housing is referenced in conjunction with special housing types and senior housing.	No	No	Fair Housing is referenced in conjunction with senior housing.	Fair housing is referenced in regard to compliance in providing reasonable accommodation for persons with disabilities	No

Source: BBC Research & Consulting

Similar to the County review, the analysis did not reveal any overt fair housing concerns but did identify several opportunities for improvement:

- Carpinteria and Lompoc both specify that no more than five unrelated persons living together should be considered a family. Though their definitions do not explicitly discriminate against a group of unrelated individuals with disabilities living together, the language could be improved to explicitly include such a use by removing the limitation of five persons not all related by blood or marriage occupying the same premises.
- Only three of the six jurisdictions reviewed mention fair housing in their code; even in those three, fair housing is only discussed in reference to special needs or senior housing. A more robust discussion of fair housing law could improve awareness and understanding of fair housing law as it applies to land use and development.

**Housing Authority of the County of Santa Barbara.** The Housing Authority of the County of Santa Barbara (HACSB) serves residents of Santa Barbara County through the provision of vouchers, public housing and housing related services. HACSB has three housing offices throughout the County in Lompoc, Santa Maria and Goleta and is the largest property management organization in the County.

HACSB operates over 500 units of public housing and administers approximately 3,600 vouchers (about 100 project based vouchers and 3,500 tenant based vouchers). The waitlist for vouchers and public housing units has been closed for approximately five years. After Care and VASH waitlists remain open. HACSB expects to reopen the waitlist sometime in 2015.

Selection for participation in HACSB programs begins with a pre-application, available for completion on HACSB's website or in hard copy upon request (under reasonable accommodation). Preferences include residency in the County of Santa Barbara, working family, veteran status, and involuntary displacement (by a HUD Program, to avoid reprisals, by government action or by private action).

Applications are not available in Spanish; however, Spanish-speaking HACSB staff members are available to provide language assistance for applicants upon request. HACSB's website (excluding PDFs and application portals) is available in alternate languages through a google translate drop-down menu.

According to HACSB's Annual Plan, funding levels are insufficient to support the long term capital needs to properly maintain their public housing units. In order to implement rehabilitation of public housing units HACSB is seeking alternative funding sources. One such strategy is the conversion of public housing units to Section 8 units under HUD's Rental Assistance Demonstration (RAD) program. HACSB has been awarded authority to convert seven properties (213 units) under the RAD program in 2014 and 2015. HACSB has previously been granted approval to dispose of 178 housing units, many of which have now been rehabilitated using low income housing tax credits and are re-occupied by low and very low income households.

## Fair Housing Infrastructure

This section summarizes fair housing organizations and activities in the Consortium. It also includes a discussion the availability of fair housing information on Consortium member websites.

**Rental Housing Mediation Task Force (RHMTF).** Since 1999 the County of Santa Barbara has contracted with the RHMTF to help fulfill their fair housing obligation. The RHMTF is a function of the City of Santa Barbara but is contracted to serve Goleta, Carpinteria and unincorporated areas of the County in addition to the City of Santa Barbara. Services provided by the RHMTF include:

- Mediation (between landlords, tenants, roommates, property managers, sublessors, sublessees and any combination thereof);
- Information on landlord/tenant rights and responsibilities (including fair housing);
- Staff consultations;
- Referrals to social service agencies; and
- Outreach and education.

In fiscal year 2014, RHMTF served 234 residents in unincorporated Santa Barbara County. Of those, six had housing discrimination issues.

**Legal Aid Foundation of Santa Barbara County.** The County also contracts with the Legal Aid Foundation to help fulfill their fair housing obligation. The Legal Aid Foundation provides tenant-related representation related to housing discrimination and provides fair housing education and advocacy. The Legal Aid Foundation also conducts some fair housing testing under contract with Consortium members.

**Other fair housing resources.** A number of other organizations in the County contribute to the fair housing environment through education, advocacy, and/or legal services. Those include:

- California Rural Legal Assistance (CRLA)—CRLA provides legal representation for low income residents on a range of civil issues, including housing discrimination. CRLA has offices in both Santa Maria and Santa Barbara.
- Conflict Solutions Center Community Mediation Program—The Conflict Solutions Center is committed to community based conflict resolution and provides mediation and training in conflict resolution and restorative justice. The Community Mediation Program provides an assortment of mediation services including landlord-tenant mediation.
- Santa Barbara Rental Property Association—a membership organization for rental property owners, the SBRPA provides fair housing training and produces a monthly magazine on signification housing issues.

- Vet Center—The Vet Center provides counseling and assistance to veterans and their families, including services related to housing and homelessness.

**Affirmative fair housing marketing procedures.** Adopted by the County in 1995 (and updated in 2007), the Affirmative Fair Housing Marketing Procedures are designed to ensure that all residents are aware of affordable housing opportunities. The requirements apply to projects funded (in part or whole) by Community Development Block Grant (CDBG), HOME Investment Partnerships, or other local funds. Some of the requirements outlined include:

- Display the equal housing opportunity logo and title on project advertisements;
- Advertise available units in publications marketed to non-English speakers;
- Employ affirmative efforts to attract minority groups;
- Provide fair housing training for management and sales employees; and
- Implement fair waitlist and lottery policies.

As a part of the Affirmative Fair Housing Marketing Procedures, the County publicizes fair housing literature, logos and slogans in both English and Spanish.

**Availability of fair housing information.** A lack of fair housing information and awareness is a common issue cited in Analyses of Impediments to Fair Housing Choice (AIs), including the County's 2011 AI. It is important that all members of a community—residents, community leaders, landlords, HOA board members—correctly understand fair housing laws so they do not intentionally or inadvertently deny a member of a protected class the same housing rights as other community members. It is also critical that residents who feel they may have experienced discrimination be able to access resources to investigate their rights and/or file a complaint.

BBC reviewed County and Consortium member websites to assess the availability of fair housing information according to the following criteria listed below.

- Does the county/city website contain fair housing information?
- Is the information available in languages other than English?
- Is there a link to HUD and/or information about how to file a complaint?
- Does the website contain a list of protected classes?

Figure IV-8, on the following page, displays the results from this analysis. Four of the seven Consortium members do have at least some fair housing information on their websites. However, only the County provides the information in languages other than English and only three Consortium members include a list of protected classes.

**Figure IV-8.**  
**Availability of Fair Housing Information, Consortium Members, 2015**

	Does the county/city website contain fair housing information?	Is the information available in languages other than English?	Is there a link to HUD and/or information about how to file a complaint?	Does the website contain a list of protected classes?
<b>Santa Barbara County</b>	Yes. The county website includes fair housing information on its "Landlord Tenant Issues" page. The page includes a link to HUD and contact information for mediation and legal services.	Yes	Yes	Yes
<b>Buellton</b>	No	No	No	No
<b>Carpinteria</b>	No	No	No	No
<b>Goleta</b>	Yes. The city website includes a "Fair Housing Services" page which provides information and resources related to fair housing, landlord-tenant mediation and assistance. It also includes links to state and federal information, as well as the city's most recent AI.	No	Yes	No
<b>Lompoc</b>	No	No	No	No
<b>Santa Maria</b>	Yes. The city website includes a "Fair Housing Program" page which discusses the results of the most recent AI and provides links to organizations providing fair housing services.	No	There is not a link to HUD but the site directs residents to Legal Aid, Conflict Solutions and the RHMTF.	Yes
<b>Solvang</b>	Yes. The city's planning documents page includes a downloadable fair housing brochure produced by HUD.	No	The fair housing brochure contains this information.	The fair housing brochure contains this information.

Source: BBC Research & Consulting.

# SECTION V.

## Fair Housing Impediments and Action Plan

Sections II through IV of this report present the research and public outreach processes conducted as part of the County of Santa Barbara's update to the 2011 AI. The section begins with a discussion of the impediments found in 2011 compared to current impediments.

### 2011 Impediments to Fair Housing Choice—Do they remain?

The impediments found in the 2011 AI include the following:

- **Lack of understanding of fair housing laws by landlords, tenants, and lenders.** This impediment was identified in 1996 and 2006 in addition to 2011. The 2015 AI also found limited awareness of fair housing information to be a barrier (see 2015 Impediment No. 5).
- **Discrimination.** This impediment was identified in 2000, specific to rental housing and was expanded to include lending discrimination in 2011. The 2015 AI confirmed, through complaint analysis and public input, that discrimination does still exist in the Consortium (see 2015 Impediment No. 3).
- **Lack of special-needs housing.** This impediment was included in both the 2006 and 2011 AI and covers housing for residents with disabilities as well as homeless residents and elderly residents. The 2015 also found demand for more special needs housing and identified a barrier particularly for residents with disabilities (see 2015 Impediment No. 2).
- **Lower home ownership rates among certain classifications due in part to a lack of knowledge about homeownership process.** This impediment was included in the 2000, 2006 and 2011 AIs based on lower rates of homeownership for minority and female householders. The 2015 AI confirmed that lower rates of homeownership persist for some protected classes, specifically Hispanic and African American householders, and that minorities have higher rates of mortgage loan denial than non-Hispanic whites.
- **Insufficient coordination and enforcement of Fair Housing laws.** The 2011 AI includes this impediment on the basis that fair housing laws are ineffective without enforcement and that lack of enforcement can lead to an increase in fair housing abuses. The recommended action to address this impediment included expanding contracts with fair housing organizations for education and testing as well as increasing regional efforts in fair housing education. The 2015 proposed action plan also calls for persistence and/or expansion of contracts with local fair housing organizations. Stakeholder consultation for the 2015 AI also called for increased fair housing coordination in the County.

## 2015 Barriers to Fair Housing Choice

The fair housing barriers identified in the 2015 AI research include the following:

**IMPEDIMENT NO. 1. Lack of affordable housing in the Consortium disproportionately impacts persons with disabilities and certain racial and ethnic minorities who have lower incomes and higher poverty rates.** The data in this AI demonstrate that lack of affordable housing is a critical issue in the Consortium and that certain protected classes are more likely to be affected by that lack of affordable housing than others because they have greater need for assisted and, in some cases, accessible housing.

- Lack of affordable housing is a primary concern of both residents and stakeholders. Public input indicates the greatest needs are for accessible, affordable housing; family housing (two or more bedrooms); and properties accepting Section 8 vouchers.
- Data analysis of the housing market affirms the need for affordable housing. Both rental and ownership costs are rising faster than incomes countywide, even in traditionally more affordable areas (North County). A supply and demand analysis revealed the Consortium has a rental shortage of 7,604 units priced below \$500 per month.
- Certain protected classes are disproportionately impacted by lack of affordable housing. Hispanic residents, African American residents, female-headed households and residents with a disability are more likely to live in poverty than other residents. Hispanic families commonly have larger household sizes and are thus disproportionately impacted by limited affordable housing with 2 or more bedrooms. According to data from HUD, racial and ethnic minorities also have disproportionately high incidence of housing problems (substandard housing, overcrowding and cost burden).
- Affordable choices for persons with disabilities is further constrained by the lack of accessible housing, landlords reportedly not making reasonable accommodations/needed accessibility improvements, and limited accessible transit.
- Reduction in federal funding for affordable housing and the dissolution of state Redevelopment Agencies has constrained the Consortium's resources for affordable housing. Even so, the Consortium is committed to increasing the supply of affordable housing and has contributed to the production of 496 affordable units between 2009 and 2014.<sup>1</sup> The County also participates in the South Coast City-County Affordable Housing Task Force Working Group.

**IMPEDIMENT NO. 2. Lack of affordable, accessible housing, limited public transportation and private barriers (discrimination, fair housing violations) disproportionately impact housing choice for persons with disabilities.** Stakeholder and public consultation indicate an inadequate supply of accessible housing—particularly affordable, accessible housing. Other constraints for persons with disabilities found in this AI are

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<sup>1</sup> 2015-2023 Santa Barbara County Housing Element Update



a high proportion of disability related fair housing complaints, landlords reportedly not making reasonable accommodations/needed accessibility improvements, and limited accessible transit. Stakeholders also identified a need for supportive housing for persons with cognitive disabilities and residents with mental health needs.

**IMPEDIMENT NO. 3. Housing discrimination does exist in the County, as evidenced by an analysis of fair housing complaints and by resident and stakeholder accounts.**

HUD reported 43 fair housing cases in the Consortium between 2006 and 2014; 43 percent of those were related to disability, 20 percent were related to race, color or national origin and 16 percent were related to family status. Focus group reports of possible housing discrimination included the following:

- Non-compliance of property owners with reasonable accommodations and accessibility requirements;
- Misuse of occupancy standards to refuse housing to Hispanics and families; and
- Failure to offer lease documents in Spanish and refusal to return rental deposits to Hispanic residents.

**IMPEDIMENT NO. 4. Private market barriers exist in the form of high loan denials for minority loan applicants.**

According to Home Mortgage Disclosure Act (HMDA) data, there are racial and ethnic disparities in mortgage loan denial rates, even after accounting for income differences. Minority groups also have a higher incidence of subprime interest rates.

**IMPEDIMENT NO. 5. Fair housing information is limited and seldom available in languages other than English.**

According to stakeholders and residents there is a need for education about and enforcement of fair housing laws in the Consortium. Some reported landlords failing to comply with fair housing reasonable accommodations laws, largely because of their lack of understanding of their obligations. Residents also reported a lack of knowledge about how or where they could report housing discrimination.

Hispanic focus group participants, in particular, expressed no knowledge about legal remedies and resources; this may be related to limited information in languages other than English. Because 62 percent of foreign-born residents speak English less than “very well,” they are disproportionately likely to need assistance with language translation in housing, as well as other, documents, making the housing search process more challenging and the potential for housing discrimination greater. Even so, only one Consortium member website (Santa Barbara County) contains fair housing information in Spanish and housing authority program applications are not available in Spanish. Focus group participants also reported landlords refusing to translate lease documents into Spanish.

**2015 Recommended Fair Housing Action Plan**

It is recommended that the County of Santa Barbara consider the following Fair Housing Action Plan (FHAP) and activities for reducing fair housing impediments:

**Action item 1. Expand affordable housing opportunities.** Working to expand the supply of affordable housing throughout the County should also expand access to housing for protected classes. Potential strategies include:

- Continue to use federal and other County administered funds to support affordable housing and explore opportunities to increase funding for affordable housing creation.
- Support opportunities to reduce barriers to affordable housing development discussed in the County’s Housing Element.
- Increase access to family oriented housing (e.g., units with at least two bedrooms).
- Proactively monitor and address loss of existing affordable housing units, particularly in “high opportunity” areas.

**Action item 2. Reduce fair housing barriers for persons with disabilities.** The shortage of affordable, accessible units near transit and services coupled with landlords’ failure to provide reasonable accommodations further constrains housing choices for people with disabilities in an already tight market. Opportunities for improving the housing environment for people with disabilities include:

- Maintain a list of resources on City and County websites for people with disabilities—for example, information about rights concerning service animals, reasonable accommodations procedures, list accessible housing.
- .
- Sponsor fair housing training sessions with landlords and property managers, particularly those who serve the city’s lowest income and special needs populations. A key element of the trainings would be presenting case studies on reasonable accommodations and tricky fair housing landlord/tenant situations and resolving the situations through the training. Participants would be able to offer their own situations for group discussions and explore solutions.

**Action item 3. Improve access to fair housing information.** Santa Barbara County should increase the availability, access, and volume of fair housing information and educational opportunities in the County through exploring activities such as those listed below:

- Encourage Consortium members to improve fair housing content (in both English and Spanish) on their websites. Improvements could include adding visible, easy to understand fair housing information; listing protected classes; providing clear information on how to file a fair housing complaint; and links to "California Tenants, A Guide To Residential Tenants' and Landlords' Rights and Responsibilities" (in both English and Spanish).
- Continue and increase fair housing education efforts and trainings through local fair housing organizations such as the Legal Aid Foundation of Santa Barbara County and the Rental Housing Mediation Task Force.
- Support and/or lead regional collaboration on fair housing awareness, issues and solutions.

**Action item 4. Support efforts to improve residents' creditworthiness.** Support local credit counseling agencies in their efforts to educate residents about good personal finance practices and their understanding of mortgage loan financing. Refer residents who contact the County with personal finance or credit questions to local counseling agencies.

**Action item 5. Continue supporting programs to improve the landlord tenant relationship and consider expanding contracted fair housing services.** The County of Santa Barbara has provided funding to the Rental Housing Mediation Task Force and Legal Aid Foundation of Santa Barbara County to provide landlord tenant counseling, fair housing counseling, legal aid and fair housing education. The County should continue these types of services but also consider expanding services to include fair housing testing and more robust outreach activities.

# Appendix A.

## Community Participation Supplement

This appendix supplements the findings from Section II, Community Participation Process, with quotes and additional discussion detail from the citizen and stakeholder input processes conducted for the Consolidated Plan and AI. This appendix is not a comprehensive summary of public input but provides additional context for some of the themes discussed in Section II. It begins with a methodology section that describes the types of questions posed in the public input process.

### Methodology

As discussed in Section II, the stakeholder and citizen participation input process included two public meetings, two resident focus groups, one stakeholder focus group and a number of stakeholder interviews. Details regarding how the input opportunities were advertised and/or recruited as well as a description of attendees are included in Section II. BBC Research & Consulting, along with Morningside Research & Consulting, facilitated each focus group and conducted the in-person interviews. Although the specific guides used for the discussions are proprietary, the questions posed to participants were derived from HUD's e-Con Plan suite and HUD's proposed rule on Affirmatively Furthering Fair Housing.

Several examples of typical fair housing questions posed by moderators during the resident focus groups follow:

- *What are the most common housing problems in your community?*
- *Did you need your lease to be interpreted into Spanish/other language? Was it? By whom?*
- *For those of you who are renters, have you ever requested your landlord to make accessibility improvements and offered to pay for them but been denied?*
- *Suppose you or someone you know was discriminated against in trying to access housing. What would you do or recommend?*

Stakeholders were asked slightly different questions, such as:

- *Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole? What are the needs of the group(s)?*
- *Do you think housing discrimination is occurring in Santa Barbara County? If so, why? What types of activities are occurring?*

## Comments from Citizen and Stakeholder Deliberation

**Scarcity of affordable housing.** Participants in the citizen focus groups felt that finding affordable housing in Santa Barbara County was very challenging:

- “Even if you have a voucher, the amount allocated doesn’t translate to the market rate. The voucher rate of \$1,450 (for a 1-bedroom) doesn’t get you a 1-bedroom place, modified or not.”
- “The vacancy rate is 0.6 percent in Santa Barbara. Even someone with a lot of money has a hard time. If you are low income, with bad credit or accessibility issues, it is next to impossible to find housing. Then you add on the need to be near transportation or amenities, like a grocery store... it is very difficult.”
- “In Santa Barbara County, once you find something that is reasonable, you don’t move....Most people stay when they have found a place that is somewhat doable.”
- In the Spanish-speaking focus group, residents noted that the most important barrier to housing was price and the lack of available housing suitable for the needs of families. Participants frequently noted the need for affordable family housing that will accommodate larger families (2+ bedroom units or more).
- Spanish-speaking focus group residents also stated that the lack of affordable units leads to overcrowding and deteriorating housing quality as multiple families are forced to live together in order to afford a place to live. Low-quality housing conditions and neglected repairs were reported by residents in their searches for affordable housing units.
- In addition to the lack of affordable units, residents reported rental requirements and qualifications as major barriers, such as income and credit rating requirements, as well as the high cost of application fees and security deposits.

**Accessibility issues.** Participants in the focus group for individuals with disabilities shared a wide range of accessibility concerns:

- “I was born and raised here. I am privileged to own my house. Moving away from home years ago, when I was younger, I had a Section 8 voucher. I found landlords were willing to accommodate my disability. But my impression is that it has continued to be difficult for most people to find landlords willing to accept Section 8 and allow for the structural changes that may be needed.”
- “There is a lack of accessible choices. Also, you have people that have a housing voucher and no place to use it – either it is not accepted or it is accepted and the unit is not accessible. Most people are willing to take ‘accessible-ish.’”
- “There is a big difference between modification and remodeling. Some landlords allow minor modifications (ramps, grab bars) but not full accessibility. Many landlords do not want to do roll in showers or widen doorways.”

- One resident recounted the experience of a client with disabilities who spent nearly a year looking for a place that would take a non-elderly voucher. The individual eventually used the voucher for housing in Ventura County. “This is pretty typical - people choosing to port their voucher to another county where there is more availability and voucher limits are more in line with market rates.”
- Residents with disabilities noted that while it may be cheaper or there may be more available housing resources in other counties or in North County, few had considered relocating. “I haven’t considered it. There is no support there. My family and doctors, my entire support network, is here.” Another resident added, “Another issue with [North County] is transportation. If you don’t drive, there is no help.”
- Residents noted a countywide need for wheelchair-accessible taxis and accessible public transport near housing and services.

**Lack of access to opportunity.** As part of the AI public process, stakeholders were asked about areas of opportunity (good schools, job centers, transit access, etc.) and whether protected classes had equitable access to community assets.

- Participants expressed concern about overcrowding in local public schools that is causing elementary-aged children in their area to be bused to schools further away.
- The housing complex in which focus group participants live used to host a medical clinic that residents could go to monthly. They really appreciated this service and wished it had not closed.
- Residents noted that public transportation was used infrequently. They noted that the bus service was a “good option” to have, but required many transfers and long travel times. Residents said they and their friends and family members either had personal vehicles or used “rides” (“el ritero”) – an informal taxi or “ride” service where individuals with cars charge passengers for rides around town.
- Among non-housing community development needs, the participants of the Spanish-speaking focus group prioritized the need to address pedestrian safety issues, especially crosswalks for children, more crossing guards, and more speed cessation mechanisms, like stoplights, stop signs, and speed bumps.

**Discriminatory rental practices and landlord-tenant disputes.** Concerns of discriminatory rental practices were reported in both of the resident focus groups. Perceptions of discrimination as reported by participants follow:

- “I did the Santa Barbara hopscotch for years. You could see the fear when people would see my crutches. [In] one situation, whoever owned the property was afraid to have me there due to my crutches; they thought I would fall over. They were willing to accept the voucher, but not the disability.”
- “People are fearful of disability.”

- When asked if anyone they know had been denied housing on the basis of disability, one resident said, “Oh sure. It’s based out of fear. People are smarter about it now. They used to just say no (if a person with disabilities came). Now they say, “I don’t think we have anything available.”
- One participant in the Hispanic focus group recounted a situation where a landlord would not rent a 2-bedroom apartment to her because she had three children and the landlord said that all the children could not sleep in the same room.
- Another resident recounted an experience when she became pregnant with her second child. She had one child when she moved in and two years later when she became pregnant again the landlord evicted her family.
- Participants in the Spanish-speaking focus group said they would have liked to receive lease documents in Spanish, but that they were always in English. Usually the manager would verbally tell them what the documents said and ask them to sign the documents without them being able to read them for themselves. Residents noted that there was sometimes inadequate verbal translation of all of the lease terms.
- Hispanic focus group participants noted that no matter how clean they leave a unit, they have never had their security deposits returned and they are often charged additional fees for “damages;” similar experiences were recounted about family members as well.

**Recommendations to promote affordable housing.** Attendees made the following recommendations at a focus group for community stakeholders:

- Santa Barbara County should make allocating funds for affordable housing its top priority. According to one stakeholder, the funding allocation in the past few years has been “abysmal.”
- Participants would like to see Santa Barbara County create opportunities for affordable homeownership. Homeownership is important in terms of stability and asset-building. The County should not just assume that homeownership is too expensive and out of reach.
- Ensure sufficient investment in public transit, especially in areas where housing is critical. Also consider proximity to public transit for new development.
- Participants would like to stress to Santa Barbara County that public funds are necessary for development. Diminishing funding makes financing housing projects more difficult. Affordable housing projects should be treated differently than regular “hard loans” from a bank.

**Recommendations to address the needs of persons with disabilities.** Attendees made the following recommendations at a focus group for persons with disabilities and a focus group for Hispanic residents:

- Participants suggest that Santa Barbara County work toward expanding public transit in the northern and southern areas of the County and make public transit between the two parts of the County easier.
- Modernize the Santa Barbara Metropolitan District Transit Center to make services more accessible to persons with disabilities.
- Expand local paratransit and taxis. Make more taxis wheelchair-accessible.
- Educate architects in universal design to make new buildings accessible from the beginning. Persons with disabilities feel that Americans with Disabilities Act building requirements are minimal and would like to see more development that implements the principles of universal design.

**Recommendations to address information gaps.** Stakeholders identified the need to address gaps in housing market and fair housing information in Santa Barbara County to provide a baseline for addressing housing needs. Specifically, the recommendations are to:

- Provide fair housing resources, information and training for community members, including residents, landlords and community leaders.
- Conduct a community inventory of rental housing stock to identify how many units are constructed of affordable and accessible housing; where the units are located; and whether or not the property managers or landlords accept Section 8.
- The Department of Social Services should “asset map” the locations of poverty and need in the County. Asset mapping explores resources and assets, shows the interconnections among assets, and identifies ways to access assets. Asset mapping would allow planners to compare asset-rich areas with asset-poor areas to better reach target populations, promote access to services, and reduce duplication of services.

**Recommendations for community collaboration.** Stakeholders identified areas for potential collaboration between Santa Barbara County leadership and the community that could help address housing needs. Recommendations included:

- Santa Barbara County could play a leadership role in bringing communities together in South County to encourage affordable housing development.
- Participants would like to see Santa Barbara County take efforts to educate residents about the economic development benefits of spending their money in the community where they live and work.
- The County could also assemble community partners to help identify and implement regional transportation planning priorities.
- Developers could consult with residents to get community feedback on designs for new development.