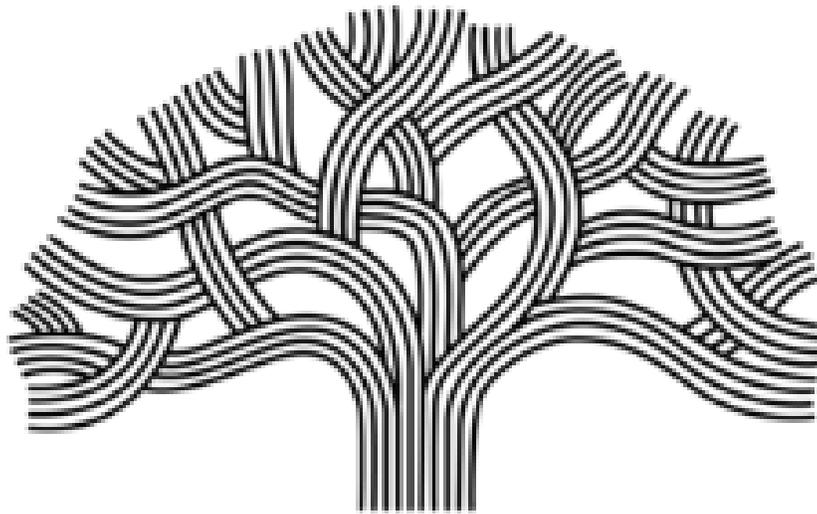


**CITY of OAKLAND, CALIFORNIA  
HOUSING and COMMUNITY DEVELOPMENT**

**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**



**CITY OF OAKLAND**

**October 2015**

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# Executive Summary

This document contains an updated Analysis of Impediments to Fair Housing Choice (AI) for the City of Oakland, California. Oakland is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant Program (ESG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively further housing" the community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what actions it will take to overcome the effects of any impediments identified.

From 2011 to 2014, the City of Oakland received just over 300 fair housing related complaints. These complaints are reviewed and addressed either by Eden Council for Hope and Opportunity (ECHO), the State, or the Department of Housing and Urban Development.

To better understand the conditions associated with housing complaints in the City of Oakland, the City conducted a thorough quantitative analysis of demographic, housing, socioeconomic, employment, mortgage lending, and bank location data to understand the current conditions in the City. The City complemented this data profile with a community survey, stakeholder interviews as well as a review and assessment of City plans, policies, and other resources to understand current conditions and identify potential impediments to fair housing choice.

Based on this analysis, the City has identified the following impediments to fair housing choice in Oakland.

1. Lack of Regulated Affordable Housing
2. Loss of Naturally Occurring Affordable Housing
3. Need for Landlord Education
4. Lack of Coordination among Fair Housing, Tenant Rights, and Advocacy Entities
5. Lack of Accessible Units
6. Discrimination regarding Accessible Features
7. Lack of Access to Community Assets
8. Lending/Sales Discrimination
9. Opposition to Siting of Affordable Housing
10. Planning, Land Use and Zoning Practices
11. Foreclosure Recovery: Homeowners, Renters and their Communities

This document includes a full description of each impediment

# I. Introduction

This document contains an updated Analysis of Impediments to Fair Housing Choice (AI) for the City of Oakland, California. Oakland is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant Program (ESG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively further fairing housing" the community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what actions it will take to overcome the effects of any impediments identified. The HUD Fair Housing and Equal Opportunity (FHEO) Office is now advising Federal entitlement Communities to update their Analysis of Impediments to Fair Housing Choice to coincide with the Five Year Consolidated Plan, and then every five years thereafter.

Equal and unimpeded access to residential housing is a fundamental civil right that enables members of protected classes, as defined in the federal Fair Housing Act, to pursue personal, educational, employment, or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials, and private citizens must embrace if social equity is to become a reality. The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, gender, disability, familial status, or national origin. In addition, the U.S. Department of Housing and Urban Development (HUD) issued a Final Rule on February 3, 2012 that prohibits entitlement communities, public housing authorities, and other recipients of federal housing resources from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

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.

One of the goals of the new AFH is to improve access to opportunity for protected classes and low income households. Access to opportunity should both expand housing choices in areas that have been exclusionary and improve the quality and conditions of the neighborhoods affordable to protected classes and low income residents.

A growing body of research has demonstrated that limited housing choice has negative outcomes for child well-being, social mobility, and, ultimately, human capital development—all factors in public sector dependency. Limited housing choice for low income households, therefore, can inhibit a city's economic growth.

To ensure the prevention and elimination of housing discrimination and housing segregation as it pertains to fair housing choice, HUD requires all entitlements or jurisdictions directly receiving any of the four HUD formula grant programs, Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnership Program (HOME), and Housing Opportunities for Persons With Aids (HOPWA), to certify that the jurisdiction will “affirmatively further fair housing choice” within their area of authority. “Affirmatively furthering fair housing” is defined by HUD as requiring a local jurisdiction to conduct an analysis to identify impediments to fair housing choice within the jurisdiction; to take appropriate actions to overcome the effects of any impediments identified through the analysis; and to maintain records reflecting the AI and actions taken in this regard.

Communities receiving HUD entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, gender, disability, familial status, national origin, actual or perceived sexual orientation, gender identity, or marital status
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act.

An AI is a review of a jurisdiction’s laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing. It is also an assessment of conditions, both public and private, affecting fair housing choice.

Public and private entity obligations under 24 CFR 91.225 can be grouped into three categories:

**Intent:** the obligation to avoid policies, customs, practices, or processes whose intent or purpose is to impede, infringe, or deny the exercise of fair housing choice on the basis of race, color, religion, sex, national origin, disability and familial status.

**Effects:** the obligation to avoid policies, customs, practices, or processes whose effect or impact is to impede, infringe, or deny the exercise of fair housing rights on the basis of race, color, religion, sex, national origin, disability and familial status.

**Affirmative Duties:** the obligation and fiduciary responsibility of public agencies to anticipate policies, customs, practices, or processes that previously, currently, or may potentially impede, infringe, or deny the exercise of fair housing choice on the basis of race, color, religion, sex, national origin, disability and familial status.

This AI will:

- Evaluate population, household, income, and housing characteristics by protected classes
- Evaluate public and private sector policies that impact fair housing choice

- Identify blatant or de facto impediments to fair housing choice where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

An impediment to fair housing choice is defined as any action, omission, or decision that restricts or has the effect of restricting the availability of housing choices of members of the protected classes. This AI serves as the basis for fair housing planning; provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and assists in building public support for fair housing efforts. The City is expected to review and approve the AI and use it for direction, leadership, and resources for future fair housing planning. The AI will serve as a point-in-time baseline against which future progress in implementing fair housing initiatives will be evaluated and recorded.

A comprehensive approach was used to complete the Analysis of Impediments to Fair Housing Choice for the City of Oakland. The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the Census Tract and municipal level
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Fair housing complaints filed with HUD, California and ECHO Housing.
- Interviews conducted with agencies and organizations that provide housing and housing related services to members of the protected classes

## The Federal Fair Housing Act

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The Federal Fair Housing Act covers most housing and is the primary federal legislation to prevent housing discrimination. The Act prohibits anyone taking any of the following actions based on race, color, religion, gender, disability, familial status or national origin:

- Refusal to rent or sell housing
- Refusal to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions, or privileges for the sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale or rental
- Persuade owners to sell or rent at a loss
- Deny access to or membership in a facility or service
- Refusal to make a mortgage loan
- Refusal to provide information regarding loans
- Impose different terms or conditions on a loan
- Discriminate in appraising property
- Refuse to purchase a loan
- Set different terms or conditions for purchasing a loan
- Threaten, coerce, intimidate or interfere with anyone exercising fair housing right
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, gender, disability, familial status or national origin
- Refuse to let the person with a disability to make reasonable modifications
- Refuse to make reasonable accommodations in rules, policies and practices if necessary
- Unless a building qualifies as housing for older persons, it may not discriminate based on familial status.

## California Fair Employment and Housing Act

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In the State of California, California Fair Employment and Housing Act prohibits housing discrimination based on the following characteristics. This list provides additional protections than the Federally defined protected classes.

- Race
- Color
- Religion
- Sex
- Gender
- Gender Identify
- Gender Expression
- Sexual Orientation
- Marital Status
- National Origin
- Ancestry
- Familial Status
- Source of Income
- Disability
- Genetic Information

## Previous Analysis of Impediments and Actions Taken to Date

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The City of Oakland last conducted an Analysis of Impediments to Fair Housing Choice adopted in 2011. As a result of this analysis, the City identified 13 impediments to fair housing choice. These impediments are listed below with a summary of actions taken over the past five years to address these impediments.

The City has made significant efforts to address these impediments despite challenging conditions in which market demand has risen considerably coupled with the decline and loss of affordable housing and community development resources.

### 1. Lack of Affordable Housing

The City of Oakland faces a severe shortage of decent housing available and affordable to low-income persons.

#### *Actions taken to address impediment*

- Work closely with developers to identify and pursue all available funding for affordable housing
- Work to remove constraints to development of housing
- Give priority in annual NOFA to developments that include units for extremely low- and very low-income households and/or encourages siting of affordable housing in areas without concentration of poverty

### 2. Community Opposition to Siting of Affordable Rental Housing

Neighborhood opposition to development of affordable rental housing.

#### *Actions taken to address impediment*

- Encourage developers to include community outreach program as part of predevelopment process
- Participate in public information and education activities to highlight affordable housing accomplishments and their positive impacts
- Conduct briefings and work sessions with City Council to provide decision makers with information on City's low income housing needs
- Encourage developers to assist in formation of resident councils
- Monitor existing affordable housing to ensure that management and maintenance are of high quality
- Support East Bay Housing Organization's (EBHO) Affordable Housing Week
- Support five CHDOs in City that certify their annual actions align with this goal

### 3. Discrimination in the Sale or Rental of Housing

The report *Discriminatory Housing Trends* identified a number of discriminations associated with both the sale and rental of housing to protected classes.

#### *Actions taken to address impediment*

- Provide funding to nonprofit agencies to provide fair housing counseling, investigate complaints and provide information and referrals
- Provide outreach and information materials in other languages in order to reach out to underserved populations
- Encourage owners and managers of affordable housing to provide translation assistance or referrals to community -based organizations that can assist with the translation for housing applicants

- Require that all projects that receive public assistance (federal or non-federal) comply with the City's Affirmative Fair Marketing Guidelines

#### **4. Lack of Accessible Features in Housing**

Many low-income persons lack resources to modify homes to install necessary accessible features.

##### *Actions taken to address impediment*

- Provide Access Improvement Grants to existing homeowners and owners of rental developments (5-year goal of 40 households (as of September 2014, 30 applications were received and completed or underway))

#### **5. Barriers to the Provision of Supportive Housing**

Difficult to access funding for supportive services associated with housing and overcome neighborhood opposition to siting of supportive housing.

##### *Actions taken to address impediment*

- Work with PATH/Everyone Home partnerships to find sources for long-term services linked to housing
- Provide education and outreach regarding housing with supportive services
- Support EBHO's Affordable Housing Week

#### **6. Discrimination in Mortgage Lending**

2005 HMDA data and anecdotal evidence identified variations in mortgage lending among races/ethnicities.

##### *Actions taken to address impediment*

- Monitor and assess HMDA data and Community Reinvestment Act lender evaluations
- Encourage financial institution participation in mortgage lending to low and moderate income individuals
- Fund consumer counseling that includes financial literacy and credit counseling
- Administer City's Linked Banking Services Ordinance requiring financial institutions to meet Fair Share allocations based on community need and bank's total deposits
- Pursue pending lawsuit against Wells Fargo Bank challenging predatory lending practices against minority borrowers.

#### **7. Foreclosures**

Many homeowners have experienced foreclosure or struggling with risk of foreclosures.

##### *Actions taken to address impediment*

- Use NSP funds and other funding sources to acquire, rehabilitate and resell foreclosed homes
- Work with non-profit housing service providers to target programs to extremely low, low and moderate income homeowners

#### **8. Housing Conditions**

Many low-income homeowners are seniors, persons with disabilities and/or minorities who have few resources available to rehabilitate their homes and cannot keep up with routine maintenance.

*Actions taken to address impediment*

- Fund housing rehabilitation both inside and outside areas of minority concentration

**9. Land Use and Zoning Practices**

Constraints such as permitting process for permanent supportive housing.

*Actions taken to address impediment*

- Amended its Planning Code in July 2014 to only require transitional and supportive housing consisting of less than six residents to be considered a residential use of property and must only be subject to those restrictions that apply to other residential dwellings of the same type in the same zone
- Works to reduce the time and cost of environmental reviews by using CEQA exemptions for affordable housing

**10. Access to Transportation**

Low-income population tends to rely on public transportation. Affordable housing near public transit is a necessity.

*Actions taken to address impediment*

- Prioritize affordable housing developments near transit to provide better access to jobs and services

**11. Policies Regarding Public Housing and Section 8**

Need to continue to promote mixed income developments and development and placement of affordable housing in areas that do not have high minority concentrations.

*Actions taken to address impediment*

- The Oakland Housing Authority is focusing investment into rehabilitating current public housing and/or project based voucher units in order to increase housing options for low-income families, improve the quality of housing for families and improve the surrounding neighborhoods and communities

**12. Policies Regarding Other Assisted Housing**

There is a concentration of assisted housing in the flatlands area of Oakland.

*Actions taken to address impediment*

- Taking action to monitor and preserve assisted housing when possible to prevent affordable units from expiring

**13. Policies Regarding Location of Housing and Community Development Activities**

Housing and community development policies can result in targeting of affordable housing and other activities in high minority concentration areas.

*Actions taken to address impediment*

- Targeted HUD funding to address impediments cited in 2011 Impediments to Fair Housing Choice.

## II. Community Participation Process

### Outreach and Engagement

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Community outreach is critical to any planning process to ensure that residents, housing providers, stakeholders and city agencies and departments are able to participate in the planning process.

Public participation can take the form of community meetings, focus groups, individual interviews, and electronic and paper-based surveys.

The outreach process for the preparation for this AI included:

- Meetings with Oakland City staff and agencies
- Interviews with fair housing related service providers
- Web-based surveys
- Stakeholder participation at community meetings
- Resident participation at community meetings

In Spring 2015, Cloudburst conducted a series of interviews with the following agencies to gather issues and opportunities related to fair housing in Oakland and how conditions have changed over the past five years and how the agency expects conditions to change in the coming five years.

These interviews targeted organizations that work directly with residents of Oakland on issues related to fair housing. The organizations interviewed were:

1. ECHO Housing
2. Center for Independent Living
3. Bay Area Legal Aid
4. Centro Legal de la Raza
5. East Bay Community Law Center
6. Causa Justa :: Just Cause
7. Oakland Housing Authority

### Key Identified Fair Housing Issues

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As a result of the interviews, stakeholders identified a number of potential impediments to Fair Housing in the City of Oakland.

The primary impediment identified by all stakeholders is the overall lack of affordable housing in the Bay Area and in the City of Oakland. The lack of affordable housing puts immediate pressure on low- and moderate-income households in the City. Given the continued growth in the region's housing market, these pressures are not expected to alleviate in the near future. The key impediments identified by stakeholders include:

1. Lack of Affordable Housing
2. Landlord Education
3. Lack of Accessible Units

4. Coordination
5. Discrimination regarding accessible features
6. Lack of access to community assets

## Survey Process

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As part of the Consolidated Plan/Analysis of Impediments process, the City of Oakland conducted an electronic and paper-based survey to gather data on neighborhood conditions, community needs, and fair housing issues. The survey was available in English, Spanish, and Chinese characters.

The City distributed the survey electronically through email list-serves, stakeholder email lists, City employee email lists, as well as social media outlets. Additionally, the City made paper versions available at key stakeholders, community meetings, and City departments and offices.

The City collected 1,404 responses to the survey and used the data to inform needs for community development projects as well as assess fair housing issues among residents within the City.

The survey emphasized residents satisfaction with their current living situation, desire to move (and limitations preventing a move), barriers to housing, conditions of persons with disabilities, access to housing, and housing discrimination. The surveys also included a series of demographic questions to allow the results to be filtered by different protected classes to compare and contrast experiences for different households and persons.

Key findings from the survey are included below.

- 50.50% of residents are satisfied with their current living situation. When asked to select the one reason why they are not satisfied with their current living situation, slightly more than 17% of residents indicated they did not feel safe in their neighborhoods.
- 37.5% of survey respondents indicated a desire to move from their current home/apartment. Of this 37.5%, slightly over 88% indicated that the cost of housing was the largest impediment to finding a new house/apartment.
- 36.8% of respondents identified that they would face a barrier to housing if they looked for housing. Of these respondents, the two largest barriers were cost of housing and need for access to public transit.
- More than half of respondents with a disability or family member with a disability indicated that they have trouble traveling in their neighborhood due to poorly maintained/lack of sidewalks.
- 18 respondents of 243 with a disability or family member with a disability indicated that their landlord refused to make accommodations for the disability.
- 18% of respondents were denied housing to rent or buy in the past five years. The most common reasons were other buyer paid cash or above asking price, income too low, and bad credit.
- 139 respondents indicated that they had been discriminated against when looking for housing in Oakland. Of those who felt they were discriminated against, just over  $\frac{3}{4}$  contacted a fair housing or other related agency for additional information. Less than 8% filed formal fair housing complaints.

## Stakeholder and Community Meetings

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The community and stakeholder meetings were held at City Hall to review the draft of the Analysis of Impediments report. The meetings included a brief overview of the analytical work including the qualitative and quantitative methods used as well as the recommended action steps for each identified impediment.

Stakeholders and community members were asked for their input on each identified impediment and corresponding action ideas. The meetings were structured as an informal dialogue between the facilitators and the attendees.

Key comments from the meetings are included below:

#### **General**

- Identify who is in charge of ensuring these actions move forward.
- Include/evaluate Section 8 housing in the AI report.
- Include homeless population' struggles in AI report.
- Educate other entities in Alameda County since some funding sources are countywide.
- Recognize “displacement” as impediment.
- Make note of the foreclosure problem the still exists since previous AI report.
- Make better distinctions between public and private sector.
- Rethink how future surveys can reach those who are visually impaired or have a learning disability.
- Put a stronger emphasis on transportation in the report.
- Highlight what the city has actually done since the previous AI report.

#### **Lack of Affordable Housing**

- Establish a more robust rent control program that puts less pressure on tenants to know the law.
- Establish more stringent rent increase petitions, particularly around capital improvements.
- Reexamine Section 8 housing specifically looking at why people can't use their vouchers and how landlords are using Section 8 as a means of discrimination.
- Conduct more testing in Oakland around Section 8 discrimination.
- Hold city accountable for preservation efforts.
- Reevaluate/enforce Surplus Land Act.
- Reevaluate city lending practices.
- Conduct more robust studies of SROs.
- Establish more controls around receiverships. Current housing is not always inhabitable.
- Address economics of affordable housing. How can the city think about group deals that include housing, grocery stores, and department stores, without pushing out small businesses?
- Identify/establish better landlord incentives.
- Reevaluate looking at abandoned property takeovers by government.

#### **Need for Landlord Education**

- Train SRO landlords specifically about issues they may face such as bed bugs and sustainability.
- Establish SRO landlord collaborative.
- Identify which organizations are best equipped to train different types of landlords and tenants.
- Conduct “press attack” so that more people know about housing discrimination and what to do.

- Use the Rent Authorization Board as a means to share information on housing discrimination.

#### **Lack of Coordination among Fair Housing, Tenant Rights, and Advocacy Entities in the City**

- Coordinate or hire someone to coordinate a working group.
- Initiate conference that brings together all fair housing groups to talk.

#### **Lack of Accessible Units**

- Evaluate transportation needs of those living in accessible units.
- Educate landlords about Access Improvement Program (AIP) so they know it exists.

#### **Discrimination Regarding Accessible Features**

- Identify/establish better landlord incentives.
- Continue landlord education programs.

#### **Lack of Access to Community Assets**

- Recognize transit as community asset.

#### **Lending/Sales Discrimination**

- Establish/enforce better links with banking ordinances.
- Establish/improve more stringent audit practices for landlords in violation of fair housing policy.
- Establish proactive measures to reach out to mortgage seeker before they apply to loans.
- Think creatively about how information is shared with general public.

#### **Opposition to Siting of Affordable Housing**

- Develop policies so that inclusionary zoning is not a choice, but a requirement
- Foster better understanding of SROs and the need for SROs.
- Establish clear message that the City of Oakland cares about and will push for more affordable housing.
- Establish/enforce reprimand for section 8 discrimination.
- Acknowledge that previous public housing efforts caused many of the problems that exist today.
- Change language around public housing. For example, use “enhancement” not “opposition.”

#### **Planning, Land Use and Zoning Practices**

- Align zoning requirements for residential and transitional/supportive housing units.
- Reexamine 300 ft. restriction on transitional housing placement next to another transitional housing establishment.
- Improve access to zoning information for general public including online communication tools that people can quickly respond to.
- Find new and creative ways to engage community members in zoning discussions.
- Evaluate secondary unit regulations.

## **III. Quantitative and Qualitative Analysis**

## RCAPs and ECAPs

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A large body of social research has demonstrated the powerful negative effects of residential segregation on income and opportunity for minority families, which are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases - the resources that support public services and schools.”<sup>1</sup> Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment.<sup>2</sup>

Historically, the Department of Housing and Urban Development (HUD) has relied on identifying racially and ethnically concentrated areas of poverty (RCAPs and ECAPs), geographic areas where both high poverty rates and a high percentage of minorities are clustered. The rationale for this analysis was to help communities determine where to invest housing resources by pinpointing the areas of greatest existing need. However, current evidence suggests that adding more subsidized housing to places that already have a high concentration of social and economic issues (i.e. RCAPs and ECAPs) could be counter-productive and not meet the spirit of the goals of HUD programs.

This does not mean RCAP/ECAPs should be ignored by communities, however. Residents in RCAP/ECAPs still need services and high quality places to live, and stabilizing and improving conditions in the lowest-income neighborhoods remains a key priority of HUD programs. Instead, investment should be balanced between existing RCAP/ECAPs and other neighborhoods that offer opportunities and advantages for families.

To describe the variation in neighborhood opportunity across regions, HUD has adopted a “Communities of Opportunity” model based on research developed by The Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University. Communities of Opportunity is a framework that assigns each neighborhood a score reflecting the degree to which its residents have access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards.

HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of this exercise are to bring opportunities to opportunity-deprived areas and to connect people to existing opportunities throughout a region. The Institute has argued that “we need to assess the geographic differences in resources and opportunities across a region to make informed, affirmative interventions into failures and gaps in ‘free market’ opportunities.”

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues but are also based on research that validates the connections between the indicators and increased opportunity. Data is collected at the smallest geographic unit possible for each indicator and organized into sectors (prosperity, mobility, etc.), which are then combined to create a composite opportunity map.

The resulting maps allow communities to analyze opportunity “comprehensively and

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<sup>1</sup> Orfield, Myron. “Land Use and Housing Policies to Reduce Concentrated Poverty and Racial Segregation.” *Fordham Urban Law Journal*. Volume 33, Issue 3, 2005.

<sup>2</sup> Turner, Margery, et al. “Discrimination in Metropolitan Housing Markets: National Results from Phase I HDS 2000. Urban Institute. Online: [huduser.org/Publications/pdf/Phase1\\_Report.pdf](http://huduser.org/Publications/pdf/Phase1_Report.pdf)

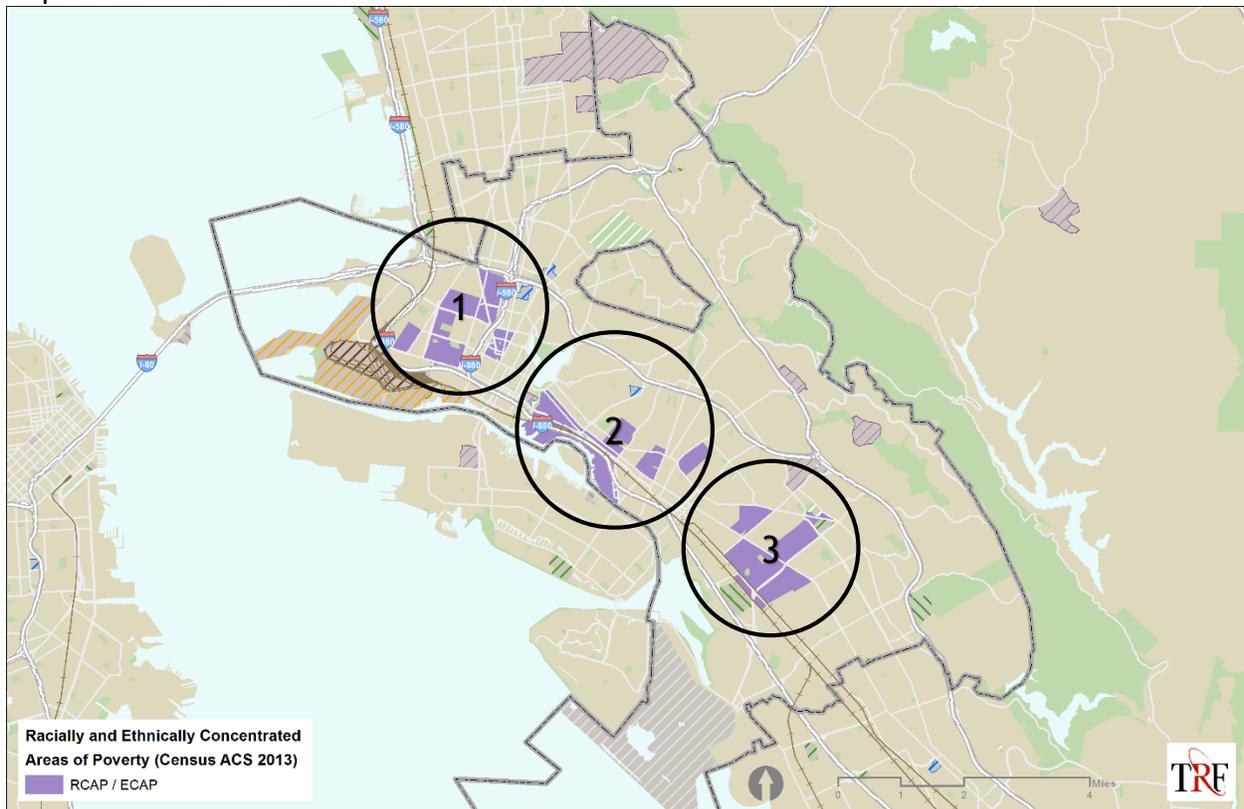
comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities.” The combination of identifying RCAP/ECAPs and Communities of Opportunity creates a holistic approach to community investment.

Although ethnicity and race as described by the US Census are not the same, this study uses rates of both non-White and Hispanic populations to map a single combined group of racial and ethnic concentrations, henceforth referred to collectively as racially concentrated areas of poverty, or RCAPs. Each Census Tract was evaluated by the share of either its non-White or Hispanic population, whichever was higher.

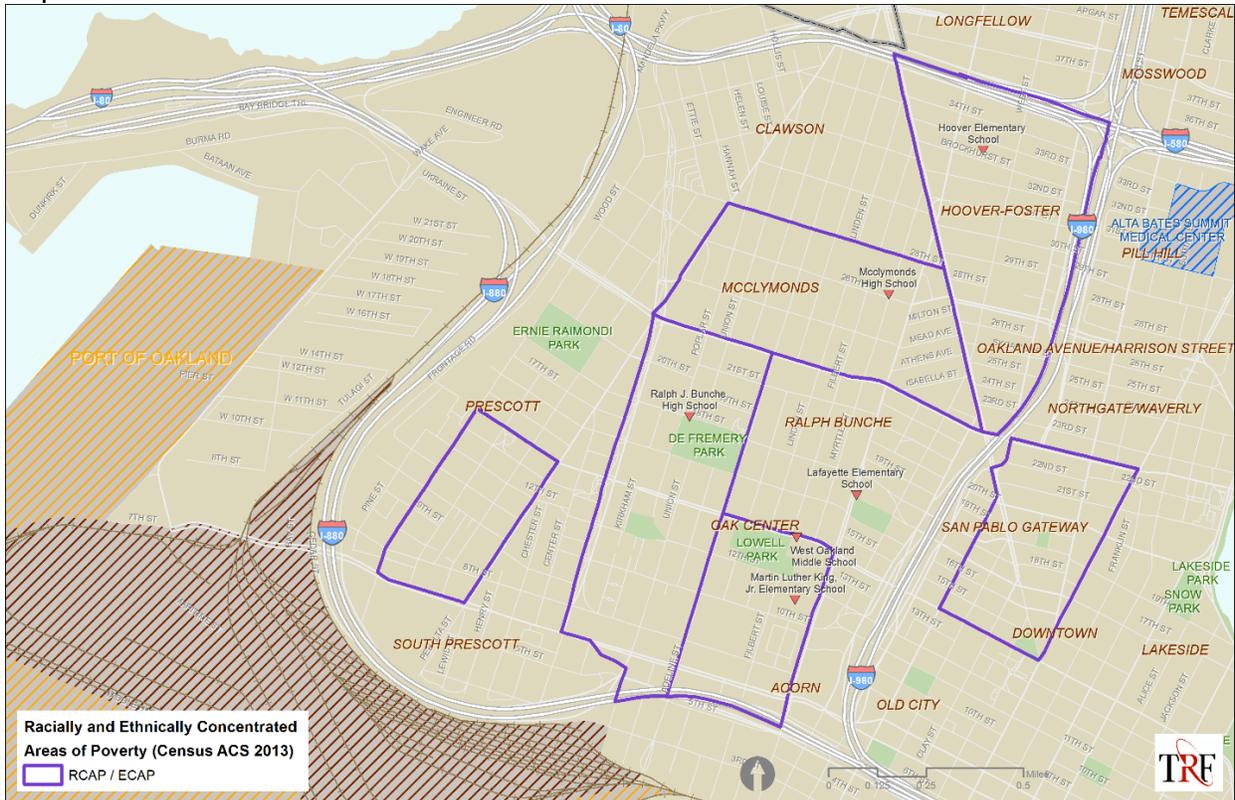
The standard HUD definitions of RCAPs and ECAPs are areas where the total non-White population is greater than 50% and the poverty rate is greater than 40%. These baseline thresholds for defining RCAPs are meant to serve as a starting point for communities across the nation. HUD encourages communities to modify these thresholds if they do not make sense for local demographics. Given the spatial distribution of race and poverty in Oakland, the guideline thresholds are appropriate.

The RCAP and ECAP Census Tracts are included in all maps to highlight where these areas of high minority and poverty concentration are located to help inform our analysis.

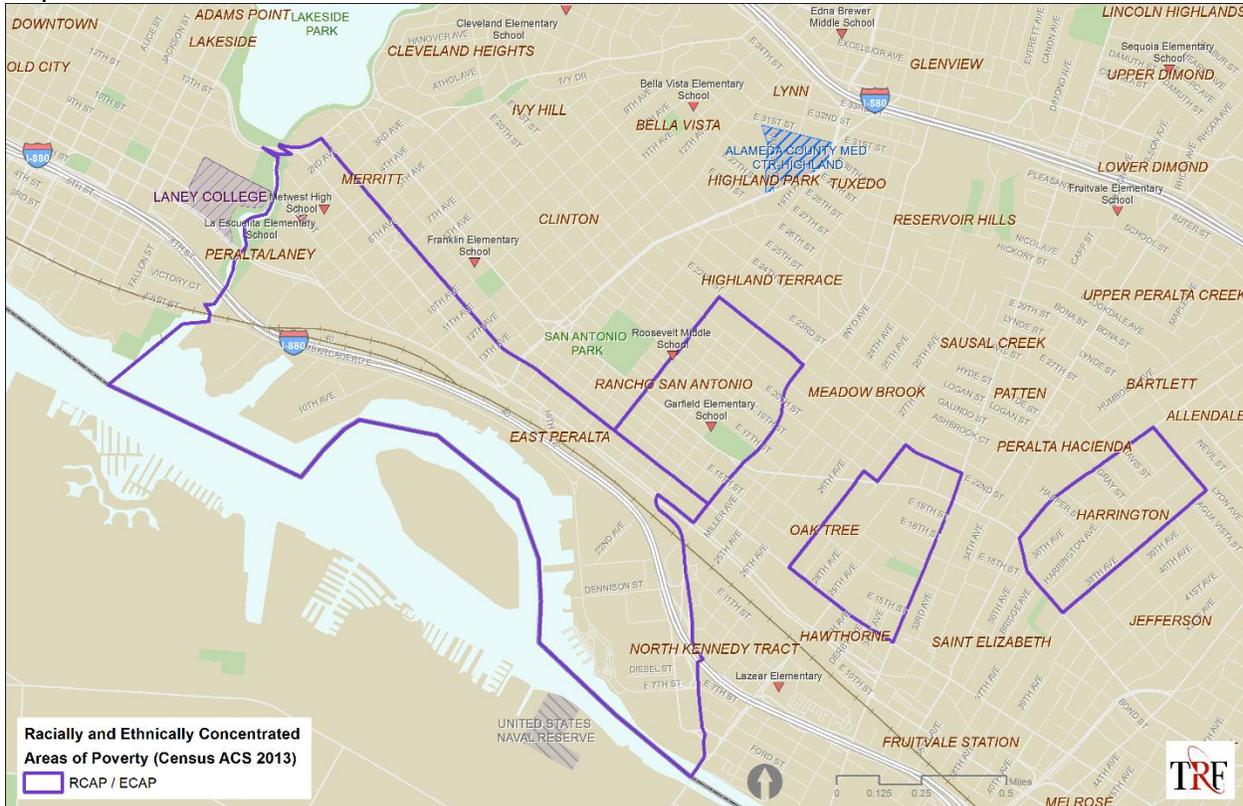
Map 1: RCAP/ECAP Areas in Oakland



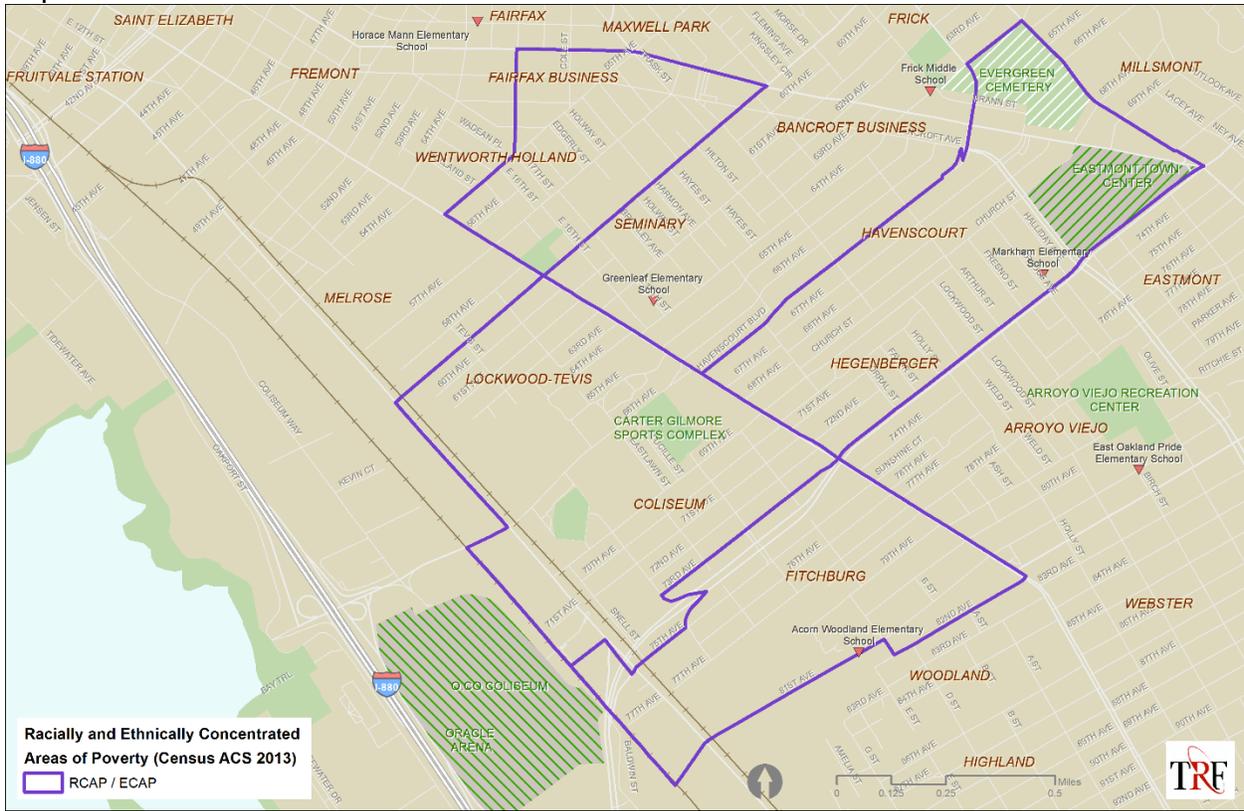
Map 1a: RCAP/ECAP Areas in Oakland - Zoomed in Area 1



Map 1b: RCAP/ECAP Areas in Oakland - Zoomed in Area 2



Map 1c: RCAP/ECAP Areas in Oakland - Zoomed in Area 3



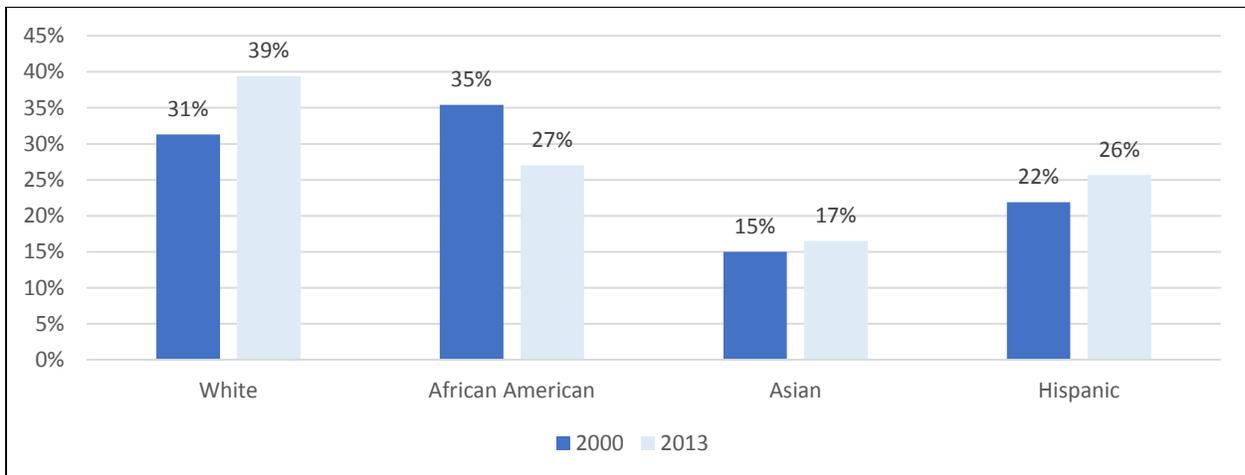
## Demographics

*While population growth is in a steady state, White, Asian and Latino households are increasing while African American households are decreasing.*

Table 1: Population Profile

Oakland	2000		2013		Change	Percent Change
	#	%	#	%		
<b>Total Population</b>	<b>399,477</b>	<b>100%</b>	<b>397,011</b>	<b>100%</b>	<b>(2,466)</b>	<b>-1%</b>
White	124,921	31%	156,236	39%	31,315	25%
African American	141,294	35%	107,015	27%	(34,279)	-24%
Asian	60,110	15%	65,354	17%	5,244	9%
Hispanic	87,443	22%	102,090	26%	14,647	17%

Graph 1: Percentage of Population by Race/Ethnicity: 2000 vs. 2013



According to the US Census American Community Survey (ACS), the City of Oakland's population has remained relatively stable over the past 13 years, reducing from 399,477 to 397,011.<sup>3</sup> While the total population has remained stable, the African American population has decreased significantly in the City, from just over 141,000 to 107,000, a decrease of more than 24 percent. On the contrary, Oakland's White, Latino and Asian populations have increased (increasing by 25%, 17%, and 9% respectively).

A dissimilarity index measures the evenness between two demographic groups distributed across Census Tracts in the City of Oakland. The higher the index, the more segregation exists

<sup>3</sup> The 2010 Census and the American Community Survey (ACS) continue to be evaluated by City of Oakland staff. Comparing these data to other sources used by the City (e.g.: 2000 Census, California State Department of Finance, and USPS 90-day Vacancy data), there is clear evidence that there are problems with the ACS sampling. Specifically, the ACS data in question is an under count of the population and over count of the vacancy rate.

among Census Tracts. Table 2 below presents the City’s Dissimilarity Index for the period between 2000 and 2010.

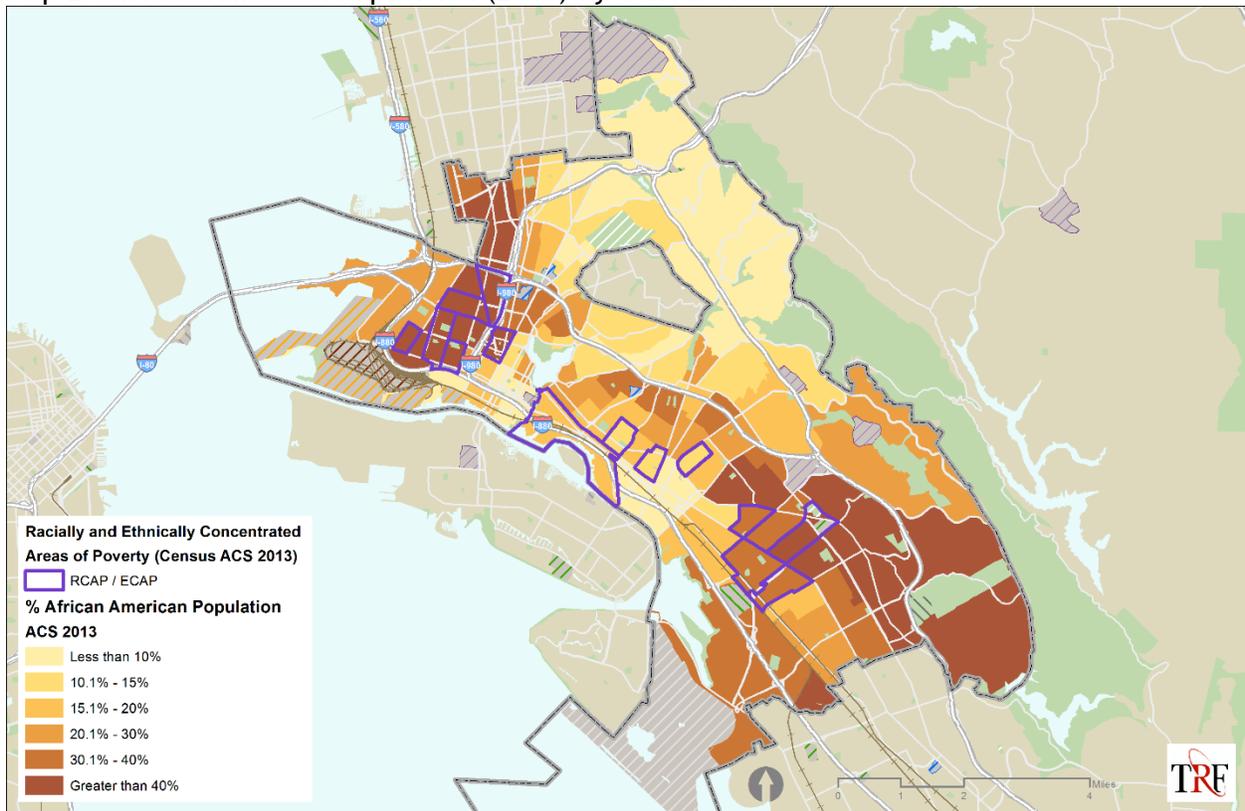
In reviewing the data between 2000 and 2010, it is apparent that the dissimilarity index has declined from 2000 to 2010 between White and Non-White populations and all sub populations. While this would indicate that the City is becoming less segregated, it is important to note that the total African American population declined by more than 11 percentage points.

Table 2: Dissimilarity Index

Racial / Ethnic Group	Year	Population		Dissimilarity Index with White Population	Dissimilarity Index with Hispanic Pop.
		#	%		
White	2000	108,046	32%	n/a	0.54
	2010	134,931	35%	n/a	0.51
Non-White	2000	234,179	68%	0.41	0.29
	2010	255,802	66%	0.36	0.28
Hispanic	2000	74,897	22%	0.54	n/a
	2010	99,077	25%	0.51	n/a
African-American	2000	125,716	37%	0.49	0.36
	2010	109,471	28%	0.42	0.34
Asian	2000	46,087	14%	0.42	0.54
	2010	65,811	17%	0.41	0.51

The maps below highlight race/ethnicity trends in the City of Oakland and their association to RCAP/ECAP areas, as defined above.

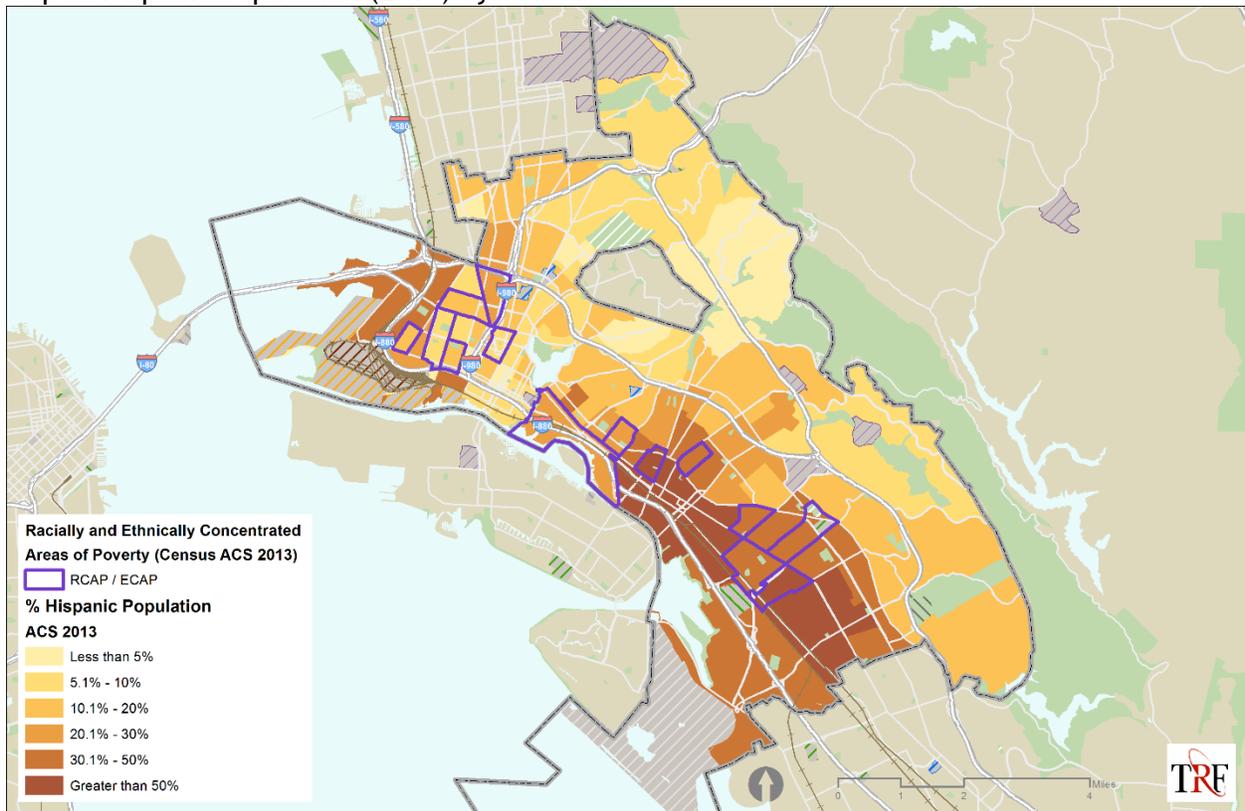
Map 2: African-American Population (2013) by Census Tract



As illustrated above, a number of the RCAP/ECAP areas have 30% or more African American residents.

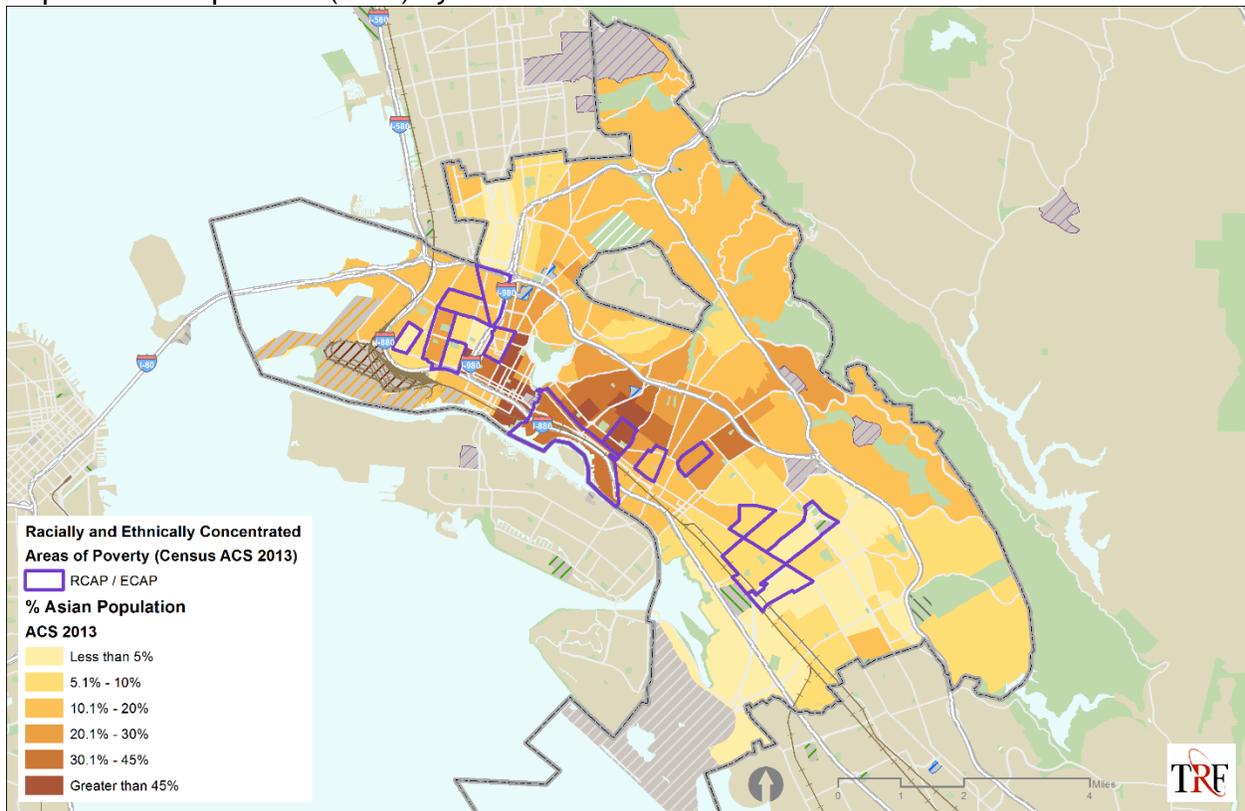
The areas with the highest concentration of African American residents are in West Oakland and East Oakland.

Map 3: Hispanic Population (2013) by Census Tract



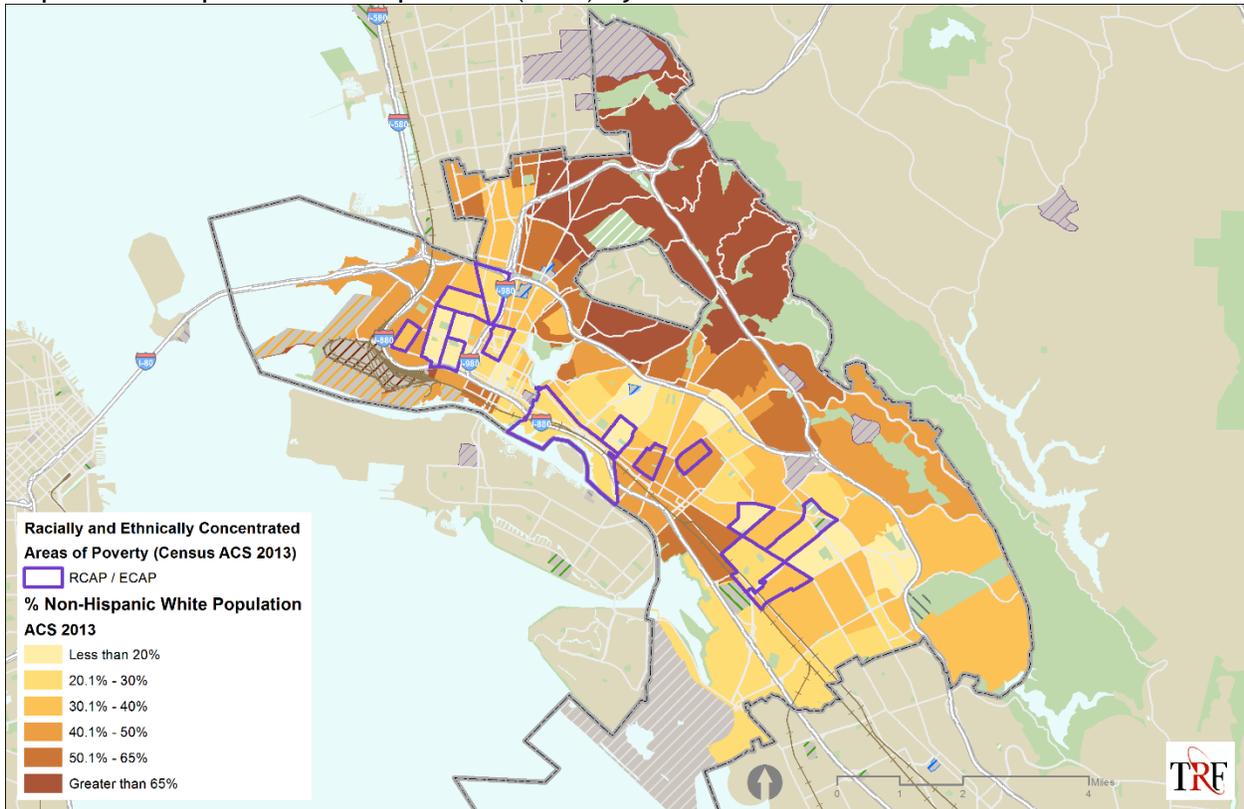
This map indicates that the majority of the Hispanic population is concentrated in East Oakland, with much of the area at a threshold of at least 30% Hispanic. Further, many of the tracts in East Oakland are majority Hispanic.

Map 4: Asian Population (2013) by Census Tract



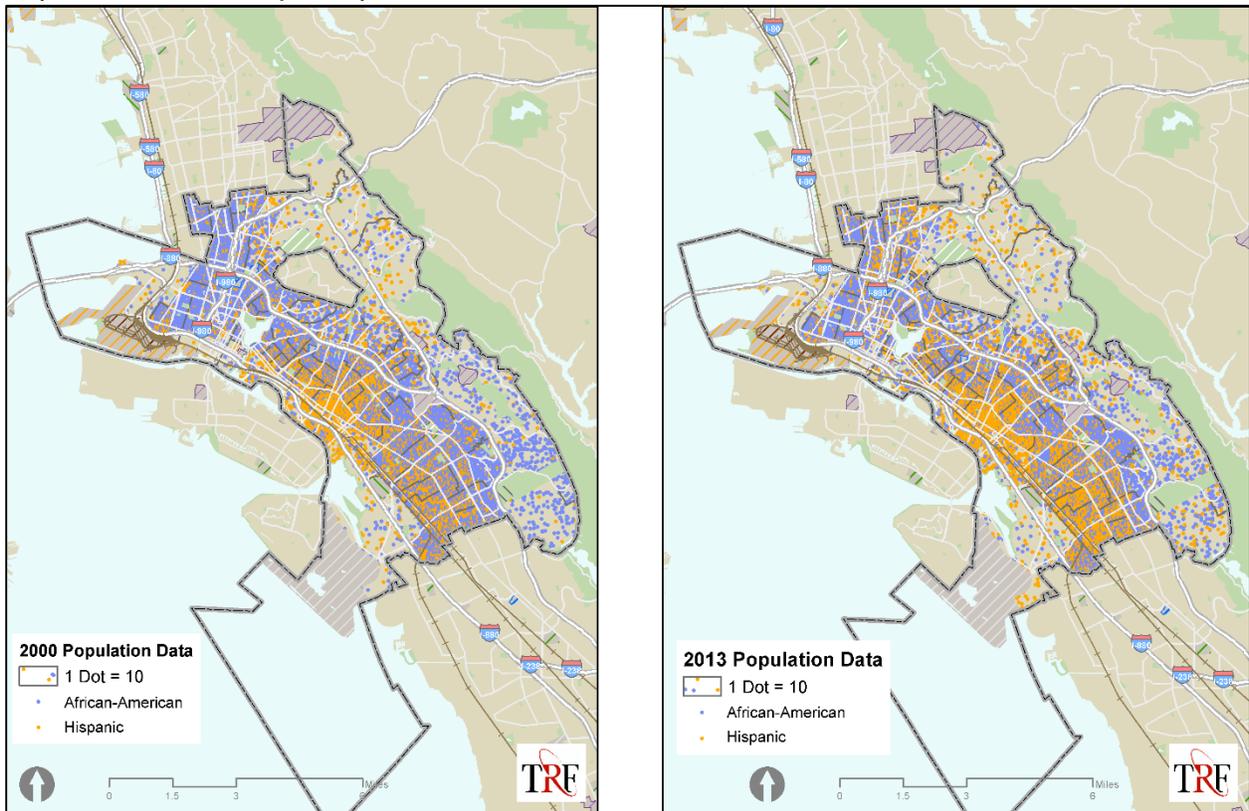
Dissimilar from where many African American and Hispanic populations live in Oakland, the areas with higher Asian populations are concentrated in smaller areas just east of Downtown and in a small area of East Oakland.

Map 5: Non-Hispanic White Population (2013) by Census Tract



Unlike the African-American, Hispanic, and Asian maps presented above, the areas with the highest share of White population are largely concentrated in North Oakland and Oakland Hills. When looking specifically at the RCAP/ECAP areas, the white population is minimal when compared to other races and ethnicities seen in the previous maps.

Map 6: Race/Ethnicity Comparison from 2000 - 2013

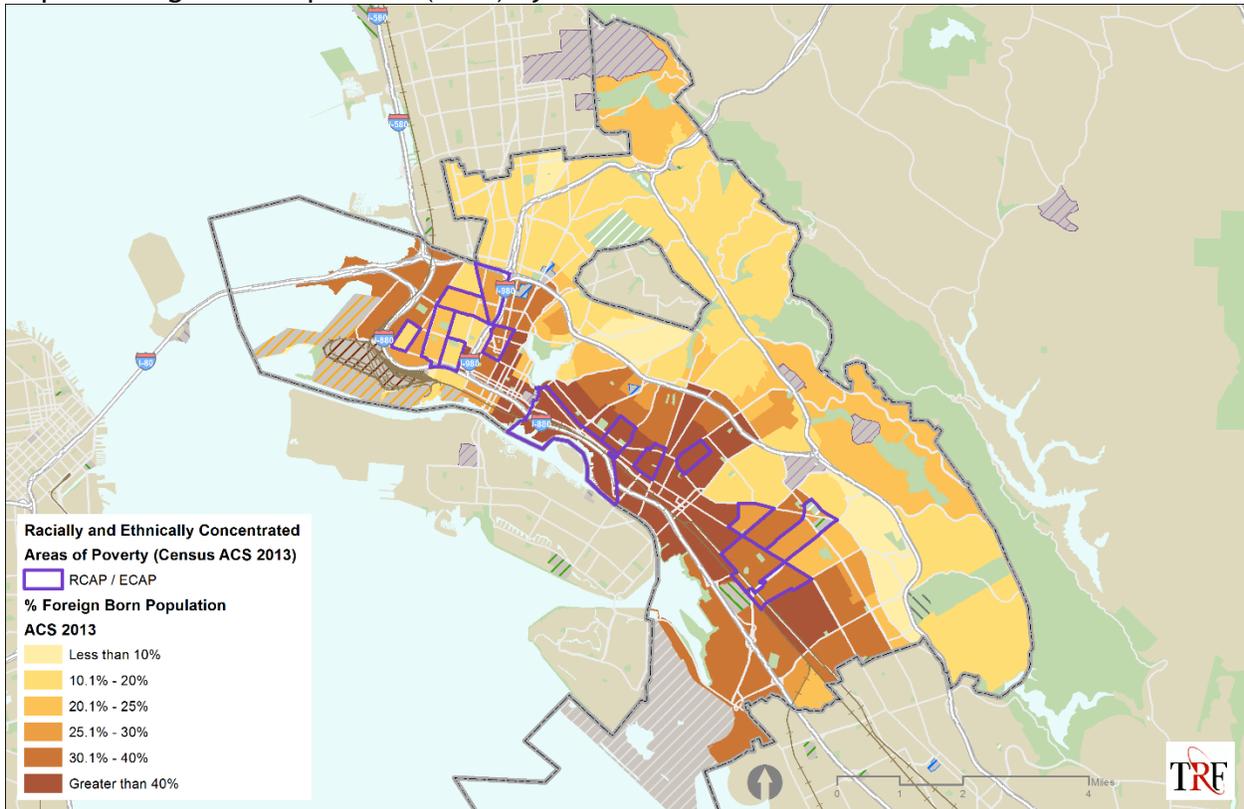


The maps above indicate the general geographic location of African-American and Hispanic persons in 2000 and 2013. Each dot represents ten people.

When comparing the two maps, there is a clear increase of the Hispanic population in East Oakland, largely supplanting the African-American population in this area.

Less apparent, but also noticeable, is the African-American population decrease in East Oakland east of Interstate 580.

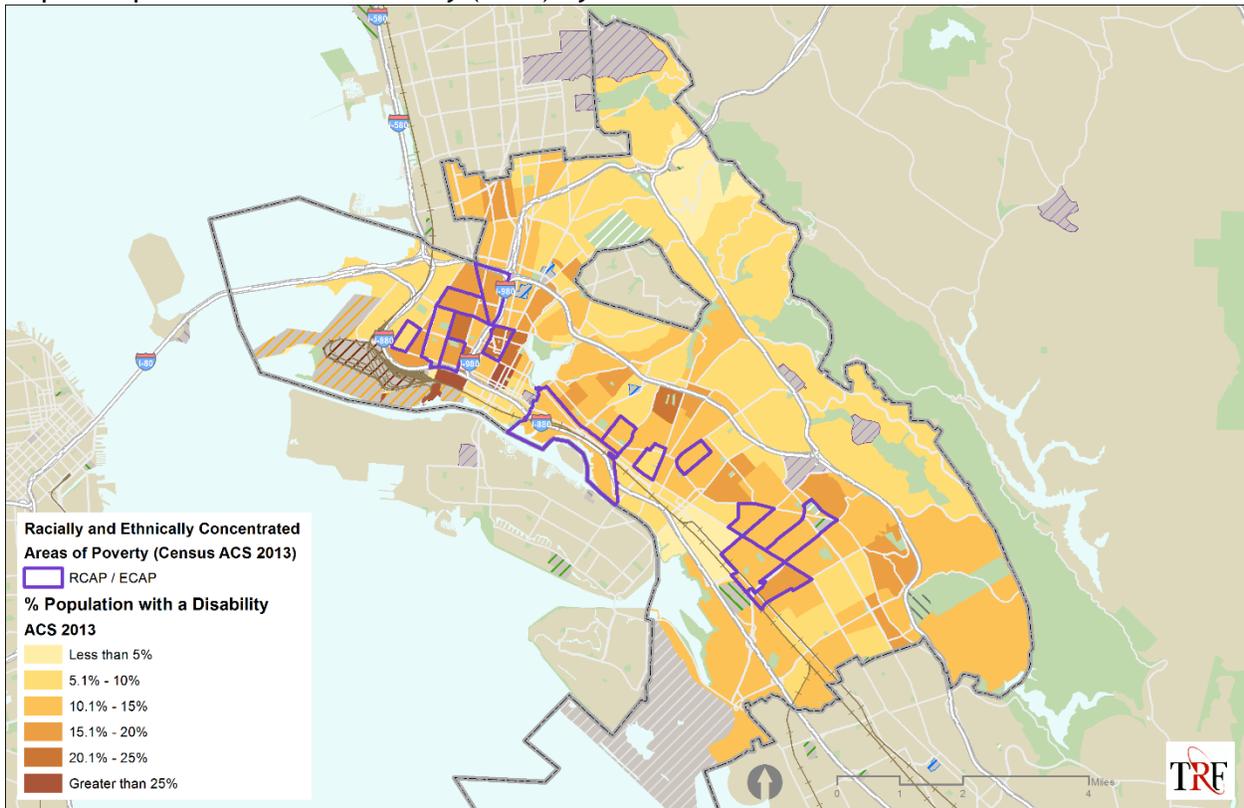
Map 7: Foreign Born Population (2013) by Census Tract



Over 107,000 residents in Oakland are foreign born (approximately 27% of the City’s population). The foreign born population is largely located in East Oakland, specifically in the RCAP/ECAP areas in East Oakland.

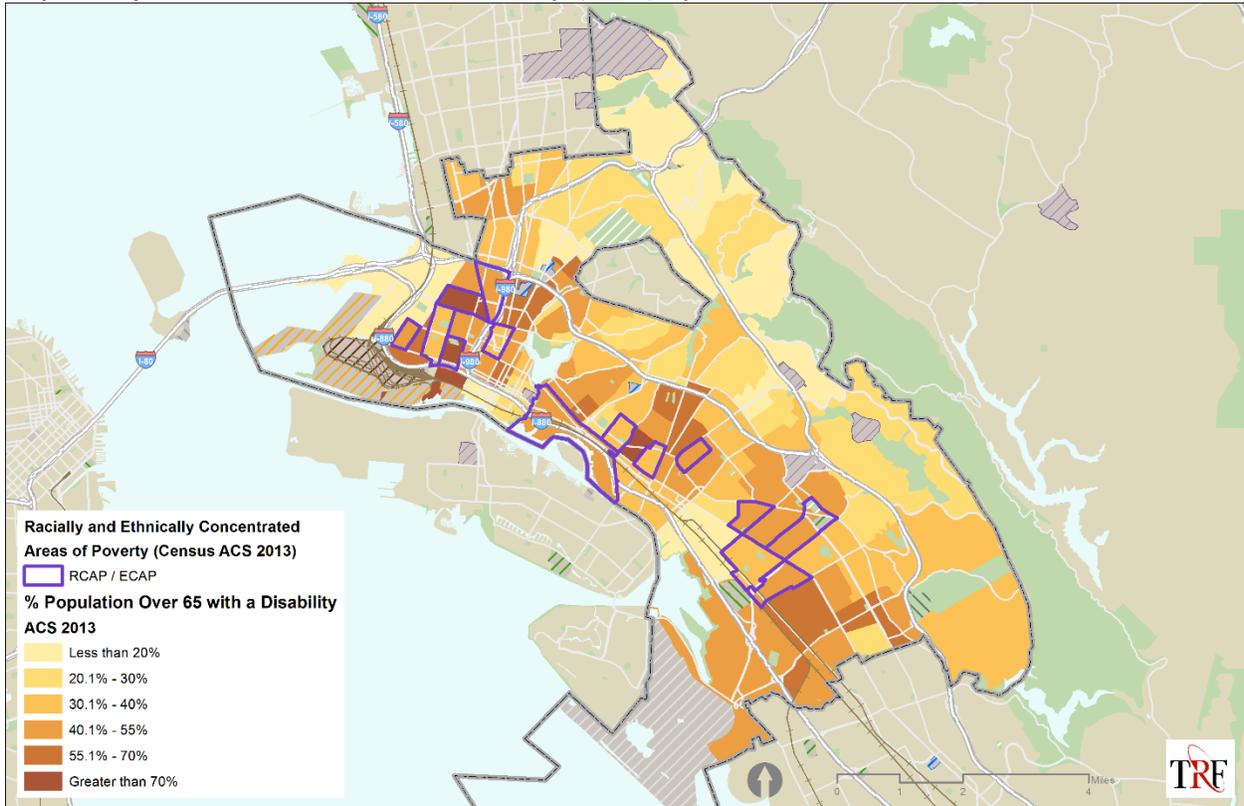
In areas with a higher foreign born population, it is likely that there is a greater percentage of the population that has a limited proficiency in English. In Oakland as a whole, 21% of residents report that they speak English less than “Very Well.” The Spanish speaking population in the City is approximately 22%.

Map 8: Population with a Disability (2013) by Census Tract



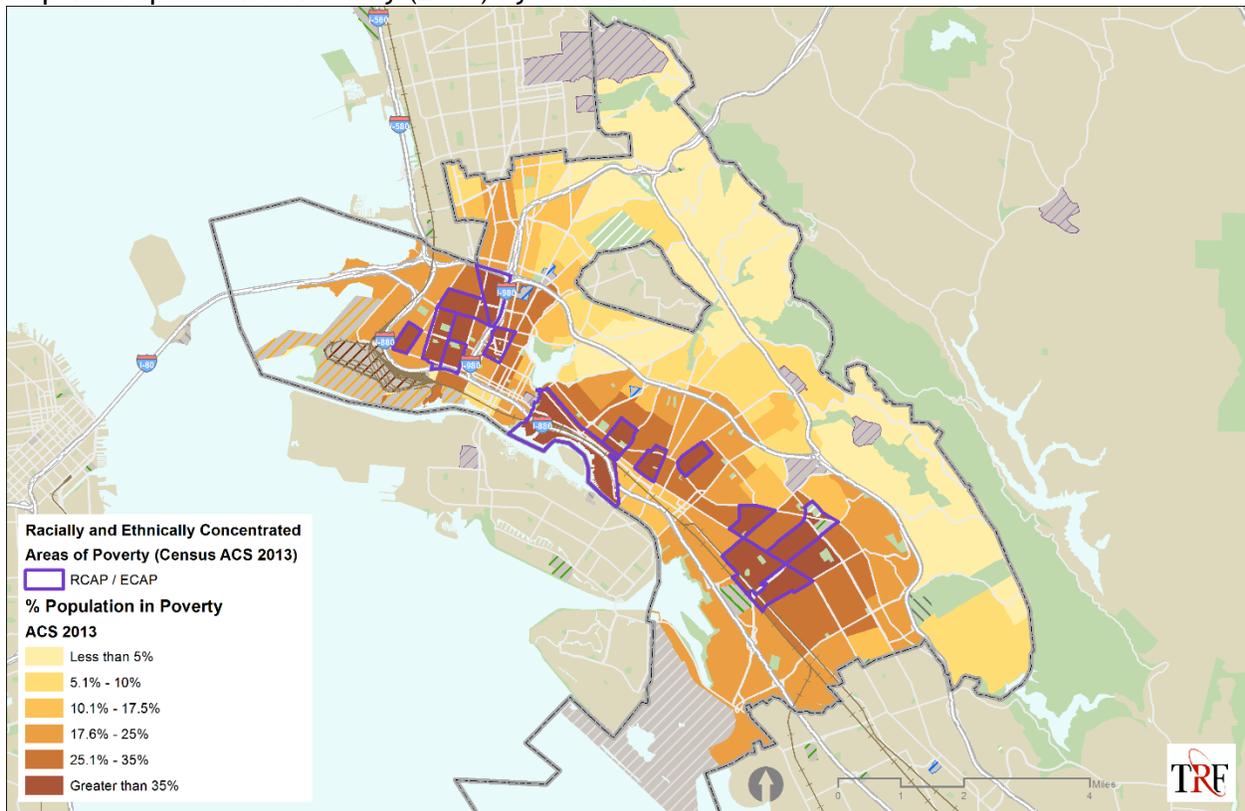
According to the ACS, approximately 45,000 residents in Oakland have a disability (11%). While there is no wide disparity of the concentration of disabled persons in the City, a small concentration of the disabled populations is located in downtown, likely due to the prevalence of services, walkable neighborhoods and accessible residential units.

Map 9: Population over 65 with a Disability (2013) by Census Tract



Just over 38% of the City's population over the age of 65 has at least one disability. When comparing this map illustrating the population over 65 with a disability to persons overall with a disability, there is a concentration of elderly, disabled persons in in downtown/West Oakland as well as some Census Tracts in East Oakland.

Map 10: Population in Poverty (2013) by Census Tract



As illustrated above, poverty rates are concentrated in West Oakland, downtown and East Oakland. There are very low poverty rates in the Oakland Hills and North Oakland.

## Employment

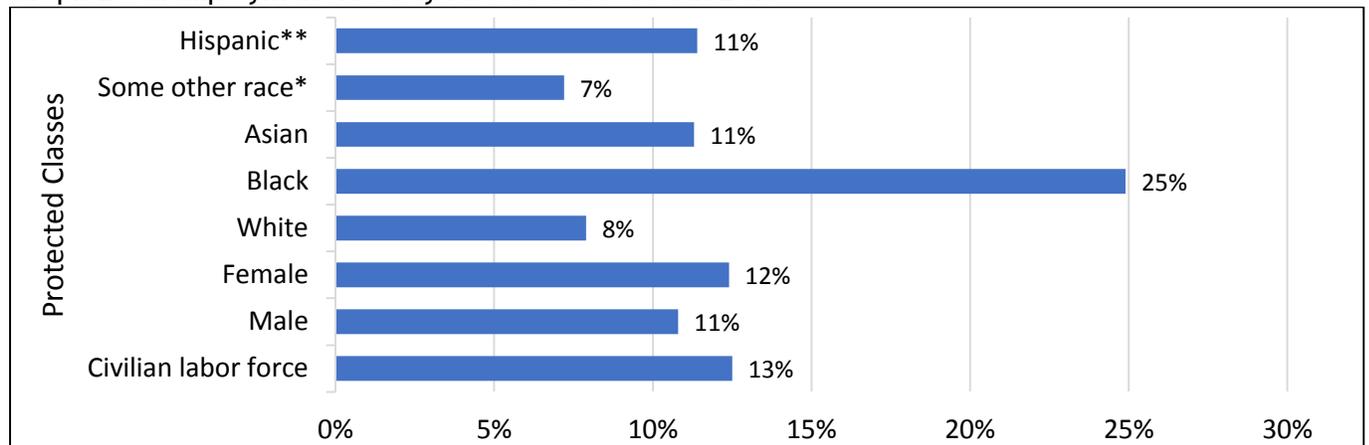
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### *Blacks face the highest unemployment rates*

Local employment opportunities are the most critical influence on household income, which is an extremely important factor in evaluating housing choice. The American Community Survey provides detailed employment data by gender and race, two of the protected classes in the Fair Housing Act, indicating differences in employment rates among groups.

According to 2013 estimates for the City of Oakland, women experience slightly higher unemployment rates than men. White residents are less likely to experience unemployment than any other race or ethnicity, and Blacks experience the highest unemployment rates in the City (nearly double the overall unemployment rate).

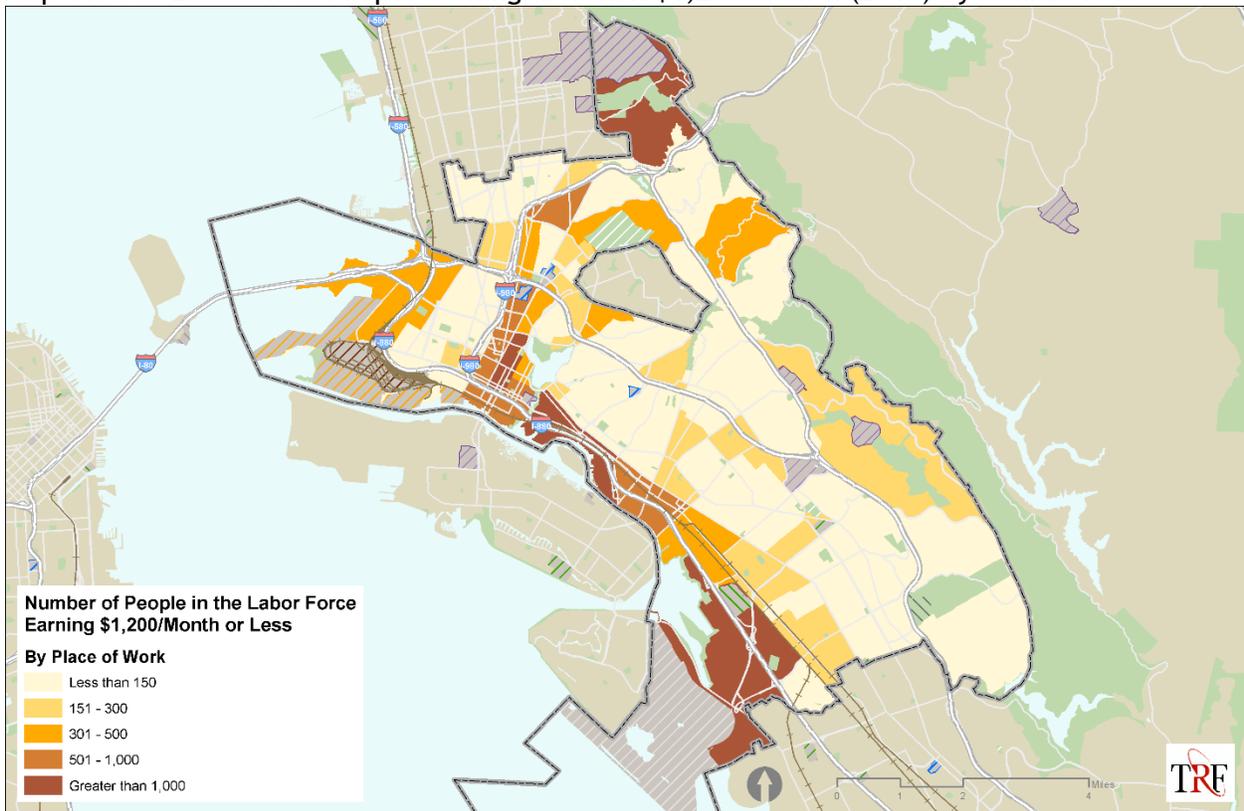
Graph 2: Unemployment Rate by Protected Classes in 2013



\*Does not include Native American/Hawaiian/Pacific Islander

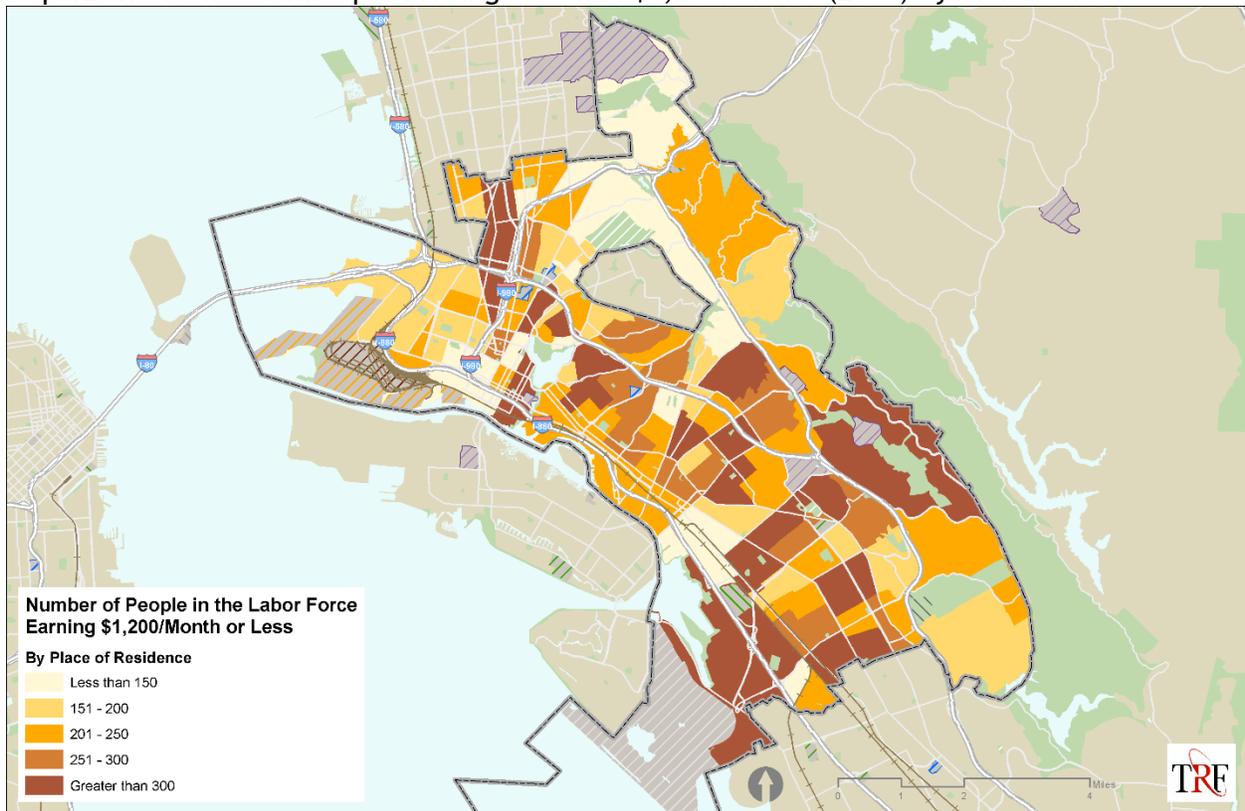
\*\*Hispanic ethnicity is counted independently of race

Map 11: Job Location of People earning less than \$1,200/month (2013) by Census Tract



The highest concentration of low-income jobs are in downtown and in East Oakland, especially in the Census Tracts surrounding and encompassing the Oakland Airport.

Map 12: Residences of People Earning less than \$1,200/month (2013) by Census Tract

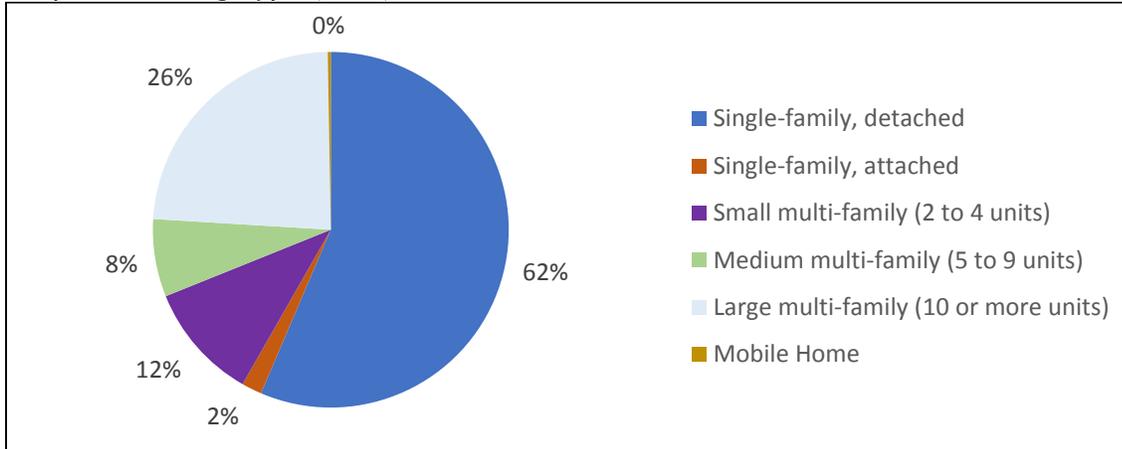


The places of residences of lower-wage earners are predominately located in East Oakland with pockets in downtown and North/Northwest Oakland.

## Housing

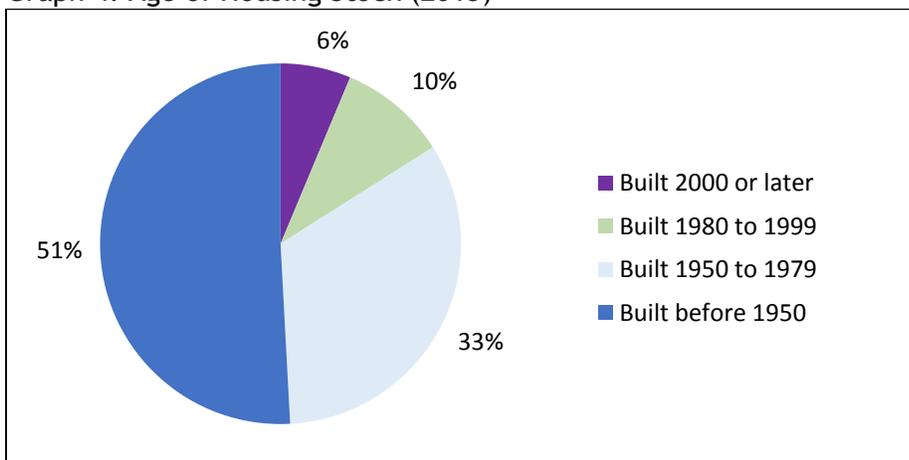
*The majority of Oakland's housing stock is comprised of older, multi-family homes*

Graph 3: Housing Type (2013)



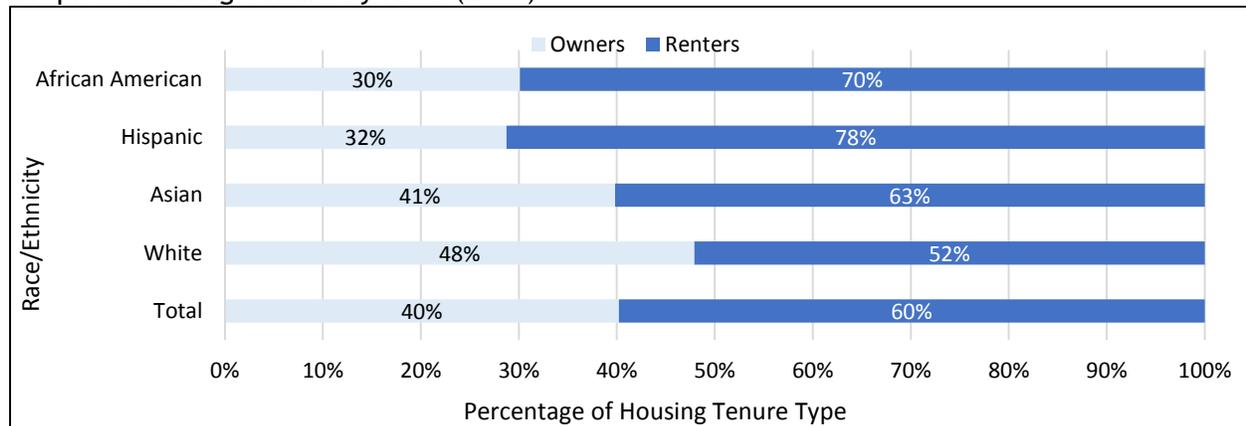
Older multi-family homes tend to be less accessible for those with physical disabilities, as they generally have narrower doorways and hallways. Additionally, older multi-family buildings may lack facilities such as ramps and elevators that are more standard in modern apartment complexes. Most homes in Oakland were built before 1980, and over half were built before 1950.

Graph 4: Age of Housing Stock (2013)



In addition to generally being less accessible, older houses can require more maintenance and energy efficiency upgrades, which places additional financial burden on low-income homeowners. As illustrated earlier, City residents who are older and/or disabled are more likely to live in poverty than other groups, leaving these populations without the means to maintain and upgrade their homes as needed.

Graph 5: Housing Tenure by Race (2013)



As indicated by the graph above, a much higher share of White and Asian households own a home compared to Hispanic and African-American households. This gap may be indicative of the overall wealth gap among the different races/ethnicities in the City.

### *Housing Problems*

The Consolidated Plan analyzed housing problems, severe housing problems and cost burdened data by race to identify potential areas of disproportionate greater need. These areas include:

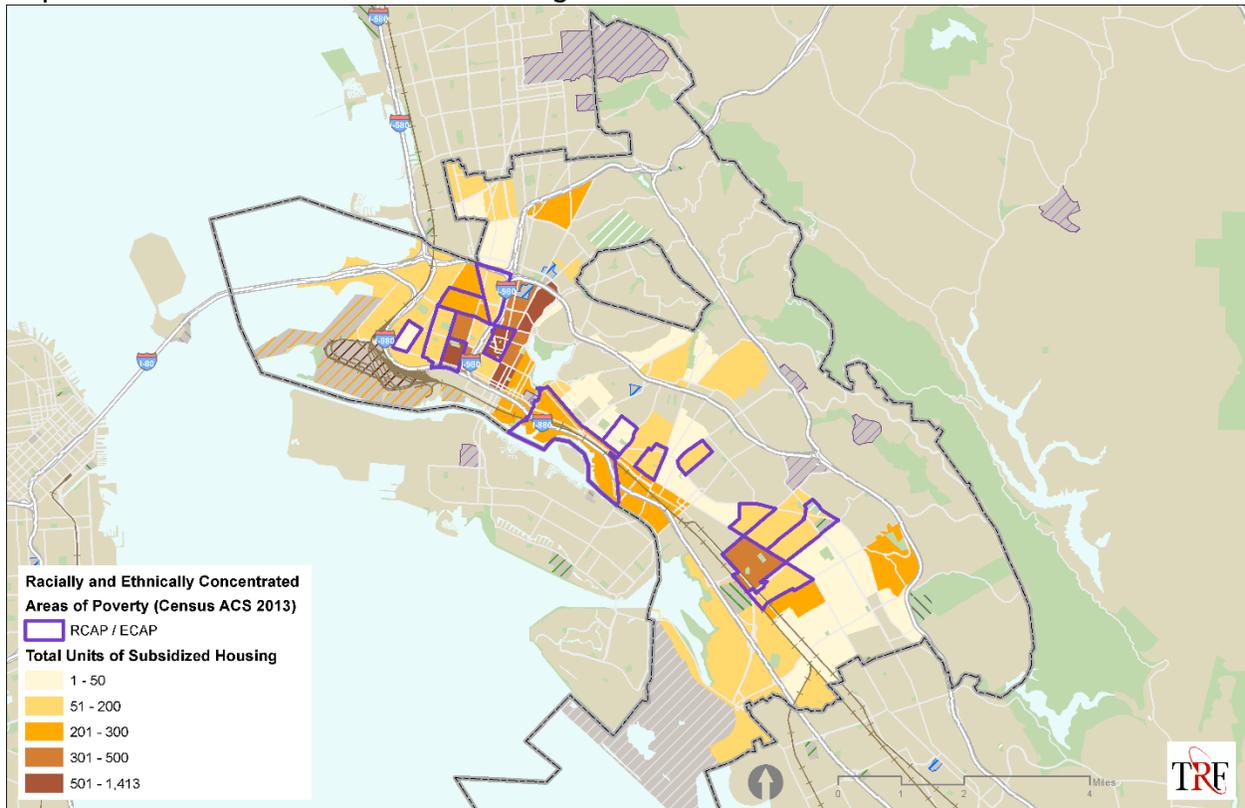
- Disproportionate greater need for housing problems for Hispanic households at 50-80% and 80-100% AMI
- Disproportionate greater need for housing problems for Pacific Islander households at 30-50% AMI
- Disproportionate greater need for severe housing problems for Pacific Islander population at 0-30% AMI, 30-50%, 50-80%, and 80-100% AMI
- Disproportionate greater need for severe housing problems for AIAN population at 0-30% AMI, 30-50%, and 50-80% AMI
- Disproportionate greater need for severe housing problems for Hispanic population at 0-30% AMI, 50-80%, and 80-100% AMI
- AIAN Disproportionate greater need for cost burden
- Large Family Households (0-80% AMI) had disproportionate greater need for cost burden and extreme cost burden
- 0-50% AMI Renter Households had disproportionate greater need for cost burden

### *Subsidized housing is located in areas with higher poverty rates and declining population*

Subsidized housing includes Low Income Housing Tax Credit developments, HOME rental assistance properties, persons with disabilities, Section 202 developments for low-income seniors, Section 811 supportive housing and Oakland Redevelopment Agency’s Affordable Housing developments.

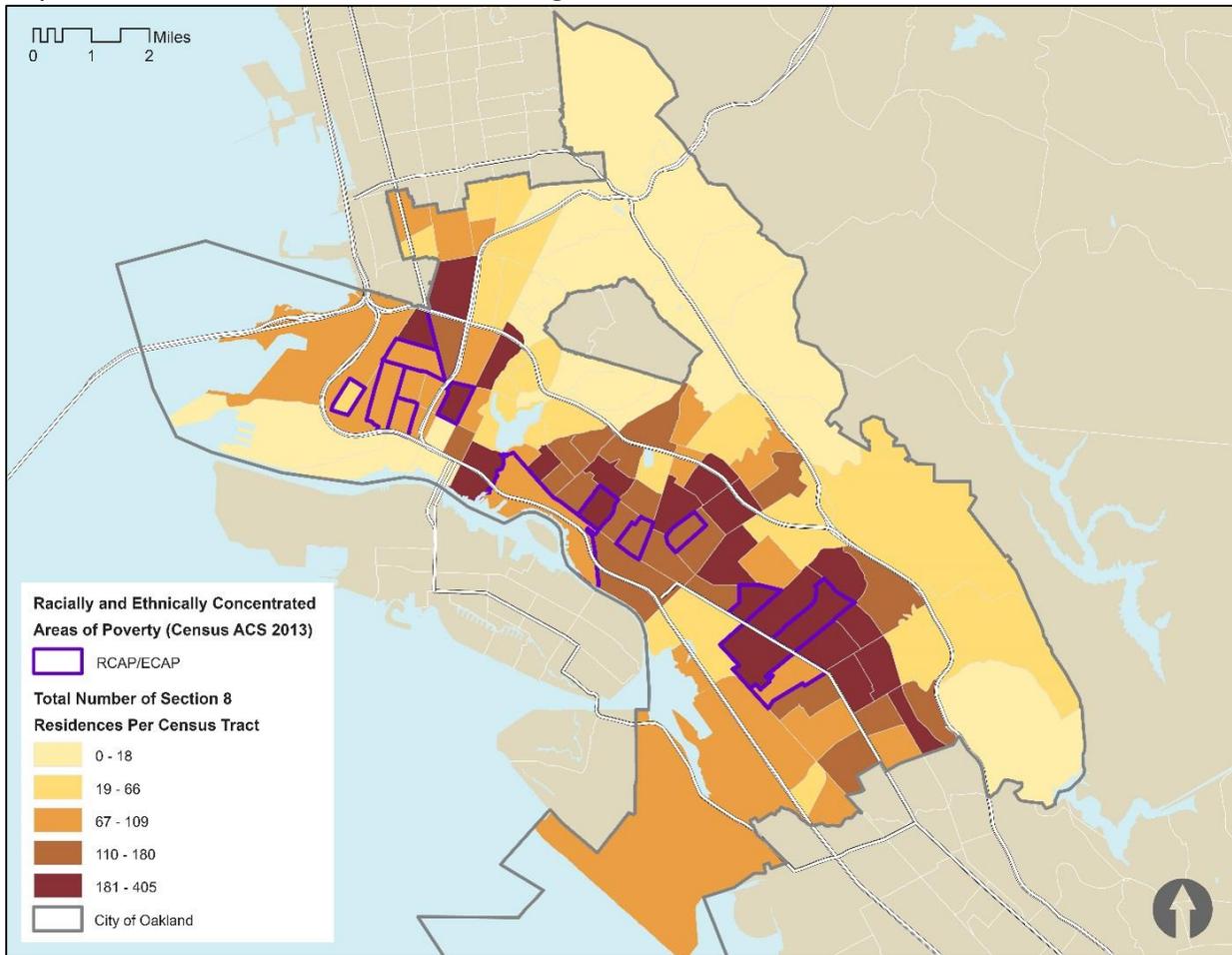
According to the data from the City’s database of subsidized housing units illustrated in the map, the majority of HUD, State and local subsidized developments in the Oakland area are located near the center of the City and in or around Racially Concentrated Areas of Poverty (RCAPs). The map below does not include Oakland Housing Authority Public Housing units.

Map 13a: Total Units of Subsidized Housing



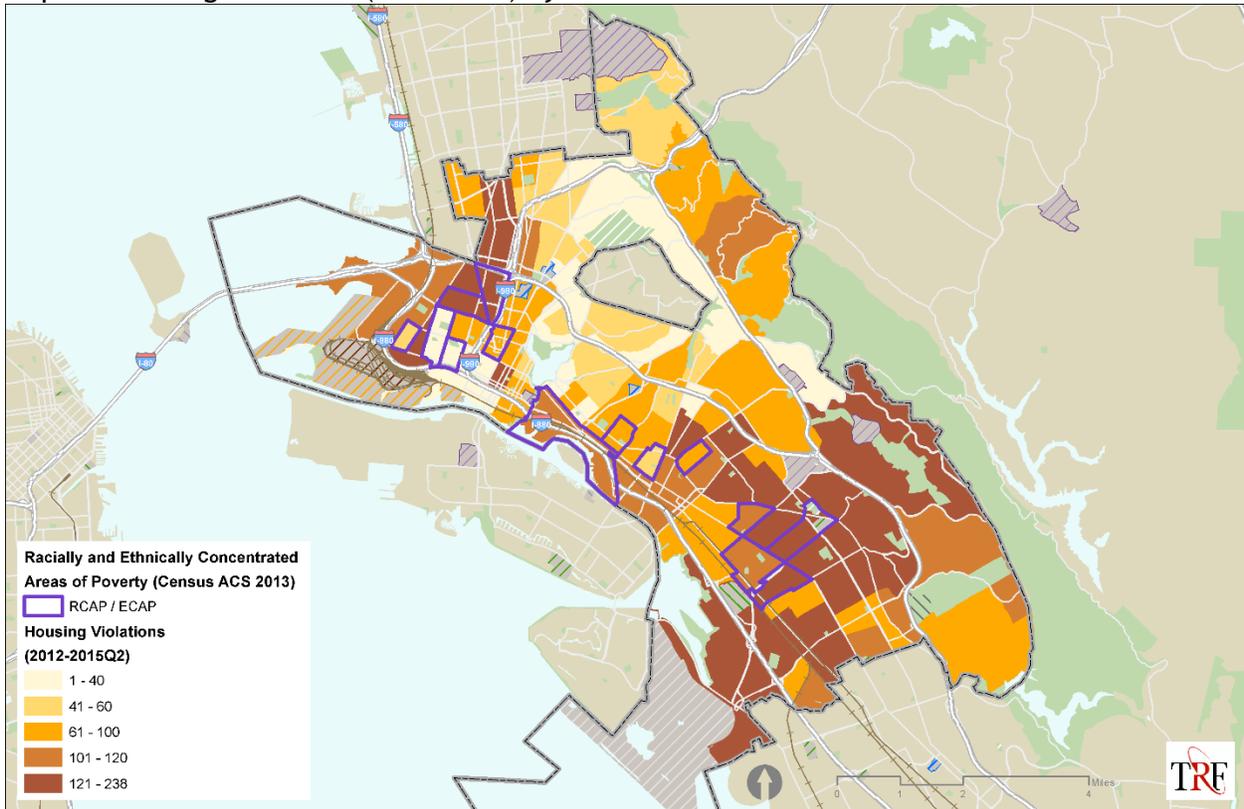
As indicated in the map above, the concentration of subsidized housing units (not including Oakland Housing Authority subsidized units) is located in downtown and areas of West and East Oakland. There is a smaller share of subsidized units in North Oakland. There are no subsidized units east of Interstate 580.

Map 13b: Total Units of Subsidized Housing



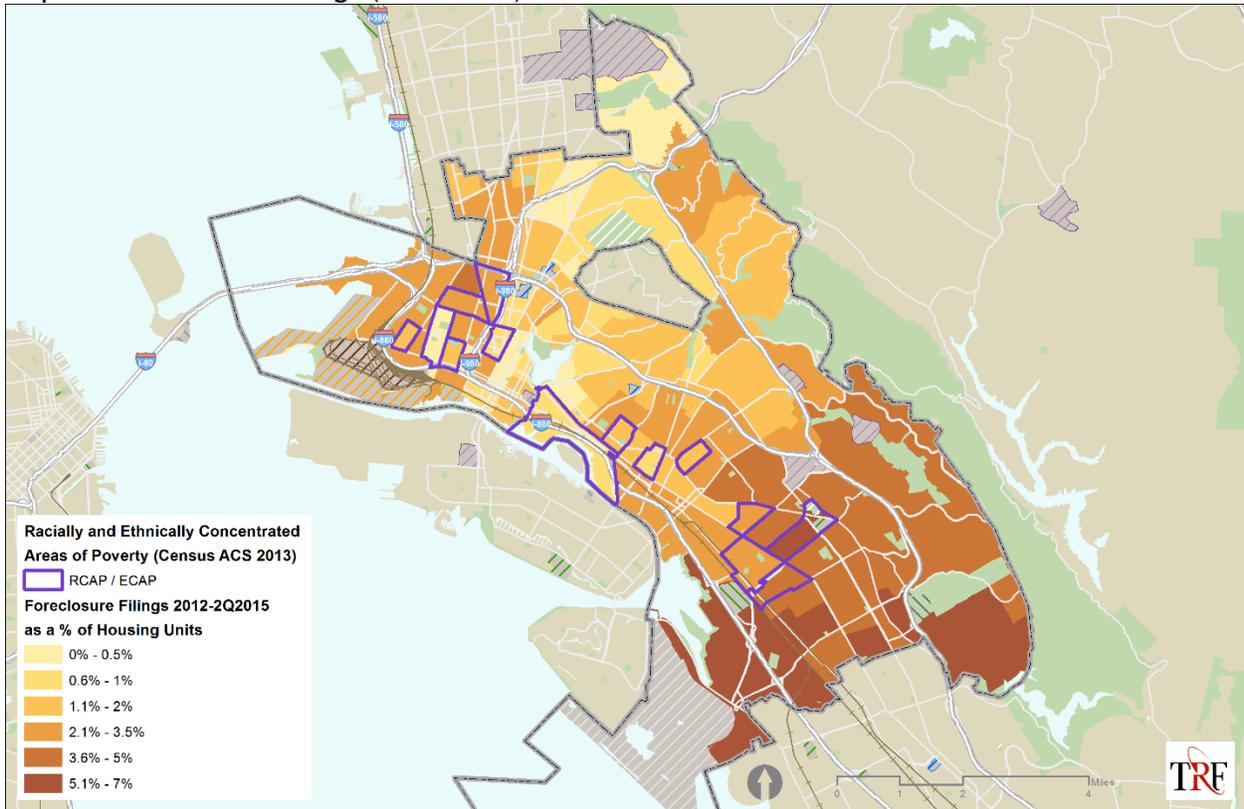
The map above shows the number of Section 8 residences per Census Tract. While there is a heavier concentration of Section 8 buildings in East Oakland, they are also located throughout downtown and areas of West Oakland.

Map 14: Housing Violations (2012-2015) by Census Tract



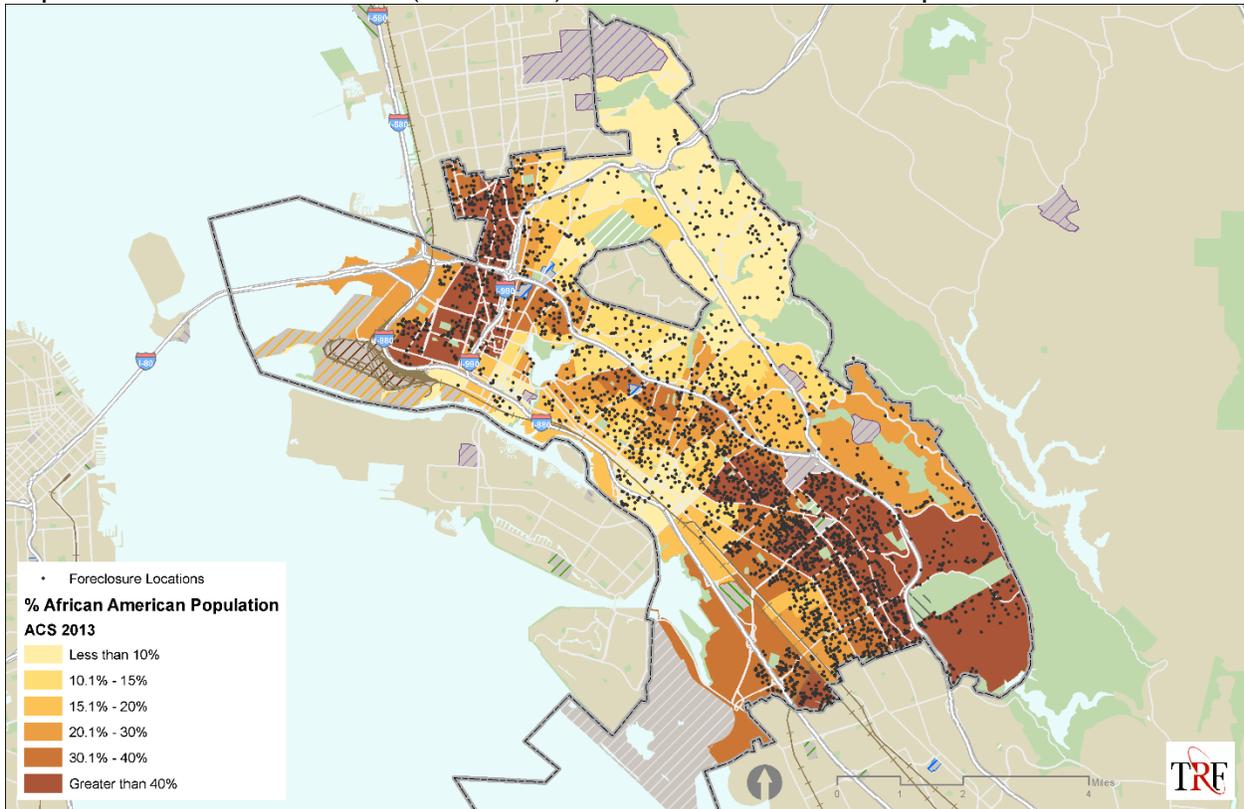
A housing violation is recorded in the City of Oakland by Code Enforcement. Violations are issued for unsafe/unsanitary buildings, zoning violations, public nuisances and other deficiencies that do not meet or comply with City Code. The majority of housing violations in Oakland are concentrated in West Oakland, East Oakland and downtown. To a lesser extent, there are concentrations of housing violations in North Oakland and in the southeastern area of the City. In focusing just on the RCAP/ECAP areas, all of these Census Tracts have a high concentration of housing violations.

Map 15: Foreclosure Filings (2012-2015)



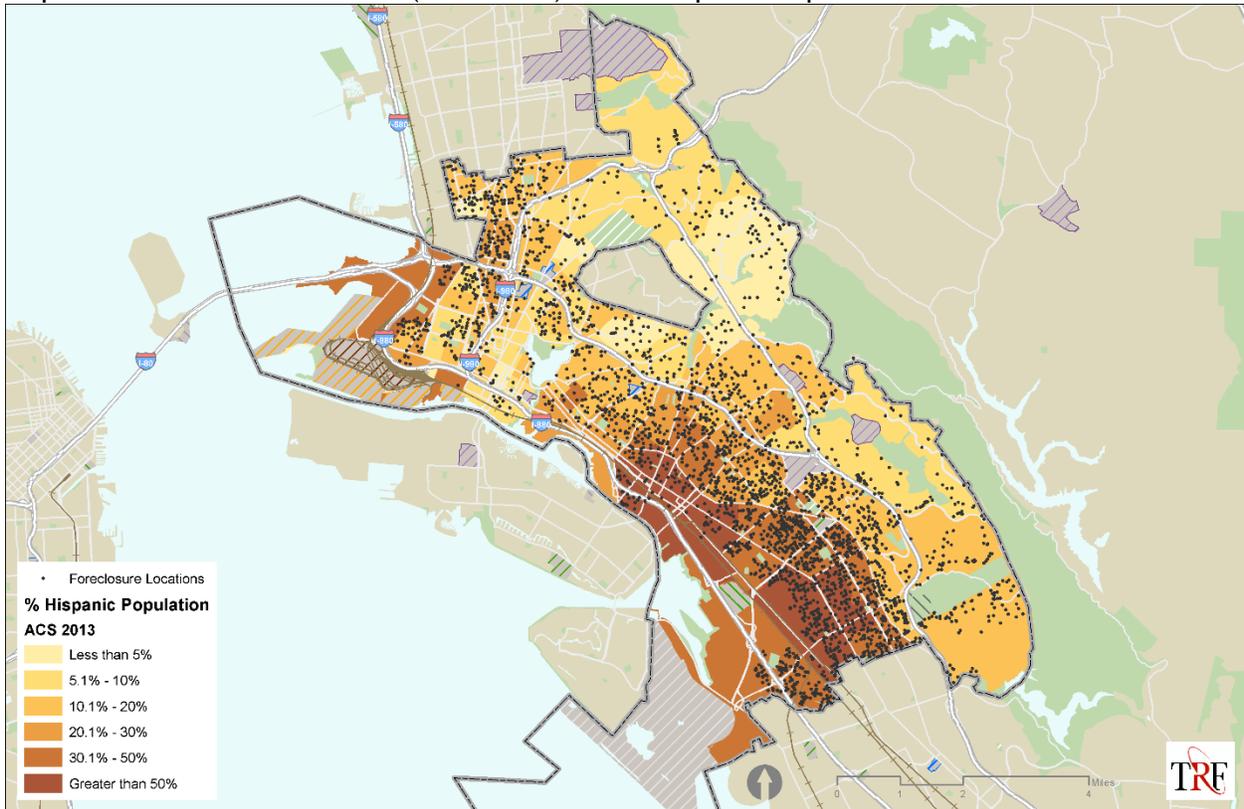
The map above illustrates the share of foreclosure filings as a share of the total number of housing units per Census Tract. Though the share of foreclosures declined since 2008, there is still a concentration of at least 5% of all housing units in Census Tracts in East Oakland.

Map 16: Foreclosure Locations (2012-2015) and % African American Population



The map above indicates the location of a foreclosure and the thematic shading indicates the share of African-American residents. As discussed earlier, the concentration of African-American population is in West Oakland, downtown, and East Oakland. These areas also have a higher share of foreclosures.

Map 17: Foreclosure Locations (2012-2015) and % Hispanic Population



Similar to the previous map, this map shows the location of foreclosures and share of Hispanic residents. Similarly, foreclosure filings appear to be concentrated in areas with a majority or high share of Hispanic residents.

## Housing Cost Burden

Table 3: Housing Cost Burden

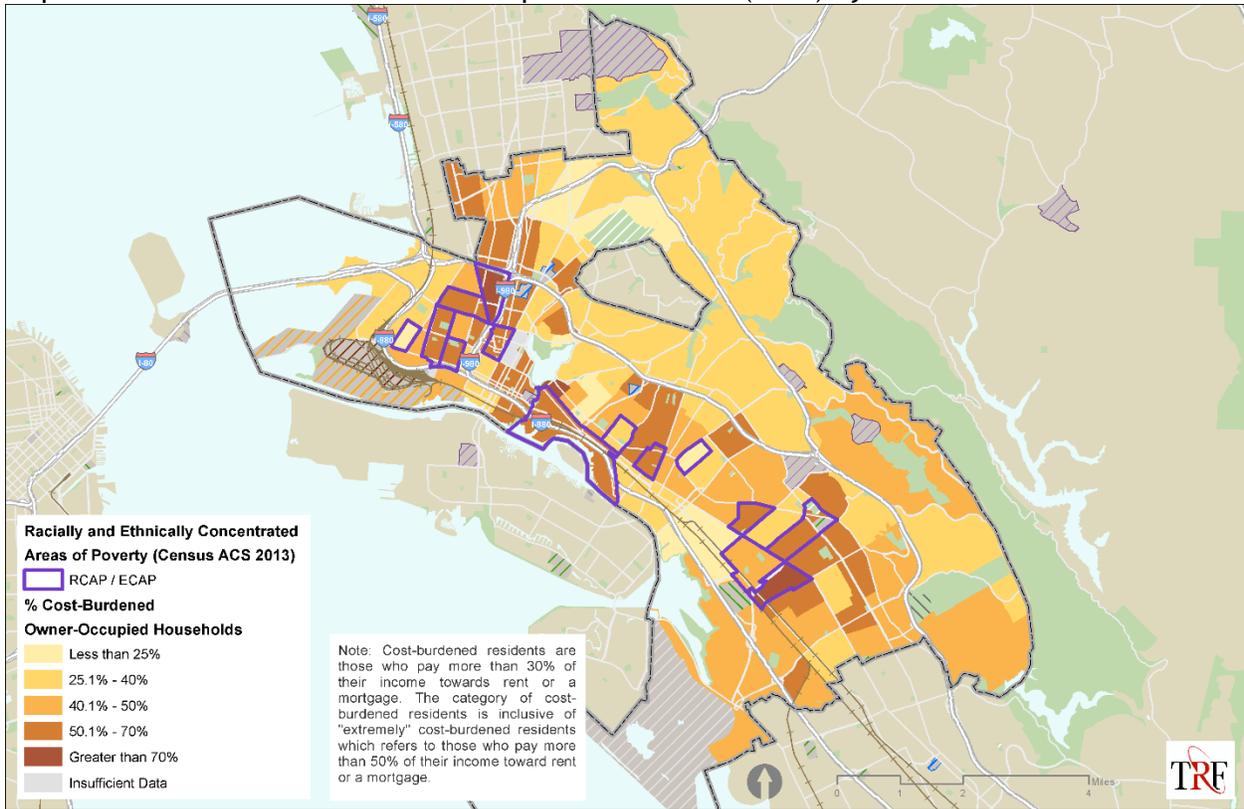
<b>Cost-Burdened Households</b>	<b>2000</b>	<b>2013</b>	<b>2000-2013 Change</b>
Total Owners	62,434	62,538	0%
Total Renters	88,199	92,248	5%
<b>Number of Residents</b>			
Burdened Owners	17,094	25,215	48%
Extremely-Burdened Owners	7,342	10,782	47%
Burdened Renters	37,215	49,004	32%
Extremely-Burdened Renters	19,169	26,617	39%
<b>Percent of Residents</b>			
Burdened Owners	27%	40%	47%
Extremely-Burdened Owners	12%	17%	47%
Burdened Renters	42%	53%	26%
Extremely-Burdened Renters	22%	29%	33%

Housing Cost Burden is defined as a household paying more than 30% of its household income for housing. An Extremely-Burdened household is defined as paying more than 50% of its household income for housing.

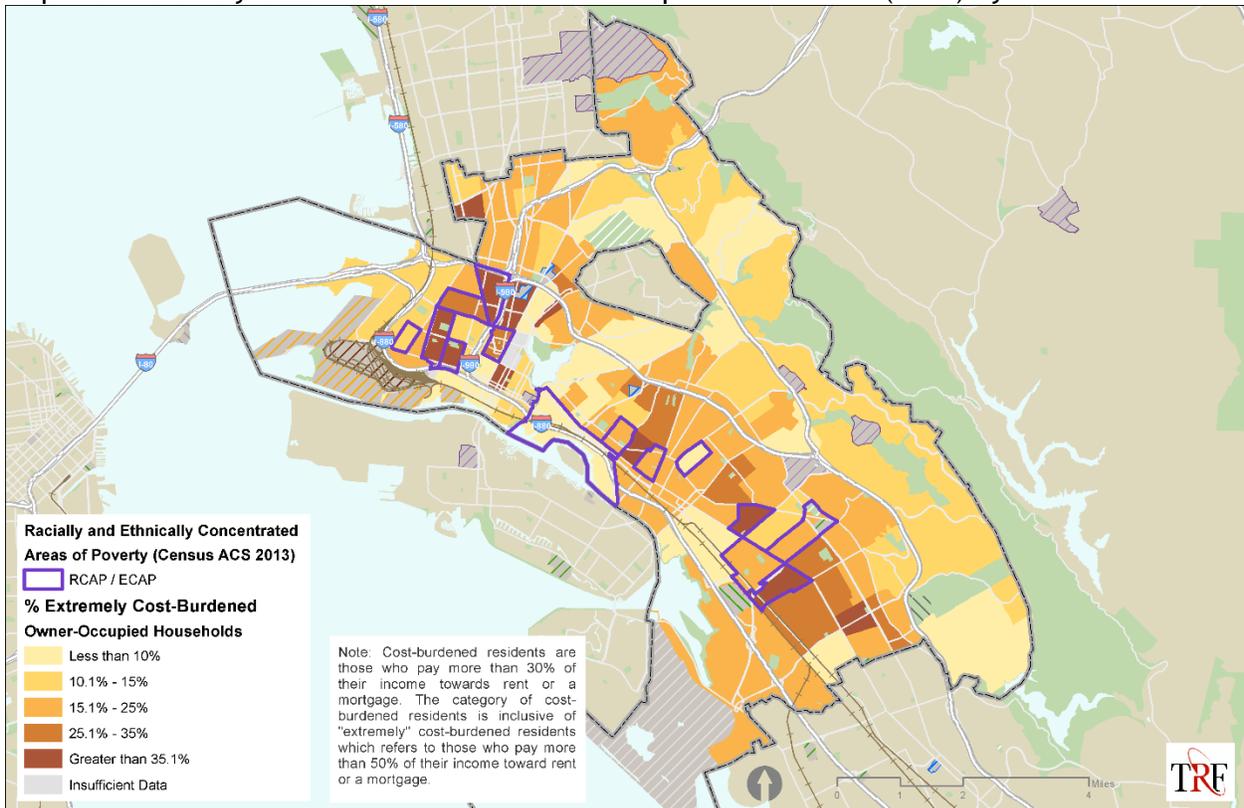
In Oakland, nearly 60% of all owners and more than 80% of renters were cost burdened in 2013 and nearly 25% of all households are extremely cost burdened. Further, the share of cost burdened households have increased significantly from 2000 to 2013 for both renters and owners.

The following four maps show households that are cost burdened and extremely cost burdened by tenure type (homeowner or renter). In assessing the data collectively, cost burdened households are concentrated in areas of East Oakland, West Oakland, Downtown, and parts of downtown. The areas of high concentration coincide with the RCAP/ECAP areas and with areas noted above as being high concentrations of poverty and/or minority populations.

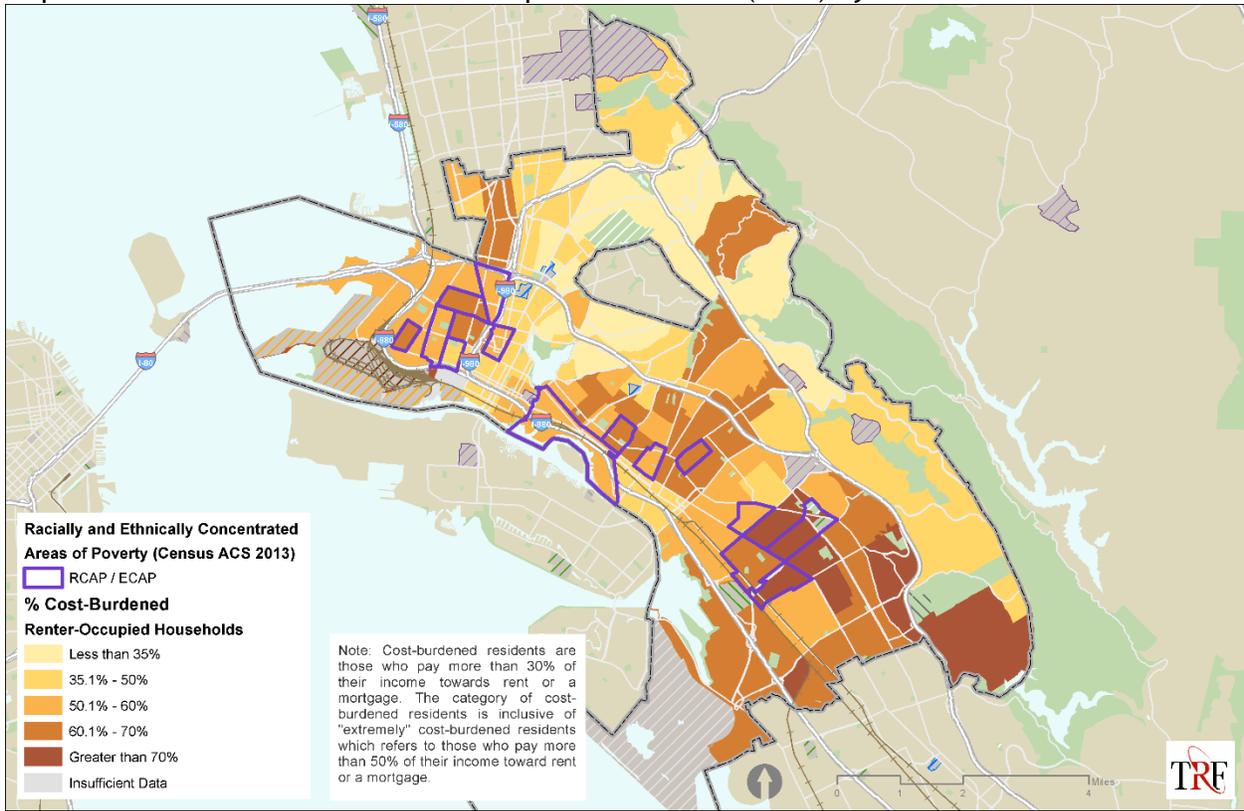
Map 18: Cost Burdened for Owner-Occupied Households (2013) by Census Tract



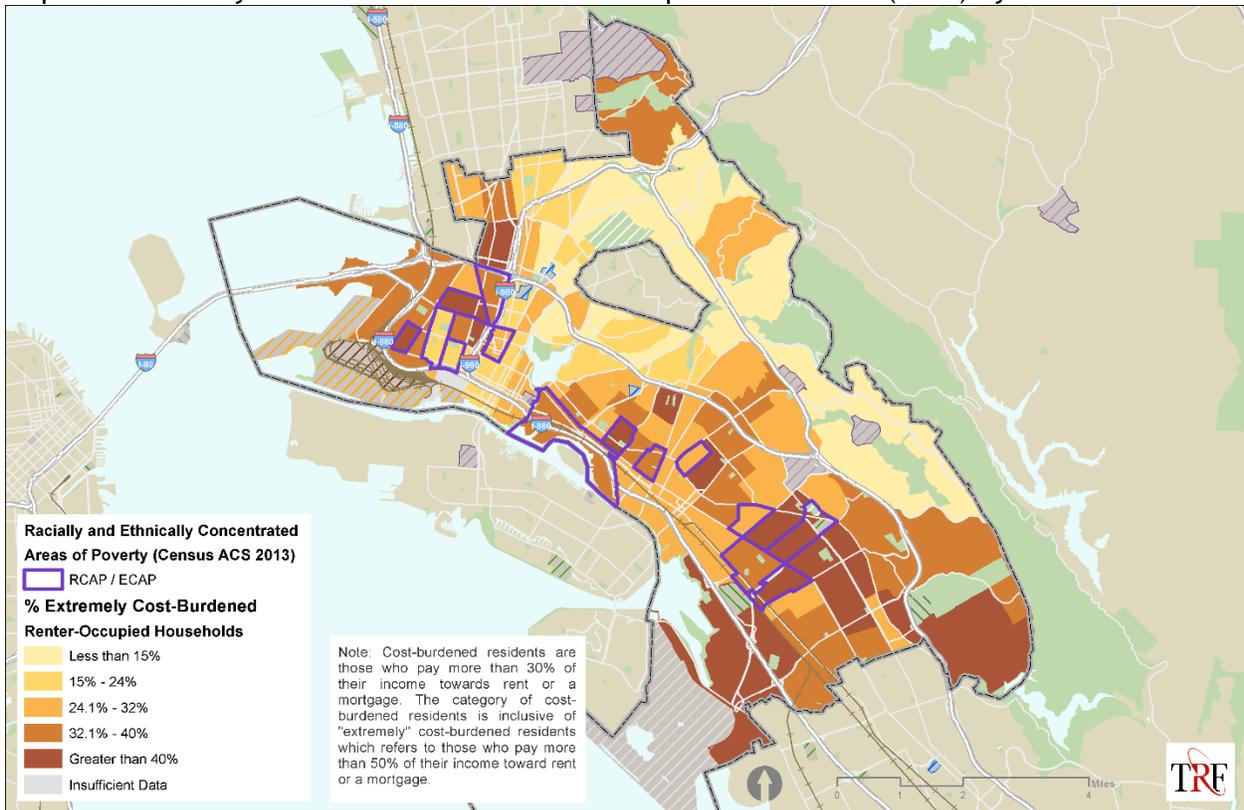
Map 19: Extremely Cost Burdened for Owner-Occupied Households (2013) by Census Tract



Map 20: Cost Burdened for Renter-Occupied Households (2013) by Census Tract



Map 21: Extremely Cost Burdened for Renter-Occupied Households (2013) by Census Tract



## Communities of Opportunity

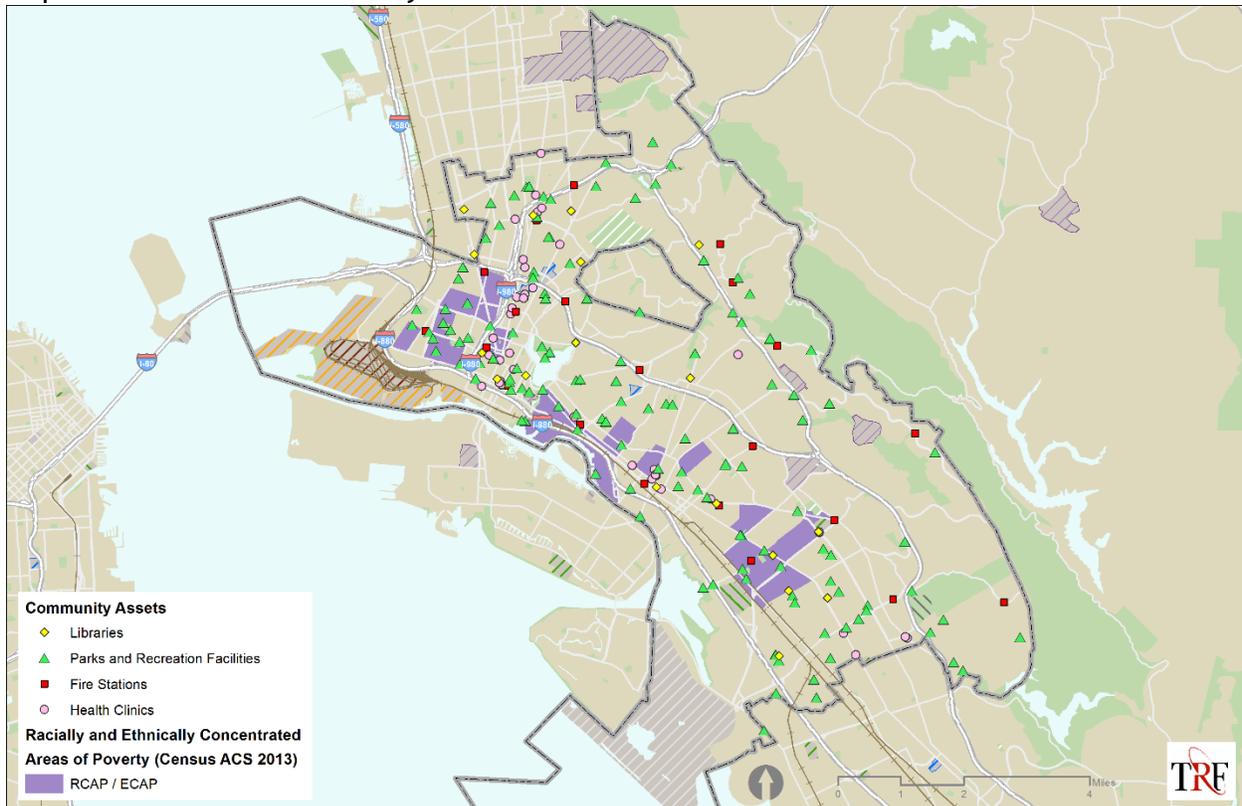
A growing body of social research demonstrates the powerful adverse impact that residential segregation can have on income and opportunity for minority families. Studies, such as Margery Turner's 2000 Urban Institute Report titled *Discrimination in Metropolitan Housing Markets: National Results from Phase 1 HDS 2000* finds that households in areas with low median incomes and high concentrations of race/ethnicity concentration have fewer opportunities for education, jobs and wealth creation.

Given research such as this, HUD recognizes the importance of neighborhood conditions on life outcomes and access to fair housing. With that, the following maps indicate the relation of RCAP/ECAP areas to community assets such as nonprofits, community facilities and quality schools.

The nonprofit data is compiled by the National Center for Charitable Statistics. The data presented in this report is from the Center's 2012 dataset. It is important to note that all nonprofit data is based on the organization's geography and not its catchment area. As such, areas that appear to be underserved by nonprofits may actually fall within a nonprofit's service area.

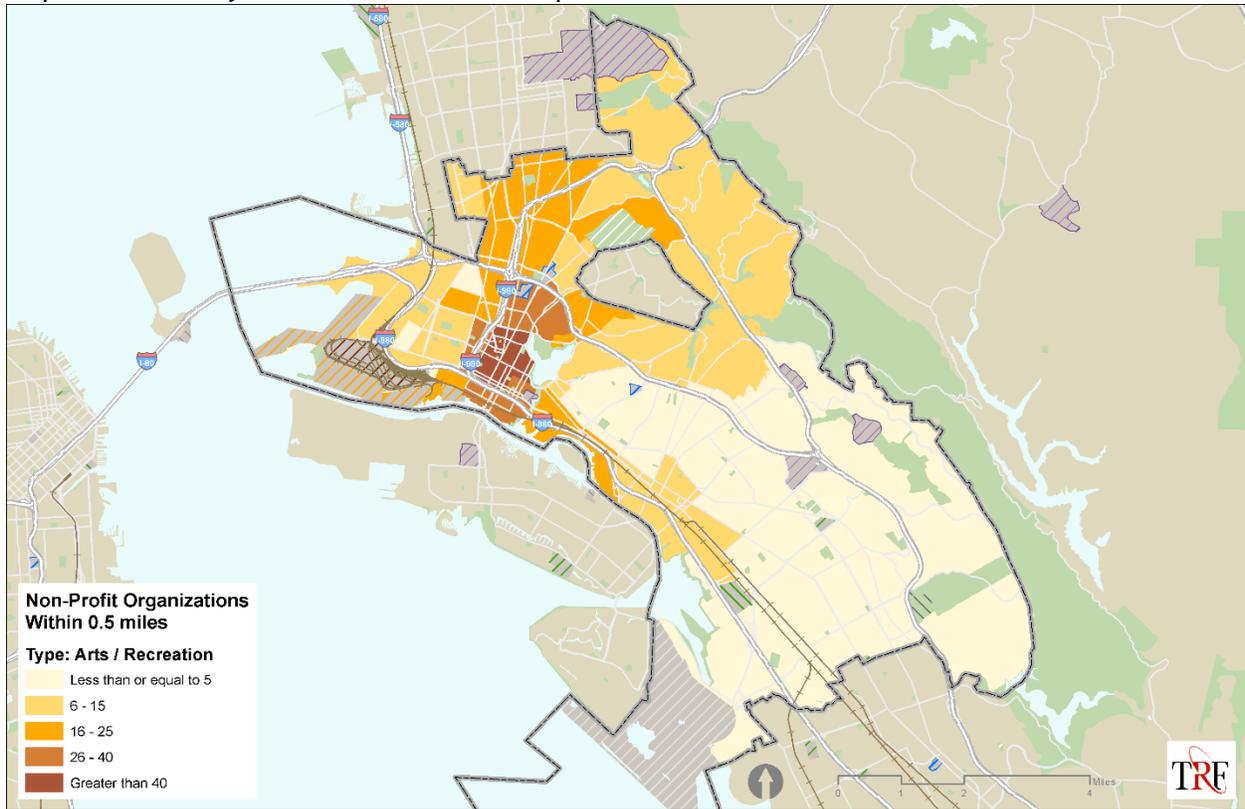
The education data used in this report is based on the State's 2013 API Growth and base Academic Performance Indexes (APIs). In 2014, the State announced that it would transition to Smarter Balanced Assessment after the 2015 school year. This data is not yet available and, as such, the 2013 API data is the most current data available.

Map 22: Location of Community Assets and RCAP/ECAPs



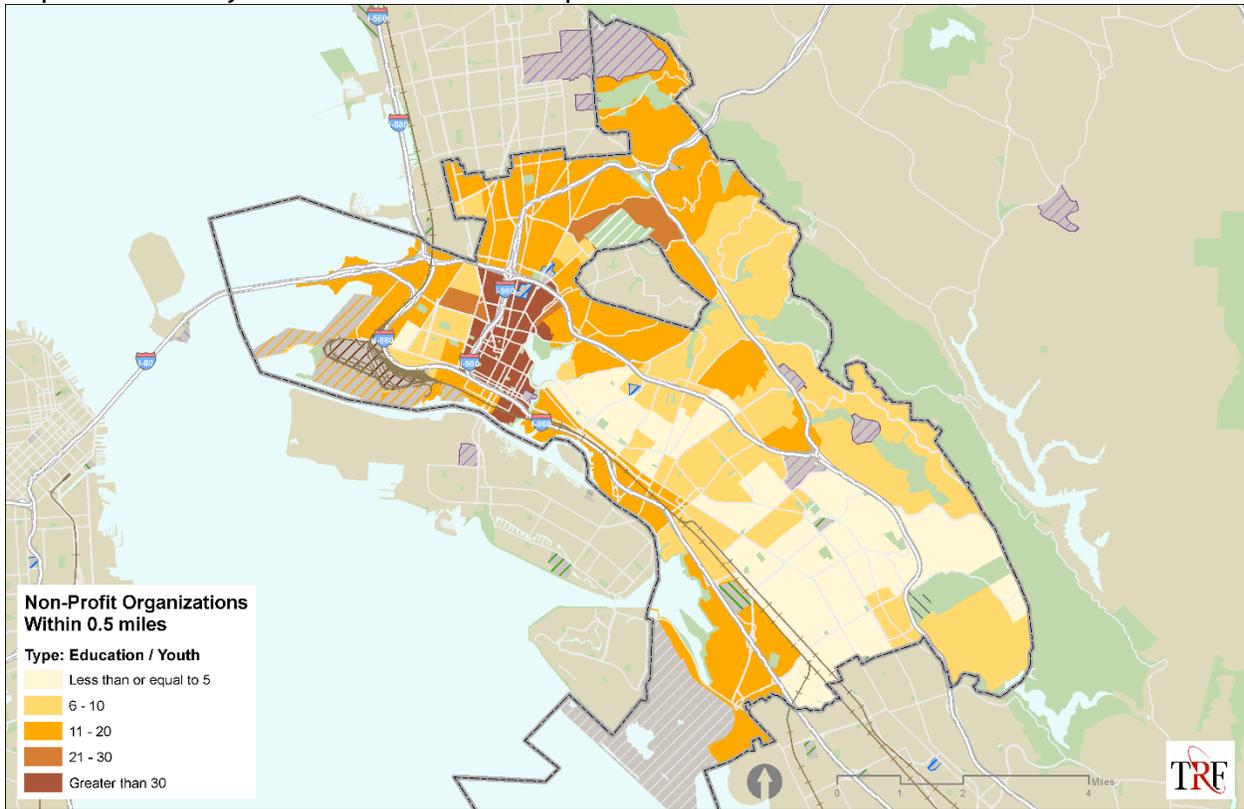
As illustrated above, parks and recreation facilities are generally accessible through the City. However, when assessing the location of libraries and health clinics there are a reduced number of services in West Oakland and East Oakland, especially in or adjacent to the RCAP/ECAP Census Tracts in East Oakland.

Map 23: Proximity to Arts/Recreation Nonprofits



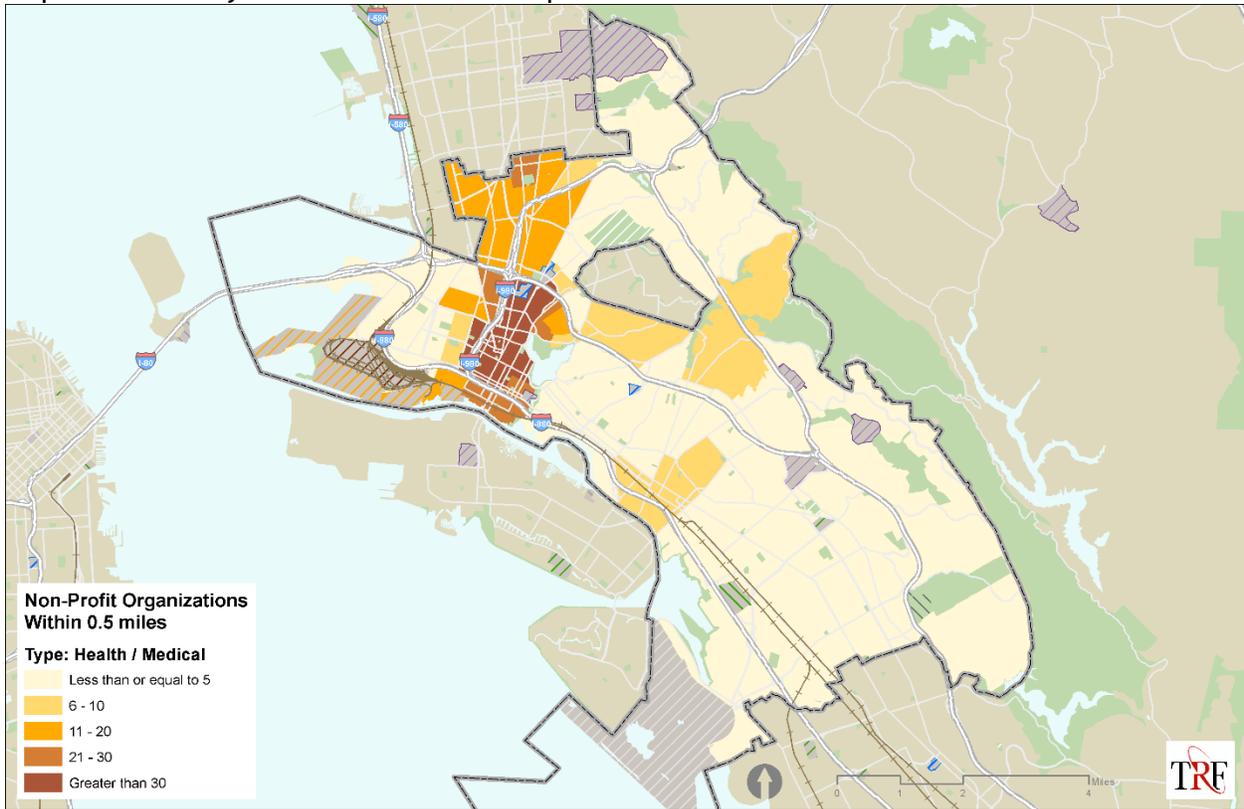
There are very few Arts and Recreation organizations in East Oakland. The majority are concentrated in Downtown and North Oakland.

Map 24: Proximity to Education/Youth Nonprofits



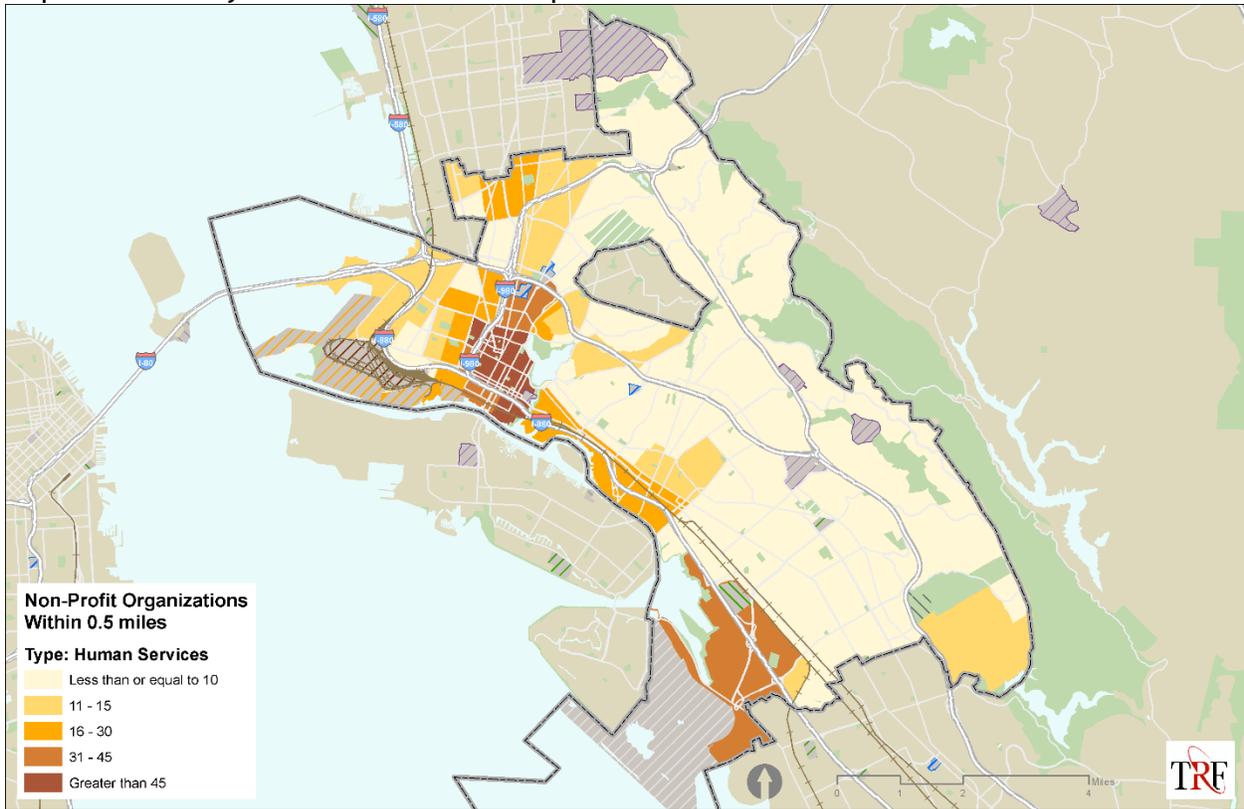
In general, there is a high number of Education/Youth organizations throughout the City. The majority are concentrated in downtown with some in North Oakland, West Oakland and along the International Blvd Corridor in East Oakland. There still appears to be a lower share of organizations operating in East Oakland than the rest of the City.

Map 25: Proximity to Health/Medical Nonprofits



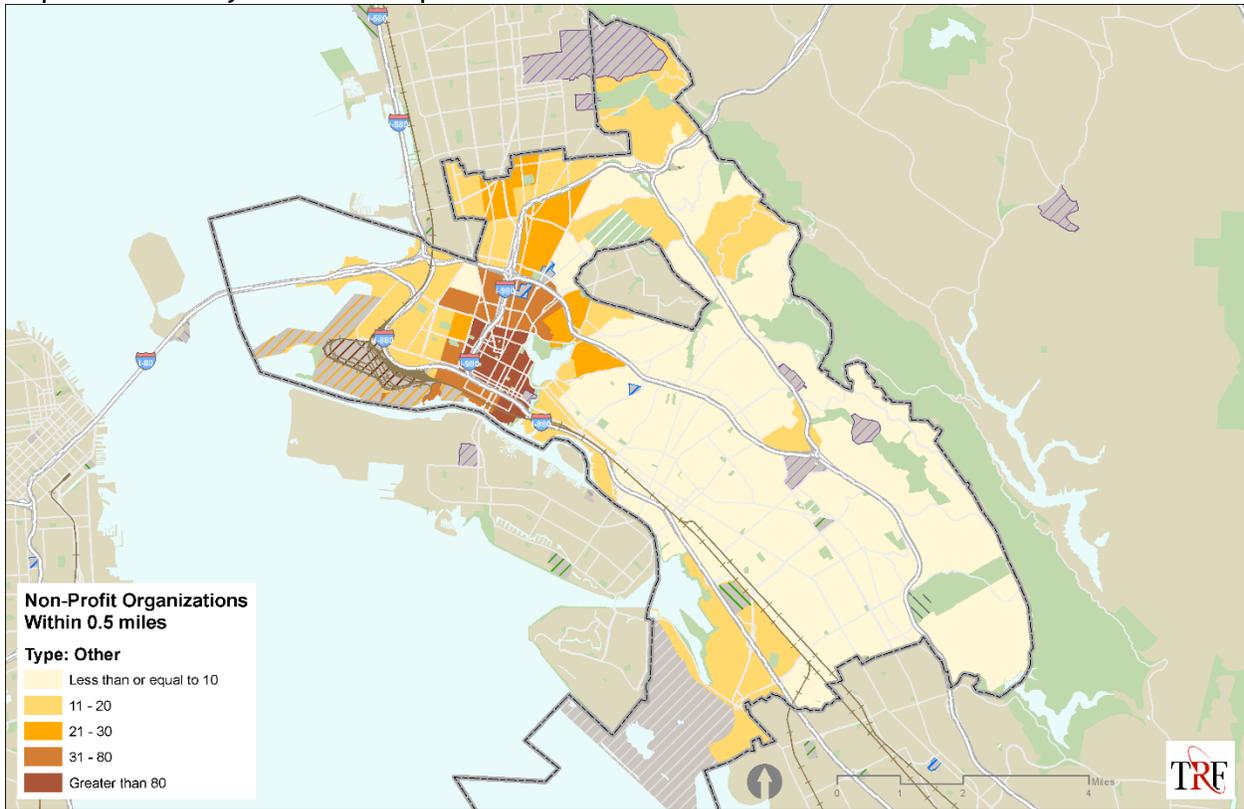
While it appears that Health/Medical nonprofits are concentrated in downtown and parts of North Oakland (likely associated with the Medical campuses in North Oakland), many of these entities provide services throughout the City and likely have a broader catchment area than indicated on the map.

Map 26: Proximity to Human Services Nonprofits



Similar to Medical/Health, the majority of Human Services Nonprofits are concentrated in the Downtown area, but likely have a larger catchment area. There are a much lower share of nonprofits in East Oakland and, to a lesser extent, West Oakland.

Map 27: Proximity to Other Nonprofits



Other Nonprofits include nonprofits that are focused on community service, civil rights, public safety, religion, environment and science. These organizations are predominately concentrated in Downtown, with some spillover in North Oakland and West Oakland. There are very few organizations located in East Oakland.

## Education

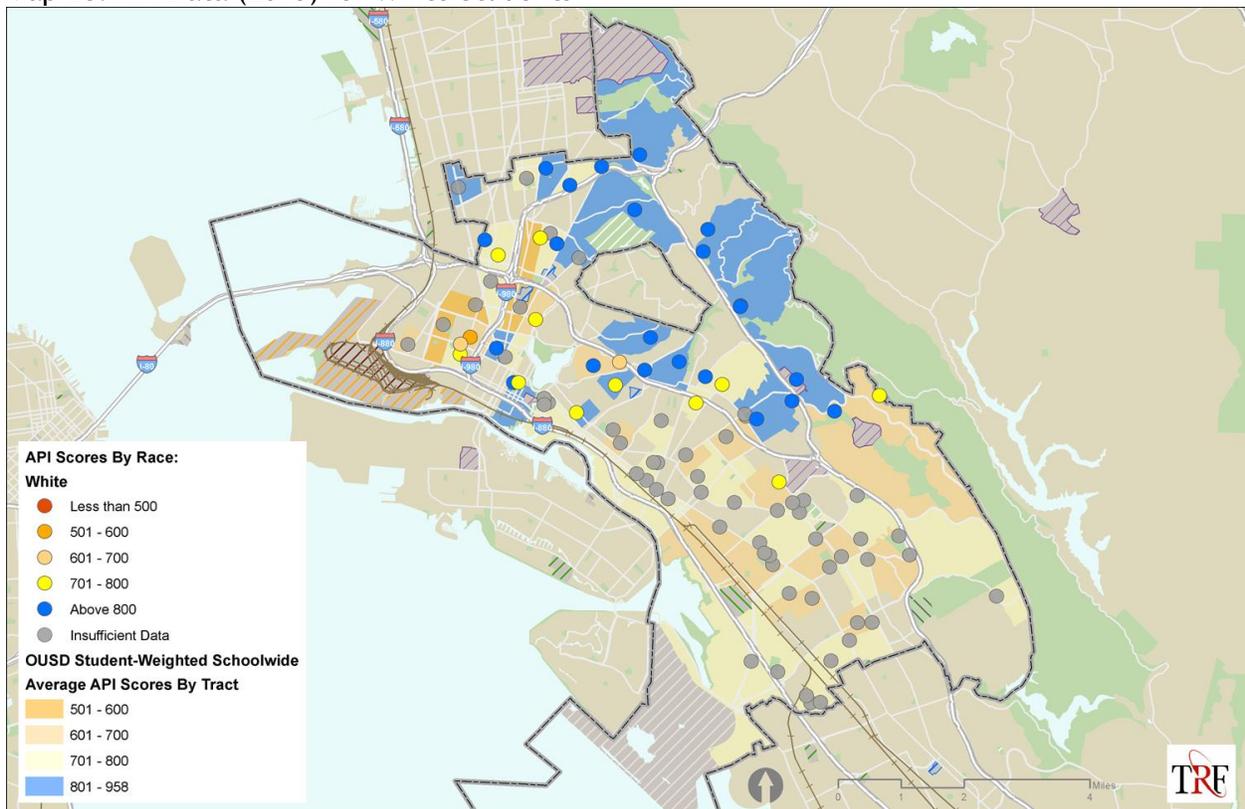
The following maps indicate the State Education Academic Performance Indexes by data by both Census Tract (overall Average) and average scores by Race/Ethnicity by School.

The highest performing students are located in the Oakland Hills and in parts of North Oakland, both by average score by Census Tract as well as scores by school.

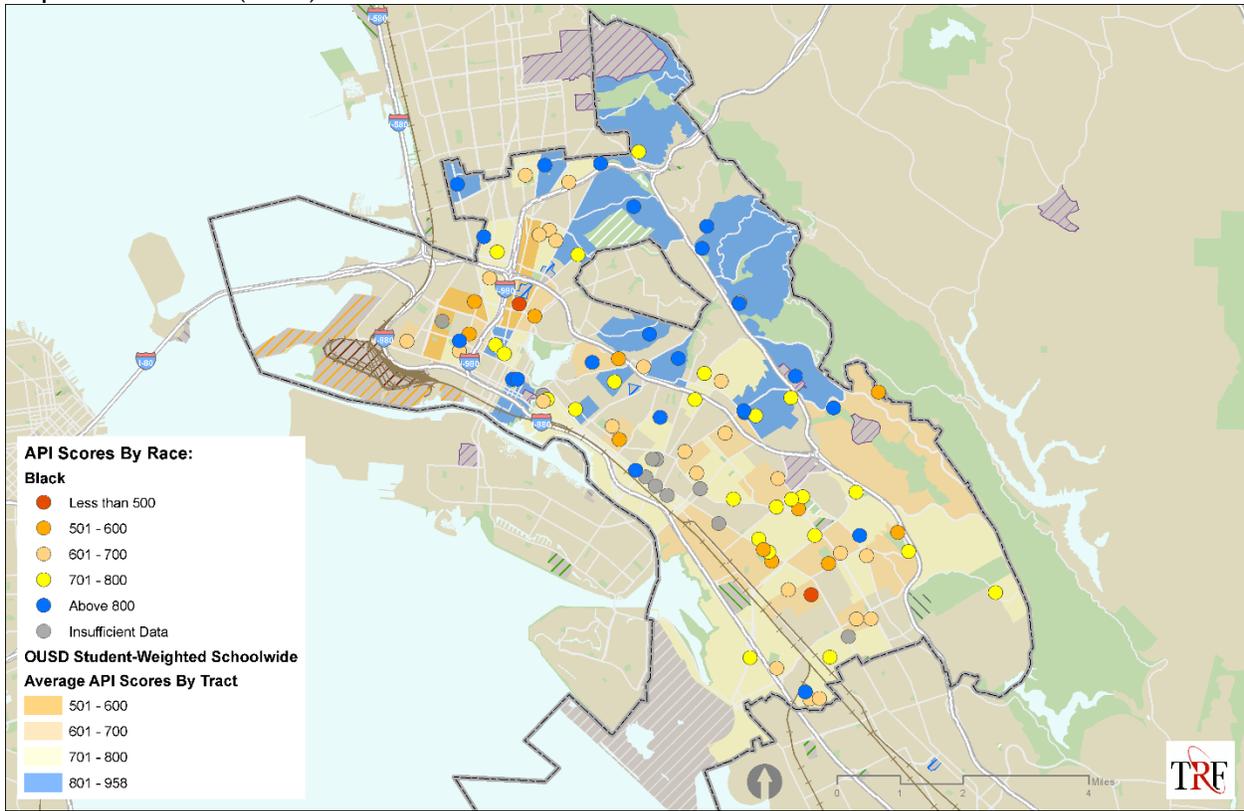
The majority of schools that have sufficient data to report on for White and Asian students indicate an above 800 (well above average) or score between 700-800 (above average).

However, for African-American and Hispanic students, schools in East Oakland and West Oakland report scores being below 600 for a much greater share when compared to the White and Asian student populations.

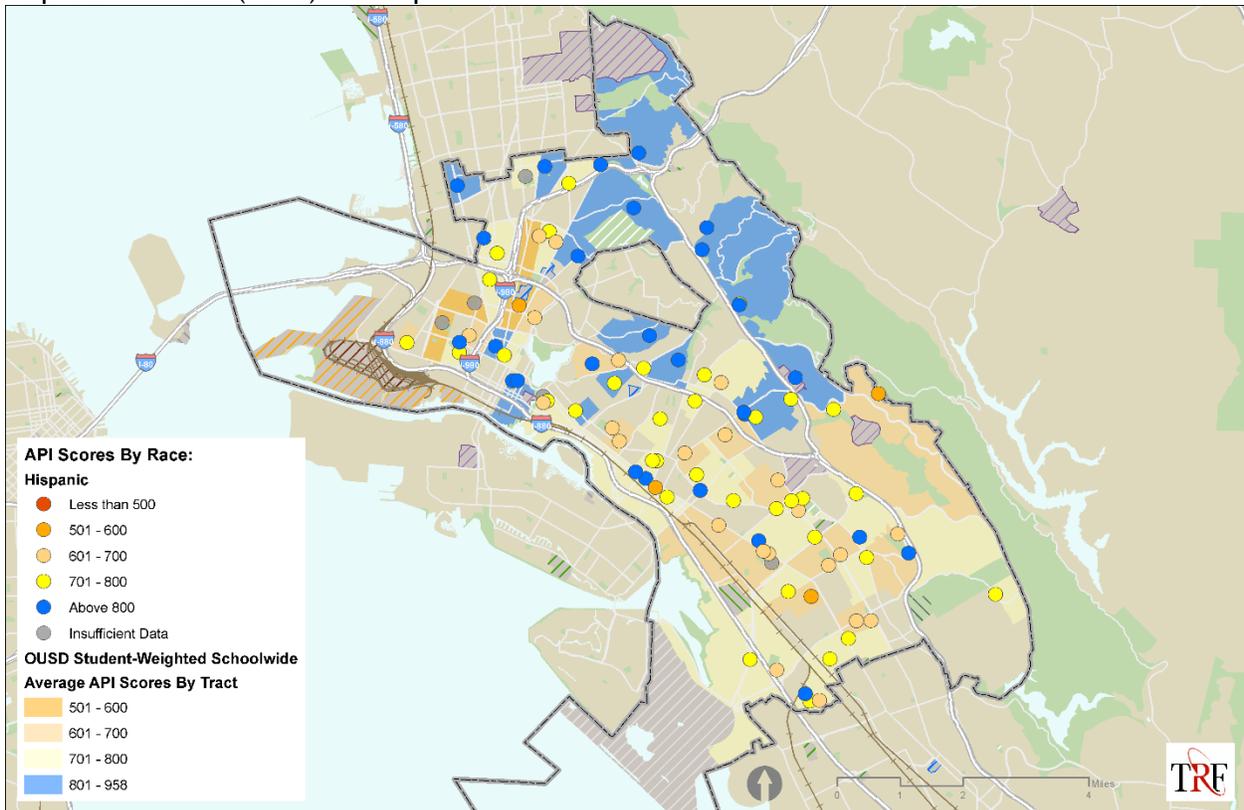
Map 28: API Data (2013) for White Students



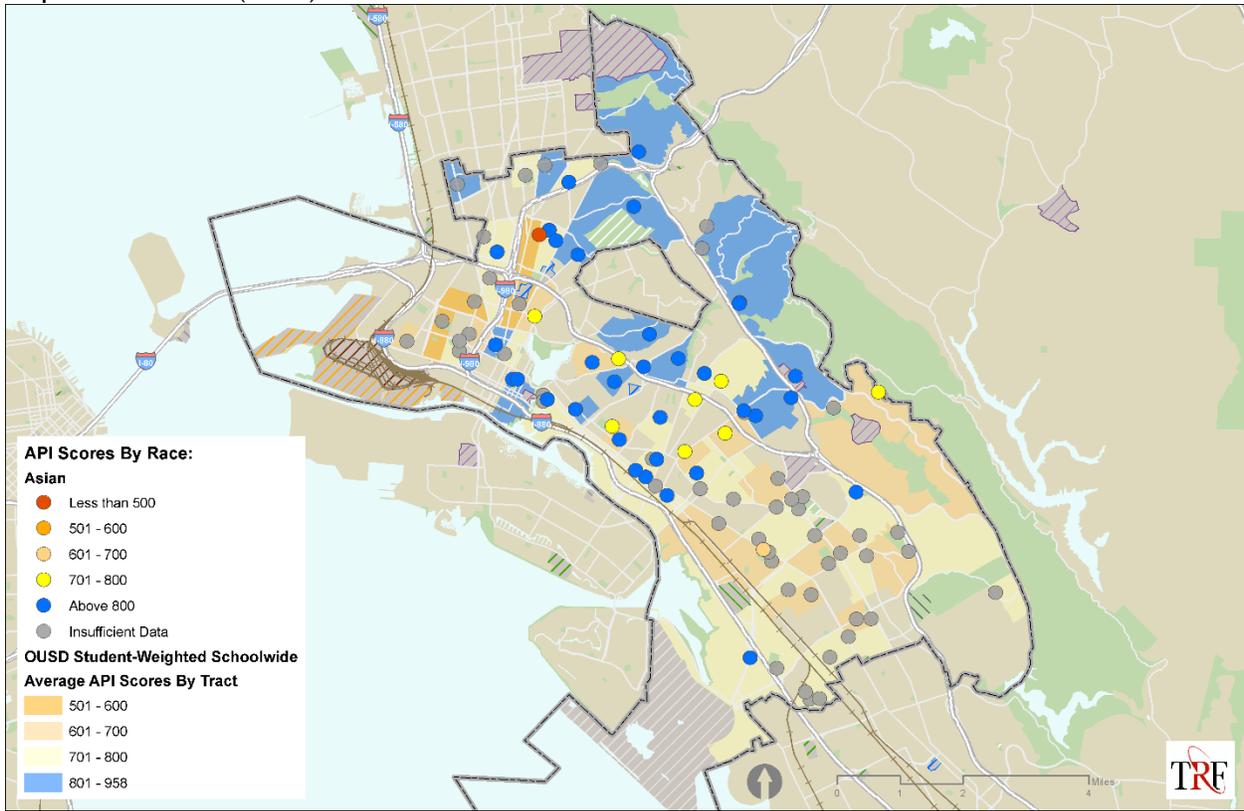
Map 29: API Data (2013) for African-American Students



Map 30: API Data (2013) for Hispanic Students



Map 31: API Data (2013) for Asian Students



## IV. Fair Housing Organization Profile

There are numerous federal laws that cover fair housing including the following: Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, and the Architectural Barriers Act of 1968. All of these federal actions are part of every City's responsibility when conducting business. HUD does require through its community development regulations that all entitlement jurisdiction affirmatively further fair housing.

It is expected that the jurisdiction will provide a minimum of three services:

1. **Enforcement** - Fair housing complaint intake and referral system.
2. **Outreach** - Programs to promote the services of the organization as well as materials related to fair housing for distribution throughout the City.
3. **Education** - Programs that educate the housing delivery system to fair housing laws, regulations and litigation so that they may be better informed as to their responsibilities under the law and also to educate consumer on their rights regarding fair housing.

It is the decision of the jurisdiction on how this is best done but, at the minimum, a basic fair housing program is needed.

The City of Oakland offers a comprehensive Fair Housing Program through its agreement with Eden Council for Hope and Opportunity (ECHO). ECHO provides intake, investigation (including testing) and counseling regarding housing discrimination complaints. The agency provides this service for a variety of communities in Alameda County as well as for the City of Oakland. ECHO has a long history of advocating for equal housing rights since its establishment in 1964. ECHO is complaint driven in its enforcement activities, working with a number of organizations to assure a cooperative and collaborative program for the City.

ECHO also provides counseling regarding tenant/landlord issues but not for the City of Oakland. This service is provided by a number of other organizations that service the City such as Bay Area Legal Aid and Housing and Economic Rights Advocates. While this activity is not specifically related to fair housing and often not recognized as a true fair housing activity, it has become an important step for advocates as they provide enforcement services regarding housing discrimination.

Often what seems a simple tenant/landlord issue will become a fair housing complaint upon further investigation. An example would be the tenant who calls to receive counseling regarding an eviction. Upon further questioning of the tenant, it is discovered that the tenant is disabled and the reason for the eviction is that they have a ramp that the landlord has decided they do not like. Consequently, the service that organizations provide regarding tenant/landlord counseling and advocacy is extremely important in the provision of fair housing services to the City. All tenant/landlord inquiries that ECHO receives are referred to other organizations for assistance that operate in the City of Oakland. Similarly,

tenant/landlord organizations in Oakland are instructed to forward potential fair housing complaints or issues to ECHO.

ECHO offers free fair housing education for tenants groups, members of the housing industry, and community-based organizations about federal and state fair housing laws.

A review of ECHO's intake and investigative efforts found that organization provides a high quality of service for residents of the City.

Including ECHO there are three main organizations who offer fair housing services in the City of Oakland, California Department of Fair Employment and Housing (CDFEH - the FHAP agency), Bay Area Legal Aid (FHIP agency since 2012) and Housing and Economic Rights Advocates (HERA -a past FHIP agency). ECHO has a cooperative relationship with Bay Area Legal Aid.

Bay Area Legal Aid has received \$325,000 in FY2013 and FY2014 to continue fair housing enforcement services to address the fair housing needs of low-income Bay Area residents in the protected classes and build capacity among local, state, and regional public and private organizations. Specifically, Bay Area Legal Aid will:

1. Conduct intake and investigate complaints
2. Conciliate complaints of housing discrimination
3. File and/or litigate meritorious complaints for judicial enforcement
4. Conduct complaint and audit-based testing

In addition, Bay Area Legal Aid will submit analyses regarding the performance of local entitlement jurisdictions in meeting their obligations to affirmatively further fair housing under applicable laws and regulations. The organization's education and outreach activities will include fair housing education presentations, fair housing enforcement trainings for staff of local Bay Area government and community-based organizations, and regional trainings on fair housing law and litigation.

The tables below break down data provided by ECHO, HUD and CDFEH. The maps present a geographic illustration of Housing Complaints.

Table 4 breaks out fair housing complaints received and investigated by ECHO for the time period from 2011 through 2014. The vast majority of complaints were from non-Hispanic households, more than 87%. Of complaints by protected class, Disability was the largest at more than 39%. This aligns with national trend data as complaints based on disability rank number one of all protective classes nationally. Familial status (10%) and Race (8%) follow as the next highest of specific protected classes. This also follows national trends.

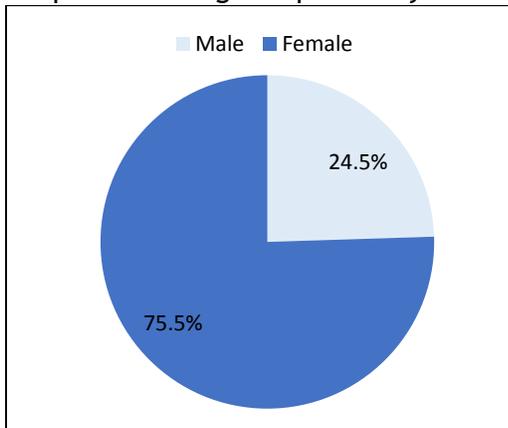
A significant number of those filing complaints are female, 75.5% compared to males 24.5%. Of those that do file complaints 65% or 212 earn less than 30% of area median income. That is significant in that the majority of households experiencing alleged discrimination are women and significantly poor.

Of Hispanics who filed complaints 65% were earning less than 30% of median income. This was also the case for non-Hispanics with 65% earning less than 30% of median income. In every protected class category, those earning less than 30% of median income were the largest

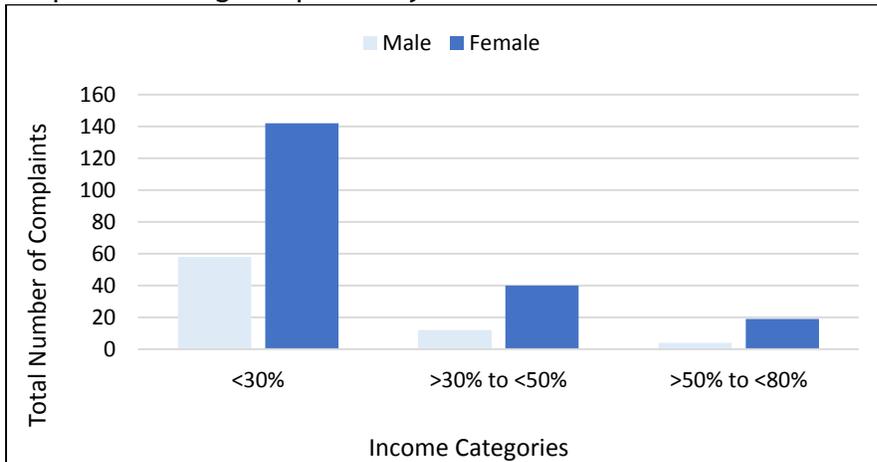
populations. For Disabilities it was more than 55%, for Race it was 70% and for Familial Status it was more than 72%.

It is also important to note that data provided by ECHO shows that the vast majority of complaints filed based on Familial Status were female headed households. With more than 75% of all complaints filed from women and 66% of those earning less than 30% of median income this segment of the population appears to be one of the most vulnerable.

Graph 6: Housing Complaints by Gender



Graph 7: Housing Complaints by Gender and Income



The locations of the complaints are included in Map 32. The majority of housing complaints from July 2014 - May 2015 are located in the flatlands of Oakland and are either in or adjacent to RCAP/ECAP areas. Maps 33 and 34 show areas of high concentrations of African American and Latino residents with the number of housing complaints. Areas with more complaints tend to be in areas of higher minority concentration.

Table 5 shows complaints received from HUD and the FHAP agency (CDFEH.) The purpose of the Fair Housing Assistance Program (FHAP) is to provide assistance to State and local fair housing enforcement agencies. The intent of this funding program is to build a coordinated intergovernmental enforcement effort to further fair housing and to encourage the agencies to assume a greater share of the responsibility for the administration and enforcement of their fair housing laws and ordinances.

During the five year period between 2010 and 2014 HUD received 25 complaints of which Disability made up 40% followed by National Origin (32%) and Race (16%). The FHAP agency received 91 complaints with Disability accounting for more than 50% of the complaints, Race (13%) and National Origin (10.9%) followed as the next highest complaints.

These trends align with the data collected by ECHO.

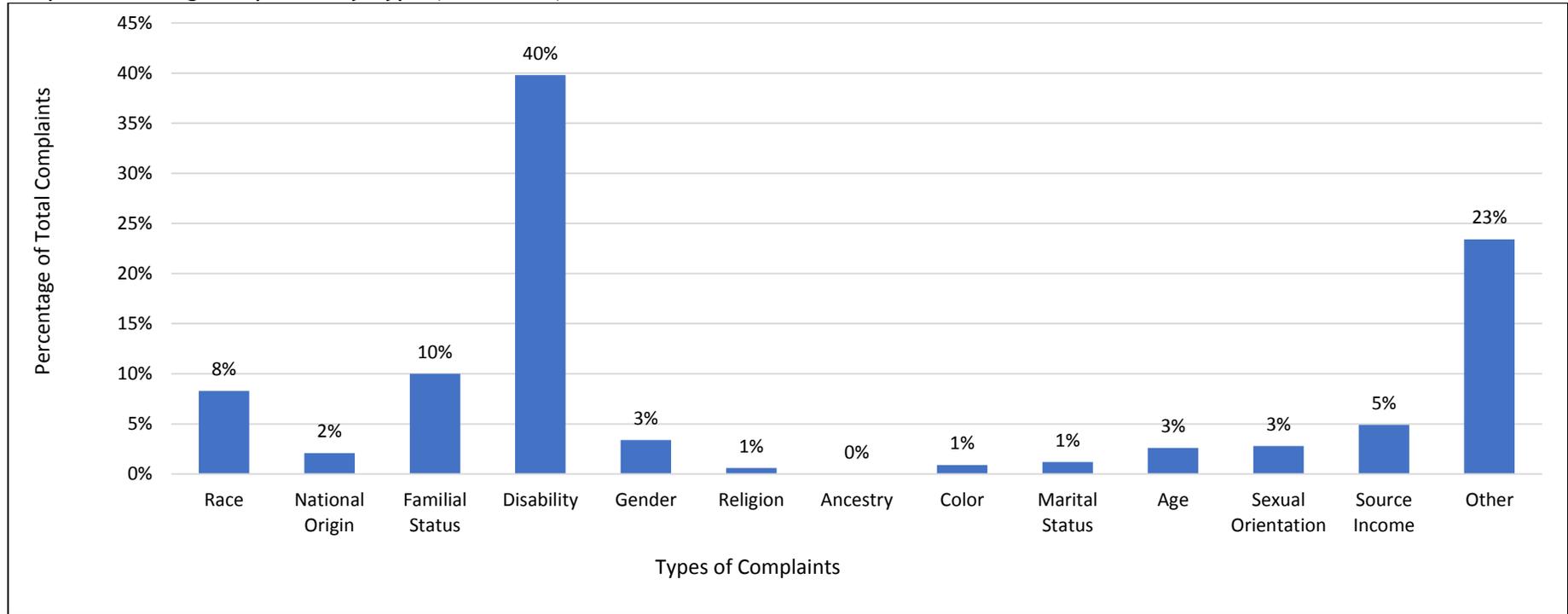
Table 6 shows action taken on complaints received from HUD and the FHAP agency. Of the Disability cases received by the two agencies a large number were found to be “no cause” - seven for HUD and 25 for the CDFEH. Of those, Disability complaints CDFEH settled 11 while HUD settled two. One potential cause for further analysis is that almost half of the Disability complaints filed (51) were found to be “no cause.” In reviewing this trend in the aggregate, it presents a potential need for further analysis and careful investigation of future disability cases given the large share of disability cases.

Both HUD and the CDFEH recovered over \$27,885,000 in damages awarded. The largest settlement was for \$27,550,000 for refusal to sell, discriminatory advertising, statements and notices based on race, color and national origin. The next highest settlement, also from HUD, was for \$175,000 in a race/national origin complaint for refusal to sell and discriminatory financing.

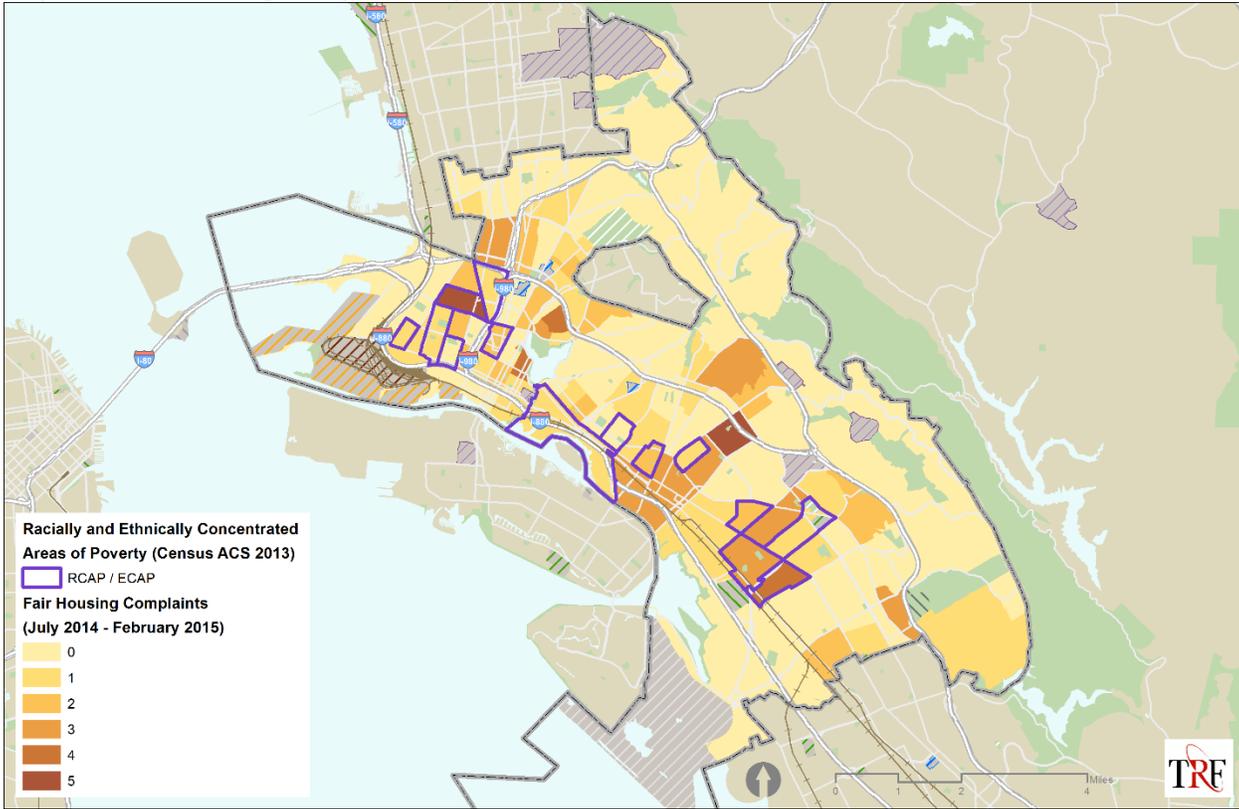
Table 4: City of Oakland Fair Housing Complaints Filed 2011-2014

ECHO Fair Housing Complaints						
Type of Complaint	All Complaints		Income			
	Number	Percent	<30%	>30% to <50%	>50% to <80%	DTS
Hispanic	37	12%	24	1	1	2
Non-Hispanic	265	88%	172	53	17	23
Race	27	8%	19	5	2	1
National Origin	7	2%	4	3	0	0
Familial Status	33	10%	24	2	2	5
Disability	129	40%	72	21	14	14
Gender	11	3%	9	2	0	0
Religion	2	1%	2	0	0	0
Ancestry	0	0	0	0	0	0
Color	3	1%	2	1	0	0
Marital Status	4	1%	3	1	0	0
Age	9	3%	5	2	2	0
Sexual Orientation	7	3%	5	1	0	1
Source Income	16	5%	12	4	0	1
Other	76	23%	55	13	6	2
<b>Total</b>	<b>324</b>	<b>100%</b>	<b>212</b>	<b>55</b>	<b>26</b>	<b>24</b>
Male	74	25%	58	12	4	0
Female	228	76%	142	40	19	27
<b>Total</b>	<b>302</b>	<b>100%</b>	<b>200</b>	<b>52</b>	<b>23</b>	<b>27</b>

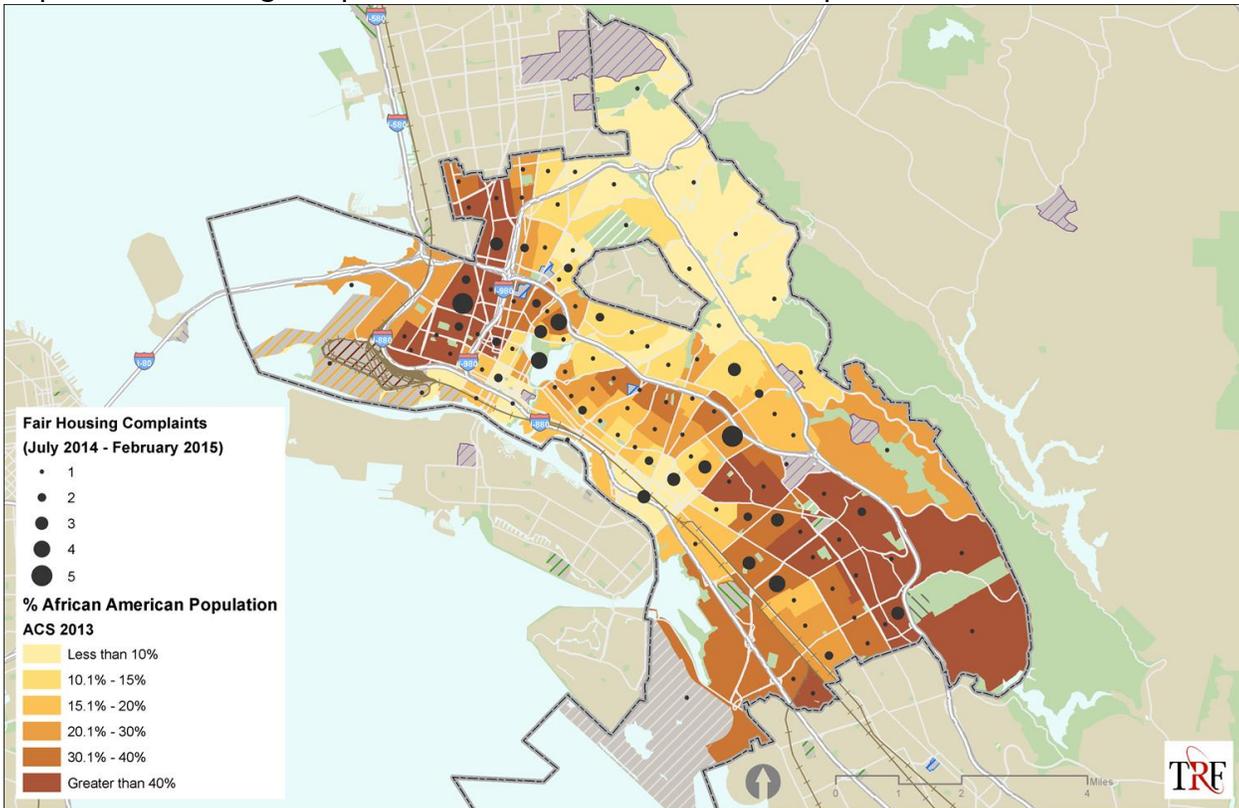
Graph 8: Housing Complaints by Type (2011-2014)



Map 32: Fair Housing Complaints by Tract (July 2014 - February 2015)



Map 33: Fair Housing Complaints and % of African-American Population



Map 34: Fair Housing Complaints and % of Hispanic Population

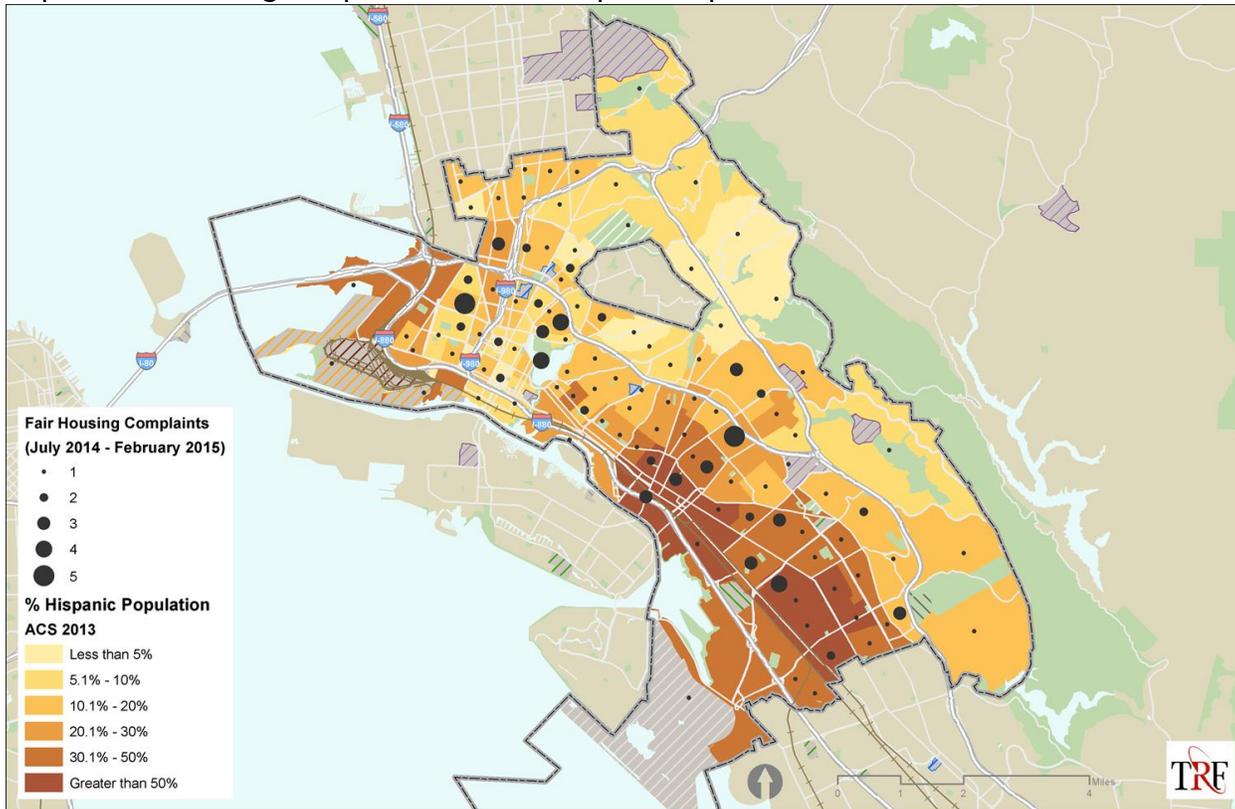


Table 5: HUD/FHAP Agency Fair Housing Complaints (2010-2014)

Type of Complaint	HUD All Complaints		FHAP All Complaints	
	Number	Percent	Number	Percent
Race	4	16%	12	13%
National Origin	8	32%	10	11%
Familial Status	0	0	6	7%
Disability	10	40%	51	56 %
Gender	1	4%	9	10%
Religion	0	0	3	3%
Ancestry	0	0	0	0
Color	2	8%	0	0
Marital Status	0	0	0	0
Age	0	0	0	0
Sexual Orientation	0	0	0	0
Source Income	0	0	0	0
Total	25	100%	91	100%

NOTE:

HUD = Department Of Housing and Urban Development - Fair Housing and Equal Opportunity.

FHAP = Fair Housing Assistance Program - California Department of Fair Employment & Housing

Table 6: City of Oakland - Action/Results On Fair Housing Complaints HUD - FHA (2010-2014)

Type of Complaint	Action/Results													
	No Cause		Settled - Conciliated		Failed to Cooperate		Withdrawn w/ Resolution		Judicial Consent Order		Missing Complaint		Unknown Respondent	
	HUD	FHAP	HUD	FHAP	HUD	FHAP	HUD	FHAP	HUD	FHAP	HUD	FHAP	HUD	FHAP
Race	1	7	2			2	1	3						
National Origin	3	4	2	2									1	
Familial Status		1		3		2		1						
Disability	7	25	2	11	3	1		4		2		1		
Gender		5			1	1		1						
Religion		1						1						
Ancestry														
Color			1											
Marital Status														
Age														
Sexual Orientation														
Source Income														
Other														

## Summary

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Overall, the fair housing programs in the City of Oakland are very effective. ECHO does a good job considering their size and area covered in responding to a wide variety of complaints. ECHO offers an effective program to the residents of the City. HUD and CDFEH provide an alternative resource for residents and for ECHO to file complaints. Complementing these agencies, are a large number of tenant/landlord and other advocacy organizations that provide an exceptional range of services to residents throughout the City of Oakland.

One potential cause for concern, given the large number of fair housing organizations in the City of Oakland, is the need for careful coordination among the providers to both realize service delivery efficiencies as well as ensure that certain geographies or populations are adequately served. Further, it would benefit from these organizations to coordinate and align data collection methodologies and results. This would better ensure data consistency among organizations and ensure that needs are being addressed. Further, closer collaboration would better assist clients as services are transferred from one agency to another.

# V. Oakland Fair Housing Capacity and Public Policies

## City Fair Housing Capacity and Public Policies

The City of Oakland has supported fair housing organizations and activities through a number of different ways in the past five years - ranging from the allocation of HUD funding to addressing fair housing issues to revising zoning ordinances and city policies to affirmatively further fair housing.

### *Funding Fair Housing Organizations*

In the 2010 - 2014 Consolidated Plan period, the City of Oakland actively funded a range of fair housing organizations and activities. Total funding from 2010 - 2013 was nearly \$1.5 million. This funding was used for a range of fair housing related activities including housing discrimination testing, housing counseling, information/referral services, legal representation, tenant/landlord mediation, counseling and other services. Funding was allocated to five different agencies over this period.

A summary of funding is provided in the table below.

Table 7: Fair Housing Funding - 2010 -2013

Year	Allocation	Activities
FY2010	\$358,000 (ECHO Housing, East Bay Community Law Center, Causa Justa :: Just Cause, and Centro Legal de la Raza)	<ul style="list-style-type: none"> <li>• Housing discrimination case management</li> <li>• Fair housing outreach and training</li> <li>• Limited English proficiency legal representation</li> <li>• Housing service counseling</li> <li>• Tenant/Landlord resolution services, counseling, and mediation</li> <li>• Information/referral for residents with disabilities</li> <li>• Information and referral on housing related issues</li> <li>• Legal representation of selected clients</li> </ul>
FY2011	\$297,140 (ECHO Housing, East Bay Community Law Center, Center for Independent Living, Causa Justa :: Just Cause, and Centro Legal de la Raza)	<ul style="list-style-type: none"> <li>• Housing discrimination case management</li> <li>• Fair housing outreach and training</li> <li>• Limited English proficiency legal representation</li> <li>• Housing service counseling</li> <li>• Tenant/Landlord resolution services, counseling, and mediation</li> <li>• Information/referral for residents with disabilities</li> <li>• Information and referral on housing related issues</li> <li>• Legal representation of selected clients</li> </ul>
FY2012	\$297,140 (ECHO Housing, East Bay Community Law Center, Center for Independent Living, Causa	<ul style="list-style-type: none"> <li>• Housing discrimination case management</li> <li>• Fair housing outreach and training</li> <li>• Limited English proficiency legal representation</li> <li>• Housing service counseling</li> </ul>

	Justa :: Just Cause, and Centro Legal de la Raza)	<ul style="list-style-type: none"> <li>• Tenant/Landlord resolution services, counseling, and mediation</li> <li>• Information/referral for residents with disabilities</li> <li>• Information and referral on housing related issues</li> <li>• Legal representation of selected clients</li> </ul>
FY2013	\$541,866 (ECHO Housing, East Bay Community Law Center, Causa Justa :: Just Cause, and Centro Legal de la Raza)	<ul style="list-style-type: none"> <li>• Housing discrimination case management</li> <li>• Fair Housing testing</li> <li>• Fair housing outreach and training</li> <li>• Limited English proficiency legal representation</li> <li>• Housing service counseling</li> <li>• Tenant/Landlord resolution services, counseling, and mediation</li> <li>• Legal representation of selected clients</li> </ul>
TOTAL	\$1,494,146	<ul style="list-style-type: none"> <li>• Housing discrimination case management</li> <li>• Fair housing outreach and training</li> <li>• Limited English proficiency legal representation</li> <li>• Housing service counseling</li> <li>• Tenant/Landlord resolution services, counseling, and mediation</li> <li>• Information/referral for residents with disabilities</li> <li>• Information and referral on housing related issues</li> <li>• Legal representation of selected clients</li> </ul>

In addition to directly funding fair housing activities and related counseling and services, the City of Oakland also affirmatively furthers fair housing with projects and activities through other Housing and Community Development efforts.

1. Give priority in annual HOME NOFA to projects that encourage the siting of affordable housing in areas without concentrations of poverty and in proximity to community assets
2. Encourage community outreach and engagement regarding the need for affordable housing
3. Carefully monitor existing affordable housing developments to ensure they are well maintained
4. Fund the Housing Assistance Center to serve as a single point of contact for housing services and referrals
5. Leverage non-HUD funds to support anti-poverty programs and services
6. Improve transportation options to major job centers
7. Development of new and rehabilitation of existing community assets and infrastructure

Through these efforts, the City of Oakland is targeting opportunities to affirmatively further fair housing by improving community conditions as well as target and promote the development and provision of affordable housing.

Given the high demand for affordable housing throughout the city, these efforts have helped to at least partially mitigate the gentrification pressures in Oakland.

## Oakland Housing Authority Fair Housing Capacity and Policies

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The Oakland Housing Authority has a series of policies and processes in place for both public housing developments as well as in its Section 8 program to affirmatively further fair housing and civil rights through all of its programs.

OHA's fair housing policies and processes are documented in the Admissions and Continued Occupancy Policy (updated 2015) and comply with fair housing and civil rights regulations. Through its FSS, FUP and Section 8 programs, OHA has policies and processes in place to affirmatively further fair housing.

### *Discrimination Complaints*

As part of OHA's orientation process, it ensures that all residents are fully aware of all applicable civil rights laws. It provides information to all applicant families about civil rights requirements.

If a resident believes they have suffered any form of discrimination, OHA will provide the resident with all necessary paperwork, offer to assist the resident in completing the form and refer the resident to both HUD FHEO and California Department of Fair Employment and Housing.

### *Reasonable Accommodations*

OHA actively encourages any resident to make a request for an exception, change or adjustment to a rule, policy, practice or service because of a disability. OHA will treat any such request as a request for a reasonable accommodation. OHA will provide forms and/or guidance to the requestor on the information necessary to make the request.

OHA will review and assess requests for reasonable accommodations on a case-by-case basis, taking into all available factors.

OHA will approve any request for an accommodation if the following three conditions are met:

1. The request was made by or on behalf of a person with a disability
2. There is a disability-related need for the accommodation
3. The requested accommodation is reasonable, meaning it would not impose an undue financial and administrative burden on OHA or fundamentally alter OHA's operations

### *Limited English Proficiency*

OHA follows HUD's December 19, 2003 guidance designed to assist housing authorities comply with Title VI of the Civil Rights Act of 1964. OHA recognizes that for many applicants and residents, English is not their primary language and they have a limited ability to read, write, speak or understand English. Language for LEP Persons can be a barrier to accessing important benefits.

OHA's automated phone service provides menu options in English, Cantonese, Spanish, and Vietnamese. The Authority uses "I speak" flash cards to identify the language spoken by walk-in LEP clients. Once identified, OHA uses a telephone interpretation service to assist walk-in clients - enabling OHA to serve clients in over 150 languages.

All vital documents (such as waitlist application and opening notices) are translated from English into Cantonese, Spanish and Vietnamese. Oral translation, where reasonable, will be provided for other LEP clients.

### *Waitlist Process*

OHA’s project-based voucher sites use site-based waiting lists. Each site-based waitlist must establish the selection criteria or preferences for occupancy of particular units, in accordance with all federal, state and local civil rights and fair housing requirements.

OHA audits site-based waiting lists biennially to ensure that waiting list management and tenant selections are adhering to written procedures and policies.

### *Relocation Policies*

If a temporary relocation is necessary because of maintenance or other conditions and an appropriate unit is not immediately available, OHA will provide temporary accommodations. If the condition of the unit cannot be repaired, OHA will transfer the resident to the first available and appropriate unit.

### *Housing Authority Units and Resident Profile*

As of May 2015, OHA currently oversees 1,544 public housing units and 12,269 vouchers (1,795 project-based vouchers and 10,474 tenant-based vouchers).

A brief profile of all public housing residents is provided in the table below.

Table 8: Public Housing Resident Characteristics

Category	Public Housing Resident	Voucher Holder
<b>Total Units</b>	<b>1,544</b>	<b>12,269</b>
White	64	962
African American	993	8,592
Asian	412	2,512
Hispanic	48	533
Non-Hispanic	1,448	11,736
Elderly	708	3,198
# of Disabled Families	336	2,819
Requesting Accessibility Features	1,444	9,914
Average Annual Income	\$14,985	\$18,461

Source: 2015 Consolidated Plan

OHA does not anticipate opening any waitlist in the upcoming year except for potentially one partial waitlist for three bedroom units at Lion’s Creek Crossing. The OHA waitlist (as of December 2014) totaled more than 44,000 households, indicating an incredibly high demand for affordable housing in the City.

## Home Mortgage Disclosure Act (HMDA) Analysis

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Unfettered access to fair housing choice requires impartial and equal access to the mortgage lending market. The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. An analysis of mortgage applications and their outcomes can identify possible discriminatory lending practices and patterns in a community.

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant.

The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also help to identify possible discriminatory lending practices and patterns. The data focus on the number of homeowner mortgage applications received by lenders for home purchases, refinancing, and improvements.

The most recent HMDA data available for the City of Oakland is from 2013. The information includes data for Alameda County as a reference to the City. The information provided is for the primary applicant only; co-applicants were not included in the analysis. In addition, where information was not provided or is categorized as not applicable, no analysis has been conducted due to the lack of information.

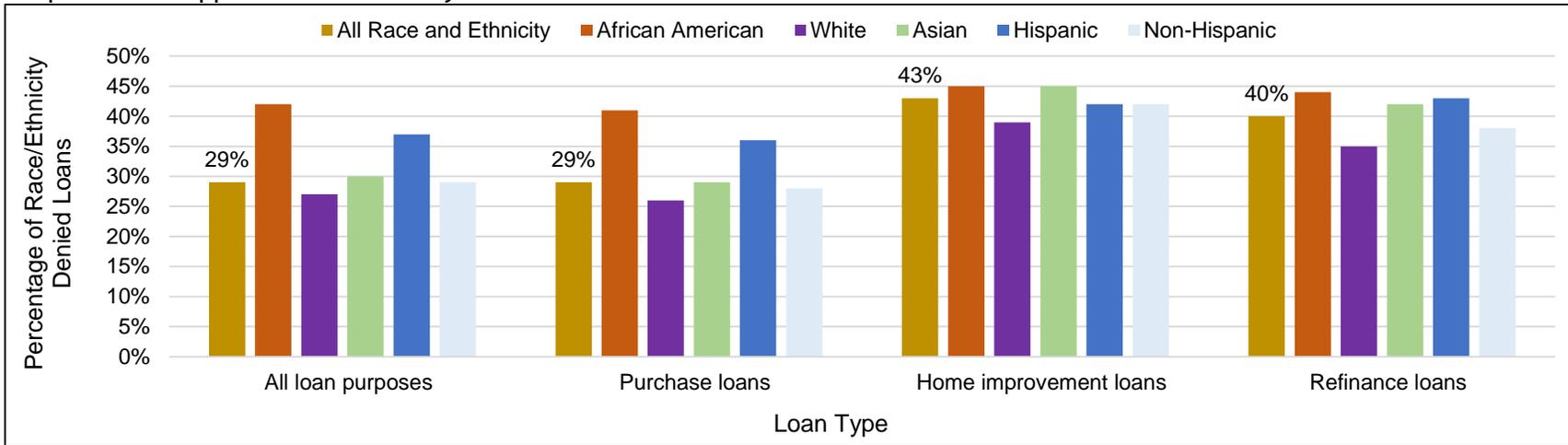
## Mortgage Loan Summary Analysis

The tables and maps below provide data on mortgage loan summary data. The data includes a profile of percent of loan applications denied by race/ethnicity, percent of loan applications denied by income levels (less than \$25,000, \$25,000 - \$50,000, \$50,000 - \$100,000, \$100,000 - \$150,000, and greater than \$150,000) coupled with race/ethnicity, and the share of high cost loans by race/ethnicity. The maps provide a summary of the number/type of mortgage originations by Census Tract as well as mortgage origination amounts by Census Tract.

Table 9: Loan Application Denials by Race

Loan Purpose	Percent of Loan Applications Denied						% Point Difference		
	<i>All Race and Ethnicity</i>	<i>African American</i>	<i>White</i>	<i>Asian</i>	<i>Hispanic</i>	<i>Non-Hispanic</i>	<i>African American / White</i>	<i>Asian / White</i>	<i>Hispanic / Non-Hispanic</i>
<b>All loan purposes</b>									
Oakland	32%	45%	28%	35%	40%	32%	17%	7%	9%
Alameda County	29%	42%	27%	30%	37%	29%	15%	2%	9%
<b>Purchase loans</b>									
Oakland	31%	45%	27%	34%	38%	31%	18%	7%	8%
Alameda County	29%	41%	26%	29%	36%	28%	15%	3%	8%
<b>Home improvement loans</b>									
Oakland	43%	46%	39%	54%	44%	42%	7%	14%	2%
Alameda County	43%	45%	39%	45%	42%	42%	6%	6%	0%
<b>Refinance loans</b>									
Oakland	46%	50%	44%	29%	78%	44%	6%	-16%	44%
Alameda County	40%	44%	35%	42%	43%	38%	9%	7%	5%

Graph 9: Loan Applications Denied by Race



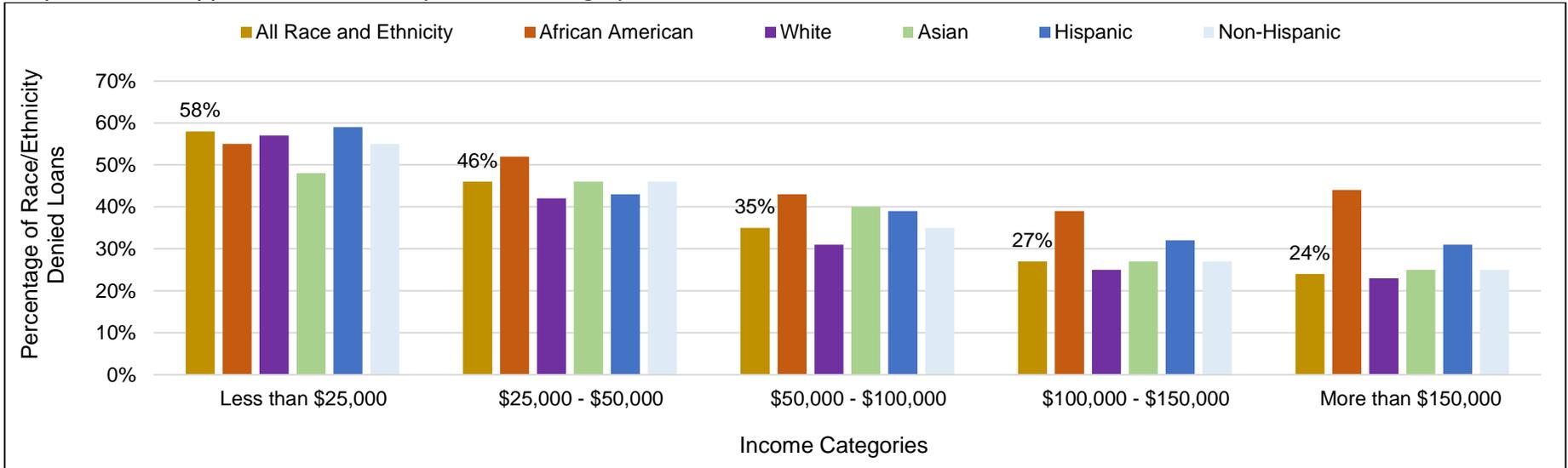
For all loans in Oakland, 45% of African American loans are denied, while 28% of White loans and 35% of Asian loans are denied. This difference between African-American loans and White loans is slightly greater in Oakland than in Alameda County. Similarly, 40% of Hispanic loan applications were denied, compared to 32% for non-Hispanic applications. When examining purchase loans, 45% of African-American loans were denied, while only 27% of White loans and 34% of Asian loans were denied.

This data presents a potential concern and impediment to fair housing given the large discrepancy between White and African American and to a lesser extent between Hispanic and non-Hispanic and Asian and White.

Table 10: Loan Applications Denied by Income Category

	Percent of Loan Applications Denied						Difference		
	<i>All Race and Ethnicity</i>	<i>African American</i>	<i>White</i>	<i>Asian</i>	<i>Hispanic</i>	<i>Non-Hispanic</i>	<i>African American / White</i>	<i>Asian / White</i>	<i>Hispanic / Non-Hispanic</i>
<b>All income Categories</b>	<b>32%</b>	<b>45%</b>	<b>28%</b>	<b>35%</b>	<b>40%</b>	<b>32%</b>	<b>17%</b>	<b>7%</b>	<b>9%</b>
Less than \$25,000	58%	55%	57%	48%	59%	55%	-2%	-9%	4%
\$25,000 - \$50,000	46%	52%	42%	46%	43%	46%	11%	5%	-3%
\$50,000 - \$100,000	35%	43%	31%	40%	39%	35%	12%	9%	4%
\$100,000 - \$150,000	27%	39%	25%	27%	32%	27%	15%	3%	6%
More than \$150,000	24%	44%	23%	25%	31%	25%	21%	2%	6%

Graph 10: Loan Applications Denied by Income Category



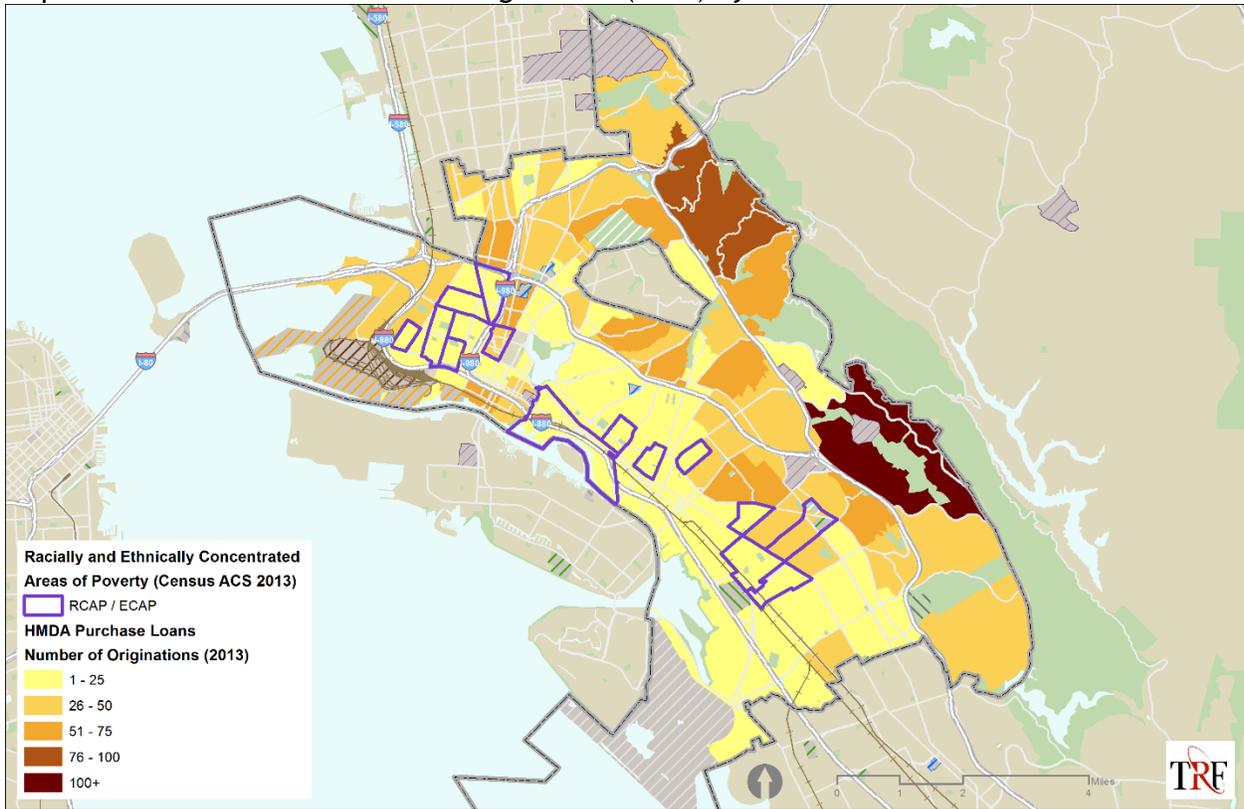
This data table examines loan applications denied when comparing race/ethnicity and income categories. As income levels rise, the discrepancy between White and African-American households as well as Hispanic Non-Hispanic increases. Similar to the table above, this presents a potential concern of an impediment to fair housing access.

Table 11: Share of High Cost Loans

County	Percent of High Cost Loans						Difference		
	<i>All Race and Ethnicity</i>	<i>African American</i>	<i>White</i>	<i>Asian</i>	<i>Hispanic</i>	<i>Non-Hispanic</i>	<i>African American / White</i>	<i>Asian / White</i>	<i>Hispanic / Non-Hispanic</i>
<b>All loan purposes</b>									
Oakland	1%	5%	1%	0%	14%	1%	3%	-1%	13%
Alameda County	1%	4%	1%	0%	3%	1%	3%	-1%	2%
<b>Purchase loans</b>									
Oakland	0%	1%	0%	0%	1%	0%	1%	0%	1%
Alameda County	0%	1%	0%	0%	1%	0%	1%	0%	0%
<b>Home improvement loans</b>									
Oakland	6%	23%	15%	7%	19%	14%	8%	-8%	5%
Alameda County	6%	20%	16%	12%	16%	15%	5%	-3%	0%
<b>Refinance loans</b>									
Oakland	0%	0%	0%	0%	0%	0%	0%	0%	0%
Alameda County	0%	1%	0%	0%	0%	0%	1%	0%	0%

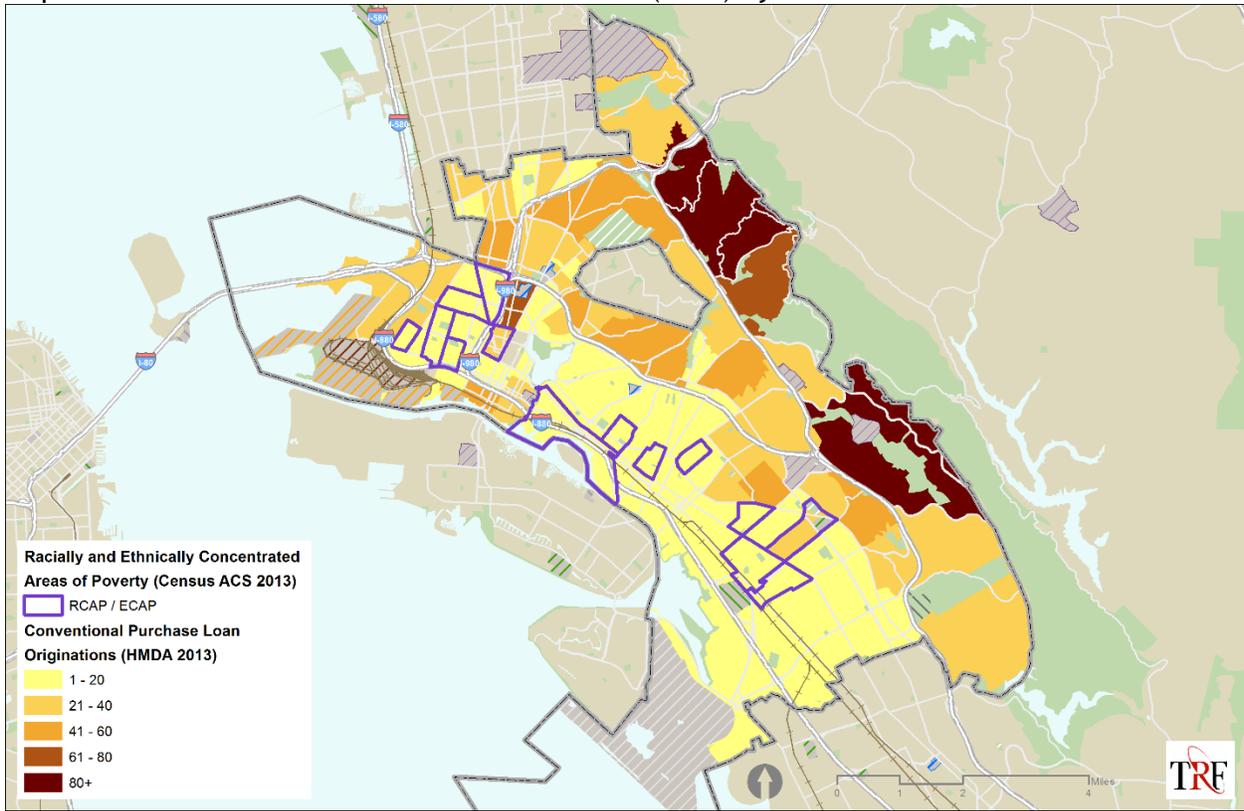
This table examines high cost loans by race and ethnicity. In general, there is a very small share of high price loans in Oakland and Alameda County for purchase and refinance loans. However, there is a higher share of high purchase loans for Home Improvement Loans. When examining this category, there is a higher share of high cost loans targeted to African-American and Hispanic populations than other races/ethnicities.

Map 35: Number of Purchase Loan Originations (2013) by Census Tract



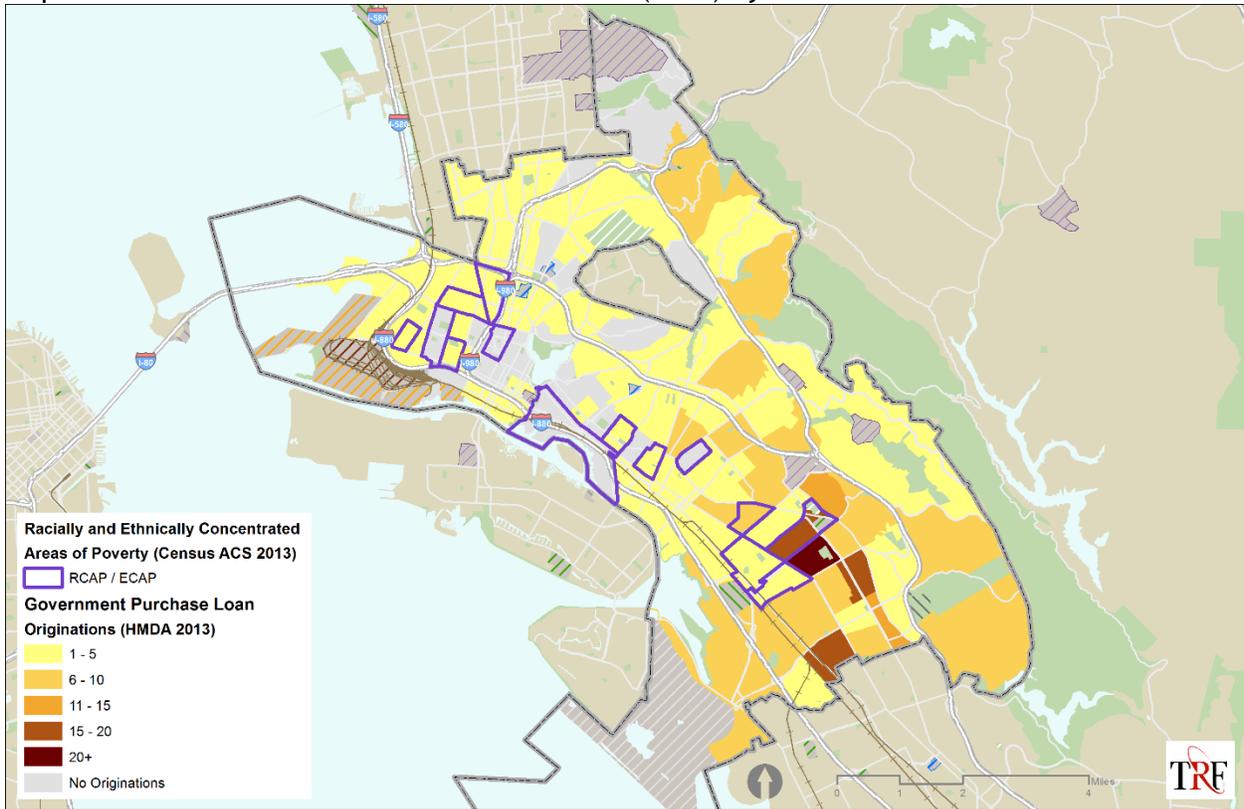
This map examines the concentration of loan originations in 2013 by Census Tract. There is a much higher concentration of originations in the Oakland Hills and, to a lesser extent, North Oakland. Throughout Downtown, East Oakland and West Oakland there is a very small number of originations and low number of originations in all RCAP/ECAP areas. Concentration of Loan Originations in Oakland Hills and to a lesser extent North Oakland

Map 36: Number of Conventional Purchase Loans (2013) by Census Tract



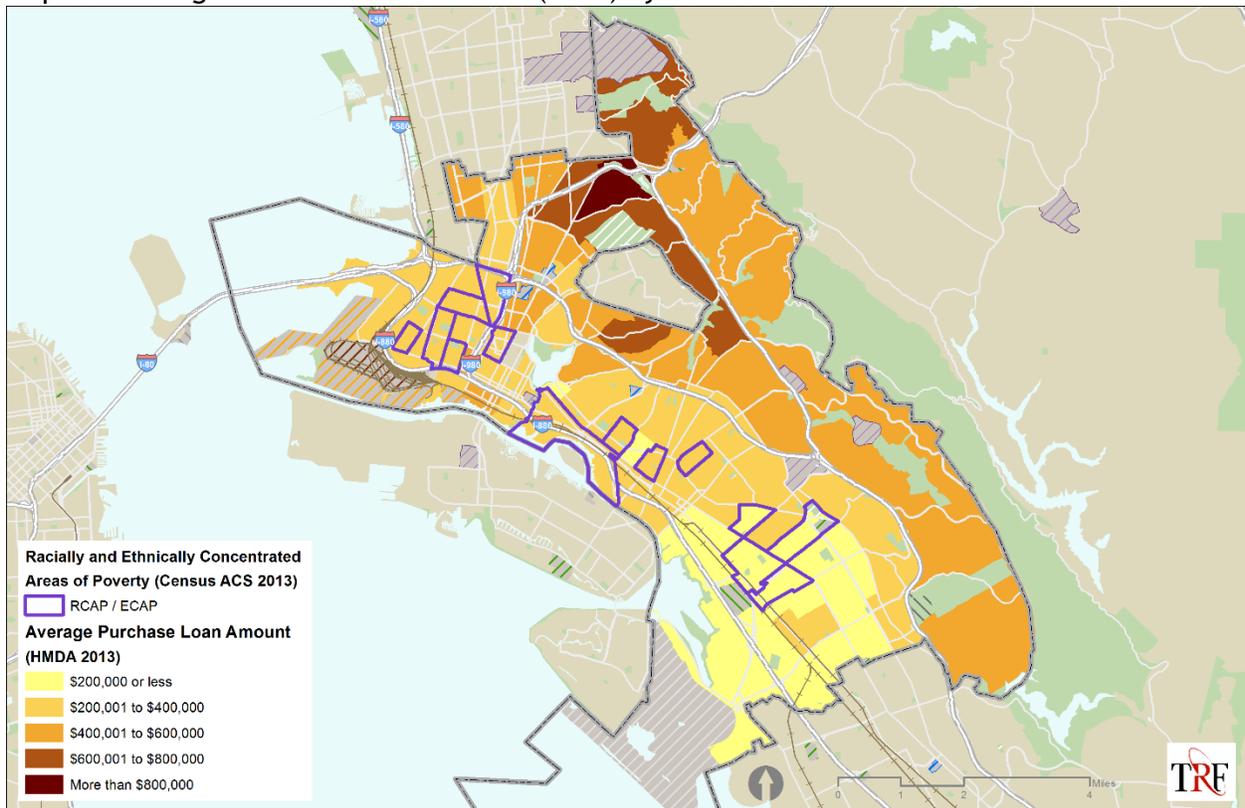
Mirroring the previous map for all purchase loans, the conventional purchase loans indicates that the majority are based in the Oakland Hills and North Oakland. There are very few in East Oakland, Downtown and all of the RCAP/ECAP areas.

Map 37: Number of Government Purchase Loans (2013) by Census Tract



On the contrary to examining conventional loans, the majority of government insured purchase loans are concentrated in East Oakland, including in two RCAP/ECAP Census Tracts. However, there are still a very low number of government insured loans throughout the City.

Map 38: Average Purchase Loan Amount (2013) by Census Tract



The above map depicts the average purchase loan amount. This map further illustrates the discrepancy in wealth and income between the Oakland Hills and North Oakland compared to East Oakland and West Oakland, which have much lower average loan amounts.

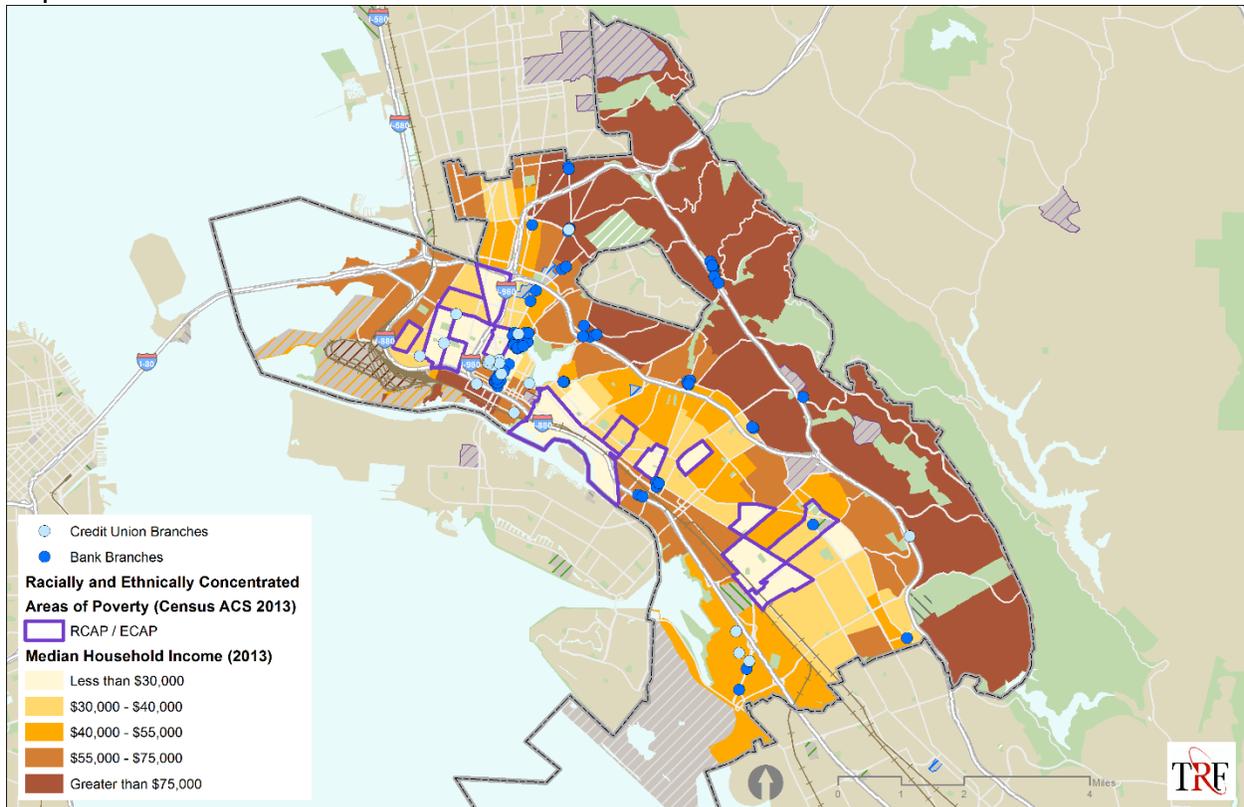
### Key Points

- There is a clear discrepancy between White/Non White populations in access to mortgage lending/denial rates.
- Data trends show increasing discrimination with medium- and upper-income levels when comparing different races/ethnicities.
- The HMDA and Mortgage data relatively aligns with Alameda County as a whole.
- When comparing this data to the 2008 MSA data (used for 2011 Analysis of Impediments), the 2013 data shows increased variation among race/ethnicity.

## Bank Branch Locations

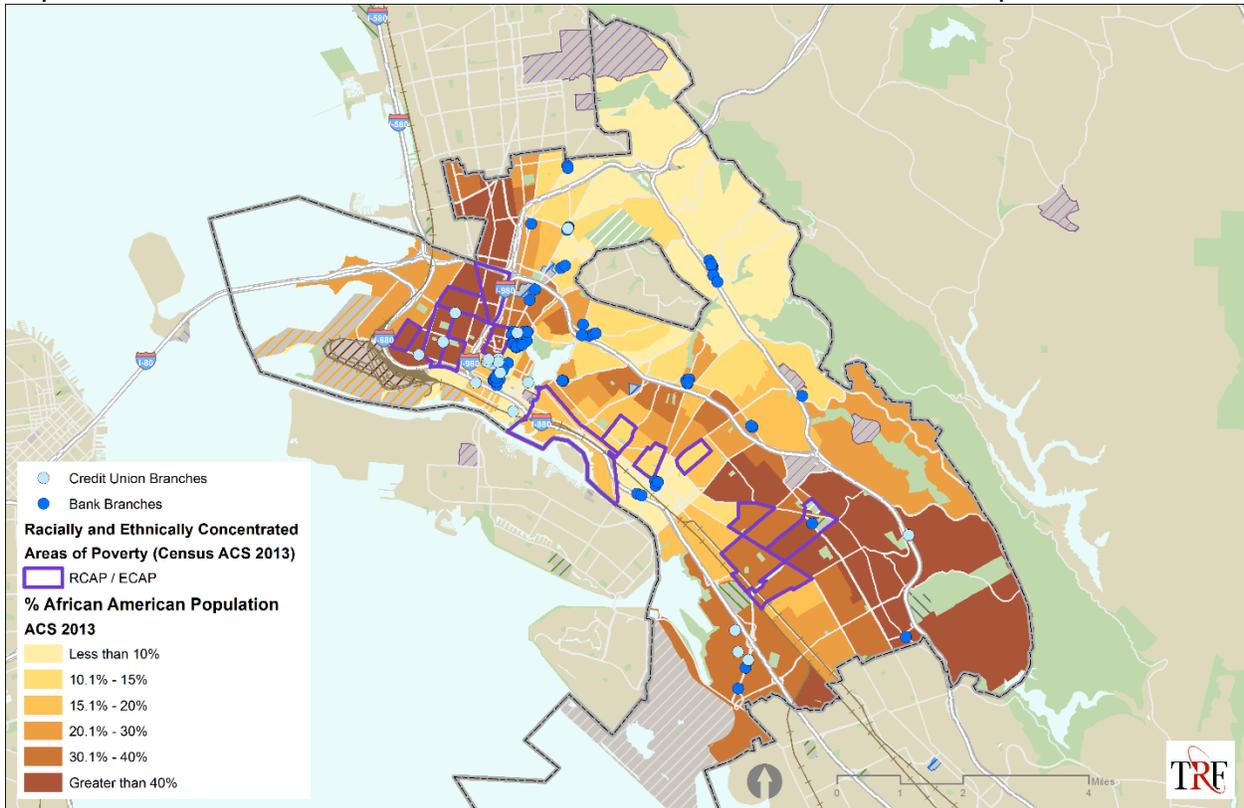
In addition to analyzing HMDA and mortgage summary data, it is valuable to assess the access to retail banking and credit unions in the City to explore access to financial services. Areas that are underserved with banks and/or credit unions may have less access to housing finance services as well as be pressured to use high cost payday lending type services. The maps below indicate retail bank locations recorded by the Federal government compared to median household income and share of African-American and Latino residents.

Map 39: Bank and Credit Union Branch Locations and Median Household Income

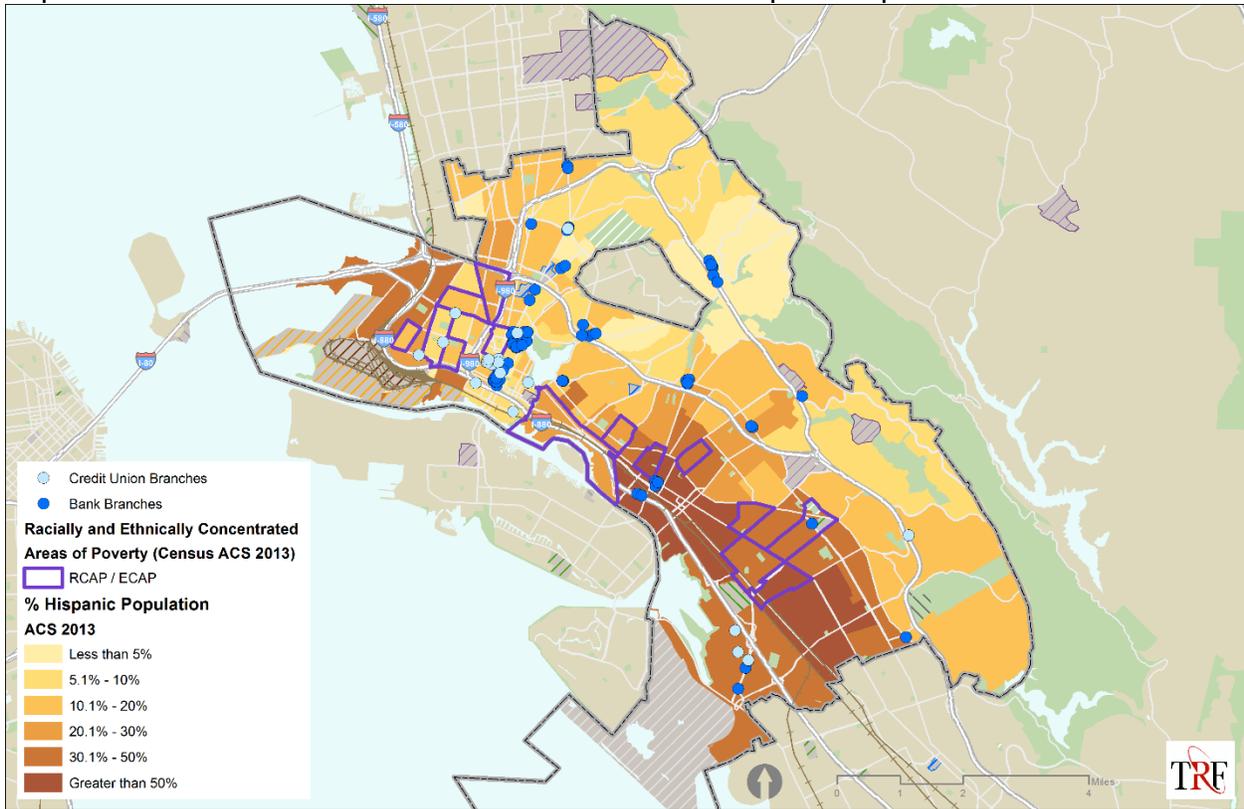


When analyzing the location of Banks and Credit Unions, the majority are concentrated in downtown's commercial center. Banks are also fairly regularly located in North Oakland and close to the Oakland Airport. There are, however, a limited number of banks or credit unions in lower median household income areas, especially in East Oakland.

Map 40: Bank and Credit Union Branch Locations and % African-American Population



Map 41: Bank and Credit Union Branch Locations and % Hispanic Population



When analyzing the location of banks to areas of high concentration of African-American and Hispanic residents, the data indicates that there are a lower number of bank and credit union branch locations in areas with higher minority populations, indicating a potential greater challenge for basic banking services for minority residents.

### Key Points

- Lower income areas and areas with high minority concentration have limited access to financial services.
- Aside from downtown RCAP/ECAP tracts, only one RCAP/ECAP tract in East Oakland has a retail banking location.
- This data indicates a potential need for additional/improved access to financial services throughout the City.

## VI. Impediments to Fair Housing Choice

The previous sections of this report have identified the demographic, housing, socioeconomic, quality of life, and financial lending characteristics of the City as well as a brief profile of the City's current policies and procedures as they relate to furthering fair housing. This report has also provided an overview of current procedures of ECHO Housing and fair housing compliant data gathered for the City of Oakland.

Based on this analysis, the City of Oakland has identified a number of areas that could constitute impediments to fair housing choice. Each of these areas is discussed in more detail below.

The impediments are categorized in three categories: Public, Public/Private, and Private.

**Public:** Includes impediments and activities associated with zoning, building codes, regulated affordable housing, and municipal and other services.

**Public/Private:** Includes impediments and activities associated with fair housing enforcement, outreach programs, private market inputs on affordable housing, and general housing market conditions.

**Private:** Includes impediments and activities associated with lending policies and procedures and

The ensuing section offers recommendations on strategies and actions to address these impediments.

### Lack of Regulated Affordable Housing (Public)

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As documented in this report, the Oakland Housing Element, OHA 2016 Plan, 2015 Consolidated Plan, and other public and media reports, there is a severe shortage of suitable housing available and affordable to very low-, low-, and moderate-, income households in Oakland. As housing prices continue to rise, low- and moderate-income households, especially renters, are being priced out of traditionally affordable neighborhoods in the City.

As documented in this report and the City's Consolidated Plan, protected classes such as minorities, elderly, persons with disabilities, and female head of household are disproportionately low- and moderate-income households and are being more adversely impacted by the lack of regulated affordable housing than the population as a whole.

Section 8 voucher holders are also disproportionately impacted by the lack of landlords willing to rent housing to Oaklanders who hold this type of housing subsidy. As reported by stakeholders, there are a decreasing number of landlords that accept Section 8 vouchers. Consequently, more voucher holders need to look for rental housing outside of Oakland.

The City of Oakland has taken great efforts in promoting affordable housing in the past five years, but with the loss of Redevelopment tax-increment funds dedicated to affordable housing, the reduction in Federal resources, and the increase in market demand, this issue remains a significant impediment to fair housing choice in Oakland and the Bay Area region.

## **Lack of Coordination among Fair Housing, Tenant Rights, and Advocacy Entities in the City (Public)**

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A strength of Oakland's fair housing services is the number of strong and active organizations that operate throughout the City. These organizations have an understanding of the needs of the community and actively work to affirmatively further fair housing throughout the City for a range of constituents.

However, many of these organizations act independently without centralized coordination. Consequently, there is a potential for overlapping services or, alternatively, underserved areas/populations. Further, the lack of coordination may result in confusion among service providers and the client when two service providers are working with the same client. For example, the hand-off from a tenant/landlord service provider to a fair housing agency may not happen smoothly because roles and responsibilities are not clearly articulated and understood.

While this lack of coordination per se is not an impediment to fair housing choice, there is an opportunity to improve and coordinate the service delivery of these organizations that would improve the effectiveness and efficiency of fair housing services in the City.

In addition to this need for coordination, other housing and social service agencies do not have a strong understanding of fair housing and what constitutes housing discrimination. As a result, these organizations are neither well suited to help serve on the front line for identifying potential fair housing issues nor to reference clients to the appropriate service.

## **Opposition to Siting of Affordable Housing (Public)**

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The City has made efforts in the past five years to mitigate opposition to siting of affordable housing in neighborhoods throughout Oakland. However, despite efforts made by the City, developers, and other stakeholders there is still opposition to affordable housing in neighborhoods throughout the City. City staff confirmed these challenges and they were reinforced by comments submitted by residents as part of the Consolidated Plan Public Hearings - in which residents made statements insinuating that no more affordable housing should be built in their neighborhoods. This community opposition limits the ability for the City to develop additional affordable housing to address the severe affordable housing shortage.

## **Planning, Land Use and Zoning Practices (Public)**

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The City has made gains in improving planning and land use practices to eliminate constraints to developing affordable housing in the City. However, the City's zoning code still maintains distinctions between transitional/supportive housing and general residential development. This distinction makes it more difficult to develop supportive or transitional housing in the City. Likewise, the City's current zoning code places a 300 foot restriction on the proximity of more than one transitional housing project. Such a limitation prevents the development of scattered-site or even multiple transitional housing projects within close proximity to one another. This limits the areas within the City where new transitional housing can be identified.

In terms of eliminating constraints to develop affordable housing, the City identified land use and planning practices in their 2015 Housing Element that initiate or further expedite the

development process for housing in the City. Delayed or lengthy planning processes increases the cost of affordable housing development, which ultimately limits the number of units that can be built. Continuing to monitor and identify potential areas where project delays can be minimized or removed entirely, will decrease project time and cost, and thus help to alleviate issues associated with the affordable housing development process.

## **Loss of Naturally Occurring Affordable Housing (Public/Private)**

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Compounding the issue of lack of regulated affordable housing is the loss of naturally occurring affordable housing. With the tremendous increase in market demand for owner and renter-occupied units in the City, housing prices for both new homeowners and existing renters has dramatically increased.

This loss of naturally occurring affordable housing has also led to significant displacement and gentrification as outlined in the assessment of changing demographic profiles in the City over the past decade. This is further illustrated in a recent study conducted by UC Berkeley researchers at the Urban Displacement Project, which identifies nearly all Census Tracts in Oakland as being at high risk for gentrification and displacement.

The increase in demand (and corresponding displacement) and the impact on naturally occurring affordable housing is impacted by several public and private market conditions:

1. Approximately one third of all housing units in the City are rent controlled while any new construction built after January 1, 1983 has no such rent control provisions. Consequently, landlords are able to increase the cost of rental units for non-controlled properties to match market costs. These cost increases push many existing residents (predominately low- and moderate-income households) out of the Oakland rental market, displacing them to surrounding communities
2. Of those units that are protected under rent control, landlords are able to increase rental prices by making capital improvements to the building and passing-on a portion of those costs to their tenants. Given that tenants generally don't have the time, resources, or understanding of rent control rules to be able to challenge unjust rent increases (ex. landlords making capital improvements that are actually just deferred maintenance), moving out becomes the most plausible option.
3. The foreclosure crisis recovery continues to impact both renters and owners. Renters of formerly foreclosed single family residences that were purchased by investors and placed on rental market are not protected by rent control. As the real estate market values increase in the City, investors are selling their investment and displacing households renting these units. For some owners, although the height of the foreclosure crisis has passed, there are still significant numbers of households that are losing their homes to foreclosure or who are at risk of foreclosure. For those owners who are not at risk of foreclosure but who live in neighborhoods that are not seeing impacts of non-local real estate investors, there continue to exist abandoned defaulted and foreclosed properties. Those housing units are registered in the City's Foreclosed Property Blight Abatement program whose efforts are focused on ensuring that existing defaulted and foreclosed properties do not become nuisance properties that further decrease real estate values in neighborhoods. Additionally, City staff are working with a public interest law firm to protect long-standing Oakland owner-occupied housing residents

who were impacted by predatory loans that made their affordable housing payments, unaffordable.<sup>4</sup>

As a result of these market conditions, many protected class households have been displaced or are at serious risk of displacement in the short-term.

## **Need for Landlord Education (Public/Private)**

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Interviews with fair housing and service providers in Oakland identified that many landlords, primarily smaller landlords, lack knowledge of fair housing rules and requirements. Consequently, these landlords may discriminate (potentially inadvertently or without full understanding of the law) against protected classes. Anecdotally, service providers indicated that this discrimination seemed to be especially prevalent for persons with disabilities making reasonable accommodation requests to the landlord.

Both service providers and the East Bay Rental Housing Association offer workshops, training and resources on fair housing rules and regulations for landlords. However, based on the input from service providers, these resources may not be reaching all landlords.

Consequently, discrimination (whether inadvertent or not) may occur resulting in a potential impediment to fair housing choice for protected classes.

## **Lack of Accessible Units (Public/Private)**

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Due to the age and style of the housing stock in Oakland, there is a limited number of accessible units in the City. Furthering this issue, households with members with a disability are more likely to be low- or moderate-income households who do not have the financial resources to make the necessary accommodations to housing units to make them accessible. This limited number of accessible units in addition to the inability of households with members with a disability to make their units accessible are impediments to fair housing choice for persons with a disability.

Currently, the City operates an Access Improvement Program that provides grants for reasonable accommodations for owner- and renter-occupied households. However, this funding is not adequate to fully address the need and many owners and renters do not know that this program exists.

## **Discrimination Regarding Accessible Features (Public/Private)**

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In interviews with service providers, providers anecdotally cited that one of the most common complaints was regarding discrimination about service animals and accessible features. Discrimination claims ranged from landlords refusing to allow service animals to be present in the unit to not allowing the addition of ramps and other accessibility features.

The complaint data compiled by ECHO, CDFEH, and HUD validates this claim since the majority of the complaints were associated with discrimination with the most common complaint being landlords refusing service animals. Fair housing service providers in Oakland suggested this was

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<sup>4</sup> City of Oakland Agenda Report “Quarterly Report on Foreclosure Issues” February 26, 2015 presented at the Community Economic Development Committee on March 24, 2015.

potentially due to lack of knowledge of legislation that prevents discrimination of a tenant due to a service animal.

## **Lack of Access to Community Assets (Public/Private)**

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As indicated in the quality of life, financial, and employment data, RCAP/ECAP, areas of high minority concentration, and low-income areas have limited access to community assets, banks, transit and employment centers when compared with the City as a whole. The limited access to these assets has an adverse impact on the residents (disproportionately protected classes) to have access to jobs, quality schools, fresh food and financial institutions.

## **Foreclosure Recovery: Homeowners, Renters, and their Communities (Public/Private)**

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As noted in the analysis of foreclosed properties, the rate of foreclosure in Oakland has declined since the last Analysis of Impediments. However, there is still a concentration of foreclosed properties in East Oakland including within the RCAP/ECAP Census Tracts. Furthermore, many individuals, families, and the community at large are still dealing with the repercussions of being foreclosed upon.

Foreclosures lower property values in the surrounding neighborhood and cause blight. Neighborhood absentee homeowners (i.e. banks) also do not adequately manage the vacant properties resulting in blight and locations for criminal activities, further lowering property values. This, in turn, threatens the remaining homeowners' ability to refinance homes and limits incentives for potential homebuyers to move into the neighborhood. Foreclosed homeowners are also left with little to no savings and reduced credit scores resulting in difficulty obtaining funding for future homes.

Renters in properties that were foreclosed on also are adversely affected including unlawful eviction attempts, health problems due to unresponsive landlords in pre-foreclosure situations, lack of stability especially for persons with disabilities, seniors, and families with children, in addition to other issues associated with the change of building ownership such as evictions due to non-payment, payment for moving, and rent increases.

The repercussions of foreclosures on homeowners, renters, and the community at large is an impediment to fair housing.

## **Lending/Sales Discrimination (Private)**

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As indicated in the Mortgage Sales summary data (HMDA data profile), there is a significant differences between White household mortgage denial rates when compared to Latino and African American households. The discrepant share of African American households denied is especially apparent for medium-income and higher-income households. In the course of developing the document, the Oakland City Attorney has filed a lawsuit against Wells Fargo Bank alleging predatory lending targeted to minority households in Oakland.

While the number of high cost loans has declined in the City since the last Analysis of Impediments, there is still a higher prevalence of non-White households who receive high cost mortgages, especially for Home Improvement loans.

The discrepancies in denial rates are further compounded by the limited number of loan originations in West, downtown and East Oakland (areas that tend to be lower-income and higher minority concentration) and are the locations of all of the RCAP/ECAPs in the City. As a result, the wealth gap in Oakland is likely rising between high-income and low- and moderate-income households. This potential discrimination by race/ethnicity in seeking mortgage loans is a clear impediment to housing choice.

## VII. Fair Housing Action Plan

This Analysis of Impediments to Fair Housing Choice has provided information on the population and housing needs of Oakland, with a special emphasis on the needs of racial and ethnic minorities, families with children, persons with disabilities, and other members of protected classes under federal non-discrimination laws and regulations. Oakland is a city of great racial and ethnic diversity, in which groups which are racial and ethnic minorities at the national level are in fact in the majority in the City. The City also has significant number of seniors and people with disabilities, for whom there may be a need for housing with supportive services. There are also a significant number of families with five or more persons, who find it extremely difficult to secure adequate and affordable housing.

Analysis of data available also indicated that low-income and minority households are more likely to be in areas with limited community assets. As described by HUD in the recent Affirmatively Furthering Fair Housing Rule, requires communities to assess disparity in access to community services such as transit, quality schools and open space. The concentration of RCAP/ECAP areas in these areas with limited services and assets meets the new AFFH definition of an impediment to fair housing choice. The City must continue to target and address these areas of concentrated poverty and minority concentration and promote affordable housing in asset-rich areas.

On the contrary, the City has made significant strides in affirmatively furthering fair housing through planning code amendments, public housing policies and housing and community development programs by attempting to target housing developments in non-concentrated areas of poverty and encourage development to be within proximity to asset rich areas. The City should continue to promote and expand these policies to continue to further fair housing choice and streamline the development process for affordable housing.

In addition to these policies and targeting developments in areas without high concentrations of poverty, the City has also allocated significant resources to fair housing programs through its CDBG programs in the past five years that have had a positive impact on the delivery of fair housing and tenant/landlord services. The City should continue to fund both fair housing services as well as promote affirmatively furthering fair housing through its various programs and policies. To that end, the following actions are recommended to address impediments and affirmatively further fair housing:

### General Action Elements

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In preparing to address these responses, the City recognizes that many of the fair housing issues, especially those impacted by the private market, are regional in nature and cannot be addressed by Oakland alone. To this end, the City of Oakland will invite neighboring cities and regional organizations to participate in a planning strategy to identify ways that the region can address fair housing issues such as the increasing rate of displacement and discrimination in the mortgage market.

General actions the City will take to address impediments to fair housing include:

1. Identify a primary lead from the Housing and Community Development to serve as point person to drive this Action Plan for the next five years.

2. Produce progress reports on all action items on an annual basis in the Annual HUD Reporting document (CAPER).
3. Host a planning session with regional organizations and local governments to discuss strategies on how to address fair housing issues from a regional perspective
4. Host a series of summits with housing providers, fair housing organizations and other stakeholders regularly (at least twice a year) to confirm progress towards addressing fair housing issues over next 5 years.
5. Convene meeting with East Bay governments and agencies to collaborate on service delivery to explore strategies to unify data collection and service delivery into a more streamlined process.

## **Lack of Regulated Affordable Housing (Public)**

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- Continue to work with developers, Federal, State and other stakeholders to identify and pursue all available funding for affordable housing.
- Identify potential city-owned parcels or other sites that can be used for affordable housing developments as articulated in the Housing Element and in accordance with the City's real estate disposition laws. HCD will work with other departments to identify potential parcels for mixed-income (including possibly affordable housing) and report to City Council and ways in which the City could comply with the Surplus Land Act, if applicable.
- Through its HOME and other Housing NOFAs, HCD will encourage siting of affordable housing in areas without concentrations of poverty.
- Through its HOME and other Housing NOFAs, HCD will encourage siting of affordable housing in asset-rich areas.
- Continue to streamline development and permitting process to reduce costs for affordable housing. HCD will gather input from affordable housing developers on additional strategies to streamline development process and assess if recommendations can be incorporated into development process.
- Explore and identify potential land use policies and zoning concessions such as inclusionary zoning, parking requirements that can be made to reduce cost of development and promote affordable housing or allowance of secondary units. HCD should prepare an analysis of the possible increase in affordable housing in Oakland based on these policies and share with City Council.
- Continue pending analysis of potential development impact fees, including a housing impact fee to fund affordable housing development with an in-lieu on-site inclusionary option.
- Meet with OHA to understand what data, if any, is collected regarding landlords who oppose Section 8 and facilitate a discussion on what outreach the City and OHA could initiate to these landlords on the benefits of Section 8 program.
- Establish goal of preserving all affordable housing units expiring in next ten years.

## **Lack of Coordination among Fair Housing/Advocacy Entities (Public)**

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- Identify point of contact to be responsible for coordinating all activities with fair housing providers at City.
- Conduct kick-off meeting with city-funded fair housing/advocacy entities with City to establish roles and responsibilities.
- Facilitate quarterly meetings with city-funded fair housing/advocacy entities with City to ensure ongoing coordination and alignment.

- Explore coordinated database development or reporting to enable City or appointed agent to collect and analyze data at city-wide level.
- Explore coordinated development and delivery of trainings, outreach and other efforts to ensure all areas/populations of Oakland are adequately served.
- Promote semi-annual or annual trainings from different advocacy entities for all city funded service agencies on various elements of fair housing and tenant rights.

## **Opposition to Siting of Affordable Housing (Public)**

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- HCD, City Council and Mayor to establish clear message on importance of affordable housing and that City is in support of affordable housing.
- Continue to work with developers to conduct community outreach programs as part of predevelopment process.
- Consult with legal service provider in region to provide legal education to stakeholders on California Government Code that prevents discrimination on the development of housing based on the source of financing used for that development.
- Use language such as “enhancing neighborhoods” to avoid negative connotation of affordable housing.
- Conduct proactive outreach to council members and community leaders.
- As noted above, assess feasibility of inclusionary zoning to leave no choice for siting of affordable housing.
- Continue to participate and promote Affordable Housing week.
- Coordinate with Oakland Housing Authority in outreach and marketing campaigns.
- Continue to provide technical and/or financial support to organizations that are involved in education and information campaigns.
- Continue to monitor existing affordable housing to ensure that property is well maintained.
- Continue to encourage formation of resident councils in affordable housing developments to foster sense of commitment to and participation in neighborhood activities.

## **Planning, Land Use and Zoning Practices (Public)**

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- Continue to streamline processes for the issuance of zoning/building permits for affordable housing.
- Use existing service provider and stakeholder networks to engage low- and moderate-income households in discussions regarding zoning and changes to the planning code and access to land use and zoning policies.
- Explore additional planning/zoning concessions that can be made to affordable housing developments.
- Explore use and viability of affordable housing development impact fee.
- Continue to gather input and feedback on ways to improve planning, land use and zoning practices from practitioners and stakeholders.
- Recommend to Strategic Planning office to revise zoning code to treat transitional/supportive housing in same manner as residential units.
- Recommend to Strategic Planning office to revise zoning code to eliminate 300 foot restriction for development of multiple supportive housing projects.
- Evaluate secondary unit regulations as option of increasing number of housing units and/or affordable housing units in the City.

- As noted above, evaluate the impact and feasibility of inclusionary zoning to increase affordable housing in the City and provide a report to City Council on the outcomes of the evaluation.

## **Loss of Naturally Occurring Affordable Housing (Public/Private)**

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- HCD to study and possibly propose an expanded rent control model to better protect tenants and maintain affordable housing within the City.
- HCD to continue support of Community Buying Program with the goal of assisting developers to purchase tax defaulted, foreclosed, abandoned, or unmaintained properties for the development of affordable homeownership opportunities.
- Action items from the above “Lack of Regulated Affordable Housing” that address the development and supply of more affordable housing also apply to this impediment given that it will reduce the number of people that will have to move due to market demand.

## **Need for Landlord Education (Public/Private)**

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- Conduct landlord education summit with housing service providers, East Bay Rental Housing Association and other stakeholders to identify education gaps in landlord education.
- Conduct outreach and education to broaden reach of stakeholders including business groups such as Chamber of Commerce.
- Coordinate with housing service providers and East Bay Rental Housing Association to market fair housing trainings and resources. Potential marketing strategies include:
  - Leveraging lending institutions and banks to provide training, resource and contact information to landlords or potential landlords
  - Conduct media campaigns through utility bills
  - Market trainings in newspapers, social media and other outlets
  - Advertise at meetings and social events for landlord associations
- Use quizzes or assessment tools to test knowledge and impact of training to ensure that participant achieves training learning objectives.

## **Lack of Accessible Units (Public/Private)**

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- Continue to provide Access Improvement Program grants to homeowners and landlords.
- Coordinate efforts and activities with disability rights advocacy and outreach organizations in Oakland.
- Continue to require 504 accessible units to be built in City assisted rental developments.
- Establish additional landlord incentives such as microloans to make units more accessible.

## **Discrimination Regarding Accessible Features (Public/Private)**

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- Continue to provide funding to nonprofit agencies to provide fair housing counseling, complaint investigation and referral services.
- Provide trainings on fair housing regulations regarding persons with disabilities and reasonable accommodations.

- Continue to provide fair housing workshops and public outreach efforts, ensuring that activities include guidance on discrimination regarding accessible features.
- Provide counseling and outreach to persons with disabilities on how to identify discrimination regarding accessible features.
- Establish better landlord incentives such as microloans to make units more accessible.

## **Lack of Access to Community Assets (Public/Private)**

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- Continue to target affordable housing in areas that are asset-rich and not in areas of concentrated poverty.
- Leverage other HUD resources to improve community assets and conditions in areas of minority concentration and RCAP/ECAP areas.
- Coordinate efforts with other City/County agencies to improve community assets and conditions in areas of minority concentration and RCAP/ECAP areas.

## **Foreclosure Recovery: Homeowners, Renters, and their Communities (Public/Private)**

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As listed in the City’s 2011 Analysis of Impediments, the following actions will continue to be pursued:

- Encourage more research to gain a deeper understanding of the role of race in mortgage lending and foreclosure prevention in order to inform public policy and encourage the accountability of financial institutions.
- Continue to work with non-profit housing services providers to target programs to extremely low, low and moderate income homeowners at risk of losing their homes to foreclosure.
- Support housing counseling efforts by either providing City funding or supporting applications for outside funding.
- Continue to enforce the City’s Just Cause Ordinance to protect tenants from being evicted from foreclosed housing units.

## **Lending/Sales Discrimination (Private)**

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- Continue to provide funding to nonprofit agencies to provide fair housing counseling, complaint investigation and referral services.
- Provide financial support for fair housing audits for rental and homeownership properties.
- Support law firms that work with affordable housing owners and agents to provide assistance regarding fair housing practices.
- Continue to provide fair housing workshops and public education outreach efforts
- Conduct targeted outreach, support and counseling to minority households.
- Explore including HMDA Institution Data Reports as part of Linked Banking Services Ordinance analysis for Oakland financial institutions.
- Consult with City Attorney annually to review HMDA data and post summary of findings publically.
- Promote creative marketing and outreach to residents regarding lending practices.
- Promote more stringent audit practices - if landlords, sellers, or banks are in violation of fair housing policy, proceed with lawsuit.

# VIII. Appendices

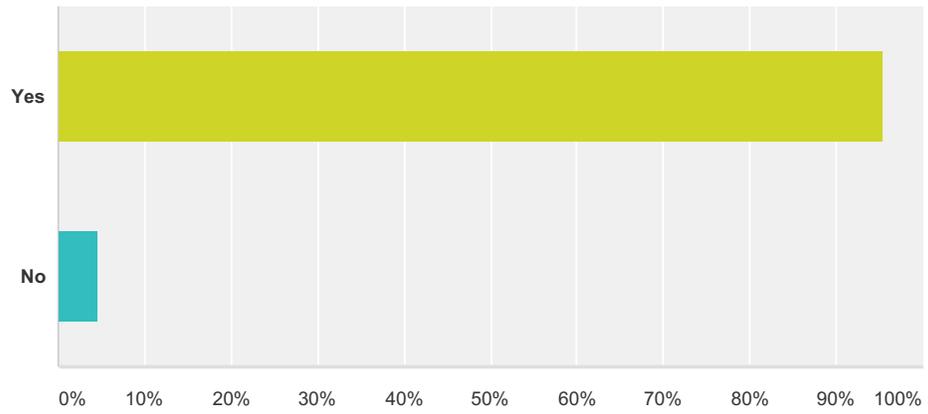
## Stakeholder and Community Meeting Attendees

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<b>Name</b>	<b>Organization</b>	<b>Meeting</b>
Judy Jackson	Everyone Home	Stakeholder Meeting
Lisa Greif	Bay Area Legal Aid	Stakeholder Meeting
Ellyn Gendler	Bay Area Legal Aid	Stakeholder Meeting
Nick Dubruff	Public Advocates	Stakeholder Meeting
David Zisser	Public Advocates	Stakeholder Meeting
Jacee Santos	Housing Consortium of the Easy Bay	Stakeholder Meeting
Lucy Kasdin	Bay Area Community Services	Stakeholder Meeting
Erik Enriquez	Bay Area Community Services	Stakeholder Meeting
Travis Poor	Bay Area Community Services	Stakeholder Meeting
Lisa Hopkins	Housing Consortium of the Easy Bay	Stakeholder Meeting
Michele Byrd	City of Oakland	Stakeholder Meeting
Gustavo Guzman		Community Meeting
Greg Garrett	City of Oakland	Community Meeting
Douglas Williams	City of Oakland	Community Meeting
Denise Turner	City of Oakland - DHS	Community Meeting
Laura Reye		Community Meeting

### Q1 Do you live in the City of Oakland?

Answered: 1,396 Skipped: 8

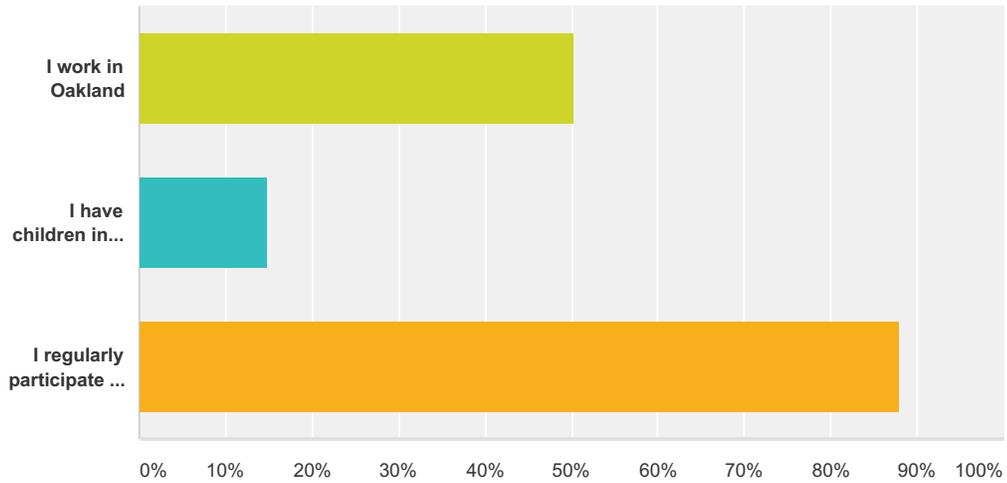


Answer Choices	Responses	
Yes	95.34%	1,331
No	4.66%	65
<b>Total</b>		<b>1,396</b>

# Oakland Resident Consolidated Plan Survey

## Q2 Please check all that apply:

Answered: 1,274 Skipped: 130



Answer Choices	Responses
I work in Oakland	50.24% 640
I have children in Oakland Public Schools	14.84% 189
I regularly participate in Oakland recreational, cultural or leisure activities	87.91% 1,120
<b>Total Respondents: 1,274</b>	

**Q3 Please identify the zip code where you live:**

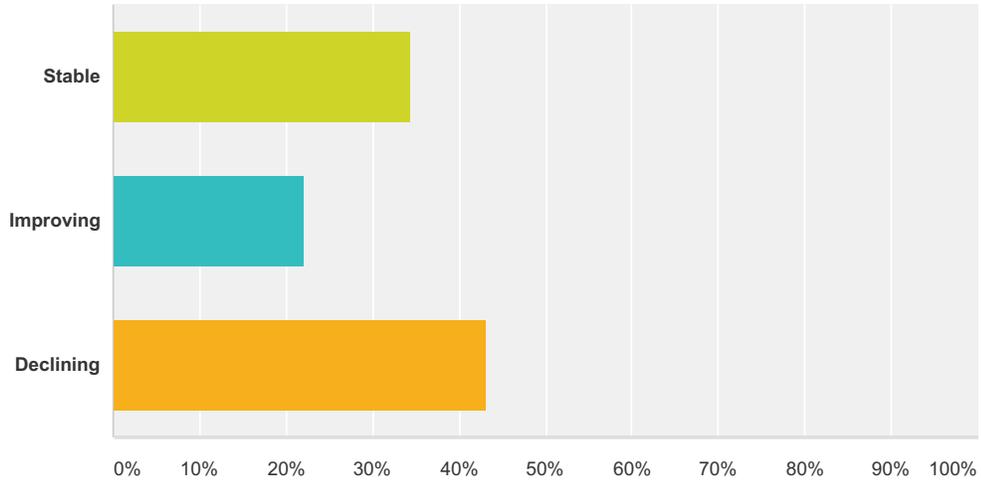
Answered: 1,247 Skipped: 157

**Q4 If you could change one thing in your neighborhood, what would it be?**

Answered: 1,208 Skipped: 196

**Q5 Do you think the physical condition of the public space in your neighborhood (streets, sidewalks, parks) is:**

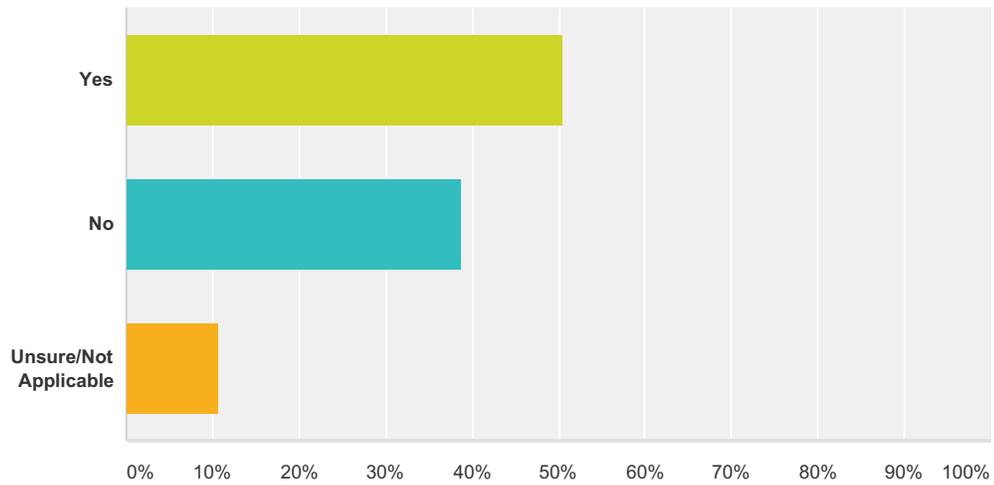
Answered: 1,233 Skipped: 171



Answer Choices	Responses
Stable	34.47% 425
Improving	22.22% 274
Declining	43.31% 534
<b>Total</b>	<b>1,233</b>

### Q6 Do you feel safe in your immediate neighborhood?

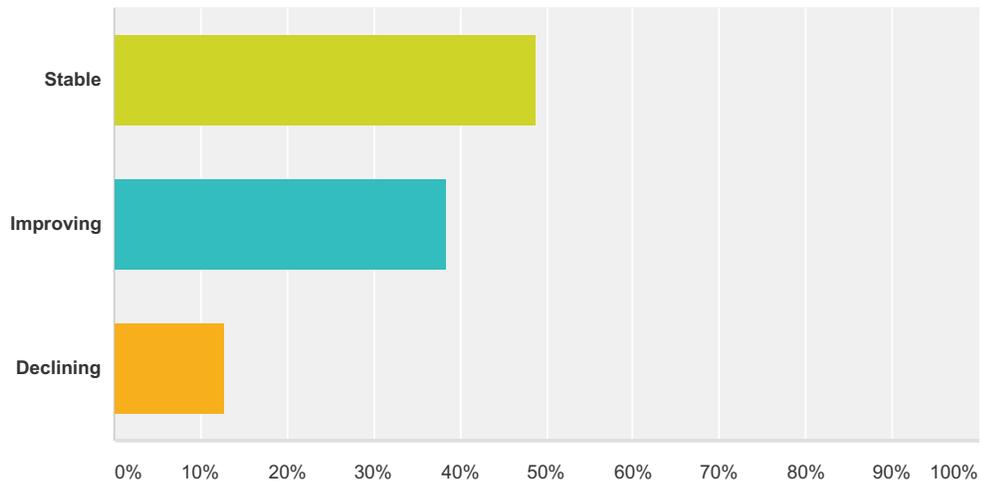
Answered: 1,233 Skipped: 171



Answer Choices	Responses
Yes	50.61% 624
No	38.85% 479
Unsure/Not Applicable	10.54% 130
<b>Total</b>	<b>1,233</b>

**Q7 Do you think the physical condition of housing in your neighborhood is:**

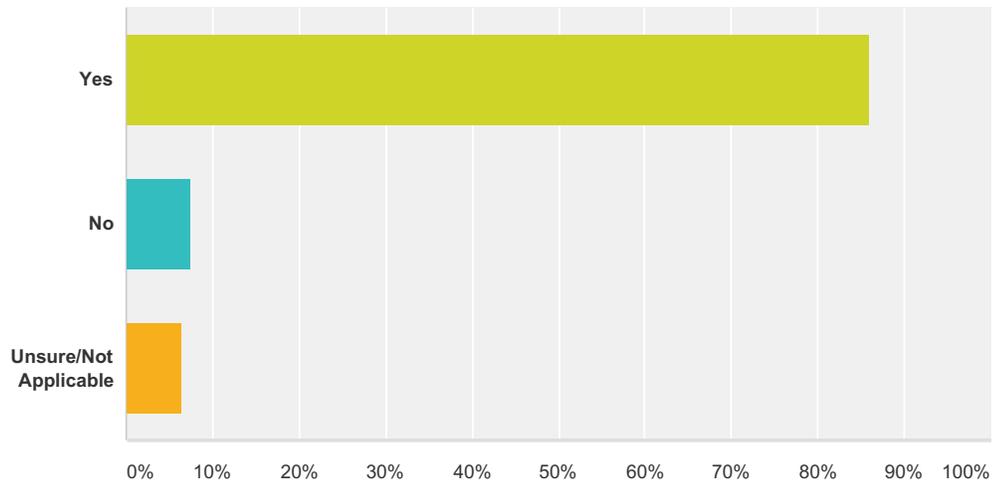
Answered: 1,231 Skipped: 173



Answer Choices	Responses
Stable	48.90% 602
Improving	38.34% 472
Declining	12.75% 157
<b>Total</b>	<b>1,231</b>

### Q8 Do you perceive economic development/job creation to be a critical issue in the City?

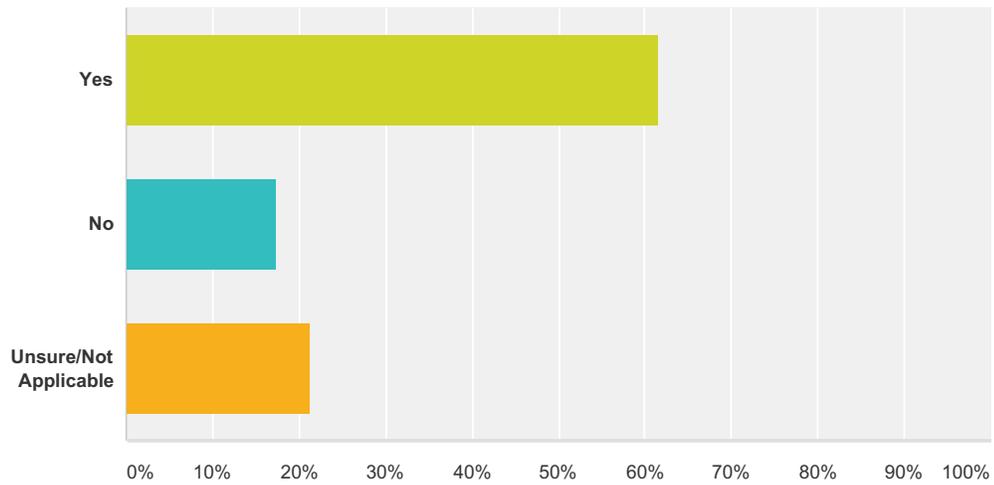
Answered: 1,274 Skipped: 130



Answer Choices	Responses	
Yes	86.03%	1,096
No	7.46%	95
Unsure/Not Applicable	6.51%	83
<b>Total</b>		<b>1,274</b>

### Q9 Do you think abandoned or foreclosed properties are a critical issue in the City?

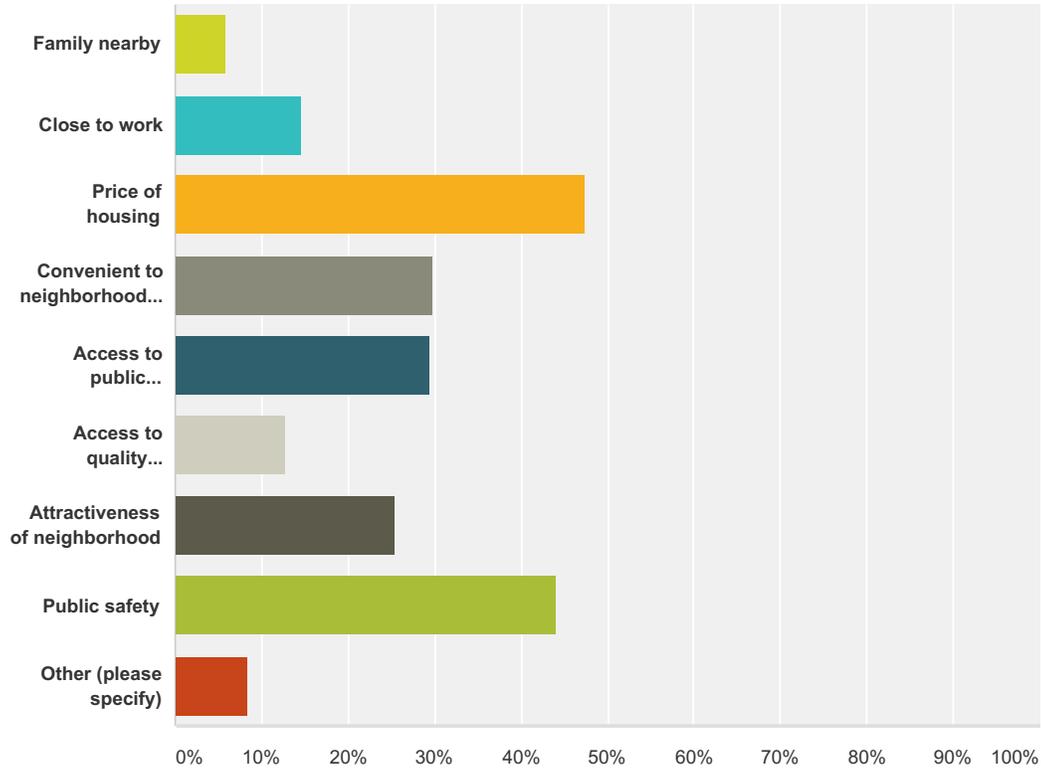
Answered: 1,273 Skipped: 131



Answer Choices	Responses
Yes	61.51% 783
No	17.28% 220
Unsure/Not Applicable	21.21% 270
<b>Total</b>	<b>1,273</b>

### Q10 What are the two most important considerations to you in choosing a place to live (pick two)?

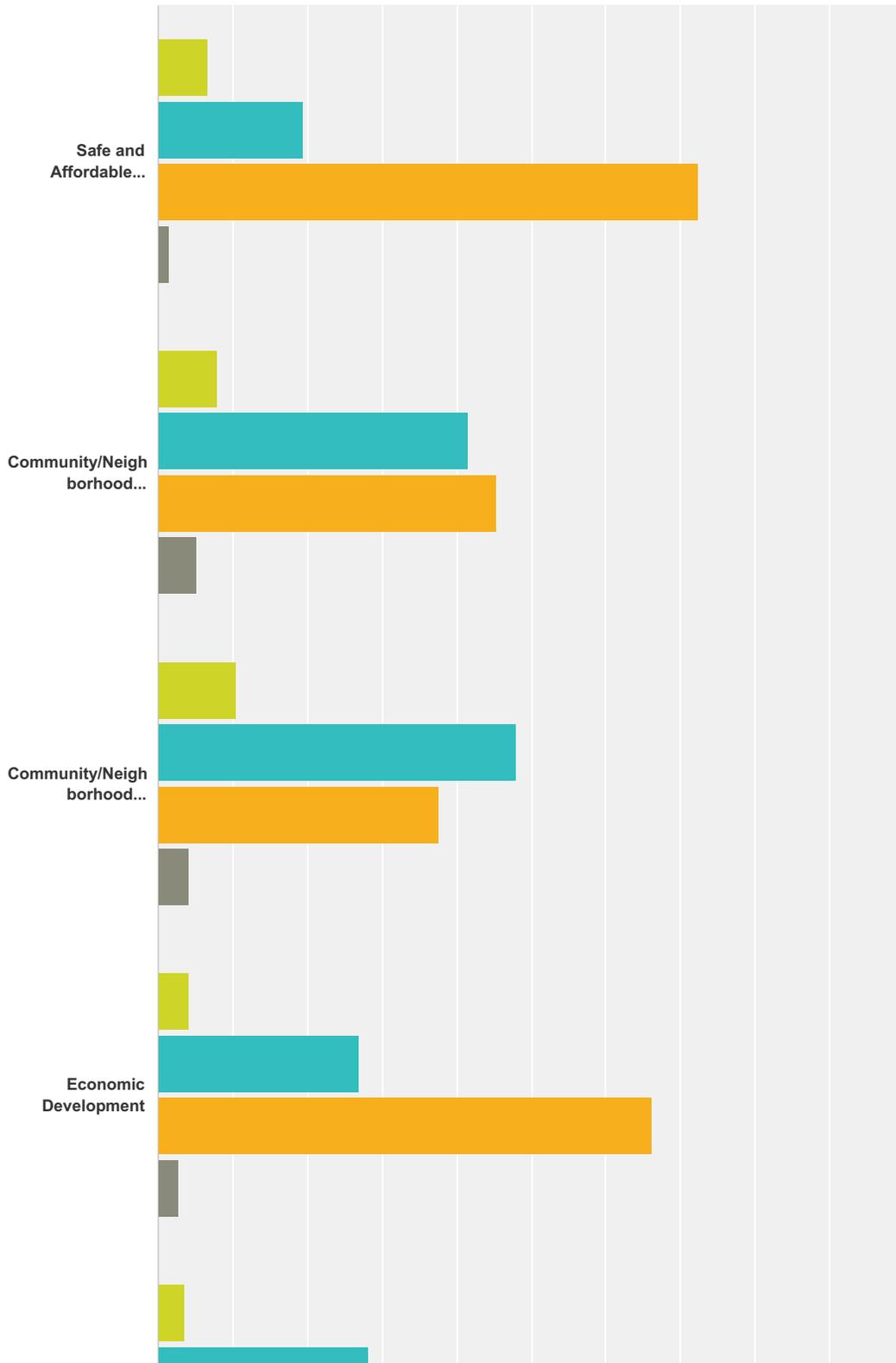
Answered: 1,280 Skipped: 124



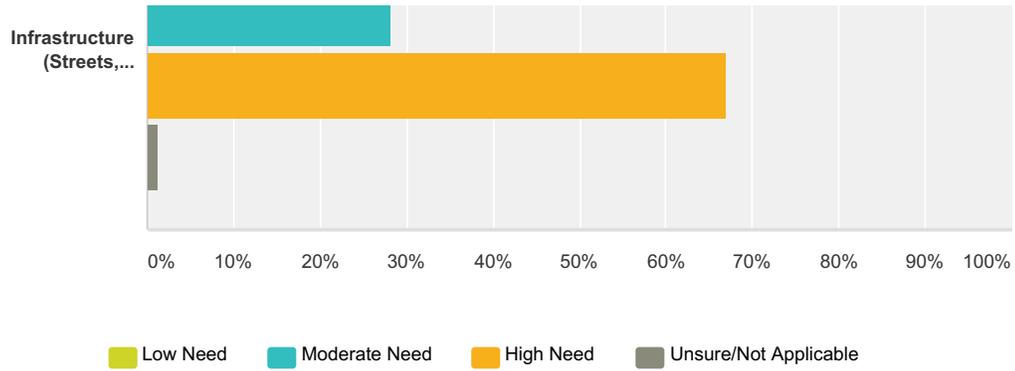
Answer Choices	Responses
Family nearby	5.86% 75
Close to work	14.69% 188
Price of housing	47.34% 606
Convenient to neighborhood amenities	29.77% 381
Access to public transportation	29.45% 377
Access to quality schools/youth services	12.81% 164
Attractiveness of neighborhood	25.39% 325
Public safety	43.98% 563
Other (please specify)	8.28% 106
<b>Total Respondents: 1,280</b>	

**Q11 Please rank the level of need for the following types of Community Development in the City (1 = most critical need; 6 = least critical need):**

Answered: 1,226 Skipped: 178



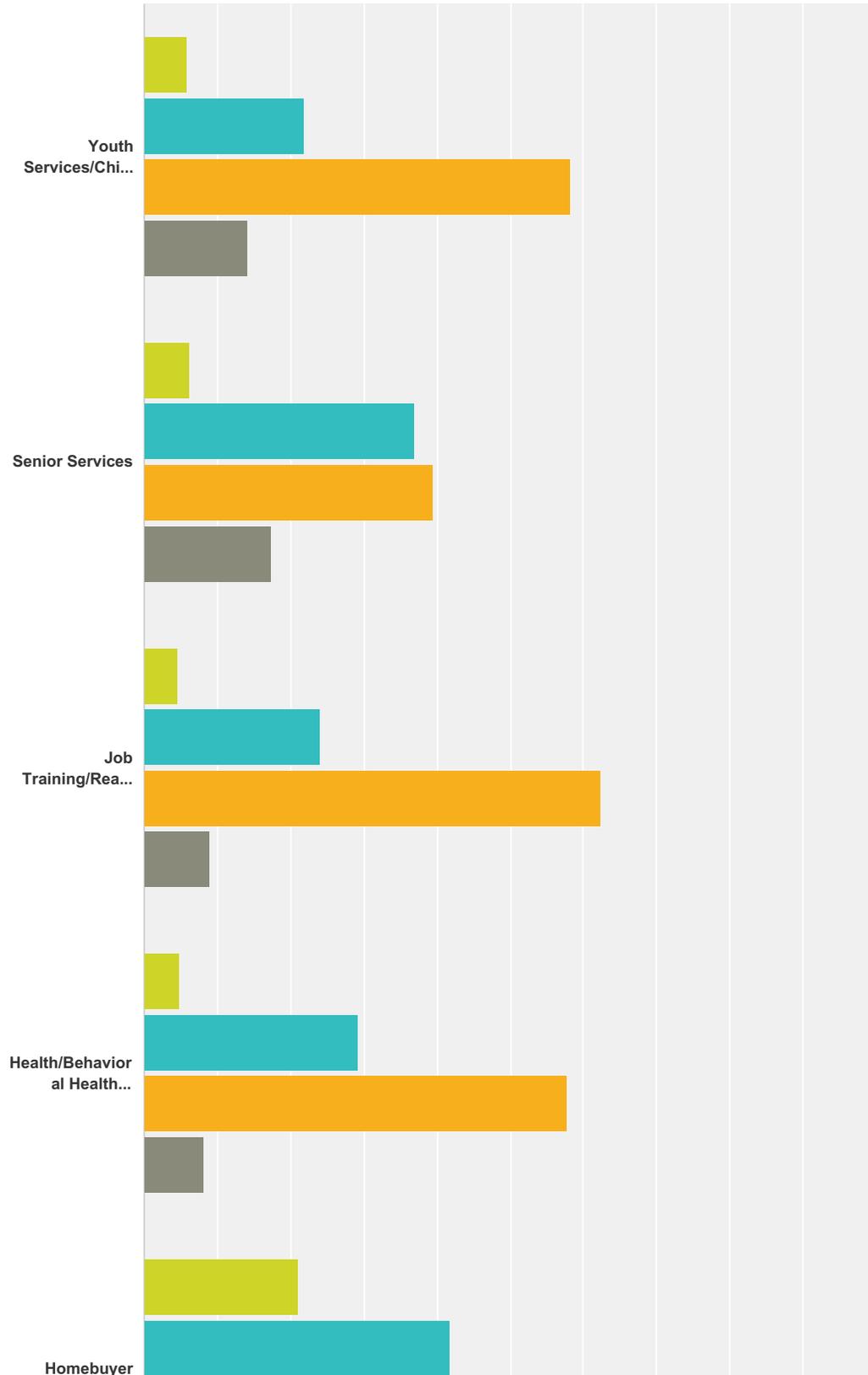
## Oakland Resident Consolidated Plan Survey



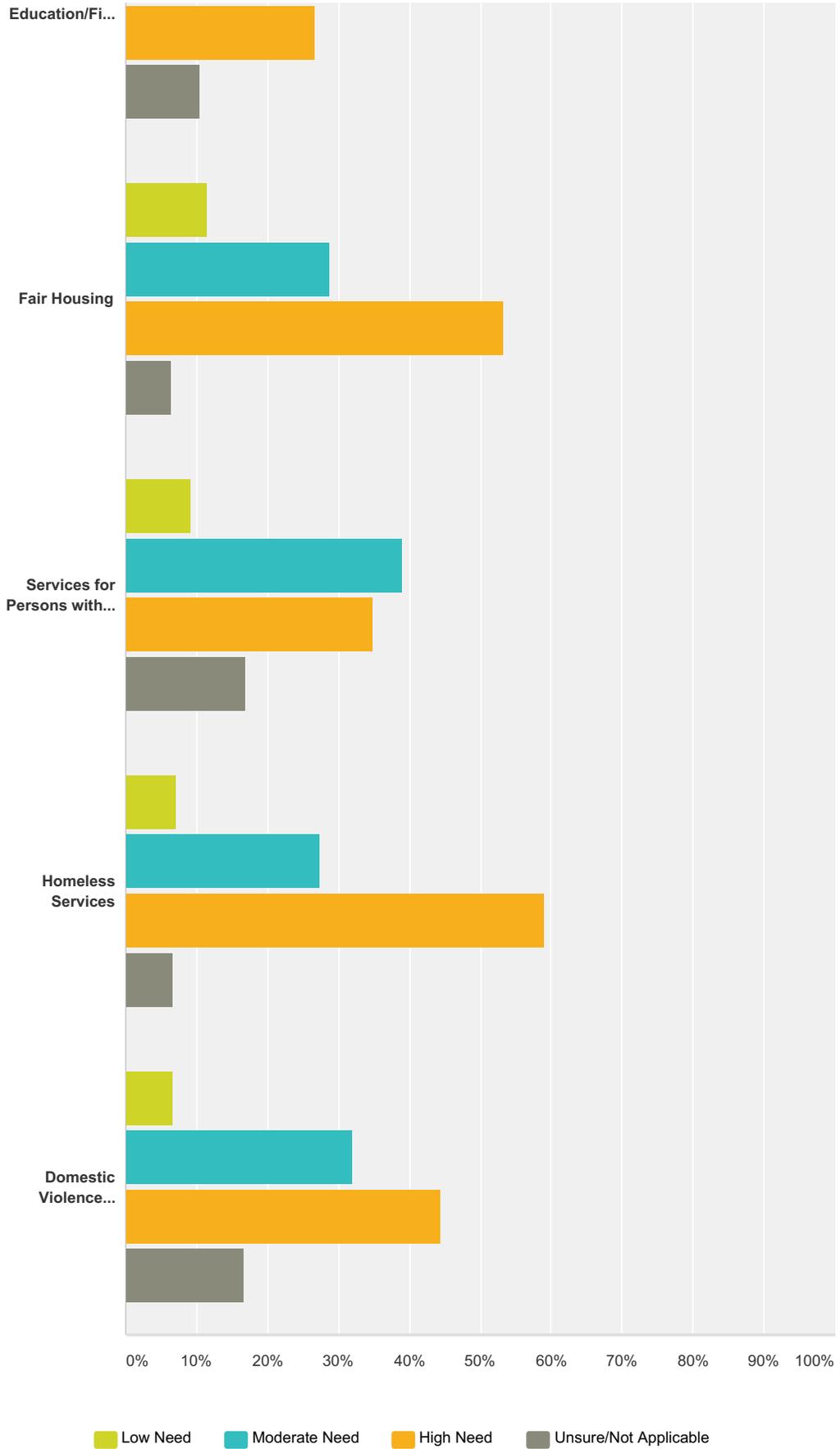
	Low Need	Moderate Need	High Need	Unsure/Not Applicable	Total
Safe and Affordable Housing	6.75% 82	19.36% 235	72.49% 880	1.40% 17	1,214
Community/Neighborhood Services	7.96% 97	41.46% 505	45.32% 552	5.25% 64	1,218
Community/Neighborhood Facilities	10.39% 125	47.96% 577	37.49% 451	4.16% 50	1,203
Economic Development	4.14% 50	26.93% 325	66.28% 800	2.65% 32	1,207
Infrastructure (Streets, Sidewalks, Parks)	3.52% 43	28.26% 345	66.91% 817	1.31% 16	1,221

**Q12 Please rank the level of need for the following types of Public Services in the City:**

Answered: 1,228 Skipped: 176



# Oakland Resident Consolidated Plan Survey

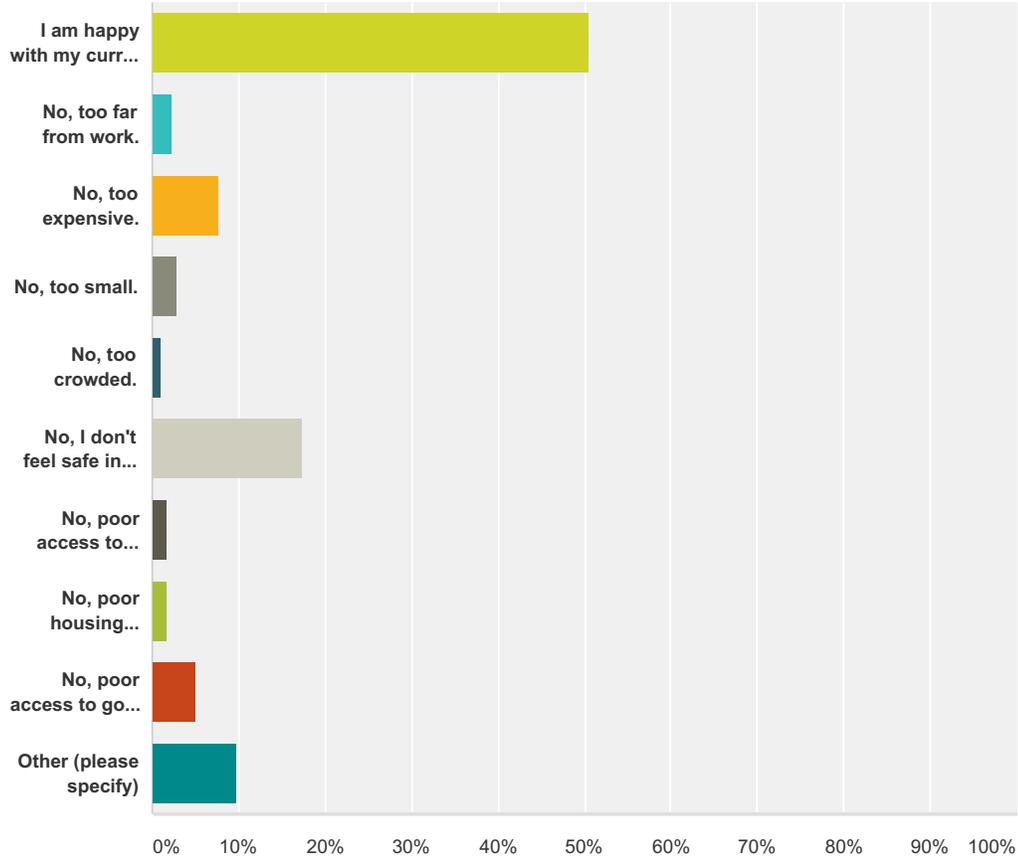


## Oakland Resident Consolidated Plan Survey

	Low Need	Moderate Need	High Need	Unsure/Not Applicable	Total
Youth Services/Child Care	5.78% 70	21.88% 265	58.22% 705	14.12% 171	1,211
Senior Services	6.28% 76	37.02% 448	39.42% 477	17.27% 209	1,210
Job Training/Readiness Programs	4.54% 55	24.11% 292	62.43% 756	8.92% 108	1,211
Health/Behavioral Health Services	4.88% 59	29.14% 352	57.78% 698	8.20% 99	1,208
Homebuyer Education/Financial Literacy	21.10% 254	41.78% 503	26.66% 321	10.47% 126	1,204
Fair Housing	11.54% 140	28.77% 349	53.26% 646	6.43% 78	1,213
Services for Persons with Disabilities	9.12% 110	39.14% 472	34.83% 420	16.92% 204	1,206
Homeless Services	7.01% 85	27.39% 332	58.99% 715	6.60% 80	1,212
Domestic Violence Services	6.71% 81	32.04% 387	44.45% 537	16.80% 203	1,208

### Q13 Are you satisfied with your current living situation? If no, what is the primary reason you are not?

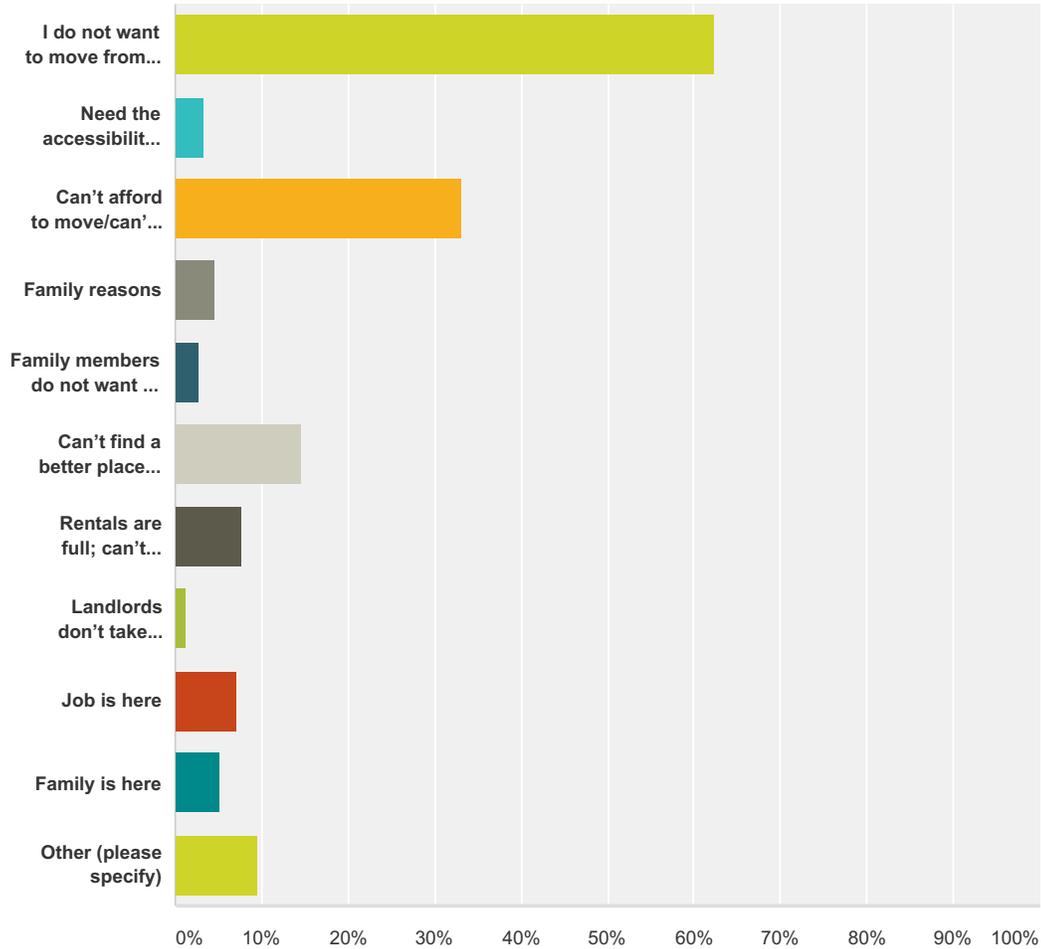
Answered: 1,194 Skipped: 210



Answer Choices	Responses
I am happy with my current living situation.	50.50% 603
No, too far from work.	2.26% 27
No, too expensive.	7.71% 92
No, too small.	3.02% 36
No, too crowded.	1.01% 12
No, I don't feel safe in the neighborhood.	17.25% 206
No, poor access to public transportation.	1.76% 21
No, poor housing condition.	1.68% 20
No, poor access to good schools or other neighborhood amenities.	5.03% 60
Other (please specify)	9.80% 117
<b>Total</b>	<b>1,194</b>

**Q14 Would you like to move from your current home or apartment? If yes, what are the three main reasons you haven't moved yet. (pick up to three)**

Answered: 1,171 Skipped: 233



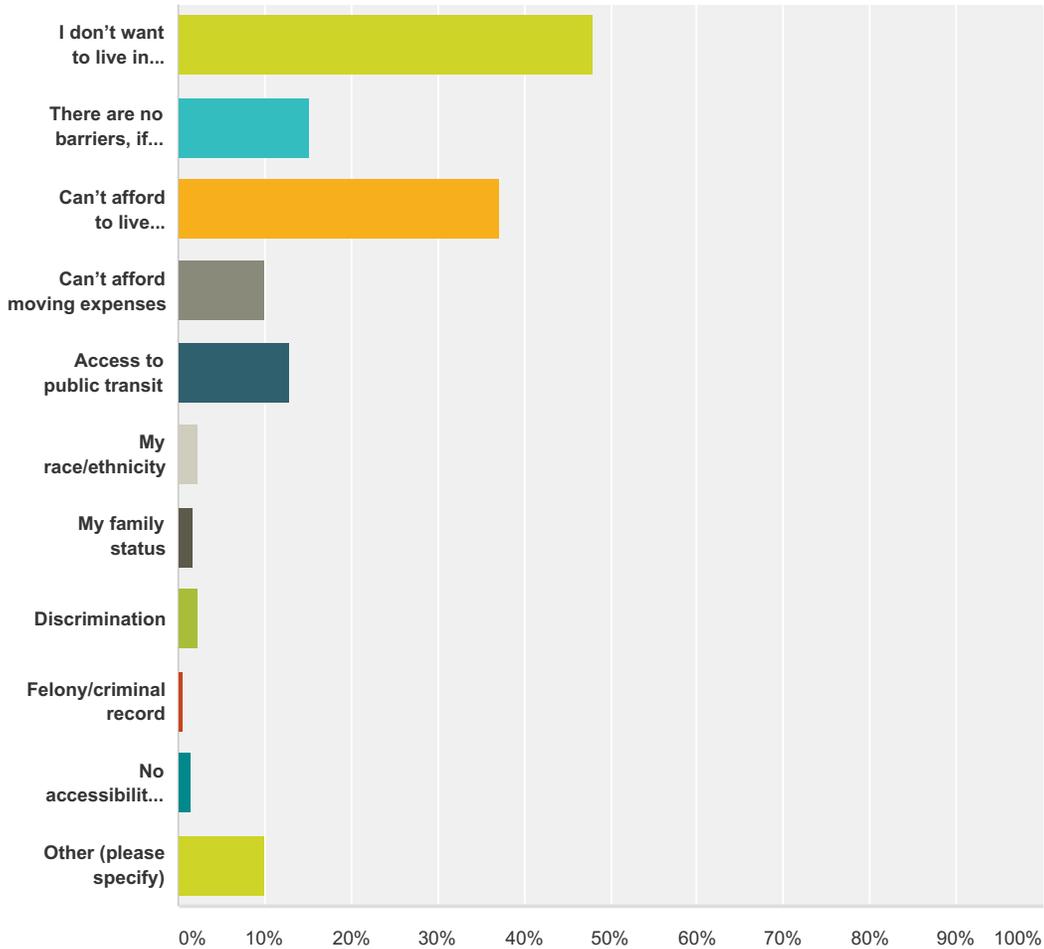
Answer Choices	Responses	Count
I do not want to move from my current home/apartment.	62.51%	732
Need the accessibility features of my current housing unit	3.25%	38
Can't afford to move/can't afford to live anywhere else	33.13%	388
Family reasons	4.61%	54
Family members do not want to move	2.82%	33
Can't find a better place to live	14.52%	170
Rentals are full; can't find a place to rent	7.77%	91
Landlords don't take Section 8	1.28%	15
Job is here	7.09%	83

## Oakland Resident Consolidated Plan Survey

Family is here	5.29%	62
Other (please specify)	9.65%	113
<b>Total Respondents: 1,171</b>		

### Q15 What barriers, if any, keep you from living in another part of Oakland (check all that apply)?

Answered: 1,179 Skipped: 225



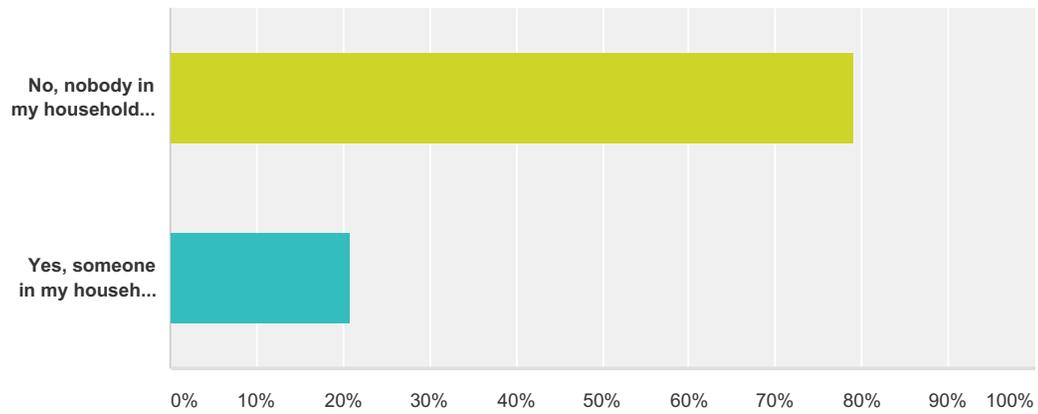
Answer Choices	Responses	Count
I don't want to live in another part of Oakland	47.92%	565
There are no barriers, if I wanted to move, I could	15.27%	180
Can't afford to live anywhere else	37.23%	439
Can't afford moving expenses	10.09%	119
Access to public transit	12.98%	153
My race/ethnicity	2.29%	27
My family status	1.61%	19
Discrimination	2.21%	26
Felony/criminal record	0.68%	8
No accessibility/handicapped accessible housing elsewhere	1.44%	17

## Oakland Resident Consolidated Plan Survey

Other (please specify)	9.92%	117
<b>Total Respondents: 1,179</b>		

### Q16 Do you, or someone in your household, have a disability of any type?

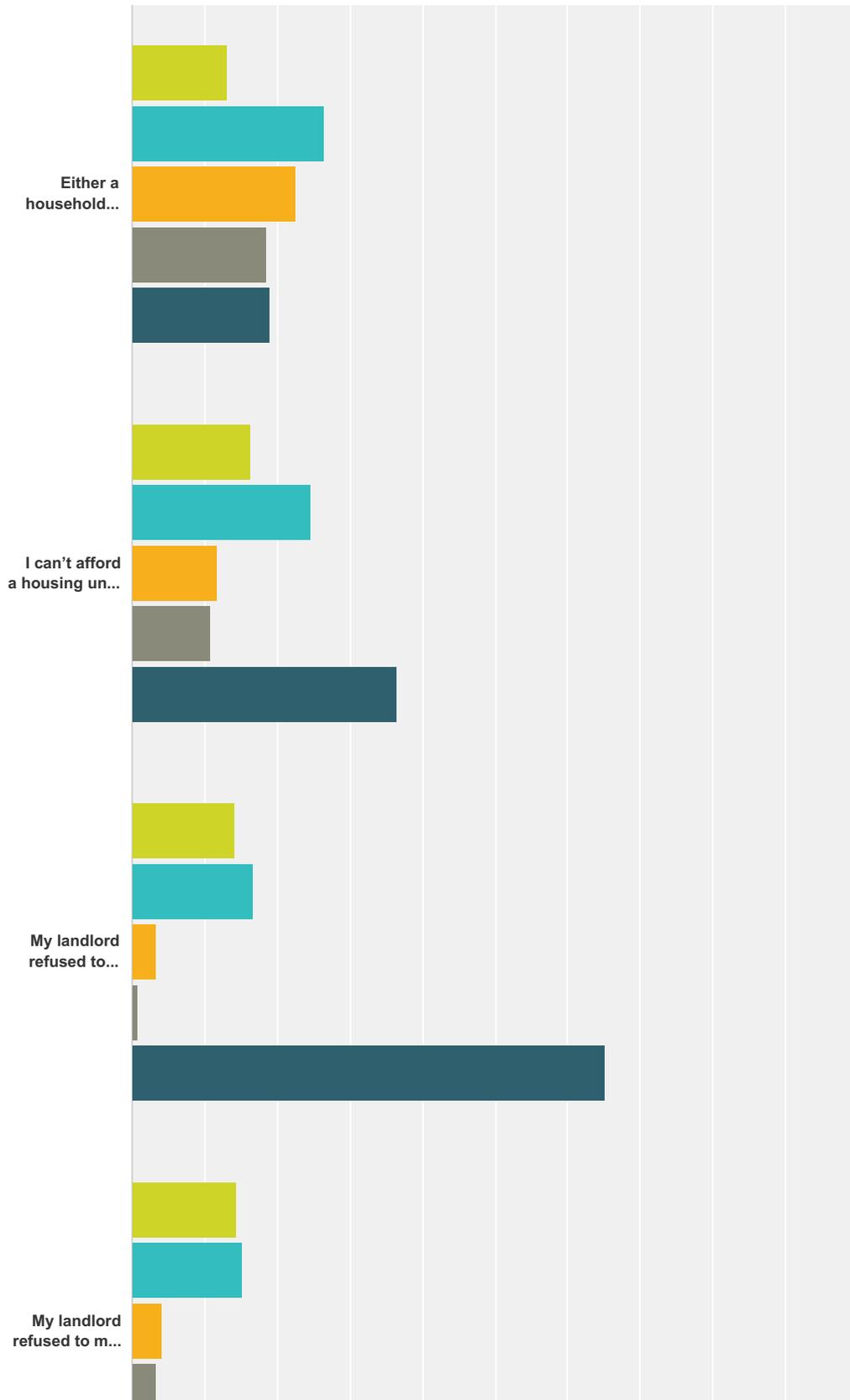
Answered: 1,200 Skipped: 204



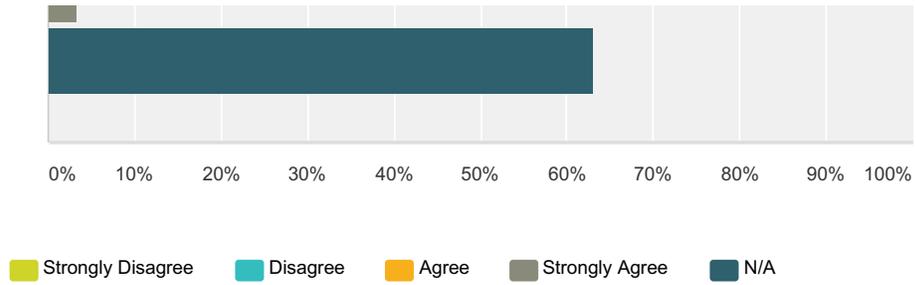
Answer Choices	Responses
No, nobody in my household has a disability of any type	79.17% 950
Yes, someone in my household has a disability	20.83% 250
<b>Total</b>	<b>1,200</b>

### Q17 Please rate your level of agreement with the following statements:

Answered: 252 Skipped: 1,152



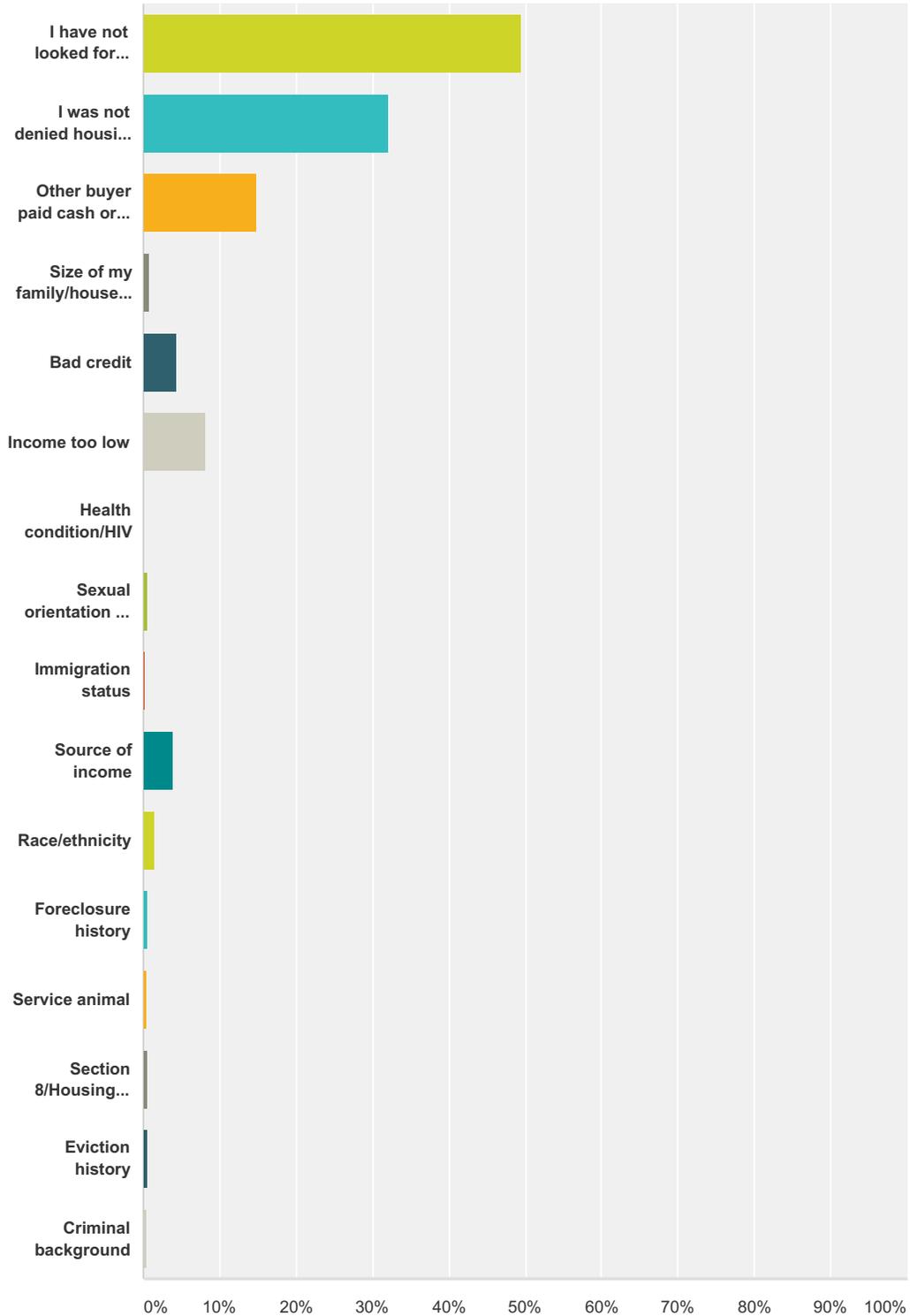
## Oakland Resident Consolidated Plan Survey



	Strongly Disagree	Disagree	Agree	Strongly Agree	N/A	Total
Either a household member or I have a disability and cannot get around the neighborhood because of broken sidewalks/no sidewalks/poor street lighting.	13.10% 33	26.59% 67	22.62% 57	18.65% 47	19.05% 48	252
I can't afford a housing unit that has accessibility/handicapped features (e.g. grab bars, ramps, handicapped parking).	16.19% 40	24.70% 61	11.74% 29	10.93% 27	36.44% 90	247
My landlord refused to accept a service animal.	14.11% 34	16.60% 40	3.32% 8	0.83% 2	65.15% 157	241
My landlord refused to make an accommodation for me or my household member's disability.	14.40% 35	15.23% 37	4.12% 10	3.29% 8	62.96% 153	243

**Q18 When you looked for housing to rent or buy in Oakland in the past five years, were you ever denied housing to rent or buy? If yes, why (check all that apply)?**

Answered: 1,118 Skipped: 286

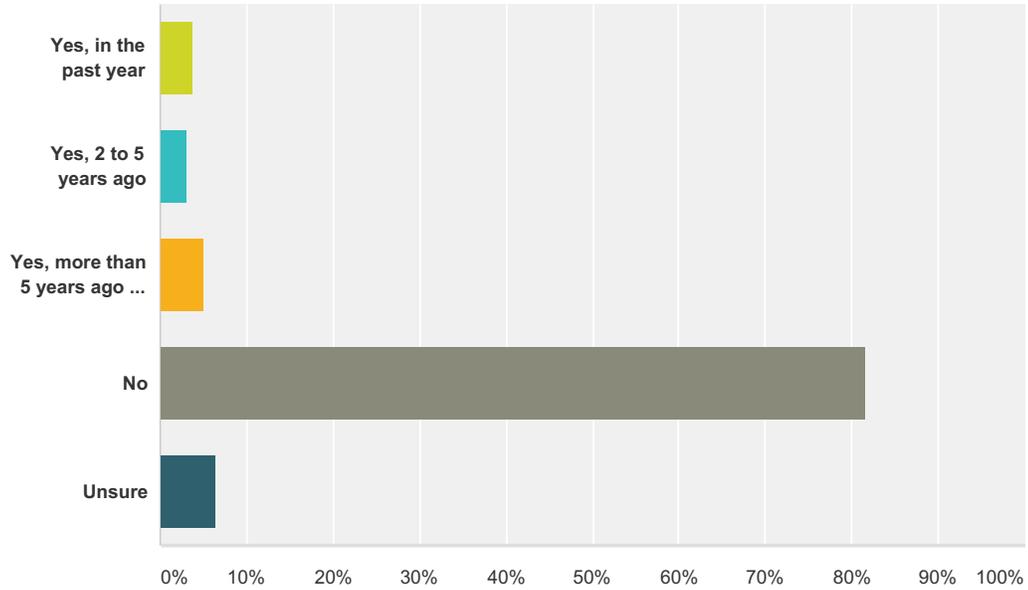


## Oakland Resident Consolidated Plan Survey

Answer Choices	Responses	
I have not looked for housing to rent or buy in the past five years	49.46%	553
I was not denied housing to rent or buy	32.20%	360
Other buyer paid cash or a higher price	14.76%	165
Size of my family/household	0.81%	9
Bad credit	4.38%	49
Income too low	8.05%	90
Health condition/HIV	0.09%	1
Sexual orientation or gender identity	0.63%	7
Immigration status	0.18%	2
Source of income	3.94%	44
Race/ethnicity	1.43%	16
Foreclosure history	0.72%	8
Service animal	0.36%	4
Section 8/Housing Choice Voucher	0.63%	7
Eviction history	0.63%	7
Criminal background	0.36%	4
<b>Total Respondents: 1,118</b>		

### Q19 Have you ever felt you were discriminated against when looking for housing in Oakland?

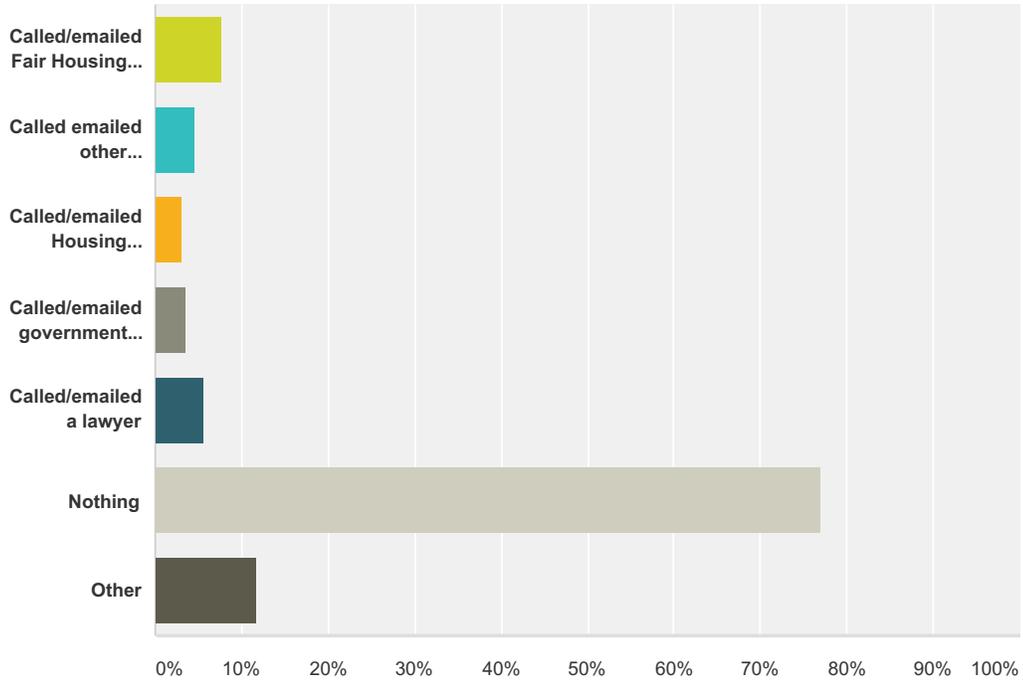
Answered: 1,166 Skipped: 238



Answer Choices	Responses	
Yes, in the past year	3.86%	45
Yes, 2 to 5 years ago	3.09%	36
Yes, more than 5 years ago or I don't remember when	4.97%	58
No	81.56%	951
Unsure	6.52%	76
<b>Total</b>		<b>1,166</b>

### Q20 If you felt you were discriminated against, what did you do about the discrimination (check all that apply)?

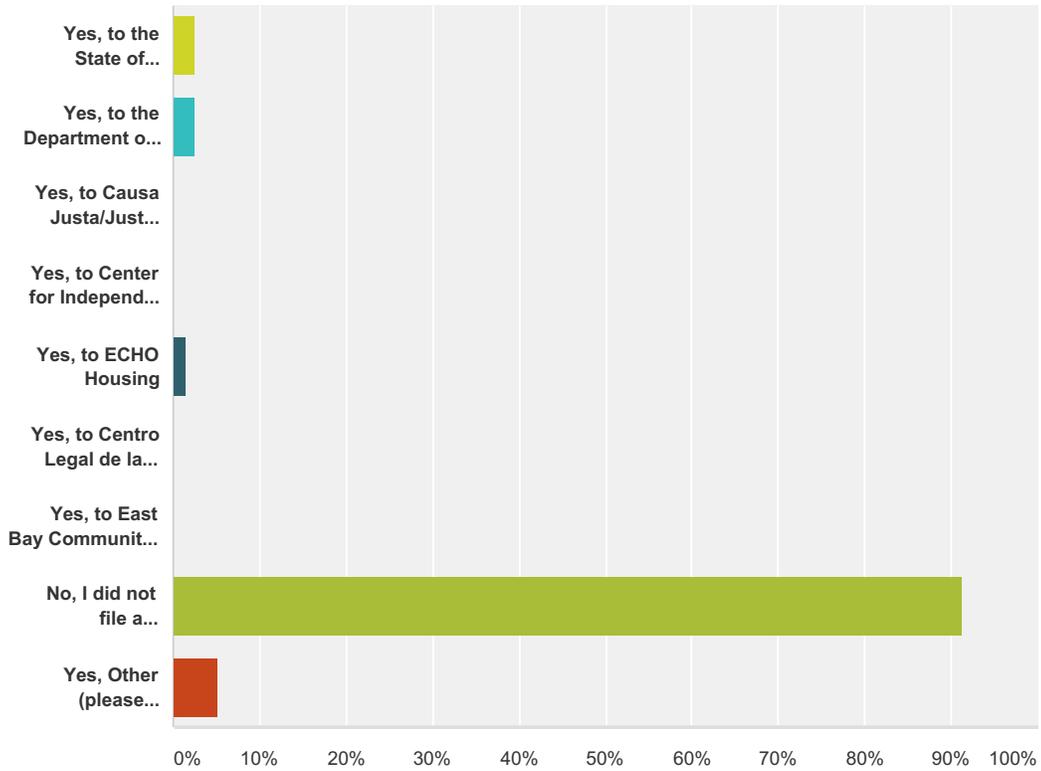
Answered: 196 Skipped: 1,208



Answer Choices	Responses
Called/emailed Fair Housing organization	7.65% 15
Called emailed other organization	4.59% 9
Called/emailed Housing Authority	3.06% 6
Called/emailed government agency	3.57% 7
Called/emailed a lawyer	5.61% 11
Nothing	77.04% 151
Other	11.73% 23
<b>Total Respondents: 196</b>	

### Q21 Did you file a complaint after you were discriminated against (check all that apply)?

Answered: 195 Skipped: 1,209



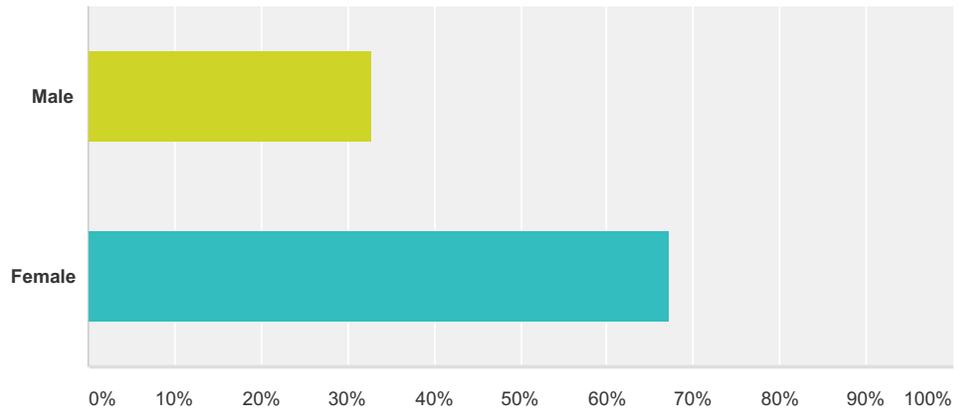
Answer Choices	Responses
Yes, to the State of California	2.56% 5
Yes, to the Department of Housing and Urban Development (HUD)	2.56% 5
Yes, to Causa Justa/Just Cause	0.00% 0
Yes, to Center for Independent Living	0.00% 0
Yes, to ECHO Housing	1.54% 3
Yes, to Centro Legal de la Raza	0.00% 0
Yes, to East Bay Community Law Center	0.00% 0
No, I did not file a complaint	91.28% 178
Yes, Other (please specify)	5.13% 10
<b>Total Respondents: 195</b>	

**Q22 If you filed a complaint, please describe if the complaint was resolved, how long it took to be resolved, and if you were satisfied with the outcome.**

Answered: 12 Skipped: 1,392

### Q23 What is your gender?

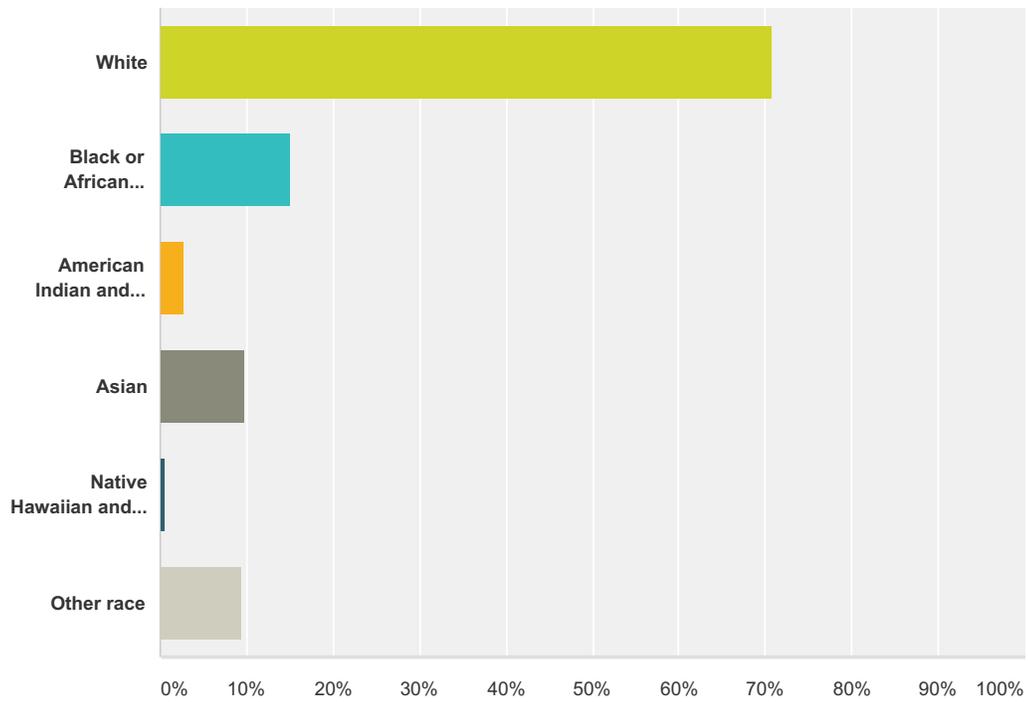
Answered: 1,170 Skipped: 234



Answer Choices	Responses
Male	32.74% 383
Female	67.26% 787
<b>Total</b>	<b>1,170</b>

**Q24 Please provide your race (check all that apply):**

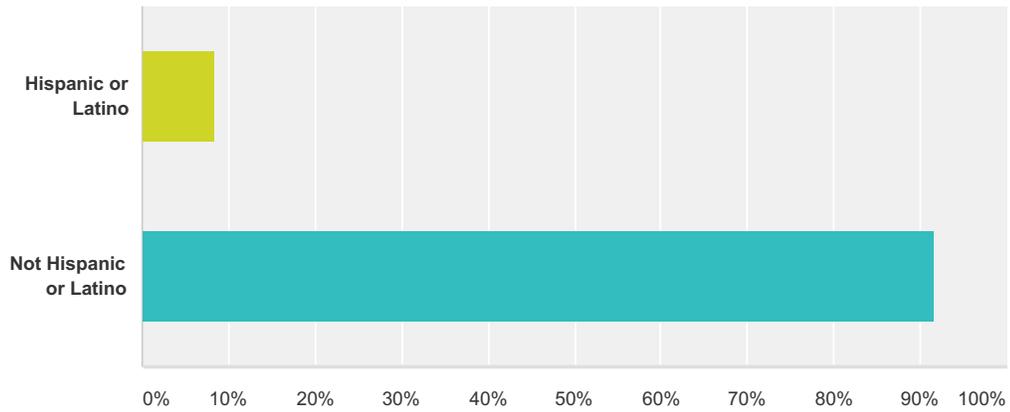
Answered: 1,163 Skipped: 241



Answer Choices	Responses
White	70.68% 822
Black or African American	14.96% 174
American Indian and Alaska Native	2.67% 31
Asian	9.80% 114
Native Hawaiian and Other Pacific Islander	0.69% 8
Other race	9.37% 109
<b>Total Respondents: 1,163</b>	

**Q25 Please provide your race ethnicity:**

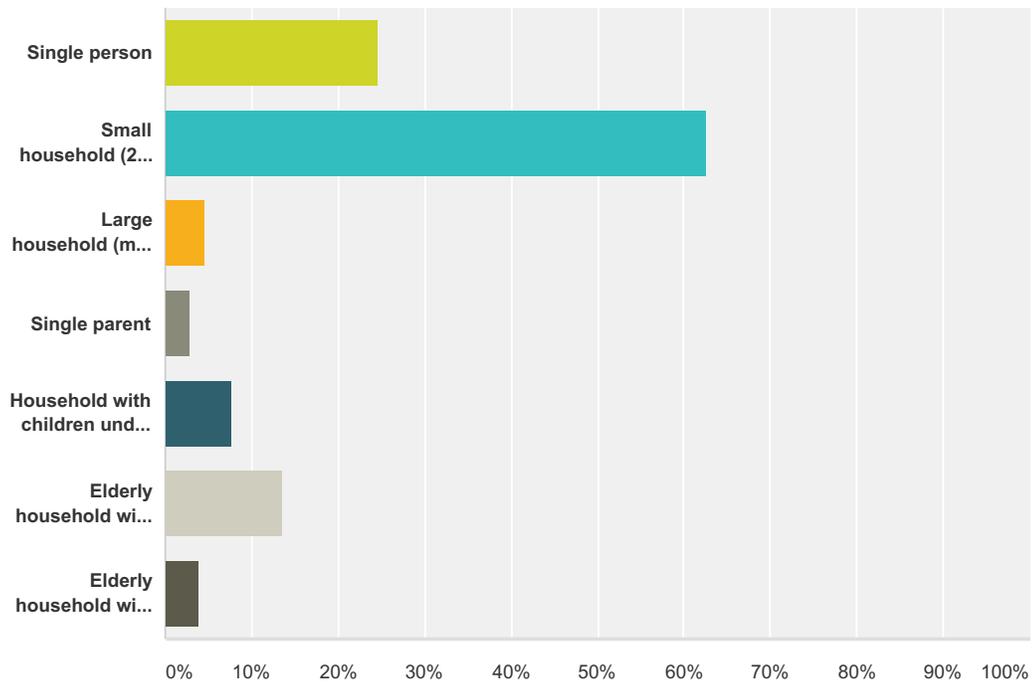
Answered: 1,035 Skipped: 369



Answer Choices	Responses
Hispanic or Latino	8.41% 87
Not Hispanic or Latino	91.59% 948
<b>Total</b>	<b>1,035</b>

### Q26 Please describe your household (check all that apply):

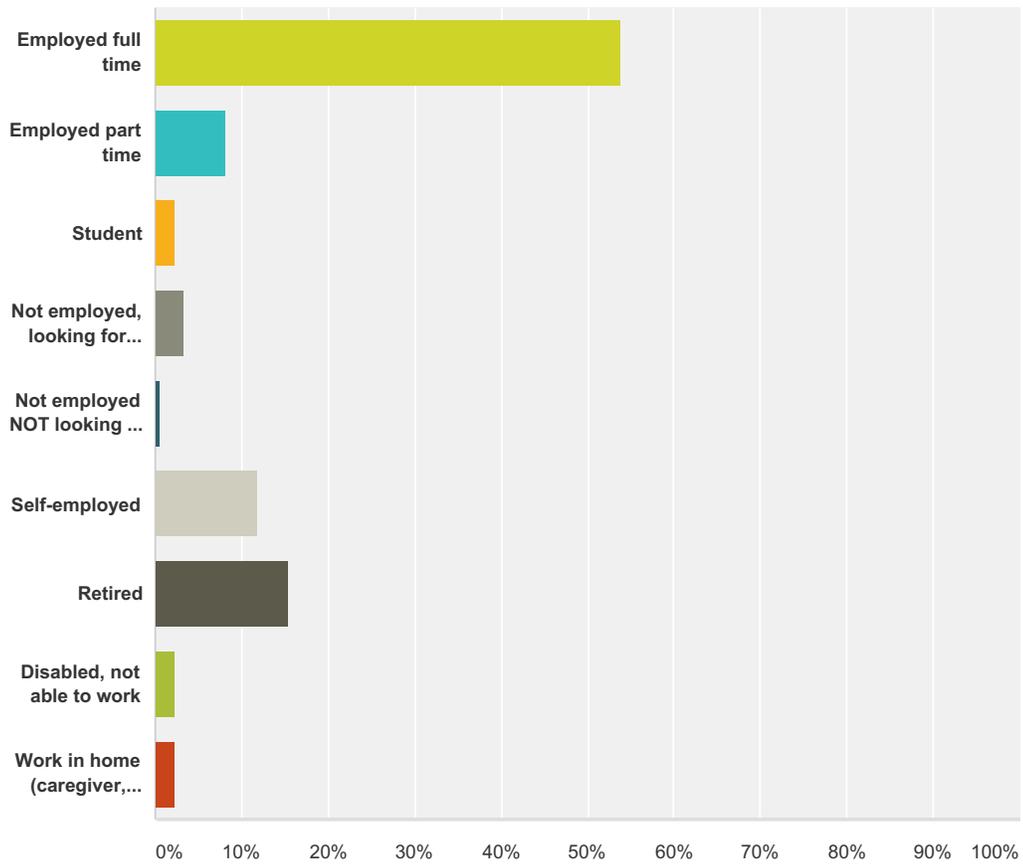
Answered: 1,168 Skipped: 236



Answer Choices	Responses
Single person	24.57% 287
Small household (2-4 people)	62.59% 731
Large household (more than 4 people)	4.54% 53
Single parent	2.83% 33
Household with children under 6 years of age	7.79% 91
Elderly household with at least one person between the ages of 62 and 74	13.61% 159
Elderly household with at least one person age 75 or older	3.94% 46
<b>Total Respondents: 1,168</b>	

### Q27 Please provide your employment status:

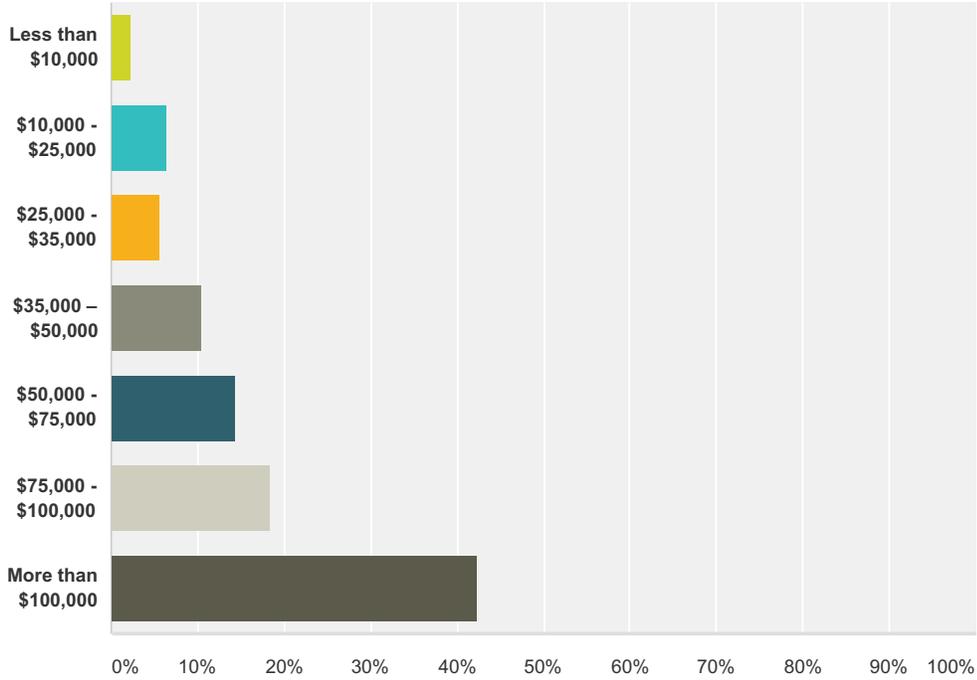
Answered: 1,171 Skipped: 233



Answer Choices	Responses	
Employed full time	53.80%	630
Employed part time	8.11%	95
Student	2.22%	26
Not employed, looking for work	3.25%	38
Not employed NOT looking for work	0.68%	8
Self-employed	11.96%	140
Retired	15.46%	181
Disabled, not able to work	2.22%	26
Work in home (caregiver, homemaker)	2.31%	27
<b>Total</b>		<b>1,171</b>

### Q28 What category does your total household income fall (include income from all sources)?

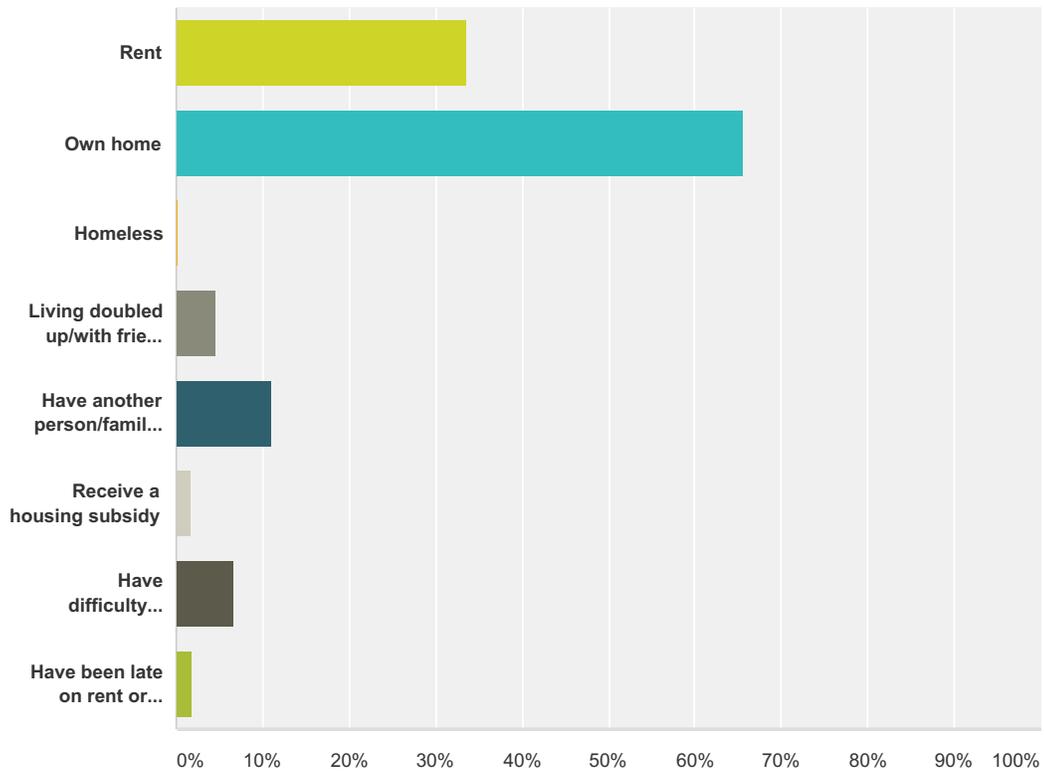
Answered: 1,123 Skipped: 281



Answer Choices	Responses	
Less than \$10,000	2.23%	25
\$10,000 - \$25,000	6.41%	72
\$25,000 - \$35,000	5.70%	64
\$35,000 - \$50,000	10.42%	117
\$50,000 - \$75,000	14.43%	162
\$75,000 - \$100,000	18.43%	207
More than \$100,000	42.39%	476
<b>Total</b>		<b>1,123</b>

**Q29 Please provide your housing status (check all that apply):**

Answered: 1,170 Skipped: 234



Answer Choices	Responses
Rent	33.68% 394
Own home	65.56% 767
Homeless	0.26% 3
Living doubled up/with friends or family	4.53% 53
Have another person/family living in my home	11.03% 129
Receive a housing subsidy	1.62% 19
Have difficulty making monthly housing expenses	6.58% 77
Have been late on rent or mortgage payments at least twice in last six months	1.79% 21
<b>Total Respondents: 1,170</b>	