



2020/21-2024/25

Analysis of Impediments



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Executive Summary

An Analysis of Impediments to Fair Housing Choice (AI) is a requirement for recipients of certain federal grants from the U.S. Department of Housing and Urban Development (HUD). The City of Visalia receives an annual entitlement of Community Development Block Grant (CDBG) and HOME Investment Partnership Funds (HOME) from HUD.

The regulations that govern these grants (Title 24 Code of Federal Regulations, Parts 91, 92, and 570) require that each HUD grantee certify as a condition of its grant that the grantee is “affirmatively furthering fair housing.” This includes the following actions: (1) conducting an analysis of impediments to fair housing choice; (2) taking appropriate actions to overcome the effects of impediments identified through that analysis; and (3) maintaining records reflecting the analysis and actions.


This AI adheres to the recommended scope of analysis and format in the Fair Housing Planning Guide developed by HUD (1996). Since 1983, the CDBG statute has required grantees to certify that they will affirmatively further fair housing (24 CFR 570.303(d)).

The Comprehensive Housing Affordability Strategy (CHAS) statute, enacted in 1990, requires a certification by the jurisdiction that it will affirmatively further fair housing as part of the CHAS. In 1995, HUD consolidated the CHAS and the submission and reporting requirements for community development formula grant programs into a single plan - the Consolidated Plan.

HUD defines the AI as, “a comprehensive review of a state’s or entitlement jurisdiction’s laws, regulations and administrative policies, procedures and practices. The AI involves an assessment of how these laws, regulations, policies and procedures affect the location, availability, and accessibility of housing, and how conditions, both private and public, affect fair housing choice.”¹

This review and assessment are used to identify actions the grantee will take to improve fair housing. The format of the AI is such that each action is associated with a concern or issue. These are described as “impediments.” HUD formally defines an impediment to fair housing as “... any action, omission, or decision that is intended to or has the effect of

¹ HUD Memorandum, “Analysis of Impediments to Fair Housing Choice Reissuance,” September 8, 2004.



restricting a person’s choice of housing on the basis of race, color, religion, sex, disability, familial status, or national origin.”²

The identification of and actions to be taken to remove impediments are to be used by the grantee to plan its annual actions and to report on actions taken to improve fair housing. This work is accomplished in the Annual Action Plan and in the Consolidated Annual Performance and Evaluation Report (CAPER), respectively.

Although the AI is not required as part of the annual submission to HUD, HUD recommends that each grantee regularly update its AI. HUD has suggested that the AI be conducted at least as often as the Consolidated Plan, which is required every five years. The City of Visalia is currently updating the Five-Year Consolidated Plan for the period July 1, 2020 through June 30, 2025.

² U.S. Department of Housing and Urban Development, *Fair Housing Planning Guide*, March 1996, 2-8.



Preparation of the AI

City staff worked with Michael Baker International to draft the AI and take it through the consultation and citizen participation process.

Work on the AI was completed concurrently with the drafting of the City's Five-Year Consolidated Plan. A Consolidated Plan Community Outreach Survey and a Housing Needs Survey were conducted as part of the Consolidated Plan and Analysis of Impediments process (detailed in Chapter 2: Community Participation Process). The surveys were conducted to solicit the community's input on the City's most pressing needs, particularly in the areas of housing, parks, community facilities, human services and fair housing.

Three public meetings were held, June 12th, June 13th, and June 26th to solicit input from stakeholders. Meetings were also held with the Citizen's Advisory Committee on August 7th and the Disability Advocacy Committee on August 12. The meetings are described in "Chapter 2: Community Participation", and comments will be detailed in Appendix A.

As part of the Consolidated Plan process, a public hearing with City Council is to be held between December 2019 and February of 2020 for the purpose of informing the City Council on the Consolidated Plan process, soliciting public comments on community needs, and kicking off the 30-day review period for the Consolidated Plan. Any comments received during the Public Review process, will be incorporated into the AI and Consolidated Plan. The Consolidated Plan would be sent to City Council for adoption at a spring public hearing.

Chapter I: Introduction

A. History of Visalia

Visalia is located east of State Highway 99 and along State Highway 198. In 2017, the City's population is approximately 130,047³ (8.25 percent increase from the 2010 U.S. Census count) Visalia is the oldest San Joaquin Valley town and the largest city in Tulare County. In 1874, Visalia was incorporated as a city with a common council and an ex-officio Mayor and President. Today Visalia is a charter city. The incorporated area covers approximately 37.74 square miles. The City's Finance Department – Housing Division is responsible for carrying out and overseeing various projects and programs with the use of United States Department of Housing and Urban Development (HUD) federal funding received.

The Census reported an increase in average household size from 2.98 persons per household in 2010 to 3.04 persons in 2017. This could mean a trend towards larger families, or a trend towards extended families sharing living quarters. During this same period, between 2010 and 2017, the housing stock increased by 5.9 percent, according to the California Department of Finance, E-5, Housing Estimates.

The City of Visalia offers a mix of housing types. Single-family homes make up about 78 percent of the housing stock, the multi-family share is approximately 19 percent, and mobile homes comprise 3 percent⁴. The median price of a single-family home in the City of Visalia was estimated at \$242,000 and \$178,000 for a condominium as of February 2019. Apartment rents range from \$750 for a two-bedroom apartment to \$1,600 for a unit with three or more bedrooms. Lower income households may be able to afford some of the City's smaller rental units; however, most are not able to afford homeownership.

B. Legal Background


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

1. Federal Laws

The federal Fair Housing Act of 1968 and Fair Housing Amendments Act of 1988 (42 U.S. Code §§ 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all

³ U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates.

⁴ Ibid.




aspects of housing, including the sale, rental, lease, or negotiation for real property. The Fair Housing Act prohibits discrimination based on the following protected classes:

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

Specifically, it is unlawful to:

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



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

HUD Final Rule on Equal Access to Housing in HUD Programs: On March 5, 2012, HUD published the Final Rule on “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.” It applies to all McKinney-Vento-funded housing programs, as well as to other housing assisted or insured by HUD. The rule creates a new regulatory provision that generally prohibits considering a person’s marital status, sexual orientation, or gender identity (a person’s internal sense of being male or female) in making housing assistance available.

Section 504 of the Rehabilitation Act of 1973: A federal law, simply called “Section 504,” codified at 29 U.S.C. § 794, that prohibits discrimination on the basis of disability in any program or activity that receives financial assistance from any federal agency, as well as in programs conducted by federal agencies including HUD. HUD’s regulations for Section 504, that apply to federally assisted programs or activities, may be found in the Code of Federal Regulations at 24 C.F.R. part 8. There are also regulations that govern Section 504 in programs conducted by HUD which may be found at 24 C.F.R. part 9; however, this webpage focuses on Section 504’s requirements for federally-assisted programs and activities.




2. California Laws

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

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

The following categories are protected by the FEHA:

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

- 
- Religion
 - Mental/physical disability
 - Medical condition
 - Age


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

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

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

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

And, finally, California Civil Code Section 1940.3 prohibits landlords from questioning potential residents about their immigration or citizenship status. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person’s citizenship or immigration status.



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

- Housing for persons with disabilities
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing
- Housing for extremely low-income households, including single-room occupancy units
- Housing for persons with developmental disabilities

3. Fair Housing

Equal access to housing is fundamental to each person being able to meet essential needs and to the pursuit of personal, educational, employment, and other goals. In recognition of equal housing access as a fundamental right, the governments of the United States and the State of California have both established fair housing as a right protected by law.

Federal fair housing laws prohibit discrimination in the sale, rental, lease, or negotiation for real property based on race, color, religion, sex, national origin, familial status, and disability. The California fair housing laws are built on the federal laws and add marital status, ancestry, source of income, sexual orientation, and “any arbitrary factor” as protected categories under the laws.

Many factors in the public and private domains impede equal access to housing or fair housing choice. Impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual

orientation, or any other arbitrary factor.⁵

To affirmatively promote equal housing opportunity, a community must work to remove or to mitigate impediments to fair housing choice. The City of Visalia is dedicated to providing fair housing opportunities to all residents, to assuring compliance with all applicable laws throughout the City, and to conducting its business fairly and impartially.

C. What is an Analysis of Impediments to Fair Housing Choice?

The AI is an assessment of how laws, governmental policies, real estate practices, and local conditions may affect the location, availability, and accessibility of housing. The analysis of their impact on housing choice can highlight areas where corrective actions might broaden the housing options of persons protected by fair housing laws. The analysis includes examining impediments and barriers to fair housing choice:

- An impediment to fair housing choice is any action, omission, or decision that is intended to or has the effect of restricting a person's choice of housing on the basis of race, color, religion, sex, disability, familial status, or national origin. Such a limitation to fair housing choice constitutes housing discrimination.
- This AI defines barriers to housing choice as factors, such as income level and housing supply that limit a person's choice of housing.⁶


This AI adheres to the recommended scope of analysis and format in the Fair Housing Planning Guide developed by the U.S. Department of Housing and Urban Development (1996).

D. Purpose of the Analysis of Impediments to Fair Housing

The purpose of an AI is to review conditions in the jurisdiction that may impact the ability of households to freely choose housing and to be treated equally, without regard to race, ethnicity, religion, gender, national origin, source of income, age, disability, or other protected status. The AI reviews the general state of fair housing, the enforcement of fair housing law, efforts to promote fair housing, access to credit for the purpose of housing, and general constraints to the availability of a full range of housing types.

⁵ U.S. Department of Housing and Urban Development, Fair Housing Planning Guide, March 1996, 2-8.

⁶ Ibid.



An AI also examines the affordability of housing in the jurisdiction with an emphasis on housing affordable to households with annual incomes classified as low-income. (Low-income is defined as equal to or less than 80% of the adjusted area median family income (AMI) as most recently published by the U.S. Department of Housing and Urban Development. For Visalia, 80 percent of the AMI is \$51,850, according to the 2019 income limits issued by HUD.⁷)


The document has three major goals:

1. To evaluate current conditions that may impact fair housing choice.
2. To review the impacts of policies and practices and how they may impact fair housing choice and the provision of housing, specifically affordable housing and housing for special needs households.
3. To identify impediments to fair housing choice and actions the City will take to remove those impediments or to mitigate the impact those impediments have on fair housing choice.

Fulfilling these goals includes the following:

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

⁷ FY 2019 Income Limits Summary for the Visalia-Porterville, CA MSA, U.S. Department of Housing and Urban Development, May 2019.



Pursuant to CDBG regulations [24 CFR Subtitle A §91.225(a)(1)] and HOME regulations [24 CFR Subtitle A §92.104], to receive funds, a jurisdiction must certify that it “actively furthers fair housing choice” through the following:

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



E. Organization of the Report

This report is divided into eight sections, including the executive summary and this introduction.

Executive Summary – Identifies the intent and purpose of the report, provides a brief description of the process, and summarizes the key findings.

Introduction – Explains the purpose of the analysis of impediments to fair housing, defines “fair housing”, lists the data and funding sources for the report, and describes the public participation process.


Community Participation Process – Provides a description of public outreach efforts to obtain community input on community needs and possible impediments.

Community Profile – Describes the housing and population characteristics of the City of Visalia. Population characteristics include income, age, race, ethnicity, familial status, and disability. Employment characteristics are also included. Housing characteristics include unit type and tenure, housing cost, and overcrowding. The geographic distribution of households by income, race, and ethnicity is also examined.

Public Policies – Reviews public policies and practices to determine the potential impact on fair housing and the provision of an adequate number and appropriate types of housing.

Private Sector Practices – Assesses the general level of fair housing and housing rights awareness in the private sector. Specifically, rental housing, residential real estate sales, and mortgage lending are evaluated. The analysis relies on an array of tools including interviews with stakeholders and the review of local advertisements, published data on mortgage lending, and reports of unfair housing practices.

Assessment of Fair Housing Practices – Evaluates existing public and private programs, services, practices, and activities that aim to assure fair housing in the City. This section describes the City’s recent actions to promote fair housing, provide affordable housing, and remove barriers to affordable housing. In order to identify actions taken to affirmatively further fair housing, this section reviews the City of Visalia’s most recent Consolidated Plan (ConPlan), Annual Action Plans (AP’s), and Consolidated Annual Performance and Evaluation Reports (CAPER’s).




Five-Year Progress – Summarizes impediments identified in 2015 and actions taken to accomplish objectives and goals used in addressing the impediments identified in the City’s previous AI.

Conclusions and Recommendations for Fair Housing – Summarizes the findings regarding fair housing issues in the City and provides recommendations for furthering fair housing. In this section, the reader can find the impediments identified and the actions proposed to address those impediments.

Data Sources - In preparation of this Analysis of Impediments to Fair Housing Choice (AI), the following data sources were consulted.

- American Community Survey (ACS) 2013-2017 - 5-Year Estimates, U.S. Census Bureau. ACS data are obtained from a nationwide survey on demographic, social, economic, and housing information conditions. The 5-Year Estimate includes 60 months of collected data for all population size areas. It utilizes the largest sample size of all the Survey forms (1-Year, 3-Year and 5-Year Estimates) and is the most reliable. It is, however, the least current of the Survey forms. The 5-Year Estimate is best utilized when precision is more important than currency, and when examining tracts and other smaller geographies.
- 2000 and 2010 Decennial Census, U.S. Census Bureau. The Decennial Census provides comprehensive data describing demographic and housing characteristics.
- California Department of Finance (DOF). The Department of Finance provides estimates on current population and housing stock based on housing construction and demolition data submitted annually by local jurisdictions.
- Employment Development Department (EDD). The Employment Development Department provides current and projected labor market data.
- Comprehensive Housing Affordability Strategy (CHAS). Developed by the Census Bureau for HUD, the CHAS database contains information on low- and moderate-income households, as well as housing problems (i.e., cost burden, overcrowding, and substandard conditions). In June 2018, HUD posted CHAS data based on the 2011-2015 ACS. The five-year (2010-2014) data are used by HUD and state and local governments to examine housing needs and make funding decisions. The data are



available at the state, county, place, and census-tract level.

- U.S. Bureau of Labor Statistics. The U.S. Bureau of Labor Statistics provides labor market data including data on employment, wages, and earnings.



Chapter II: Community Participation Process

The analysis of impediments in the City of Visalia was conducted through community outreach and housing needs surveys, public meetings, stakeholder interviews, and public hearings. Significant outreach efforts were made to the public, faith-based organizations, educational institutions, housing services, and health and social service organizations (including organizations providing services to homeless persons and families, persons with HIV/AIDS, victims of domestic violence, senior citizens, and extremely low to low income populations).

A. Community and Housing Surveys

To encourage broad and meaningful community participation, two surveys were designed. A community outreach survey asked questions designed to elicit feedback about needs for housing, community facility needs, special needs services, homeless, economic development, and other supportive community programs. The housing survey was designed to gain input on the community's experience with housing discrimination, awareness of tenant housing rights, home lending, housing affordability, and information related to home maintenance and condition.

Legal notices in the newspaper and media outlets, such as the City's website, Facebook, and Utility billing, were used to publicize the surveys. Efforts to reach populations underrepresented in the planning process included discussions regarding the survey with various housing, social service, faith based, and other organizations that provide services to the disabled, special needs, low income, and homeless population community. Many of the organizations that assisted in the effort to distribute the surveys posted them on their websites and sent notification to their partners and clientele. The surveys were provided in English and Spanish.

The surveys were publicized through

- Legal notice in the newspaper
- Email blast of flyers in English and Spanish distributed to 493 community partners and service organizations
- Day-long booth at a Farmer's Market
- City of Visalia Department Directors

- Visalia’s Facebook page
- Various websites
 - City of Visalia
 - Central Valley Recovery Services
 - Local Continuum of Care- Kings/Tulare Homeless Alliance

1. Survey Results

The Community Outreach Survey was used to gather public feedback and information for the 2020-2025 Consolidated Plan. The surveys were open to the public from May 13, 2019, to June 24, 2019. 185 people responded to the Community Outreach survey and 102 people responded to the Housing Survey, completing over 75% of all the questions posed. The highest priority needs were affordable rental housing as well as affordable homeownership, housing maintenance, and homeless shelters that include supportive services to assist the transition out of homelessness.


The second highest needs identified were larger housing units, skills and affordability of home maintenance, and for homeless persons, emergency shelters, transitional housing, and low barrier shelters.

The third highest priorities were senior housing, landlord oversight, and less discrimination toward homeless populations and services to housing issues, such as, affordable housing, housing for homeless, and, supportive services for the homeless.

Respondents lived in all areas of the City. Most respondents reported that the quality of their housing unit was “Good” out of choices Excellent, Good, Fair, Poor, and Very Poor. Lastly, the respondents indicated more services for the homeless population would increase their satisfaction.

B. Public Workshops

Three public community workshop meetings were held on June 12th, June 13th, and June 26th of 2019. The workshops were designed to solicit public input. Engagement activities were used to gather input on the highest community and housing needs. The results of the input were narrowed to the three highest priorities:

- 
1. Affordable housing
 2. Housing rehabilitation
 3. Economic development

The meetings were legally noticed through the newspaper, the City's website, and notices were emailed to the 493 organizations from the contact list of partners and service organizations the City has compiled from past stakeholder and community meetings related to grant funding from HUD. Flyers were provided to all students through the Visalia Unified School District- Elementary and Middle Schools.


C. Consultation

From June to August of 2019, several stakeholders were consulted during public workshops, over the phone, and in-person at their offices. Such stakeholders included, but were not limited to, Housing providers, Health services, Social services, Organizations representing protected classes, Fair housing, Broadband internet providers, Emergency management organizations, the Citizens Advisory Committee, the Disability Advocacy Committee, and Additional local and regional stakeholders. The purpose of the consultations, or interviews was to carry out a needs assessment for determining needs for:

- Housing
- Homelessness services
- Disproportionate need

As well as to assist in a market analysis to locally determine the following:

- Number of units
- Special needs services available
- Non-housing community resources
- Barriers to affordable housing



For consistency, the stakeholders interviewed were each asked the same seven questions to elicit input and gather data on community and housing needs. For a summary of stakeholder interviews, see Appendix A.

1. Evaluation of Community Participation Efforts

Examples of outreach activities the City of Visalia used include inserts in utility bills and fliers posted in communities in English and Spanish. Fliers were also distributed to elementary and middle schools of the Visalia Unified School District- a total of 15,435 fliers were provided to the students to take home. Public meetings were held in three quadrants of the City to reach the broadest and most diverse demographic. Information regarding public meetings was shared through postings in the local newspaper, the City's website, including Facebook and Twitter, and at service organizations in an effort to obtain participation by members of particular audiences, for example, homeless persons, veterans, low income individuals, families, and single female heads of household.

2. Reaching Underrepresented Populations

The City of Visalia provided meaningful access to Limited English Proficient (LEP) persons during meetings and outreach activities. Aside from English, Spanish is a predominant language spoken in Visalia. Public notice of all public meetings, hearings, and the surveys were translated into English and Spanish. Fliers publicizing the surveys, as well as the surveys were translated into English and Spanish. The City of Visalia ensured effective communication with individuals with disabilities during such events, such as through the use of auxiliary aids and services (e.g., sign language interpreters, real-time captioning, large print and braille documents).

3. Outreach to Limited English Proficient Population

The City of Visalia provided meaningful access to LEP persons during meetings and outreach activities, such as through translation of documents. Significant efforts were made to reach out to the Spanish speaking community to elicit feedback, which included distribution of the translated fliers and surveys to 493 email addresses of community organizations and agencies, phone calls to the City's contacts at local community organizations and instructions in Spanish to links to the survey as well as information translated regarding public meeting dates were also distributed to the contacts.



4. R/ECAPs

Outreach to persons who reside in areas identified as racially or ethnically concentrated areas of poverty (R/ECAPs) was undertaken by notifying organizations that can serve as representatives to such populations largely because they are knowledgeable about this populations needs through their work providing services to low income or underrepresented persons. One of the community outreach meetings was held at the Anthony Community Center which is located in the R/ECAP census tract. See Figure 4 for a map of the City's R/ECAP. Other outreach was conducted by holding a publicly noticed meeting at the Citizen's Advisory Committee's (CAC's) monthly meeting on August 7, 2019.

5. Persons with Disabilities

Organizations that provide services to the disabled throughout the City of Visalia were enlisted to notify persons who are disabled or impaired and reside in Visalia, about the process. Outreach to the disabled included meeting with the Disability Advocacy Committee (DAC) at their monthly meeting on August 12, 2019.



Chapter III: Community Data

There are several conditions that can restrict fair housing choice or access to opportunities. Conditions include but are not limited to segregation, lack of integration, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.

Below is data gathered and used in determining the fair housing issues to be addressed. Initially, understanding of the jurisdictions demographic must be obtained. Population growth, age characteristics, and race/ethnicity all help determine a community's housing needs and play a role in exploring potential impediments to fair housing choice.

A. Demographic Summary

Within the same housing market, household and individual characteristics may affect the range of housing choices available and the specific housing needs. This chapter of the AI presents and discusses the housing and population characteristics of the City of Visalia.

1. Population Characteristics

The type and amount of housing needed in a community is largely determined by population growth and the characteristics of the population. Factors such as age, occupation, and income combine to influence the type of housing needed in a community and the affordability of housing provided.

Information in this section is primarily based on housing and population data provided by the California Department of Finance (DOF) and the U.S. Census Bureau. The most current data available has been used.

Population

Visalia experienced population growth by 35 percent between 2000 and 2010. The California Department of Finance, Population and Housing Estimates, 2018, estimated that Visalia's population was 136,403. This represented an increase of 9.6 percent (8,968 persons) from 2010 to 2018 (Table 1). Visalia's population growth exceeded Tulare County's which was 7.5% for the same period.



Table 1: Regional Population Growth Trends							
Jurisdiction	1990 Population	2000 Population	2010 Population	2018 Population	% Change 1990-2000	% Change 2000-2010	% Change 2010-2018
City of Visalia	74,000	91,891	124,442	136,403	24%	35%	9.6%
County of Tulare	309,200	368,021	442,179	475,346	19%	20%	7.5%

Source: Bureau of the Census, 1990-2010. California Department of Finance, Population and Housing Estimates 2018.

Table 2: Population Growth of Visalia (2000-2018)				
2000	2010	Percent Change	2018	Percent Change
91,891	124,442	35%	136,403	9.6%

Source: Bureau of the Census, 2000-2010. California Department of Finance, Population and Housing Estimates 2018.

2. Population Age

The age of persons in a community is a determining factor of a community’s housing needs. Different age groups have distinct family types, sizes, and income levels, all of which correspond to different housing needs.⁸ Younger adults tend to seek apartments, condominiums, and single-family units that are proportionate to their typically smaller household sizes and more constrained finances; adults with children may seek larger single-family homes; however, as grown children begin to leave home, older adults and seniors often seek to trade their larger homes for smaller single-family homes and condominiums that are typically easier to maintain and afford.⁹

The largest age cohort for Visalia in 2017, (Table 3) is persons between the ages 25 to 44 at 27.1 percent. Older adults combined (persons 45 to 64 and 65+) make up 33% of Visalia’s population. The median age is consistent at 31.9. Results indicate needs for senior housing and housing for young families.

⁸ Joint Center for Housing Studies of Harvard University, *The State of the Nation’s Housing 2019*, Harvard Graduate School of Design, Harvard Kennedy School, 2019, 13.

⁹ Rose Quint, “Housing Preferences Across Generations,” NAHB Economics and Housing Policy Group Studies (March 1, 2016).



Table 3: Age Characteristics (2000-2017)			
	2000	2010	2017
Under 5	7,413	10,747	11,731
5 to 19	24,040	30,334	31,420
20 to 24	5,974	8,786	8,789
25 to 44	26,098	33,922	35,201
45 to 64	18,074	27,779	27,965
65+	9,966	12,874	14,941
Totals	91,565	124,442	130,047
Median Age	31.7	31.6	31.9

Source: Bureau of the Census, 2000-2010 and ACS, 2013-2017.

3. Race and Ethnicity

The definition of race, a group of persons related by common descent or heredity, is different from the definition of ethnicity, a social group that shares a common and distinctive culture, religion, language, or the like. As such, persons of different ethnicities possess distinct preferences as for choosing types of housing.¹⁰ For example, Hispanic is an ethnicity, not a race. As of 2017, persons of Hispanic ethnicity account for half of Visalia’s population at 65,372 or 50.3% of the population (Table 4).

Table: 4: Racial and Ethnic Composition

	2000	2010	Growth Rate	2017	Growth Rate
			2000-2010		2010 - 2017
Non-Hispanic White	50,269	55,081	10%	52,589	-5%
Non- Hispanic Black	1,558	2,166	39%	2,076	-4%
Non- Hispanic Asian/Pac. Islander	4,551	6,550	44%	6,502	-1%
Hispanic	32,619	57,262	76%	65,372	14%
Non- Hispanic Other	2,568	3,383	32%	3,508	4%
Total	91,565	124,442	36%	130,047	5%

Source: Bureau of the Census, 2000-2010, Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

As indicated in Table 5, 33% of the City’s residents speak a language other than English. Also, as shown in Table 6, 24.8% speak English less than "very well". Such findings indicate a special need in the community. Language barriers may prevent residents from accessing services, information, and housing, and may also affect educational attainment and employment. Executive Order 13166 ("Improving Access to Services by Persons with Limited English Proficiency") was issued in August 2000, which requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally

¹⁰ Esther Havekes, Michael Bader, and Maria Krysan, "Realizing Racial and Ethnic Neighborhood Preferences? Exploring the Mismatches Between What People Want, Where They Search, and Where They Live," *Population Research and Policy Review* (2016): 102.

conducted programs and activities who, due to Limited English Proficiency (LEP), cannot fully and equally participate in or benefit from those programs and activities. This requirement passes down to grantees of federal funds as well. Therefore, the collaborating entities are responsible for ensuring compliance with this regulation.

Table 5: Language, all persons 5 years and older		
Language	Persons	Percentage
English language	79,750	67%
Other language	38,566	33%
All persons	118,316	100%

Source: 2013-2017 American Community Survey-5 Year Estimates

Table 6: Hispanic persons 5 years and older		
Nativity and Language	Persons	Percentage
Nativity		
Native born	45,897	79.4%
Foreign born	11,937	20.6%
Language		
Speak only English	26,806	46.3%
Speak another language, speak English "very well"	16,671	28.8%
Speak another language, speak English less than "very well"	14,357	24.8%
Total Hispanic persons, 5 years and older	57,834	100%

Note: Nativity and Language Spoken at Home
 Source: 2013-2017 American Community Survey- 5 Year Estimates



4. Limited English Proficiency

According to Figure 1 (see next page), the City's R/ECAP not only contain the City's highest concentration of poverty, but also the City's second highest (75 percent) concentration of persons of limited English proficiency (LEP). Persons that are limited in English can become culturally or linguistically isolated, tend to have less education, and earn less. To get information to these populations, regarding public services related to housing, health, or other valuable resources can be challenging without properly integrating factors related to resources, race, culture, and language.¹¹ LEP can also have an impact on the workforce and local economy. Some employers may require English speakers.¹²

¹¹ Jeanne S. Ringel, Anita Chandra, Malcolm V. Williams, Karen A. Ricci, Alexandria Felton, David M. Adamson, Margaret Weden, Meilinda Huang, "Enhancing Public Health Emergency Preparedness for Special Needs Populations: A Toolkit for State and Local Planning and Response," Public Health Preparedness, (2009): 49.

¹² Cheeseman Day, Jennifer and Shin, Hyon B. "How Does Ability To Speak English Affect Earnings?" Population Division, U.S. Census Bureau (2005).

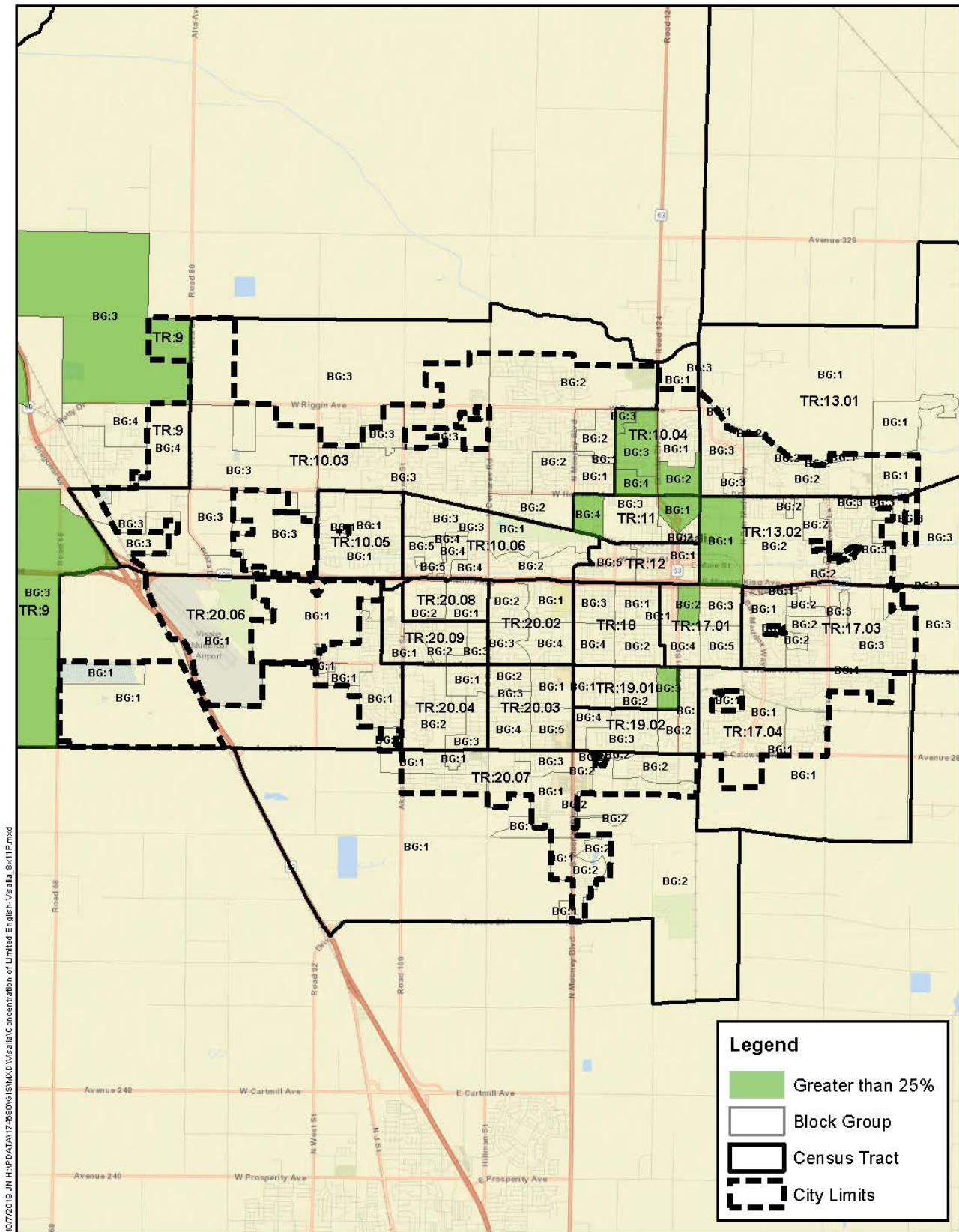


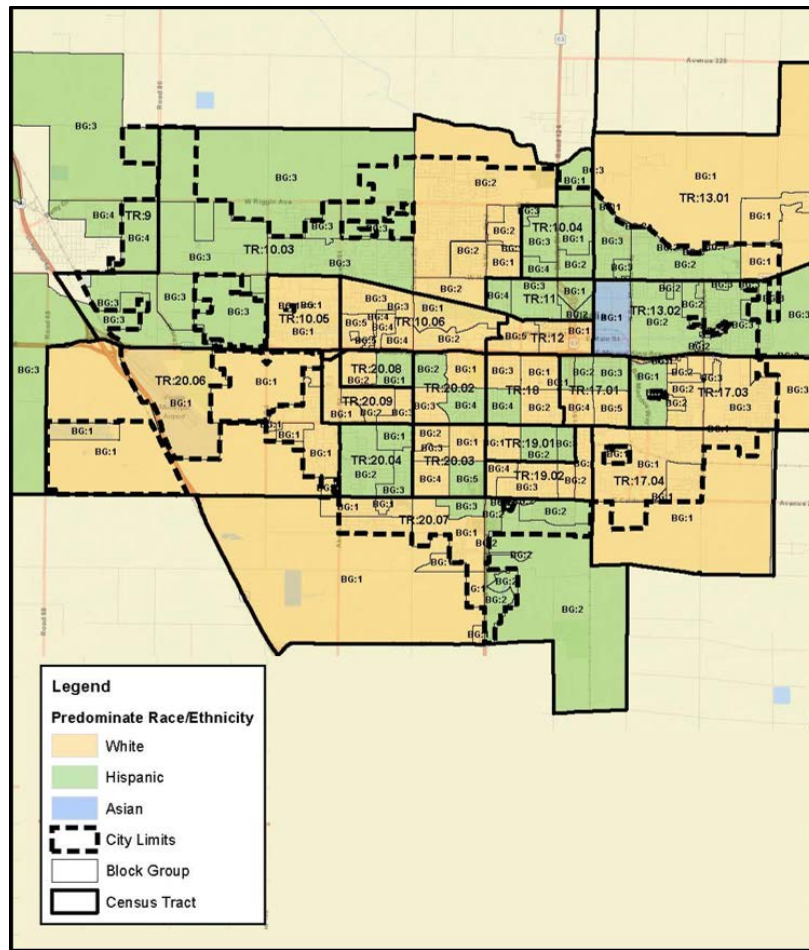
Figure 1. Concentrations of Limited English Proficiency HUD Exchange (2014).

A dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area. This dissimilarity index provides values ranging from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured. Index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. Visalia’s jurisdiction dissimilarity index trend has shown a decrease since 1990 and currently measures low overall.

Table 7: Racial/Ethnic Dissimilarity Trends

Racial/Ethnic Dissimilarity Index	(Visalia, CA CDBG, HOME) Jurisdiction				(Visalia-Porterville, CA) Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	37.56	34.52	23.61	29.23	36.51	37.80	34.94	40.58
Black/White	29.37	22.02	16.42	27.25	51.11	40.70	32.32	41.93
Hispanic/White	36.85	35.87	24.29	29.90	38.85	40.16	37.53	42.42
Asian or Pacific Islander/White	48.94	42.41	30.05	34.23	42.42	39.00	33.43	40.91

Sources: Affirmatively Furthering Fair Housing Tool (AFFHT) Data Table 3; Decennial Census.



Tract	Block Group	White	Hispanic	Black	Asian	Other	Tract	Block Group	White	Hispanic	Black	Asian	Other
TR9	BG3	33%	65%	0%	0%	3%	TR17_04	BG1	45%	44%	1%	5%	6%
TR9	BG4	9%	80%	5%	3%	3%	TR18	BG1	60%	36%	0%	2%	2%
TR10_03	BG1	41%	38%	0%	17%	4%	TR18	BG2	63%	31%	3%	1%	2%
TR10_03	BG2	46%	40%	2%	5%	6%	TR18	BG3	62%	30%	0%	2%	6%
TR10_03	BG3	37%	62%	0%	0%	1%	TR18	BG4	29%	47%	16%	2%	6%
TR10_04	BG1	1%	72%	1%	18%	9%	TR19_01	BG1	64%	30%	0%	4%	0%
TR10_04	BG2	5%	87%	0%	0%	7%	TR19_01	BG2	46%	50%	1%	2%	2%
TR10_04	BG3	10%	75%	3%	11%	1%	TR19_01	BG3	27%	70%	1%	1%	1%
TR10_04	BG4	1%	89%	0%	8%	1%	TR19_02	BG1	64%	36%	0%	0%	0%
TR10_05	BG1	56%	29%	4%	3%	8%	TR19_02	BG2	56%	43%	0%	0%	0%
TR10_06	BG1	96%	3%	0%	2%	0%	TR19_02	BG3	66%	18%	0%	13%	0%
TR10_06	BG2	75%	24%	0%	0%	1%	TR19_02	BG4	55%	41%	0%	2%	1%
TR10_06	BG3	54%	39%	0%	3%	3%	TR20_02	BG1	53%	43%	0%	4%	0%
TR10_06	BG4	77%	23%	0%	0%	0%	TR20_02	BG2	31%	54%	3%	8%	4%
TR10_06	BG5	70%	25%	0%	3%	2%	TR20_02	BG3	61%	38%	0%	2%	0%
TR11	BG1	7%	86%	0%	5%	1%	TR20_02	BG4	39%	47%	0%	10%	4%
TR11	BG2	27%	61%	10%	0%	2%	TR20_03	BG1	50%	41%	7%	3%	0%
TR11	BG3	18%	76%	0%	4%	2%	TR20_03	BG2	66%	32%	0%	2%	0%
TR11	BG4	7%	74%	2%	14%	4%	TR20_03	BG3	82%	18%	0%	0%	0%
TR12	BG1	55%	34%	1%	1%	9%	TR20_03	BG4	54%	45%	2%	0%	0%
TR12	BG5	0%	0%	0%	0%	0%	TR20_03	BG5	40%	59%	0%	1%	0%
TR13_01	BG1	75%	18%	0%	1%	6%	TR20_04	BG1	46%	46%	0%	2%	5%
TR13_01	BG2	31%	63%	0%	6%	0%	TR20_04	BG2	46%	46%	0%	4%	4%
TR13_01	BG3	18%	79%	1%	2%	0%	TR20_04	BG3	47%	51%	1%	1%	1%
TR13_02	BG1	29%	60%	2%	7%	2%	TR20_06	BG1	83%	15%	0%	1%	1%
TR13_02	BG2	16%	26%	4%	54%	0%	TR20_06	BG2	83%	15%	0%	1%	1%
TR13_02	BG3	41%	52%	4%	3%	0%	TR20_07	BG1	59%	31%	3%	3%	4%
TR13_02	BG4	29%	60%	2%	7%	2%	TR20_07	BG2	38%	49%	1%	8%	5%
TR17_01	BG1	16%	82%	0%	2%	0%	TR20_07	BG3	26%	69%	1%	0%	4%
TR17_01	BG2	22%	64%	7%	7%	0%	TR20_08	BG1	34%	44%	8%	12%	3%
TR17_01	BG3	26%	64%	3%	1%	6%	TR20_08	BG2	55%	37%	0%	6%	1%
TR17_01	BG4	50%	38%	4%	1%	7%	TR20_09	BG1	49%	48%	0%	1%	2%
TR17_01	BG5	55%	41%	0%	0%	3%	TR20_09	BG2	45%	41%	8%	4%	2%
TR17_03	BG1	42%	57%	0%	0%	0%	TR20_09	BG3	55%	41%	3%	0%	1%
TR17_03	BG2	59%	28%	2%	2%	9%							
TR17_03	BG3	55%	33%	3%	2%	7%							

Figure 2. Racial/ Ethnic Concentrations, U.S. Census 2015 (American Fact Finder)

B. Household Characteristics

A household is defined as all persons occupying a single housing unit. A household, as defined by the U.S. Census Bureau, can be a family, two or more families living together, a person living alone, or unrelated persons living together. The type, size, and composition of a household can affect the type of housing and services that are needed. Families typically need single-family homes or large apartments with sufficient bedrooms for children, whereas single-person households, especially those headed by seniors, may desire smaller, easier-to-maintain housing units such as condominiums or apartments.

Table 8: Household Growth (2000-2017)

Area	2000	2010	Percent Change	2017	Percent Change
City of Visalia	30,883	41,349	34%	42,241	2.2%
County of Tulare	110,385	130,352	18%	146,712	13%

Source: Bureau of the Census, 2000-2010. 2013-2017 American Community Survey 5-Year Estimates

1. Household Type and Size

Most household types have increased between 2000 and 2010 (Table 9). Family households remained consistent between 2000 and 2017 with less than a percentage point in increase. The number of Female-headed Households with Children increased by 3.1% between 2000 and 2017. A larger household is defined as five or more in the home and can indicate overcrowding and a need for larger or affordable units. The average household size in Visalia, as of 2017, is 3.04.

Table 9: Household Type and Size

	2000	2010	2017
Average Household Size	2.91	2.98	3.04
Percent of Households with Elderly	22%	22.7%	34.3%
Percent Families	74.2%	74.1%	74.4%
Average Family Size	3.37	3.42	3.55
Percent of Families with Children	41.1 %	38.9%	39.2%
Percent of Female- Headed Households w/ Children	14.1%	15.7%	17.2%

Source: Bureau of the Census, 2000-2010; ACS, 2013-2017.

C. Special Needs Populations

Certain groups may have more difficulty finding housing and may require specialized services or assistance. Because of their circumstances, they are more likely to have lower incomes and often have a relatively higher cost of living. These groups include the elderly, large households, single-parent-headed (female and male) households, persons with disabilities (mental, physical, and developmental), persons with HIV/AIDS, and homeless persons.

While age is not a protected class under the Fair Housing Act, information on elderly households is provided because it is often relevant to how programs operate at the local level, with some buildings or programs designated or designed to serve seniors. Since the Fair Housing Act protects families with children and persons with disabilities from discrimination, it is important to assess whether there are differences in the patterns of siting of publicly supported housing that serves families with children versus publicly supported housing that serves elderly populations. The same comparison should be done for publicly supported housing that primarily serves persons with disabilities.

1. Senior Population and Characteristics

Because of the high birth-rate during the mid- 20th century and improved healthcare, seniors are living longer and are becoming a larger portion of the population everywhere.¹³ There has been consistent growth in the senior population (age 65+) since 2000, with a 29% growth between 2000 and 2010, and a 16% growth between 2000 and 2017¹⁴. This growth creates the special need of scaled-down housing size, ADA accessibility, and other amenities that give seniors access in the community.

Senior persons (those aged 65 years or older) often have special housing needs for three main reasons: fixed relatively low income, high health care costs, and physical disabilities. According to the 2013-2017 ACS, approximately 14,941 elderly persons lived in Visalia, comprising 11.5% of the population. Seniors living with a disability accounted for 43%. Senior households with low to moderate incomes, was at 32%, and 63% of senior households experience housing problems (cost burden, overcrowding, and/ or substandard housing conditions.)

Table 10: Senior Profile (2010-2017)

% of Population 2010 ¹	% of Population 2017 ²	With a Disability ²	% of Senior Households with Low/Moderate Income ³	% of Senior Households with Housing Problems ³
10%	11.5%	43%	32%	63%

Sources:

1. Bureau of the Census, 2010.
2. American Community Survey, 2013-2017.
3. HUD Comprehensive Housing Affordability Strategy (CHAS), based on 2011-2015 ACS.

2. Disabled Population

Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one’s mobility, or make it difficult to care for oneself. Persons with disabilities frequently have special housing needs, often related to a potentially limited ability to earn a sufficient income, a lack of accessible and affordable housing, and higher health costs associated with a disability. In addition, persons with self-care and mobility limitations may

¹³ Dowell Myers & SungHo Ryu. “Baby Boomers and the Generational Housing Bubble: Foresight and Mitigation of an Epic Transition,” *Journal of the American Planning Association*, Volume 74, (2008): 17-33.

¹⁴ Bureau of the Census, 2000-2010; ACS, 2013-2017

require special housing design features such as wheelchair ramps, holding bars, special bathroom designs, wider doors, and other design features.

According to the 2013-2017 ACS 5 Year Estimates (Table 11), 13.7% of the population who live in Visalia reported a disability. As age increases, the incidence of disability increases. Persons with disabilities often face limited earning potential as the result of their disabilities, for example, their status as retired seniors, and the reluctance of some employers to hire persons with disabilities. In addition to affordability problems, people with disabilities experience other difficulties obtaining adequate housing because of discrimination and a lack of housing with accessibility features and adequate support services.

Table 11: Persons with Disabilities Profile (2013-2017)						
% of Population	Hearing Disability	Vision Disability	Cognitive Disability	Ambulatory Disability	Self-Care Disability	Independent Living Disability
13.7%	4,588	4,737	7,494	9,273	3,462	6,682

Source: American Community Survey, 2013-2017.

3. Population Living with HIV/AIDS

Persons with HIV/AIDS sometimes face biases and misunderstanding about their illness that affect their access to housing. In addition, persons with HIV/AIDS may also be targets for hate crimes, which include crimes committed because of hatred directed toward an assumed sexual orientation.¹⁵ The National Commission on AIDS states that up to half of all Americans with AIDS are either homeless or at imminent risk of becoming homeless because of illness, lack of income or other resources, or a weak support network.

The California HIV Surveillance Report-2017 published by the California Department of Public Health, Center for Infectious Diseases in Sacramento, California on March 13, 2019, reported a total of 448 persons living with HIV/AIDS in the County of Tulare. Of the 448 cases, 71.2% are of Hispanic race or ethnicity.

Table 12: County of Tulare HIV/AIDS Statistics through 2018	
Total Persons living HIV/AIDS ¹	448
Gender HIV/AIDS ²	
Female	18.6%
Male	81.4%
Race/Ethnicity HIV/AIDS ²	
Hispanic	71.2%
Not Hispanic	28.8%

Sources:

1. HHS, Public Health, Tulare County HIV 2017-2018 Update, June 25, 2019.
2. California HIV Surveillance Report-2017, California Department of Public Health, Center for Infectious Diseases, Office of AIDS, Sacramento, California, March 13, 2019.

The Tulare County Health & Human Services Agency (TCHHSA) offers a HIV/AIDS Prevention and Education program that provides education to community alcohol and drug rehabilitation groups to help prevent the spread of the disease. Staff of the TCHHSA is

¹⁵ Sannisha K. Dale, PhD, Laura M. Bogart, PhD, Frank H. Galvan, PhD, Glenn J. Wagner, PhD, David W. Pantalone, PhD, and David Klein, MS, "Discrimination and Hate Crimes in the Context of Neighborhood Poverty and Stressors Among HIV-positive African-American Men Who Have Sex with Men." J Community Health 41, no. 3 (2016 Jun): 574–583.

available to answer questions from all members of the public about HIV/AIDS diagnosis, treatment, and prevention.

4. Families with Children

Families with children may sometimes require special accommodations in housing. Due to the likelihood of smaller household incomes, single-parent families, particularly female-headed families, often require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services.¹⁶ Because of their relatively lower income and higher living expenses, female-headed families have more limited opportunities to find affordable, decent, and safe housing. Female-headed families may also be discriminated against in the rental housing market; some landlords will flatly deny rent to this demographic.¹⁷ Consequently, the landlords may require more stringent credit checks for women, which is a violation of fair housing law.

According to the 2010 U.S. Decennial Census (Table 13), 39% of households in Visalia were families with children. Of total households with children in the City, 25% were female headed households with children.

Jurisdiction	Total Households	All Families with Children		Female Headed Households with Children	
		Number	% of Total Households	Number	% of all Families with Children
City of Visalia	41,349	16,097	39%	3,969	25%
County of Tulare	130,352	56,395	43%	12,654	22%

Source: Bureau of the Census, 2010.

¹⁶ U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Discrimination Against Families with Children in Rental Housing Markets: Findings of the Pilot Study*, December 2016, 5.

¹⁷ U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Discrimination Against Families with Children in Rental Housing Markets: Findings of the Pilot Study*, December 2016, 5.

5. Large Households

Large households are defined as having five or more members. These households are usually families with two or more children or extended families with family members such as in-laws or grandparents. Large households are a special needs group because the availability of adequately sized, affordable housing units is often limited. In order to save for necessities such as food, clothing, and medical care, very low- and low-income large households may reside in smaller units, resulting in overcrowding.

Families with children, especially those who are renters, may face discrimination or differential treatment in the housing market.¹⁸ For example, some landlords may charge large households a higher rent or security deposit, limit the number of children or confine them to a specific location, limit the time children can play outdoors, or refuse to rent to families with children.¹⁹

The 2013-2017 ACS identified 6,914 households in Visalia with five or more persons, representing 16.3 percent of all households. In addition, according to 2011-2015 CHAS (Table 14) a total of 2,035 households were overcrowded in Visalia.

	Total Large Households		Large Owner Households*		Large Renter Households	
	#	% of Total Households	#	% of Owner Households	#	% of Renter Households
2000	4,862	15.7%	2,801	15.5%	2,061	17.9%
2010	7,374	17.8%	4,034	15.9%	3,340	20.9%
2017	6,914	16.3%	3,783	14.9%	3,131	18.4%

*Large households are calculated as 5-persons or more

Source: U.S. Census Bureau, 2000, 2010 Census. U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates.

¹⁸ U.S. Department of Housing and Urban Development, Office of Policy Development and Research, Discrimination Against Families with Children in Rental Housing Markets: Findings of the Pilot Study, December 2016, 4, 30.

¹⁹ Stephen Michael White "Can Landlords Refuse to Rent to Families with Children?" <https://compass.mbakercorp.com/Pages/Default.aspx>.

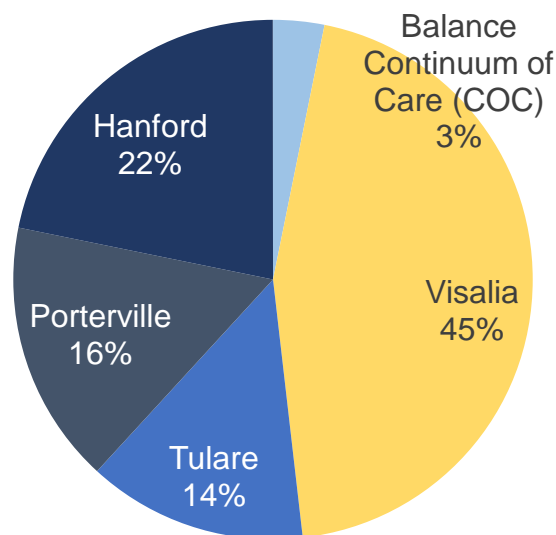
6. Homeless Population

The Kings/Tulare Homeless Alliance (Alliance) is the Continuum of Care for the region that includes Visalia. Each year, the Alliance conducts a Point in Time (PIT) count of the number of people experiencing homelessness within Kings and Tulare Counties. Information gathered through the PIT survey is used by the Alliance to understand the issues associated with homelessness, including causes of homelessness, service needs of the homeless, the region's unmet housing needs, and trends over time of homelessness in the region.

The 2019 PIT was held on January 24, 2019. A total of 481 persons were counted in Visalia. According to the Alliance's report of the count, Visalia continues to be home to nearly half (45%) of the homeless population in Kings/Tulare Counties (see Figure 3).

On January 24 and 25, 2019, the Alliance also held the Kings/Tulare Project Homeless Connect event. The event is designed to gather persons experiencing homelessness and provide them with services and information on housing. Attendees from Visalia totaled 222. Most were between 25 and 54 years old and the majority was White/ non-Hispanic and Hispanic. Of all veterans, 29% were from Visalia, more than the other cities. Additionally, most attendees were currently unsheltered.

Figure 3: Homeless Population by City



Source: Kings & Tulare Counties 2019 Point in Time Count



Table 15: Total Homeless Census Population						
Unsheltered		Sheltered		Total		2016-2019 % Change
2016	2019	2016	2019	2016	2019	
144	296	178	185	322	481	49%

By Jurisdiction and Family Status (2019)

Source: Point-in-time counts by the Continuum of Care for Visalia, January 24, 2019.

D. Income Profile

A household’s income determines the affordability of housing and other life activities. When a household’s costs for housing and utilities consumes a large percentage of income, they are limited in their ability to increase housing size when needed or obtain access to amenities that can create a negative impact on quality of life, which can become a fair housing issue.²⁰ Though economic factors that affect housing choice are not a fair housing issue, they can raise fair housing concerns based on biases related to household income, household type, race/ethnicity, and other factors.²¹

Every year, the United States Department of Housing and Urban Development (HUD) updates Income Limits to reflect changes in median family income levels for different size households and income limits for extremely low-, very low-, and low-income households. The Department of Housing and Community Development (HCD) makes additional revisions to increase a county’s area median income to equal California’s non-metropolitan median income. HCD then adjusts area median income and household income category levels to prevent any decrease in income limits and area median income levels below a prior year’s highest level and to determine income limits for California’s moderate-income category. Income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA) are:

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

²⁰ Mixed Income and the HOME Program,

https://www.hud.gov/program_offices/comm_planning/affordablehousing/library/modelguides/2004/200315

²¹ U.S. Department of Housing and Urban Development, Equal Housing Opportunity, *Fair Housing Planning Guide*, March 1996, 3-7.

- Middle/Upper Income (above 80 percent of AMI)

Collectively, extremely low and low incomes are referred to as "lower" income.

1. Median Income

As referenced in Table 16, the median household income for Visalia is \$54,934 as of the 2017 American Community Survey (ACS). Between the years 2000 and 2017, the median household income increased by 33%.

Table 16: City of Visalia- Median Household Income (2000-2017)		
Median Household Income		% Change
2000	2017	
\$41,349	\$54,934	33%

Sources: Bureau of the Census, 2000; American Community Survey (ACS), 2013-2017.

Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. This data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrates the extent of housing problems and housing needs, particularly for low income households. The CHAS cross-references each income category with other data, such as, race/ethnicity, home tenure, household size, age of housing, number of vacant housing units, and household problems, which include:

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

2. Income Distribution of Households

The area median income of Visalia is \$54,934. Income in Visalia is distributed as follows, in Table 17. As Table 17 shows, 63.9 percent (26,929 households) of 42,142 total households earn more than 80 percent of the area median income and higher; 10.5 percent (4,425 households) makes up households in the extremely low Income (0-30 percent of AMI) bracket; 11.3 percent (4,762 are low income (31-50 percent of AMI), and 14.4 percent (6,068) earn a moderate income (51-80 percent of AMI).

Table 17: Income Distribution (2011-2015)				
Total Households	% Extremely Low Income	% Low Income	% Moderate Income	% Middle/Upper Income
42,142	10.5%	11.3%	14.4%	63.9%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, American Community Survey, 2011-2015 Estimates.

3. Low to Moderate Target Areas

The map below illustrates census tracts where at least 51 percent of incomes are between zero to 80% of the Area Median Income (see areas shaded green). Tract 11 is Visalia's R/ECAP (outlined in red).

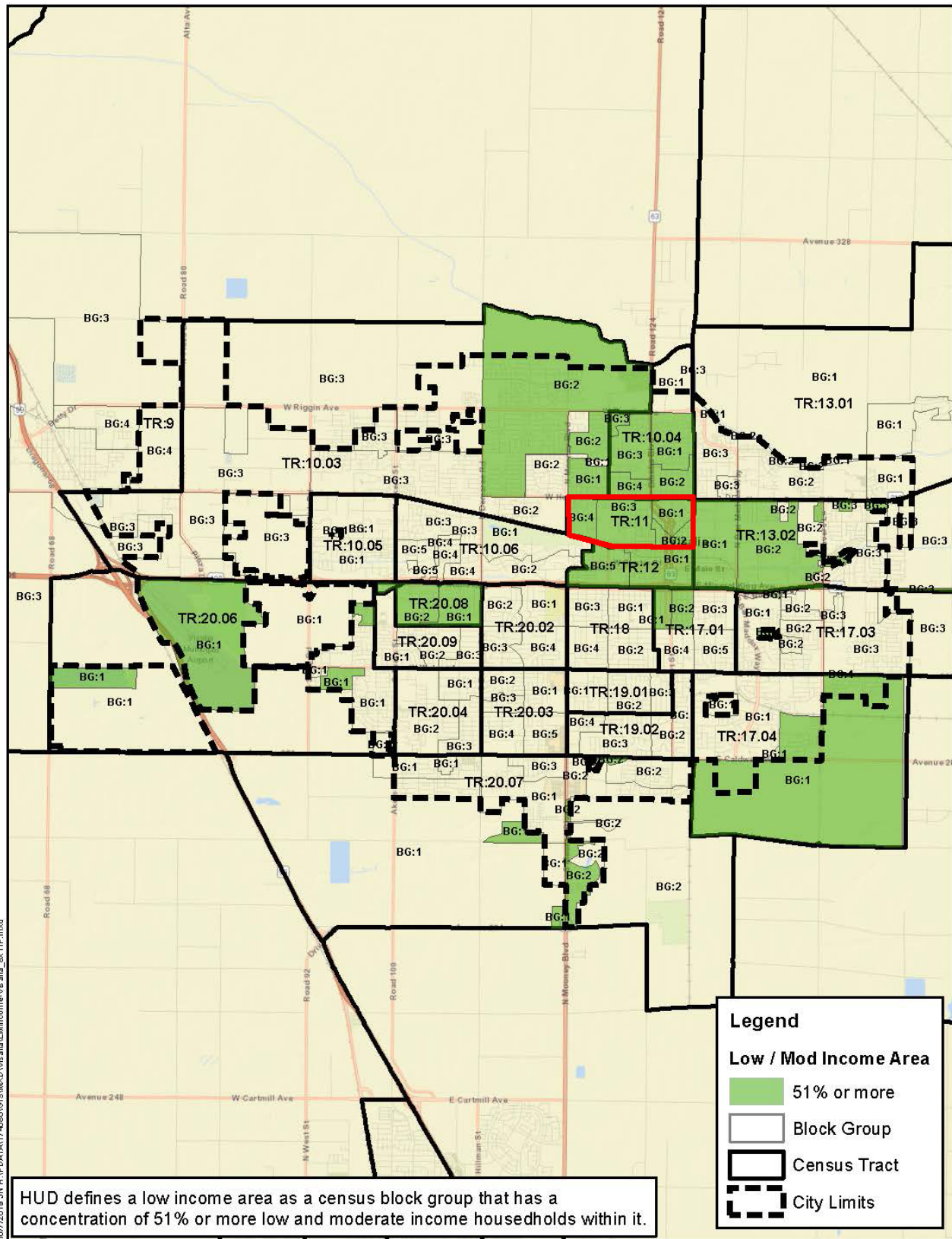


Figure 4. Low to Moderate Income Census block groups. HUD Exchange (2014).

4. Income by Household Characteristic

As mentioned, data from the CHAS cross-references income category with other household attributes. Table 18, below, illustrates that households in the category of extremely low-income category suffer the most housing problems, for example, substandard housing, the most overcrowding, and the greatest cost burden.

Table 18: Housing Problems by Income (Households with one of the listed needs)										
	Renter Households					Owner Households				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
	NUMBER OF HOUSEHOLDS									
Substandard Housing - Lacking complete plumbing or kitchen facilities	80	55	25	10	170	0	0	0	0	0
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	280	135	45	55	515	0	10	40	10	60
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	350	250	320	175	1095	35	60	105	165	365

Housing cost burden greater than 50% of income (and none of the above problems)	1920	1565	305	0	3790	975	660	685	215	2535
Housing cost burden greater than 30% of income (and none of the above problems)	210	965	1645	310	3130	135	260	1085	925	2405

Source: CHAS 2011-2015

5. Income by Race/Ethnicity

As described earlier, race, a group of persons related by common descent or heredity, is different from the definition of ethnicity, a social group that shares a common and distinctive culture, religion, language, or the like. In Table 19, data is analyzed to find percentages of the various income categories based on race/ethnicity.

The City is made up of households of differing races/ethnicities. Two races/ethnicities represent the largest shares of total households- Non-Hispanic White making up the largest share of total households at 52 percent, followed by Hispanic or Latino at 37 percent.

As shown in Table 19, a larger share of one race/ethnicity’s households’ experiences lower incomes while a larger share of another race/ethnicity’s total households experience higher incomes. For example, though only 30 were counted, 100% of Pacific Islander households earn extremely low incomes. Nearly half of all Hispanic or Latino households, 47.7 percent, earn extremely low to moderate incomes. A large share, 71.5 percent, of non-Hispanic White households earn middle to upper incomes. Though they represent a low number of total households, a large share, 75.2 percent, of Black/ African American households earned middle to upper incomes.

Overall, the majority of Visalia’s households, 63.9%, are in the middle to upper income bracket, 14.4% earning moderate, 11.3% low income, and 10.5% are extremely low earners.

Table 19: Income by Race/Ethnicity (2011-2015) City of Visalia															
Income Level	Total HHs	Non-Hispanic White		Hispanic or Latino		Black or African American		Asian		Am. Indian or Alaska Nat./Other		Pacific Islander		Other	
		HHs	%	HHs	%	HHs	%	HHs	%	HHs	%	HHs	%	HHs	%
Extremely Low	4,420 (10.5%)	1,450	6.60%	2,455	15.80%	220	12.70%	220	11.40%	0	0%	30	100%	45	6.80%
Low	4,753 (11.3%)	2,125	9.60%	2,125	13.70%	165	9.50%	185	9.60%	39	24.50%	0	0	114	17.20%
Moderate	6,050 (14.4%)	2,720	12.30%	2,835	18.20%	45	2.60%	320	16.60%	40	25.20%	0	0	90	13.60%
Middle/ Upper	26,919 (63.9%)	15,805	71.50%	8,115	52.30%	1,305	75.20%	1,200	62.40%	80	50.30%	0	0	414	62.40%
Total HH by Race and Ethnicity	42,142	22,100	100%	15,530	100%	1735	100%	1,925	100%	159	100%	30	0	663	100%
Total Lower/ Moderate Income Households	15,223	6,295	28.5%	7,415	47.7%	430	24.8%	725	37.7%	79	49.7%	30	100 %	249	37.6%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, American Community Survey 2011-2015 Estimates.



6. Racially or Ethnically Concentrated Areas of Poverty

A concentration is a non-White population of 50 percent or more. The racially or ethnically concentrated areas of poverty (R/ECAPs) must also have a non-White population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of “extreme poverty” as census tracts with 40 percent or more of individuals living at or below the poverty line. See the map for race/ethnicity, below.

According to U.C. Census American Fact Finder (2017), Figure 4, Minority Concentrations, the R/ECAP (Census Tract 11 outlined in red) has a Hispanic population of 74.87 percent. The R/ECAP are the tracts outlined in red in Figure 5, which depicts tracts with low to moderate incomes.

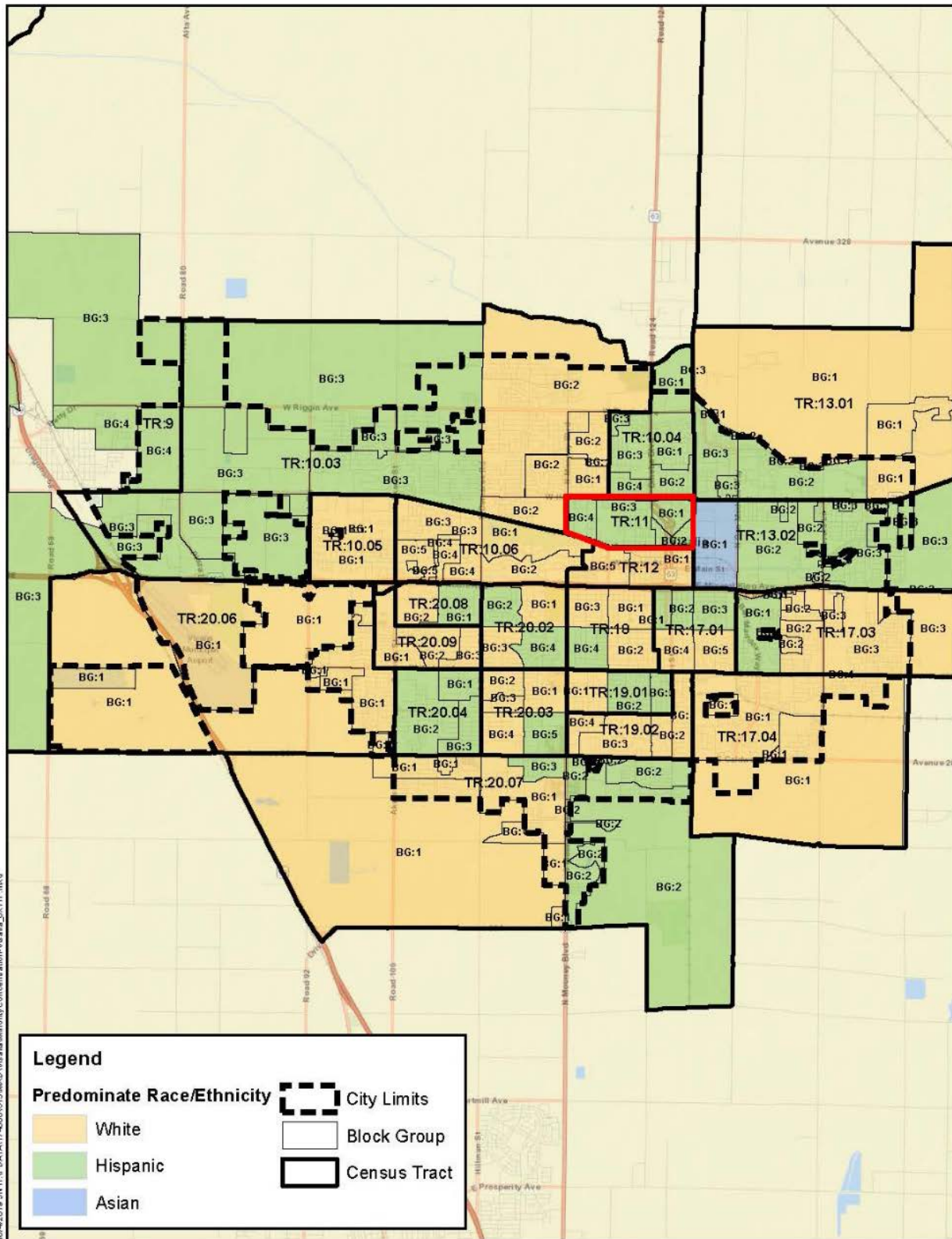


Figure 5: Minority Concentrations
 Source: U.S. Census American FactFinder (2017)

E. Housing Profile

A discussion of fair housing choice must be preceded by an assessment of the housing market under study. This section provides an overview of characteristics of the local and regional housing markets. A housing unit is defined by the U.S. Census Bureau as a house, an apartment, a mobile home or trailers intended for occupancy on the site where they stand, a group of rooms, or a single room that is occupied, or, if vacant, is intended for occupancy as separate living quarters. Separate living quarters are those in which the occupants live separately from any other persons in the building and which have direct access from the outside of the building or through a common hall.

A jurisdiction's housing stock consists of all housing units located in a community, both occupied and vacant.

1. Housing Growth

The total number of housing units according to the 2010 Census was 44,205 and has increased by 35% since 2000.

2000	2010	Percent Change
32,654	44,205	35%

Source: Bureau of the Census, 2000-2010.

2. Housing Unit Type

Housing stock is primarily comprised of single-family homes, varying densities of multi-family housing, and mobile homes. In Visalia, the number of single-family homes is the most common housing type and increased by 6.5 percent between 2010 and 2017; the number of multi-family units increased by 14.2 percent during the same period. The number of mobile homes declined slightly by a few percentage points. As mentioned earlier, the Bureau of the Census reported in 2010 that 44% of households were families with children and 22% of households were female headed households with children. The 2013-2017 ACS identified 34% (14,488) of households in Visalia with five or more persons.



Table 21: City of Visalia Housing Unit Growth by Type (2010-2017)

Unit Type	2010		2013-2017	
	Number of Units	Percent of Total	Number of Units	Percent of Total
Single-Family	32,942	79%	35,110	78%
Detached	31,539	75.8%	33,645	75%
Attached	1,403	3.2%	1,465	3%
Multi-Family	7,608	17.6%	8,689	19%
2-4 Units	4,761	11.1%	5,073	11%
5+ Units	2,847	3.4%	3,616	8%
Mobile Homes, Boat, RV, Van, etc.	1,526	3.4%	1,238	2.8%
Total	42,076	100%	45,037	100%

Sources:

1. Bureau of the Census, 2010.
2. American Community Survey (ACS), 2013-2017.

3. Condition of Housing Units

Conducting an assessment of the current condition of housing units can support the development of City policies and programs that will preserve existing housing stock. Housing preservation increases safety and neighborhood stability.²² In addition, housing constructed prior to 1979 is likely to contain lead-based paint, which must be addressed before Federal programs can fund rehabilitation to such units.²³

Table 22: Age of Housing Stock (2013-2017)		
Total Housing Units	% Built 1979 or earlier	% Built After 1979
45,037	43%	57%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates.

4. Lead-Based Paint Hazard

Though lead based paint is a critical concern that identifies housing as substandard in the community, it presents conditions that can be corrected through rehabilitation. Projects funded by Federal programs must be tested for lead-based paint if they were constructed prior to 1978.²⁴ Children under six years old are particularly vulnerable to negative effects of lead-based paint. For the long-term safety of a community, lead-based paint should be mitigated.

Table 23: Risk of Lead-Based Paint Hazard				
	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	9,670	52.80%	8,640	47.20%
Housing Units built before 1980 with children present	1,150	6.28%	2,543	13.90%

Source: CHAS 2011-2015 CHAS (Total Units and Units with Children present).

²² US Department of Housing and Urban Development, "Housing, Inclusion, and Public Safety," under "Research and Publications, <https://www.huduser.gov/portal/periodicals/em/summer16/highlight1.html>.

²³ Center for Community Progress, Increasing Neighborhood Stability, <https://www.communityprogress.net/increasing-neighborhood-stability-pages-240.php>.

²⁴ US Department of Housing and Urban Development, "Making it Work - Reference Manual," <https://files.hudexchange.info/resources/documents/MakingItWorkReferenceManual.pdf>.

5. Housing Tenure- Own Versus Rent and Vacant Units

Housing tenure describes whether a household owns or rents their home. The tenure distribution of a community's housing stock influences several aspects of the local housing market. Residential mobility is influenced by tenure, with ownership housing evidencing a much lower turnover rate than rental housing. A high relative housing cost is generally more prevalent among renters than among owners. Tenure preferences are primarily related to household income, composition, and age of head of household.²⁵

In some cases, renters experience violation of fair housing laws more frequently than owners due to a lack of proper oversight on the part of landlords and property managers. To make housing accommodations for various incomes and needs, a city must have both ownership and rental units in its housing supply.

Table 24 below lists housing tenure, as well as units that are vacant.

Tenure of Occupied Units		Overall Vacancy Rate
Renter	Owner	
16,983 (40.2%)	25,258 (59.8%)	6.2%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates.

²⁵ Joint Center for Housing Studies of Harvard University, *The State of the Nation's Housing 2019*, Harvard Graduate School of Design, Harvard Kennedy School, 2019, 17-18, 21.

Table 25 below lists CHAS data describing the proportion of owners versus renters in Visalia. In the City of Visalia, 59% of households are owner-occupied and 41% are renter occupied. Overall, there are more renters in the low to moderate income category at 49%, where 35% are occupied by owner households with low to moderate incomes. Additionally, more renters also experience housing problems, at 40% of renter-occupied units, than owners at 35%. However, the data shows that 36% of all household's experience housing problems.

Tenure	Percent of All Households	Percent Low and Moderate Income	Housing Problems
Owner-Occupied	59%	35%	33%
Renter-Occupied	41%	49%	40%
All Households	100%	41%	36%

Source: HUD Comprehensive Housing Affordability Strategy 2011-2015 CHAS data

Table 26 below indicates that homes with a higher number of bedrooms are occupied by homeowners. A higher number of residential units are under homeownership at 25,258 units, whereas 16,983 are occupied by renters.

	Owners		Renters	
	Number	%	Number	%
No bedroom	175	0.7%	666	3.9%
1 bedroom	136	0.5%	1,866	11.0%
2 or 3 bedrooms	17,161	67.9%	12,860	75.7%
4 or more bedrooms	7,786	30.8%	1,591	9.4%
Total	25,258	100%	16,983	100%

Source: 2013-2017 American Community Survey 5-Year Estimates.

6. Housing Costs

Housing costs have the potential to cause housing problems in a community.²⁶ If housing costs are high, relative to household income, there will be a higher case of cost burden and overcrowding. This section summarizes cost and affordability for the City of Visalia. Table 27 lists data from the Census showing a 25% increase in the cost of purchasing a home between 2010 and 2017.

	2010	2017	% Change
Median Home Value	\$187,300	\$233,900	25%
Median Contract Rent	\$770	\$820	6%

Source: 2010 American Community Survey, 2017 American Community Survey.

According to data from the Tulare County Association of Realtors, Table 28, the cost of purchasing a home has increased by 3.2 percent from 2018 to present. A total of 4,471 homes were sold in 2018. In 2019, 1,410 homes have been sold as of October 4, 2019.

	Units Sold in 2018	Units Sold in 2019	Median Sale Price 2018	Median Sale Price September 2019	Percent Change
City of Visalia	4,471	1,410	\$250,000	\$258,000	3.2%
County of Tulare	2,903	2,903	\$230,000	\$239,900	4.3%

Source: Tulare County Association of Realtors, Market Summary Report, Flexmls Web, October 4, 2019.

²⁶ Enterprise Community Partners, Inc., *Knowledge, Impact and Strategy Department Impact of Affordable Housing on Families and Communities: A Review of the Evidence Base, Enterprise:3.*

The table below provides the current rents for studios to 4 or more bedrooms in Visalia. Rents in Visalia are higher than those in the region, comparing to the County of Tulare.

Table 29: Average Rental Housing Prices (2019)					
	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4+Bedrooms
Housing Authority Payment Standard	\$695	\$699	\$1,018	\$1,291	\$1,525
	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4+Bedrooms
City of Visalia	\$763	\$793	\$918	\$1,420	\$1,677
County of Tulare	\$728	\$629	\$815	\$1,024	\$1,200

Sources:

1. Rentcafe.com, citydata.com, point2homes.com, deptofnumbers.com, towncharts.com, bestplaces.net, Tulare, CA, October 4, 2019.
2. Housing Authority County of Tulare, Payment Standard and Utility Allowance, effective (May 2019).

Given the high cost of home ownership that makes it prohibitive for low-income households to purchase housing in Visalia, most low-income households are renters vs. homeowners. Table 30 shows an estimate of housing cost affordability. As referenced in Table 30, an affordable rent for a four-person household with low income is \$1,296, which includes utilities. However, according to recent data shown in Table 29, the average rent for a three bedroom in Visalia is \$1,420, not including utilities. According to Table 17, 15,255 households earn low to moderate incomes, zero to 80 percent of the AMI (up to \$51,850), making the average rental in the City unaffordable to these households.

Table 30: Housing Affordability (2019)

Household	Annual Income	Affordable Costs (All Costs)		Estimated Utilities		Taxes and Insurance	Affordable Price	
		Rental Costs	Ownership Costs	Renters	Owners		Renters	Owners
Extremely Low Income 0-30								
1-Person	\$13,650	\$241	\$167	\$100	\$174	\$26	\$341	\$367
2-Person	\$16,910	\$300	\$224	\$123	\$199	\$35	\$423	\$458
3-Person	\$21,330	\$370	\$288	\$163	\$245	\$46	\$533	\$579
4-Person	\$25,750	\$448	\$362	\$196	\$282	\$57	\$644	\$701
5-Person	\$30,170	\$533	\$441	\$221	\$313	\$69	\$754	\$823
6-Person	\$34,590	\$615	\$518	\$250	\$347	\$78	\$865	\$943
7-Person	\$39,010	\$692	\$590	\$283	\$385	\$93	\$975	\$1,068
8-Person	\$42,800	\$703	\$643	\$367	\$427	\$101	\$1,070	\$1,171
Very Low Income >30=50								
1-Person	\$22,700	\$468	\$394	\$100	\$174	\$62	\$568	\$630
2-Person	\$25,950	\$526	\$450	\$123	\$199	\$70	\$649	\$719
3-Person	\$29,200	\$567	\$485	\$163	\$245	\$76	\$730	\$806
4-Person	\$32,400	\$614	\$528	\$196	\$282	\$83	\$810	\$893
5-Person	\$35,000	\$654	\$562	\$221	\$313	\$88	\$875	\$963
6-Person	\$37,600	\$690	\$593	\$250	\$347	\$94	\$940	\$1,034
7-Person	\$40,200	\$722	\$620	\$283	\$385	\$98	\$1,005	\$1,103
8-Person	\$42,800	\$703	\$643	\$367	\$427	\$101	\$1,070	\$1,171
Low Income >50=80								
1-Person	\$36,300	\$808	\$734	\$100	\$174	\$116	\$908	\$1,024
2-Person	\$41,500	\$915	\$839	\$123	\$199	\$132	\$1,038	\$1,170

3-Person	\$46,700	\$1,005	\$923	\$163	\$245	\$146	\$1,168	\$1,314
4-Person	\$51,850	\$1,100	\$1,014	\$196	\$282	\$159	\$1,296	\$1,455
5-Person	\$56,000	\$1,179	\$1,087	\$221	\$313	\$172	\$1,400	\$1,572
6-Person	\$60,150	\$1,254	\$1,157	\$250	\$347	\$183	\$1,504	\$1,687
7-Person	\$64,300	\$1,325	\$1,223	\$283	\$385	\$193	\$1,608	\$1,801
8-Person	\$68,450	\$1,344	\$1,284	\$367	\$427	\$203	\$1,711	\$1,914

Sources: HUD User, FY 2019 Income limits Summary; Housing Authority County of Tulare, 2019 Utility Allowance; Assumptions: 30% gross household income as affordable housing cost (including interest); 16% of monthly affordable cost for taxes (smartasset.com) and insurance (insurance.com under Home Insurance); zero down payment.

HUD's fair market rent calculations for the Visalia-Porterville MSA are listed in the following table. These numbers increased by one half to two percent between the 2019 and 2020 calculations.

Table 31: Final FY 2020 & Final FY 2019 FMRs By Unit Bedrooms					
Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
2020	\$710	\$714	\$941	\$1,312	\$1,534
2019	\$695	\$699	\$925	\$1,291	\$1,525

Source: FY 2020 Visalia-Porterville, CA MSA FMRs for All Bedroom Sizes, HUD User, 2019.



7. Housing Problems

Quality of life, the standard of health, comfort, and happiness experienced by an individual or group is a community's highest priority.²⁷ HUD assesses housing need within a community according to several criteria: (1) the number of households that are paying too much for housing; (2) the number of households living in overcrowded units; and (3) the number of households living in substandard housing conditions. CHAS data provides further details on housing cost burden and overcrowding. These conditions are discussed below.

The federal standard for housing affordability is that a household not expend more than 30% of its gross income on housing. Households that expend more than this amount are considered to be “cost burdened.” Cost burden most often occurs in a housing market when housing costs increase faster than household incomes.

Housing affordability is not a fair housing issue; however, housing cost burden disproportionately impacts the most vulnerable members of a community, particularly those with special needs such as seniors on fixed incomes. Cost burden affects a household's range of housing choices.²⁸

8. Cost Burden

According to the federal government, cost burden is the fraction of a household's total gross income spent on housing costs. A cost burden of 30 to 50 percent is considered a moderate burden; payment in excess of 50 percent of income is a severe cost burden. Cost burden is an important housing issue because paying too much for housing leaves less money available for basics such as food and living expenses as well as for emergency expenditures.

According to the most recent CHAS data, in Table 32 below, 2,800 owner households severely cost burdened in the City of Visalia in 2011-2015 and 1,150 owner households fell into the extremely low-income category (incomes less than 30% of AMI). 4,580 renter households are severely cost burdened in the City of Visalia in 2011-2015 and of these, 2,780 renter households fell into the extremely low-income category (incomes less than 30% of AMI), as listed in Table 33 and 34.

²⁷ Office of Policy Development and Research, “CHAS Definitions,” under “Dataset,” https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html.

²⁸ Ibid.

Table 32: Total Percentage of Owner and Renter Cost Burden > 50%

	Owner	% Owner households	Renter	% Renter households
Cost Burden <=30%	17,005	68.7%	8,040	47.3%
Cost Burden >30% to <=50%	4,560	18.4%	4,075	24%
Cost Burden >50%	2,800	11.3%	4,580	27%
Cost Burden not available	375	1.5%	305	1.8%
Total	24,740	100%	17,000	100%

Source: CHAS, 2011-2015

Comment: Totals may not add to 100% due to rounding

Table 33: Cost Burdened Homeowners by Income

	Total # of People
Household Income <= 30% of HAMFI	1,150
Household Income >30% to <=50%	945
Household Income >50% to <=80%	1,850
Household Income >80% to <=100%	1,200
Household Income >100%	2,215

Source: CHAS 2011-2015.

Table 34: Cost Burdened Renters- Renters by Income

	Total # of People
Household Income <= 30% of HAMFI	2,780
Household Income >30% to <=50%	2,915
Household Income >50% to <=80%	2,110
Household Income >80% to <=100%	395
Household Income >100%	460

Source: CHAS 2011-2015.

9. Overcrowding

Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms.²⁹

As seen in Table 35, below, Visalia experiences a 2.78 percent rate of overcrowding for owner-occupied households. Renter-occupied households have a much higher rate of overcrowding at 11.28 percent.

	Household Tenure	
	Owner-Occupied	Renter-Occupied
Occupied Units	25,258	16,983
Overcrowded	499	1,294
Severely Overcrowded	204	621
Total Overcrowded	703	1,915
Percent Overcrowded	2.78%	11.28%

Notes:

1. Overcrowded: (1+ occupants per room)

2. Severely Overcrowded (1.5+ occupants per room)

Source: American Community Survey (ACS), 2013-2017.

10. Substandard Housing

As defined by HUD, there are two types of substandard housing problems:

- Households without hot and cold piped water, a flush toilet and a bathtub or shower; and
- Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

²⁹ Office of Policy Development and Research, "CHAS Definitions," under "Dataset," https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html.

According to 2011-2015 CHAS data (Table 36), 170 renter household experience substandard Housing (i.e., lacking complete plumbing or kitchen facilities). There are no reported cases of substandard housing for owner households.

Table 36: Housing Problems (Households with one of the listed needs)										
	Renter Households					Owner Households				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
	Substandard Housing - Lacking complete plumbing or kitchen facilities	80	55	25	10	170	0	0	0	0

Source: CHAS 2011-2015.

F. Public Housing

The Housing Authority of Tulare County (HATC) administers the Housing Choice Voucher (HCV) program and Public Housing, both of which provide rental assistance to extremely low- and very low-income households. Eligible tenants pay 30% to 40% of their adjusted monthly income toward rent and utilities, with HUD paying the remaining portion of the rent directly to the landlord on behalf of the tenant. Table 37 lists the number of Public Housing units and HCVs currently in use in the City of Visalia. Also included in the table are characteristics of residents by program type.

Table 37: Program Type					
	Public Housing	Section 8 Vouchers			
		Total	Project - based	Tenant - based	Special Purpose - Veterans Affairs Supportive Housing
Total Vouchers in use	179	1,003	0	984	19
Resident Characteristics					
Average Annual Income	\$24,711	\$22,366	0	\$22,366	\$12,294
Disabled Families	50	361	0	361	15
Families requesting accessibility features	16	17	0	17	1

Source: Housing Authority of Tulare County, 2019

1. Public Housing Units in Visalia

HATC has 179 Public Housing units within Visalia as listed below. The Public Housing units are spread throughout the denser parts of the City, as seen in Figure 6.

Table 38: HATC Units (2019)

Address	Unit Breakdown	Total Units
1848 ASHLAND AVE	3 BR	1
1737, 1814, 1842 ATWOOD ST	One 3 BR and two 4 BR	3
1200 to 1340 N BURKE ST	Ten 1 BR, thirty-seven 2 BR and five 3 BR	52
521 E CAMBRIDGE DRIVE	3 BR	1
1626 to 1727 CENTRAL STREET	Twelve 3 BR	12
2627 S CHINOWTH ST	3 BR	1
3530 W COLLEGE AVE	3 BR	1
2114 S CONYER CT	4 BR	1
4211 and 4245 W COUNTRY AVE	One 3 BR and One 4 BR	2
1030 S COUNTY CENTER DR	3 BR	1
904 10 1040 S CRENSHAW CT	Three 1 BR, twenty 2 BR, eleven 3 BR, and two 4 BR	36
1748 S DUKE LN	3 BR	1
1746 and 1828 W ELOWIN AVE	Two 3 BR	2
1344 W EVANS AVE	3 BR	1
2320 S FONTANA ST	3 BR	1
1644 N GIDDINGS ST	3 BR	1

1714 S HERITAGE DR	3 BR	1
1001 to 1035 E HOUSTON AVE	Five 1 BR, eleven 2 BR, and two 3 BR	18
1035 E HOUSTON AVE #A	1 BR	1
1035 E HOUSTON AVE #B	1 BR	1
1035 E HOUSTON AVE #C	2 BR	1
1035 E HOUSTON AVE #D	2 BR	1
1035 E HOUSTON AVE #E	1 BR	1
4201 W LA VIDA AVE	3 BR	1
2745 W LAURA AVE	3 BR	1
1724 N LESLIE ST	3 BR	1
2315 S LINDA VISTA ST	3 BR	1
1616 and 1631 S LINWOOD ST	Two 3 BR	2
601 to 649 S PINKHAM ST	Twenty-four 3 BR	24
2507 W PRINCETON AVE	3 BR	1
1749 and 1831 W PROSPECT AVE	Two 3 BR	2
1820 S SANTA FE ST	3 BR	1
2011 W VINE AVE	3 BR	1
3820, 4120, and 4303 W WHITENDALE AVE	Three 3 BR	3
	Total	179

Source: Housing Authority of Tulare County, 2019

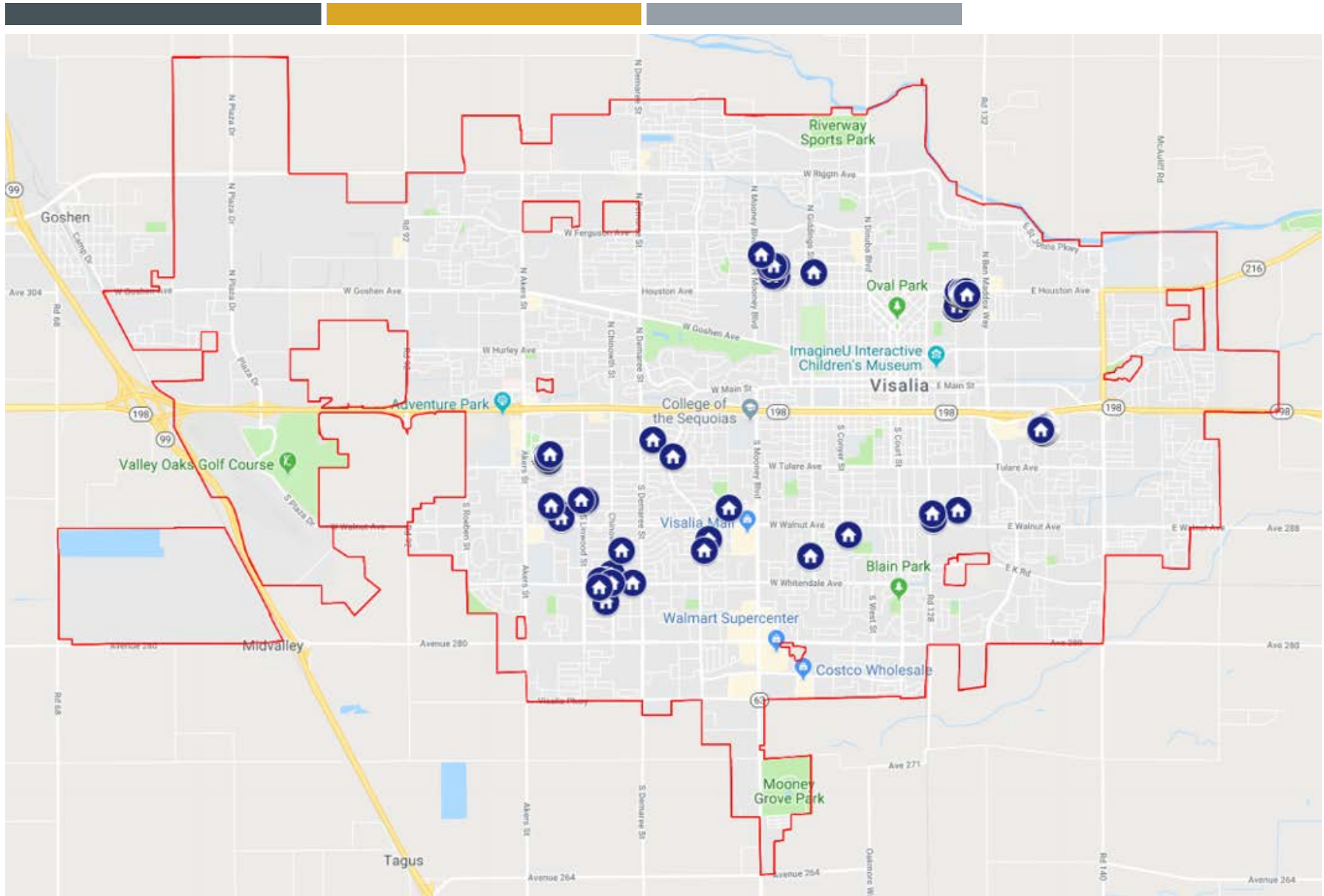


Figure 6: Location of Public Housing Units. Housing Authority of Tulare County
 Source: Housing Authority of Tulare County, 2019

2. Housing Choice Vouchers

The Housing Choice Voucher (HCV) is a rent subsidy program that helps lower income (up to 50 percent AMI) families and seniors pay rents in private units. Voucher recipients must pay 30 percent of their income toward their contract rent, and the local housing authority pays the difference through federal funds up to the payment standard (locally established fair market rent).

The Federal Section 8 Housing Choice Voucher (HCV) Program provides rental assistance to very low-income households for housing. The average annual income for an HCV participant in Visalia is \$22,366 (see Table 37). Rent (as of 2019) in Visalia ranges from \$918 for a two-bedroom apartment to \$1,677 for a unit with four bedrooms, which, if not for the HCV program, would require over 49 percent to 90 percent of monthly income of the household to go toward rent.

Housing data available from the HATC indicates that the agency administers 2,841 Section 8 HCVs in the County of Tulare. In Visalia alone, 1,003 vouchers are currently in use. See Table 37. Of the HCVs in use in the City, 361, or 37% of the vouchers are held by disabled families. The percentage of current HCV households with disabilities makes evident the need for affordable housing for individuals with disabilities.

Figure 7, below, is a map of housing sites using the Section 8 HCV. The map demonstrates that the sites are evenly distributed throughout the center and eastern side of the City.

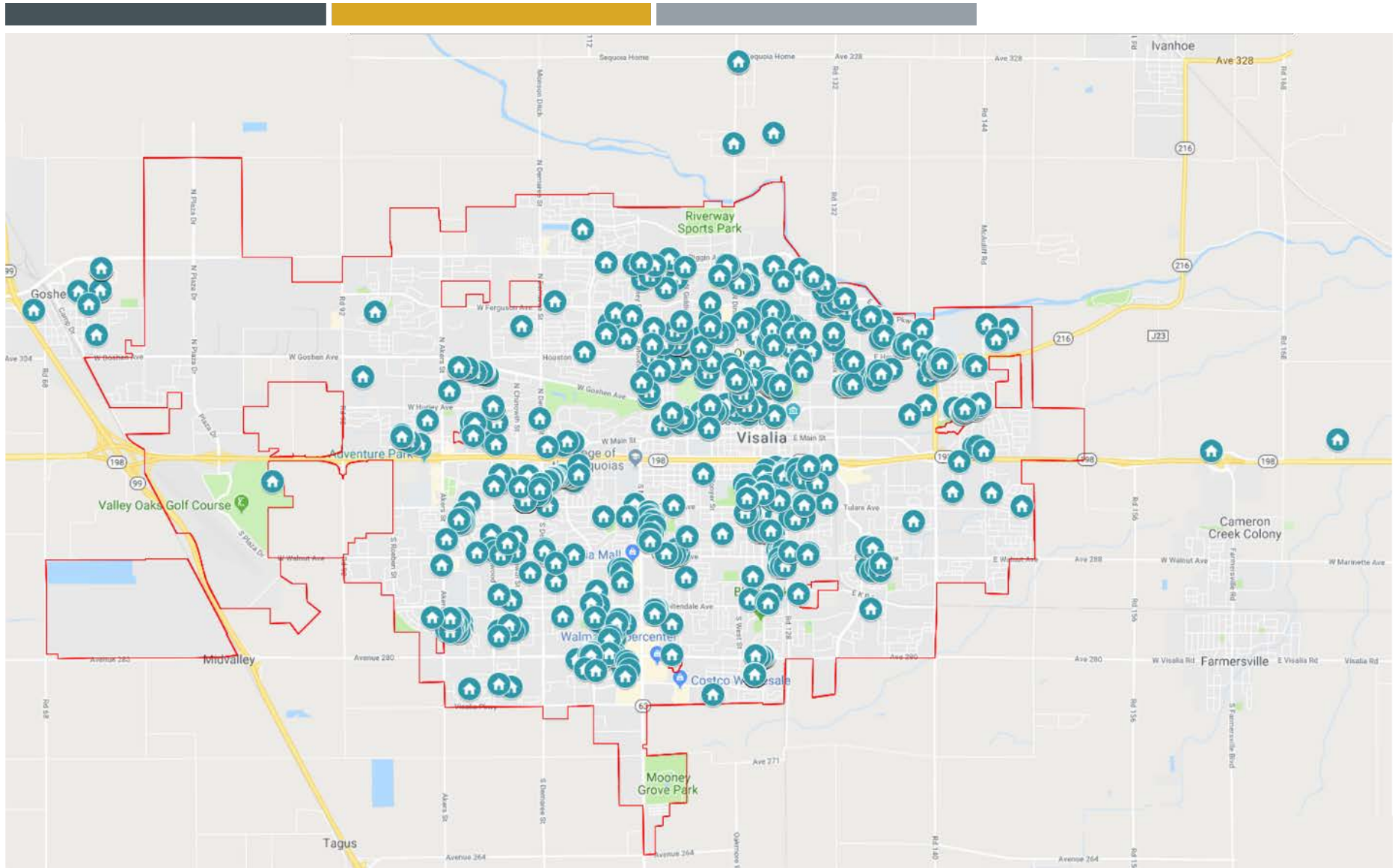


Figure 7: Locations of households using the Section 8, Housing Choice Voucher (HCV)
 Source: Housing Authority of Tulare County, 2019

3. Waiting Lists

Currently there are 11,931 on the waiting list for HCVs in the County of Tulare, 11,825 of which are certified as low income; the balance must be income eligible at time of certification for HCV. For the Public Housing units in the City of Visalia, there are 7,532 households on the waiting list. As shown in Table 39 below, most of the two waiting lists are made up of households that are extremely low income, most are families with children, and are of Hispanic ethnicity. There are no units within the City of Visalia that are under Project-based Rental Assistance. The Table 39 below indicates waiting list categories, please note that some families/persons are counted in multiple categories.

Table 39: Demographics of HATC Waiting Lists			
	Housing Choice Vouchers-County	Public Housing - Visalia	Project-based Rental Assistance Program
Number of Families on Waiting List	11,931	7,532	0
Extremely Low Income (0-30% AMI)	7,787	5,361	0
Very Low Income (31-50% AMI)	3,139	1,606	0
Low Income (51-80% AMI)	899	497	0
Families with Children	7,140	4,175	0
Elderly Families	1,333	858	0
Families with Disabilities	2,324	1,722	0
Waiting List by Race			
White	11,349	7,099	0
Black	433	334	0
Asian	96	69	0
American Ind/Native Hawaiian	53	30	0

Unknown/Multiple	0	0	0
Waiting List by Ethnicity			
Hispanic	7,690	4,540	0
Non-Hispanic	4,241	2,992	0

Source: Housing Authority County of Tulare, (2019).

Note: AMI Public Housing Income Limits: At HUD's 80% Area Median Incomes (AMI)

4. Assisted Housing

It is advised by HUD that program participants should consider a balanced approach when setting goals for overcoming the effects of contributing factors and related fair housing issues. A balanced approach may include, but is not limited to, undertaking place-based solutions to improve areas, as well as pursuing options to increase mobility for protected classes, as appropriate. Place-based strategies may include but are not limited to: (1) economic development and investments in high poverty neighborhoods that will improve conditions and thereby reduce disparities in access to opportunity between impacted neighborhoods and the rest of the jurisdiction; and (2) efforts to maintain and preserve the existing affordable rental housing stock, including HUD assisted housing, to help respond to the overwhelming need for affordable housing.

Table 40: Multi-family Housing Receiving Government Assistance							
Name of Development	Address	Sponsor	Funding Sources	Year Built / Funds Provided	Expiration Date	# of Units	Type / Target Income Groups
Mill Creek Parkway Family Apartments	3433 East Manzanita Avenue	Buckingham Property Management	Visalia RDA	2007	2061	70	Low & moderate-income
Sierra Meadows Senior Apartments	1120 East Tulare Avenue	Christian Church Homes	HUD, HOME, LIHTC	2011	2062	43	Senior; low-income
Oak Meadows	111 West School	Christian Church	HUD	2004	2057	60	Senior; low-income

	Avenue	Homes					
The Meadows	3900 West Tulare Avenue	Christian Church Homes	Visalia RDA	2001	2054	99	Senior; low-income
Paradise & Court Apartments	1526 South Court Street	City of Visalia; VIAH; Kaweah Management	HOME, Visalia RDA, LIHTC	2012	2065	20	Very low-income
Visalia Garden Villas	4901-5075 West Crenshaw Avenue	HATC	LIHTC, RHCP	1987	2042	60	Senior; very low & low-income
Fairview Village	2700 North Willis Street	HATC	LIHTC, CDBG	1994	2049	8	Very low-income
Clark Court	626-630 East Tulare Avenue	HATC	RHCP	1983	2030	24	Supportive Housing
TMHSA Housing	653, 657, 701 East Tulare Avenue	HATC	HUD	2009	2058	22	Supportive Housing
Robinwood Court	5817-5842 West Robinwood Court	HATC	HOME	2008	2037	10	Very low, low & moderate-income
Kimball Court	303 West Kimball Avenue	HATC	Visalia RDA, LIHTC	1999	2054	95	Senior; very low, low-income
Encina Triplex	301 West Encina	Kaweah Management	HOME, Visalia RDA	2009	2064	3	Very low-income

	Avenue						
Highland Gardens	2401 North Highland Street	Self-Help Enterprises	HOME, LIHTC	2016	2071	36	Very low & low-income
East Kaweah	632-644 East Kaweah Avenue	TCHA	Visalia RDA	2013	2064	8	Very low & low-income
Santa Fe Triplex	617-619 South Santa Fe Street	TCHA	Visalia RDA	2017	2072	6	Very low & moderate-income
Encina Self-Help Enterprises	517-527 North Encina Street	Self-Help Enterprises	HOME	2018	2073	6	Very low, low & moderate-income
Willowbrook Estates	1819 North Tipton Street	TCHA	Visalia RDA, HOME	1996	2051	10	Low-income
Transitional Mental Health	546 East Tulare Avenue	TCHA	Visalia RDA, HOME	2003	2058	17	Very low-income
Confidential	Confidential	Confidential	Visalia RDA, HOME	2012	2055	3	Very low-income
Westport Village	3123 South Avocado Street	TCHA	LIHTC	1989	2029	25	Senior; low & mod income

Acronyms: LIHTC = Low Income Housing Tax Credit; RHCP = Rental Housing Construction Program; RDA = Redevelopment Successor Agency; VIAH = Visalians Interested in Affordable Housing.

Source: City of Visalia; 2019



G. Access to Opportunities

Housing choice greatly depends on location, not only affordability. Adequate access to jobs and schools is imperative to households to function well in the local economy. Adequate public transportation, which includes easy and safe access to bus shelter, for example, may be required for some individuals and families to obtain access to jobs and schools.

1. Public Transit

Currently, Visalia Transit provides 23 routes of bus service to the greater Tulare County area. This includes service between the cities of Visalia, Dinuba, Tulare, Earlimart, Richgrove, and Porterville. Service originates from transit centers in each city. Express routes are available. All fixed-route buses in Tulare County are equipped with bike racks. Tulare InterModal Express (TIME) operates 7 bus routes that serve Tulare and Visalia. TIME connects with Tulare County Area Transit (TCaT), and Visalia Transit (VT).

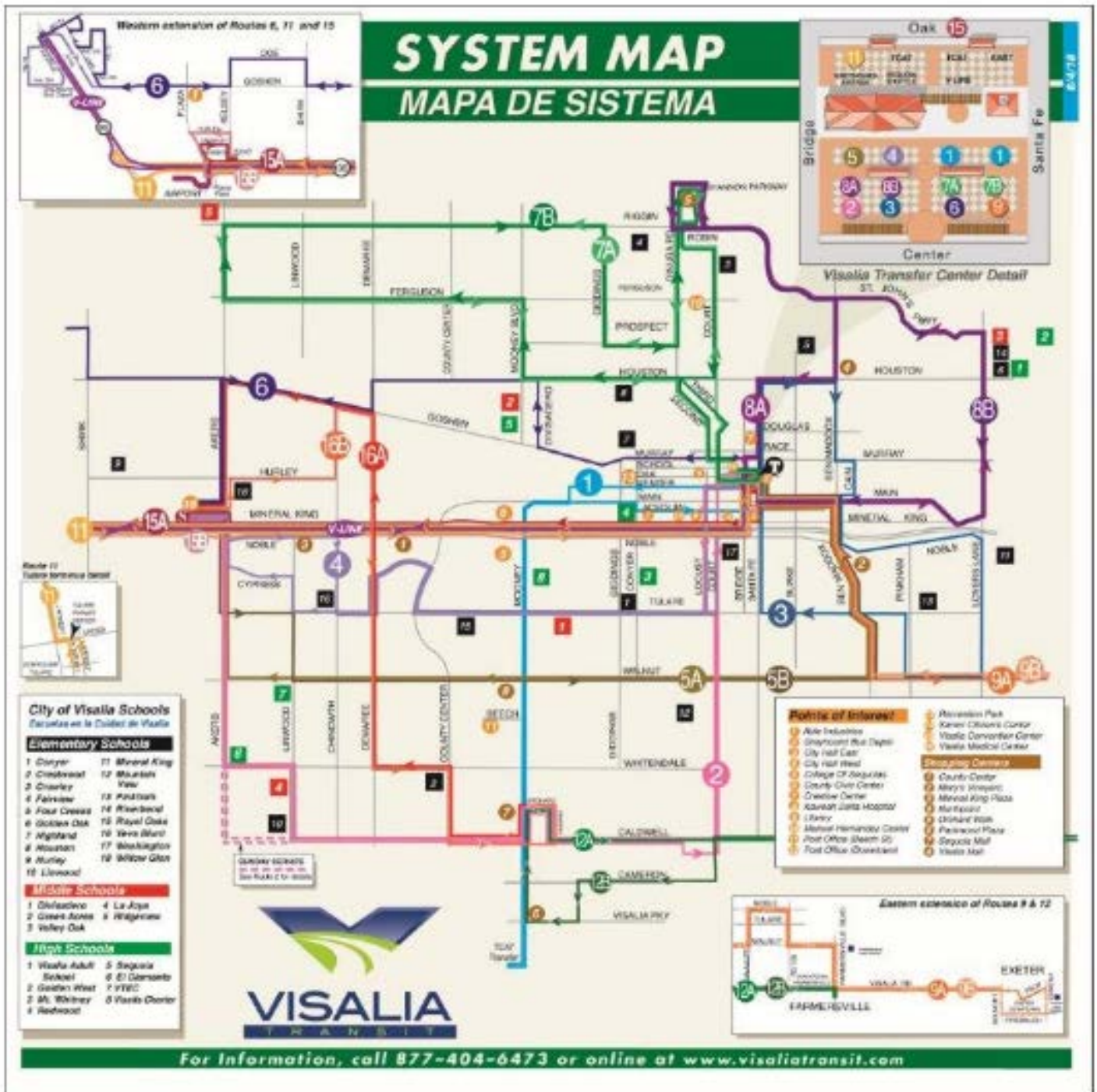


Figure 8: Visalia Transit system map.
Source: City of Visalia, 2019.

a. Transit Trip Index

Below is a map of the City's Transit Trip Index by Race/Ethnicity provided by HUD, Figure 9. Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the values, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.

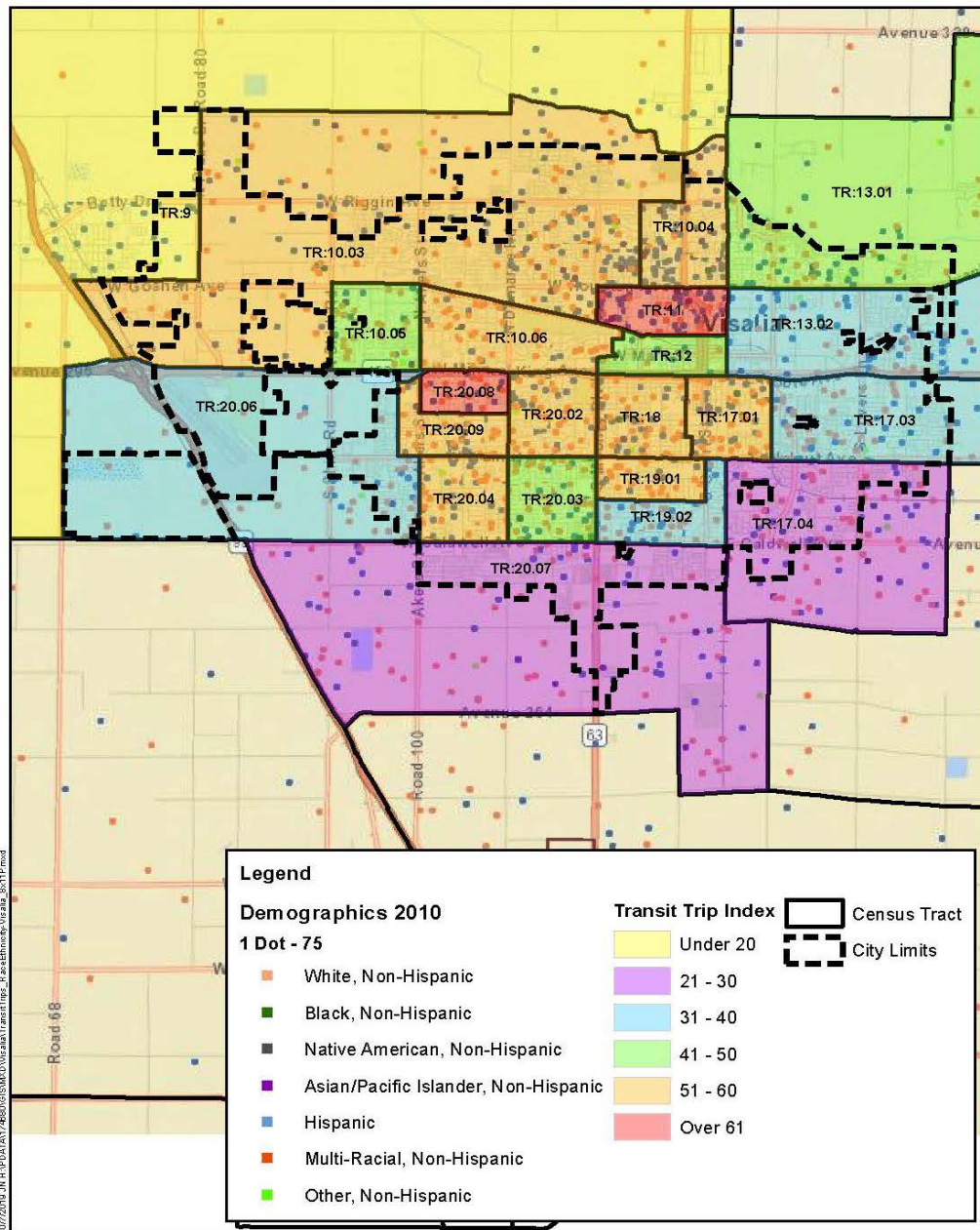


Figure 9: Transit Trips and Race/Ethnicity. Source: HUD Exchange (2014).

b. Low Transportation Cost Index

Below is the Low Transportation Cost Index by Race/Ethnicity that maps transportation cost data, Figure 10. The higher the value, the lower the cost of transportation in that neighborhood. This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region.³⁰ Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

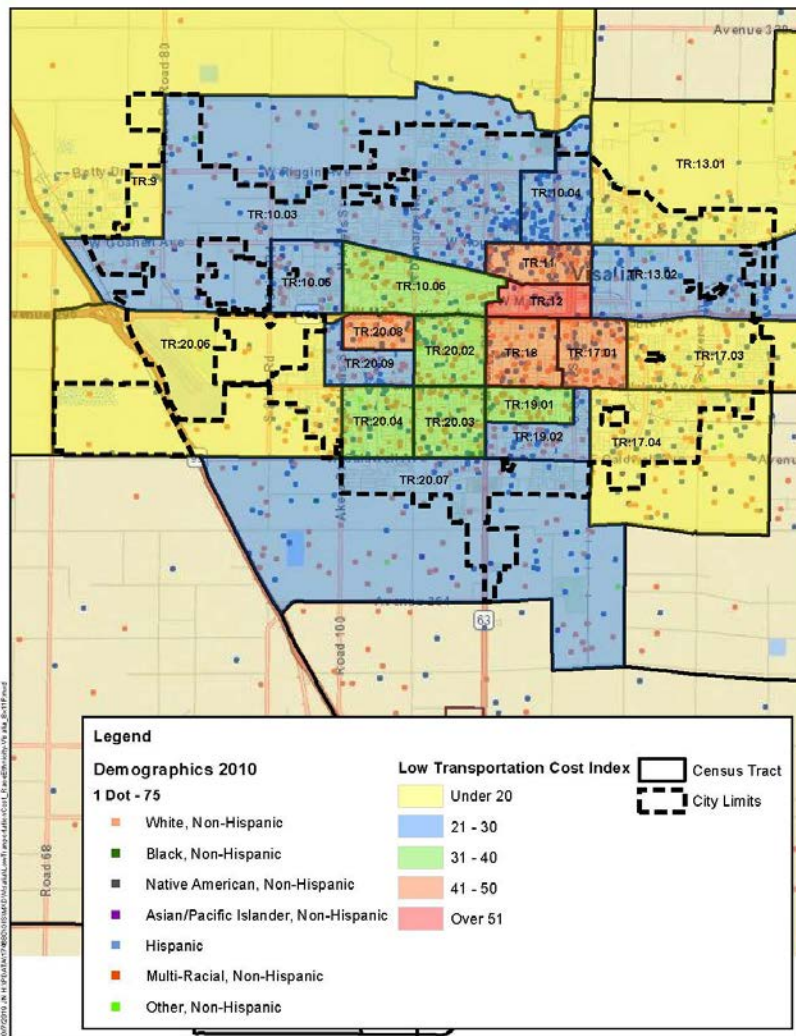


Figure 10: Low Transportation Cost and Race/Ethnicity.

Source: Affirmatively Furthering Fair Housing mapping tool; U.S. Department of Housing and Urban Development, November 17, 2017.

³⁰ Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), Data Documentation, Data Version AFFHT0004, HUD Office of Policy Development and Research, December 13, 2017.

2. Major Employers

According to the City of Visalia's Economic Development Department, there are employers spread out through the City. For the purpose of this report, a major employer is defined as one with 500 or more employees. In the City, top employers include providers of education, medical providers and services, and government agencies.

Table 41: Top Employers			
	Address	Number of Employees	Industry
Visalia United School District	5000 West Cypress Avenue	3,000	Education
Kaweah Delta Medical Center	400 W Mineral King Avenue	2,000	Medical
County of Tulare	2900 W. Burrel Avenue	1,500-2,500	Government
Visalia Mall	2031 S. Mooney Boulevard	1,300	Retail
VF Corporation	2525 N. Plaza Drive	1,200	Distribution
College of the Sequoias	915 S. Mooney Boulevard	500-999	Education
Latino Farm Labor Service	34401 Road 140	500-999	Contractors
City of Visalia	707 W. Acequia Avenue	650	Government
American Incorporated	1345 N. American Street	420	Construction
Graphic Packaging International	1600 N. Kelsey Street	350	Manufacturing
Jostens	231 N. Kelsey Street	320	Manufacturing
BlueScope Buildings	7440 W. Doe Avenue	300	Manufacturing
Visalia Medical Clinic	5400 W. Hillsdale Avenue	300	Healthcare

Source: City of Visalia, Economic Development Department, June, 2019.

3. Public Schools

The Visalia Unified School District (VUSD) includes 26 elementary schools, as reflected in Figure 11, VUSD boundary map, a newcomer language center, five middle schools, four comprehensive high schools, a continuation high school, an adult school, a charter independent study school, a K-8 charter home school, and a charter technical early college high school. Over 32,000 students, Pre-Kindergarten to adult, are served through the VUSD.

Of schools in VUSD, 24 are classified as Title I schools. The Elementary and Secondary Education Act (ESEA), passed in 1965, is a statute that funds primary and secondary education and emphasizes equal access to education. Title I programs distribute funding to schools and school districts with a high percentage of students from low income families. Approximately 40 percent of VUSD students assisted come from families who are low income.

The ESEA statute is also meant to establish high standards and accountability. The VUSD implements a Parental Involvement Plan (PIP) which addresses parental involvement requirements of the Every Student Succeeds Act (ESSA). Components of the plan include how parents can be involved in decision-making activities, the use of funds, and capacity building. Title I Parents have the right to be involved in the development of the PIP.

The designation as a Title I school brings with it federal funding (Title I dollars) to supplement the school's existing programs. These dollars are used for

- Instructional Support- staff development, substitutes
- Purchasing supplemental staff/programs/materials/supplies
- Conducting parental Involvement meetings/trainings/activities

The Title I amount is based on the number of students qualifying for free and reduced lunch as determined by completion of the School Funding Data Collection Form.

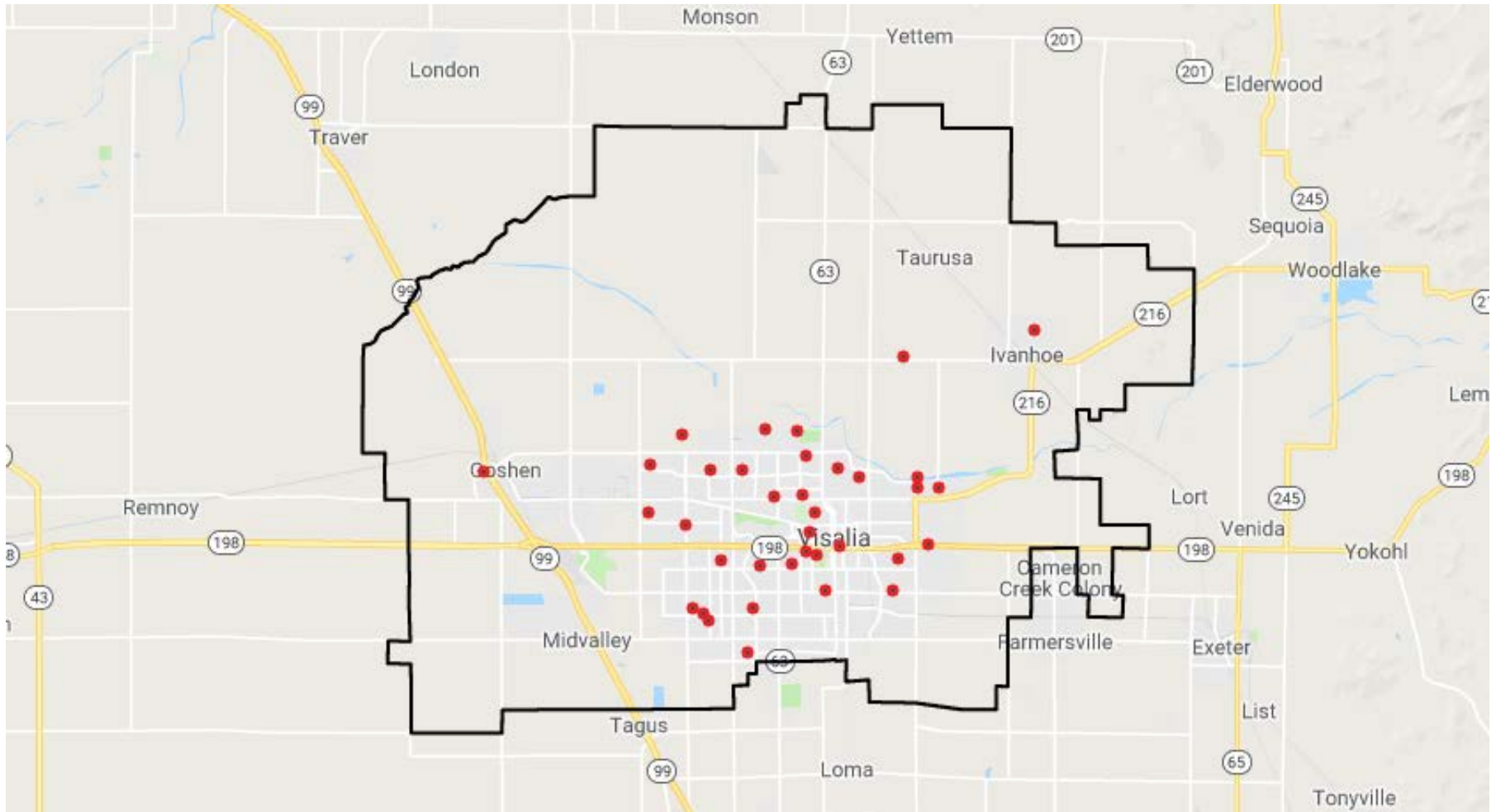


Figure 11. Visalia Unified School District boundary map.
 Source: <https://www.vusd.org/district>.

4. Opportunity Indices

The table below contains data developed by the U.S. Department of Housing and Urban Development and is based upon nationally available data sources. The index is a useful tool in assessing Visalia residents' access to key opportunity assets. The values range from 0 to 100.

Low Poverty Index: The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. Higher scores indicate less exposure to poverty in a neighborhood.

School Proficiency Index: The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the score, the higher the school system quality is in a neighborhood.

Labor Market Engagement Index: The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.

Transit Trips Index: This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the transit trips index, the more likely residents in that neighborhood will utilize public transit.

Low Transportation Cost Index: This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation is in that neighborhood.

Jobs Proximity Index: The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the

index value, the better the access to employment opportunities for residents in a neighborhood.

Environmental Health Index: The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health is indicated. Higher index values reflect better environmental quality within a neighborhood. For this index, a neighborhood is defined as a census block-group.

5. Index Findings

Of the groups of races/ethnicities city-wide, residents of the Hispanic ethnicity are the most likely to live in areas experiencing higher rates of poverty. Hispanic residents also use public transit services more than other racial groups. All racial groups experience highly adequate access to employment opportunities with Black, non-Hispanic, White, Non-Hispanic, and Native American, Non-Hispanic scoring the highest, respectively. The Environmental Health Index was low, in general, indicating a high exposure to toxins. The Environmental Health Index was higher in the Visalia-Porterville metro area. Schools near populations below the federal poverty line had the lowest scores indicating a lower the school system quality- Native American being the lowest score at 18.21 and Hispanic 30.04.

Table 42: Opportunity Indicators, by Race/Ethnicity							
(Visalia, CA CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	44.91	43.96	45.62	44.80	28.96	49.69	11.85
Black, Non-Hispanic	36.54	38.69	38.46	46.98	31.69	51.51	10.26

Hispanic	35.56	36.44	37.73	47.75	30.78	46.24	10.30
Asian or Pacific Islander, Non-Hispanic	38.94	41.14	41.99	46.63	28.37	48.30	11.58
Native American, Non-Hispanic	38.57	39.19	39.07	46.21	30.94	49.11	10.66
Population below federal poverty line							
White, Non-Hispanic	31.88	35.37	32.17	46.98	33.48	50.05	9.33
Black, Non-Hispanic	37.77	35.07	33.21	44.67	29.88	44.93	10.92
Hispanic	22.97	30.04	24.65	50.93	34.80	44.74	7.99
Asian or Pacific Islander, Non-Hispanic	40.70	52.98	53.91	50.66	29.69	46.09	12.08
Native American, Non-Hispanic	37.05	18.21	35.46	41.88	23.65	25.94	13.55
(Visalia-Porterville, CA) Region							
Total Population							
White, Non-Hispanic	34.45	33.80	32.02	36.91	21.88	45.88	28.04

Black, Non-Hispanic	28.22	32.77	26.04	41.02	26.48	41.12	20.10
Hispanic	20.51	23.20	20.34	40.28	21.83	41.37	31.30
Asian or Pacific Islander, Non-Hispanic	29.44	31.62	30.36	41.21	22.71	44.33	26.52
Native American, Non-Hispanic	32.41	39.47	24.10	34.67	18.51	44.07	40.69
Population below federal poverty line							
White, Non-Hispanic	24.54	27.32	22.97	38.85	23.95	49.26	28.70
Black, Non-Hispanic	17.16	27.09	15.92	43.00	28.30	37.28	21.65
Hispanic	13.97	19.57	15.49	41.85	22.28	44.67	34.07
Asian or Pacific Islander, Non-Hispanic	27.91	36.06	33.00	44.11	23.87	41.38	26.10
Native American, Non-Hispanic	28.91	24.81	24.68	38.27	19.07	34.22	33.02

Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
 Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Chapter IV: Public Policies

A potential barrier to housing opportunities can be related to public policies. Such policies include tax policy, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and other policies that affect the return on residential investment.³¹ Amending local zoning and land use laws or allocating funding for affordable housing through grants are mechanisms that can support the development of affordable units. Changes in policies can also help a community to overcome disparities in access to opportunity by the implementation of plans that will revitalize areas with existing affordable housing by improving services, schools and other community assets, sidewalks, and other infrastructure.

Policies to guide future development and achieve a vision for the community are contained in the City's General Plan. Two of the seven State mandated General Plan elements – Housing and Land Use Elements – have direct impact on the local housing market in terms of the amount and range of housing choice. The Zoning Ordinance, which implements the Land Use Element, is an important document that influences the amount and type of housing available in a community – the availability of housing choice.

The Housing Element is updated and is valid for a four-year planning period. The purpose of the housing element is to identify the community's housing needs and state the community's goals and objectives regarding housing production, rehabilitation, and conservation to meet those needs. It also defines the policies and programs to be implemented to achieve the stated housing goals and objectives. Part of the Housing Element includes city-wide assessments that include an analysis of population and employment trends and projections, as well as an analysis of any special housing needs for the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter. Housing characteristics, which include issues such as overcrowding and current housing stock conditions are also analyzed.

³¹ Fair Housing Planning Guide, U.S. Department of Housing and Urban Development, Equal Housing Opportunity, March 1996.



A. The Housing Element

State law requires that each local government develop a general plan as a guide for future development which must include seven elements. A Housing Element is one of the seven required elements. The Housing Element is also required by the State of California's Housing- Element Law. The purpose of the housing element is to assess the need for housing for all levels of income and establish policies to meet those needs. The policies should include the identification of sites to accommodate low-income units as well as programs geared to provide housing for low- and moderate- income residents. Projected future housing needs in Visalia based on the Regional Housing Needs Allocation (RHNA) are adopted by the Tulare County Association of Governments (TCAG). At the time of this analysis, the City is undergoing a comprehensive update of its Housing Element. After the update of the Housing Element, it is valid for a four-year planning period.

B. Land Use Policies and Practices

The City of Visalia's ordinances contain a variety of zoning districts that allow a range of housing opportunities for persons with special needs, including people with disabilities and people requiring transitional or supportive housing. The City of Visalia periodically evaluates local zoning laws and policies that may affect fair housing choice.

1. Residential Density

Visalia has made changes to residential zone districts following the 2015 Housing Element update. The table below is derived from Table 1-43 in the 2019 Draft Housing Element. As can be seen in Residential Density Table 43, the highest allowed multi-family density permitted by right, is 15 to 35 units per acre, provided that the development does not exceed 80 units. The City's 2014 General Plan Update formally established two new land use designations: CMU (Commercial Mixed Use), and DMU (Downtown Mixed Use). Both new designations encourage vertical and horizontal mixed-use developments. Both designations encourage high commercial floor area ratios (2.0 for CMU and 5.0 for DMU), and also allow residential densities as high as the site and setting can facilitate.



Table 43: Residential Density

Land Use Designation		Description	Residential Density Range ¹	Consistent Zoning Districts
Very Low Density Residential	RVLD	Large lot residential development where all infrastructure may not be required.	0.1 to 2 units / acre	R-1-20
Low Density Residential	RLD	Single-family detached homes, accommodating the majority of the city's residential uses	2 to 10 units / acre	R-1-5; R-1-12.5
Medium Density Residential	RMD	Accommodates a mix of housing types including small-lot homes, zero-lot-line, duplexes, fourplexes, and apartments	10 to 15 units / acre	R-M-2
High Density Residential	RHD	Accommodates a mix of housing types including zero-lot-line developments, duplexes, fourplexes, and apartments	15 to 35 units / acre	R-M-3


¹ Densities are based on dwelling units per gross acre
 Source: City of Visalia General Plan, 2014 and Draft Housing Element, 2019.

2. Zoning for Housing

The City’s General Plan is implemented by the Zoning Ordinance. Development standards and permitted uses in each zoning district are specified to govern the density, type, and design of different land uses for the protection of public health, safety, and welfare (Government Code, Sections 65800-65863). The Zoning Ordinance can have the effect of restricting the development of certain types of housing, such as housing of higher densities, emergency shelters, or supportive/transitional housing.

a. Residential Care Facilities

Residential Care Facilities are for the Elderly (RCFE) and serve persons ages 60 and older. They provide room, board, housekeeping, supervision, and personal care assistance with basic activities like personal hygiene, dressing, eating, and walking. The




City of Visalia makes provisions for residential care facilities for persons with disabilities. The Zoning Ordinance currently allows adult overnight residential care for six persons or less in addition to the residing family as a permitted use in all residential zones (R-1-20, R-1-12.5, R-1-5, R-M-2, R-M-3) and as a conditional use in the office (O-PA) zone. For more than six persons it is allowed as a conditional use in the single-family residential zones (R-1-20, R-1-12.5, R-1-5) and in the office (O-PA) zone. The city has no development standards for this type of use. Of residential care facilities in Visalia, there are currently 62 residential care facilities in the City, with a capacity of 539 units.

b. Emergency Shelters

Emergency shelters provide temporary housing with supportive services for homeless persons and families. Occupancy is limited to six months or less by persons experiencing homelessness. Under Health and Safety Code Section 50801[e], no individual or household may be denied emergency shelter because of an inability to pay. State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (Government Code Section 65583[c][1]). State law (SB 2) requires local jurisdictions to calculate the need for shelter, to identify a zone where shelters are allowed without discretionary review, and to limit application of development standards for shelters to those that are applied to other development in the same zone, with the exception of objective, written standards allowed in 8 specific categories:³²

³² California Government Code Section 65583[a][4](A).

- 
- | | |
|---|----------------------------------|
| 1. Maximum bed limits | 5. Up to 300 feet separation |
| 2. Off-street parking | requirements from other shelters |
| 3. Size and location of waiting and client intake areas | 6. Length of stay |
| 4. Provision of on-site management | 7. Lighting |
| | 8. Security |

The City’s Zoning Ordinance currently allows emergency shelters as a permitted use in the Light Industrial (I-L) zone and does not specify other zones permitted or conditionally allowed. The City has no development standards specifically for this type of use. The developer would use typical development standards found in the Zoning Ordinance such as setbacks, parking, etc. Density would be based on the state code allowance.

c. Transitional and Supportive Housing

Transitional housing serves persons waiting for secure housing. This type of housing is known as “bridge” or “interim housing.” State law (Senate Bill No. 2- Local Planning) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, (California Government Code Section 65582(h)), transitional housing is defined as buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance. The City’s Zoning Ordinance defines transitional housing as, “temporary housing (six months to two years) for a homeless individual or family who is transitioning to permanent housing. Transitional housing often includes a supportive services component (e.g. job skills training, rehabilitation counseling, etc.) to allow individuals to gain necessary life skills in support of independent living.”

Supportive housing has no limit on length of stay, is occupied by the target population, and is linked to health and social services that assist the resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division


4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (California Government Code Sections 65582(f) and (g)).

Pursuant to SB 2, transitional and supportive housing shall be treated as residential uses, subject only to the standards applied to other residential uses in the same zone. The City's Zoning Ordinance's definition of supportive housing is "housing with a supporting environment, such as group homes or Single Room Occupancy (SRO) housing and other housing that includes a supportive services component such as case management, medical or psychological counseling and supervision, child care, transportation, and job training." The City's Zoning Ordinance currently allows transitional and supportive housing as defined in California Health and Safety Code Sections 50675.2(h) and 53260(c), as a permitted use in all residential zones (R-1-20, R-1-12.5, R-1-5, R-M-2, R-M-3). The city has no development standards specifically for either transitional or supportive housing.

d. Single-Room Occupancy (SRO)

Assembly Bill 2634 amending the State Housing Element law mandates that local jurisdictions address the provision of housing options for Extremely Low-income households. Single Room Occupancy (SRO) units are small, one room units intended for occupancy by a single individual. California Housing and Community Development (HCD) consider SRO units to be a suitable housing type to meet the needs of Extremely Low-income individuals. It is distinct from a studio or efficiency unit in that each is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. SRO units are one of the most traditional forms of affordable private housing for lower income individuals, including seniors and persons with disabilities. These protected classes are required to have suitable housing options and SROs provide these options.

The City of Visalia has addressed the provision of housing options for Extremely Low-income households by zoning for SROs. The Zoning Ordinance currently allows single room occupancy units as a permitted use in the multi-family residential zones (R-M-2,



R-M-3) and as a conditional use in the Downtown Mixed Use (D-MU) zone. The city has no development standards specifically for this type of use.

e. Employee Housing

The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units as an accessory agricultural use in agricultural zones, subject to the same permit process as the primary agricultural use.

Visalia's Zoning Ordinance currently allows Employee Housing, as defined in California Health and Safety Code Section 17008, as a permitted use in the Agricultural (A) and Open Space (OS) zones. The city has no development standards specifically for this type of use. The developer would use typical development standards found in the Zoning Ordinance such as setbacks, parking, etc. Density would be based on the state code allowance.

f. Reasonable Accommodation

Under State and Federal law, local governments are required to “reasonably accommodate” housing for persons with disabilities when exercising planning and zoning powers. Jurisdictions must grant variances and zoning changes if necessary, to make new construction or rehabilitation of housing for persons with disabilities feasible.

In late 2017, the City adopted a Reasonable Accommodation Ordinance addition to the Zoning Ordinance, in fulfillment of Program 5.3 of the City's prior (5th cycle) Housing Element. The Ordinance states that structures or devices necessary to facilitate access to a building for persons with physical and non-physical disabilities shall be accommodated without the requirement to file an application for a variance. This ordinance can be found in Zoning Ordinance Section 17.42.050.C.

g. Permitting Process

There are different permitting procedures and timelines for development of different housing types. Table 44 below, derived from Table 1-51 in the Draft Housing Element, lists the permitting process for the City of Visalia.

Table 44: Permitting Process		
Residential Use Type	List of Typical Approval Requirements	Estimated Total Processing Time
Single Family Residential on residential lot	Permitted by Right	Less than 30 days
Single Family Residential on non- residential lot	Site Plan Review	2-3 Months
	CEQA/CUP	
Subdivision	Site Plan Review	3-4 Months
	CEQA/TSM	
Duplex on Single Family Residential lot	Site Plan Review	2-3 Months
	CUP	
Duplex on Multi Family Residential lot	Permitted by Right	Less than 30 days
Multi- Family Apartment less than 80 units and less than 4 stories	Permitted by Right	Less than 30 days
	Site Plan Review	
Multi-Family Apartment less than 80 units and more than 4 stories	Site Plan Review	2-3 Months
	CEQA/CUP	
Multi-Family Apartments more than 80 units	Site Plan Review	2-3 Months
	CEQA/CUP	
Condominium, Townhouse or Apartment Style	Site Plan Review	3-6 Months
	CEQA/TSM/CUP	
Accessory Dwelling Units	Permitted by Right	Less than 30 days
Adult Over-night Care Facility (6 people or less)	Permitted by Right	Less than 30 days
Adult Over-night Care Facility (more than 6 people)	Site Plan Review	2-3 Months
	CEQA/CUP	

Nursing and Convalescent Homes (including or not including psychiatric, drug abuse and alcoholism cases)	Site Plan Review	2-3 Months
	CEQA/CUP	
Single Room Occupancy (SRO)	Permitted by Right	Less than 30 days
Employee Housing, as defined in California Health and Safety Code Section 17008	Permitted by Right	Less than 30 days
Transitional and Supportive Housing, as defined in California Health and Safety Code Sections 50675.2(h) and 53260(c)	Permitted by Right	Less than 30 days
Emergency Shelters	Permitted by Right	Less than 30 days
Emergency / Temporary Housing	Site Plan Review	2-3 Months
	CEQA/CUP	


Source: City of Visalia

3. Development Incentives

The City’s Zoning Ordinance allows for a density bonus program as an incentive for the development of lower and very low-income households and for senior housing. The density bonus allows a density increase of at least twenty-five (25) percent over the otherwise maximum allowable residential density. Additionally, the City allows dwelling unit increases based on project amenities provided as part of a planned development. A density bonus may be granted as part of a planned development based on the following guidelines:

Percent of Net Site Area in Usable Open Space	Area Percent of Density Bonus
6% to 10%	6%
11% to 20%	10%
21% to 25%	16%
Over 25%	20%

According to the ordinance, a developer is entitled to a density bonus as defined if they enter into either a development agreement pursuant to California Government Code Section 65865 et. seq. or another recorded contractual agreement satisfactory to the city with respect to the housing development in which the developer covenants that the



affordable and/or special needs units included in the density bonus shall remain affordable units and/or special needs units.

4. Regional Housing Need Allocation

Visalia has demonstrated in its 2015 Adopted Housing Element and in the 2019 Draft Housing Element that it has the theoretical development capacity to accommodate the Regional Housing Need Allocation (RHNA) for the planning period from January 1, 2014, to September 30, 2023. Visalia has been allocated 10,021 units among the four income levels. The locations of the “RHNA sites” that make up the site inventory are listed and shown in Appendix B of the 2019 Draft Housing Element.

The City lists sites available for development in its sites inventory list, and it is a free market as to who will develop and when development will occur. There are sites listed in the sites inventory with an entitlement status as “approved tentative subdivision map” or “ready to build with building permits”. A comparison of Regional Housing Need and Residential sites is listed in Table 1-41 from the Draft Housing Element. The City approved 2,835 units between 2014 and 2018, consisting of 2,486 single-family units and 400 multi-family units³³ (see Table 46 below for the detailed number of units approved year by year). The surplus for extremely low is 40 units, 1,415 for low, 63 for moderate, and a surplus of 350 for above moderate (see Table 45).

³³ City of Visalia, Building Permits Issued by Year.



Table 45: Regional Housing Need and Sites Inventory				
	Extremely Low, Very Low	Low	Moderate	Above Moderate
Adjusted Need				
RHNA	2,616	1,931	1,802	3,672
Permitted Units	99	400	576	1,760
Adjusted Need	2,517	1,531	1,226	1,912
Sites Inventory				
Vacant Sites				
Moderate & Above Moderate Incomes			1,289	2,262
Lower Incomes	2,557	2,817		
Underutilized Sites/Redevelopment				
East Downtown		129		
Total Sites Inventory	2,557	2,946	1,289	2,262
Difference Between RHNA & Inventory				
Total Surplus (Need)	40	1,415	63	35
Total Surplus Among All Income Levels	1,868			

1 Units located in the RLD land use designation can be inventoried for either Moderate or Above Moderate-Income units but have been listed in this table in the Above Moderate-Income level.

Note: All referred tables are from the City of Visalia Housing Element

Source: City of Visalia, 2019.

The City of Visalia recently updated their Housing Element. The data in the table below is taken from the housing element adopted December 3, 2019, and shows the progress of meeting the current Regional Housing Needs Allocation (RHNA). Over the five years, below, approved deed-restricted include 57 units for very low and 196 units for low-income levels. Non-deed restricted include 42 units for very low and 204 units for low income. Additionally, 596 units were approved for moderate and 1,760 for above moderate-income levels. The approved units result in a surplus for all income categories except for moderate incomes where the need is for 675 units.


Table 46: RHNA Progress, Permitted Units Issued by Affordability Visalia, 2014 through 2018							
Income Level		Year 0 2014	Year 1 2015	Year 2 2016	Year 3 2017	Year 4 2018	Total Units To-Date
Very Low	Deed Restricted	10	9	36	2	0	99
	Non-Restricted	0	0	42	0	0	
Low	Deed Restricted	17	106	0	72	1	400
	Non-Restricted	0	0	118	0	86	
Moderate		34	132	279	29	102	576
Above Moderate		353	367	246	403	391	1,760
Total		414	614	721	506	580	2,835

Note: City of Visalia Annual Element Progress Report, 2014 through 2018.
Source: Draft Housing Element, Table 1-35, 2019.

5. Equal Housing Opportunity

The question of how to ensure equal housing opportunity is largely analyzed and explained in Visalia’s Housing Element. The Element includes several policies and programs oriented toward providing a variety of housing opportunities within the city. The City has taken many actions to discover new housing opportunities.

Re-designation/Rezoning- The 2014 General Plan Update formally established two new land use designations: CMU (Commercial Mixed Use), and DMU (Downtown Mixed Use). Both of these new designations encourage vertical and horizontal mixed-use developments. Both designations encourage high commercial floor area ratios (2.0 for



CMU and 5.0 for DMU) and allow residential densities as high as the site and setting can facilitate.

Accessory Dwelling Units- Accessory dwelling units can be an important source of affordable housing since they can be constructed relatively cheaply because of no associated land costs and most often do not require government subsidies to bridge the affordability gap. In addition, accessory dwelling units provide other benefits, such as supplemental income to the homeowner and “lifecycle housing” for seniors. The 2017 Zoning Ordinance Update revised regulations for accessory dwelling units to meet state requirements and to allow more flexibility in meeting requirements, such as increasing maximum floor areas and allowing for parking space waivers.

6. Incentives for Affordable Housing Development

The City implemented an Affordable Housing Infill Incentive Program in 2017, which reduces Transportation Impact Fees for qualifying projects that meet the infill criteria outlined in the City’s Development Fee Schedule. In the downtown area, waivers for parking requirements have been given based on past use of the building spaces. There are multiple policies and programs in the Housing Element that address promoting incentives for affordable housing that include priority permit processing and modified zoning provisions. New programs in the Draft Housing Element update, propose removing conditional use requirements for housing in certain commercial zone designations.

7. Policy Changes

Housing Element policies and programs in the Draft Housing Element will generally remain the same as those contained in the 2015 Housing Element. By contrast, there will be several changes to the implementation programs, which are specific actions or programs that carry out the policies. Many of the policies in the City’s Housing Element, including those listed under Goal HE-3, encourage development of affordable or multi-family housing. As mentioned above, new programs in the Housing Element update propose removing conditional use requirements for certain types of housing, such as senior housing in residential zones and new housing in mixed use zones.

Chapter V: Private Sector Practices

Private sector practices can be a contributing factor to fair housing choice. An important element of fair housing choice is equity in money lending from financial service organizations, namely, loans for purchasing a home.³⁴ Such organizations include credit unions, banks, credit card companies, and insurance companies. Lending is often required for the access to credit financing for mortgages, home equity, and home repair loans. Information regarding financial services is also a concern involving equality.

Gaps in financial services can make residents vulnerable to predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual's credit and the overall sustainability of homeownership and wealth accumulation.³⁵

This section of the AI discusses the City's efforts to determine and to evaluate the practices of the private sector as they relate to fair housing choice, including the policies and practices of real estate agents, property managers, and mortgage lenders.


A. Real Estate Sales Practices

In the State of California, to engage in the business of real estate sales, the Department of Real Estate (DRE) must license a broker and salesperson. The DRE also enforces violations of California real estate law. In the City of Visalia, any case of discrimination or other fair housing violation that is experienced by an individual from a real estate professional should be reported to the local representative association and/or to the DRE.

In July 2015, the Governor signed Assembly Bill 345, amending Section 10170.5 of the California Business and Professions Code. The provisions of this Code section took effect on January 1, 2016. The amendment requires that broker licensees complete upon their first renewal as a broker, a three-hour continuing education course in the management of real estate offices and supervision of real estate activities. In addition, salesperson and broker licensees must complete an eight-hour continuing education survey course for subsequent renewals that includes topics in ethics, agency, trust fund

³⁴ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, *Fair Housing Planning Guide*, (March 1996), 37.

³⁵ U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Subprime Lending and Alternative Financial Service Providers: A Literature Review and Empirical Analysis*, William C. Apgar, Jr. Christopher E. Herbert (Cambridge, MA, 795February 2006): I-23.



handling, fair housing, risk management and management and supervision. Also, a real estate broker who is renewing for the first time must complete 45 clock-hours of continuing education courses which include six separate three-hour courses in the following subjects: Ethics, Agency, Fair Housing, Trust Fund Handling, Risk Management, and a course in Management and Supervision.

A salesperson renewing for the first time must complete a total of 45 clock-hours of approved continuing education courses which includes five separate three-hour courses in the following subjects: Ethics, Agency, Fair Housing, Trust Fund Handling, and Risk Management.


For all subsequent renewals after January 1, 2016, all licensees must complete a total of 45 hours of continuing education, which must include one eight-hour survey course covering the six mandatory subjects (Ethics, Agency, Fair Housing, Trust Fund Handling, Risk Management, and Management and Supervision).

The real estate industry in California is highly professionalized. Almost all real estate brokers and salespersons are affiliated with a real estate trade association. The two largest are the California Association of Realtors (CAR), associated with the National Association of Realtors (NAR), and the California Association of Real Estate Brokers (CAREB), associated with the National Association of Real Estate Brokers (NAREB). The use of the term “Realtor” is restricted by NAR as a registered trademark. Members of NAREB are licensed to use the professional designation “Realtist.”

NAR has a professional code of conduct, which specifically prohibits unequal treatment in professional services or employment practices on the basis of “race, color, religion, sex, handicap, familial status, or national origin” (Article 10, NAR Code of Ethics). Both prohibit members from promulgating deed restrictions or covenants based on race.

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

A Realtor pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations upon Realtors and is also a firm statement of




support for equal opportunity in housing. A Realtor who suspects discrimination is instructed to call the local Board of Realtors. Local boards or associations of Realtors will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase, or rental of housing. Local boards of Realtors have a responsibility to enforce the Code of Ethics through professional standards, procedures, and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

The majority of salespersons and brokers from Visalia are members of the Tulare County Association of REALTORS® (TCAOR). TCAOR³⁶ is a trade association that services more than 1,000 members and is affiliated with the California Association of Realtors and the National Association of Realtors. The association provides members the Multiple Listing Service (MLS), education programs, and political action programs. Also, TCAOR processes ethics and fair housing complaints and finally reports the complaints to the District Attorney's office and the California Department of Real Estate. TCAOR's bylaws are based upon the California Model Bylaws ("Model Bylaws") which are designed and intended for use by Member Associations in California. The Model Bylaws are drafted to be in compliance with the policies of the National Association of REALTORS® ("N.A.R.") and California state law.

The California Association of Realtors (CAR) has many local associations throughout the state. The City of Visalia is served by the Tulare County Association of Realtors. The Tulare County Association of Realtors holds local real estate members to the professional code of ethics. Beyond the local board, real estate professionals are also held to a strict code of ethics mandated by the National Association of Realtors.

CAR offers continuous online courses dealing with fair housing requirements and issues. As part of CAR's online license renewal program, CAR offers a suite of real estate courses. "Fair Housing" is CAR's course that educates realtors on the history of fair housing as well as current fair housing laws. According to the course description, the course will provide an overview of the federal fair housing laws and an in-depth discussion of the individual laws and their application to the practice of real estate. The course also provides CAR members with a study of the State of California fair housing laws and regulations. The course emphasizes anti-discriminatory conduct that all

³⁶ 2019 Tulare County Association of Realtors. Interview by author. Visalia, CA. April, 2019.



licensees should practice and concludes by discussing the voluntary affirmative action marketing program and why promoting fair housing laws is a positive force at work in California and throughout the nation.

NAREB Realtists follow a strict code of ethics stating that “any Realtist shall not discriminate against any person because of Race, Color, Religion, Sex, National Origin, Disability, Familial Status or Sexual Orientation” (Part I, Section 2, NAREB Code of Ethics):

- In the sale or rental of real property.
- In advertising the sale or rental of real property.
- In the financing of real property.
- In the provision of professional services.

Part I, Section 2 of the NAREB Code of Ethics continues to state that any “Realtist shall not be instrumental in establishing, reinforcing or extending any agreement or provision that restricts or limits the use or occupancy of real property to any person or group of persons on the basis of race, color, religion, sex, national origin, disability, familial status, or sexual orientation.”

B. Rental and Property Management

The California Apartment Association (CAA) is the country’s largest statewide trade association for rental property owners and managers. CAA incorporated in 1941 to serve rental property owners and managers throughout California. CAA represents rental housing owners and professionals who together manage more than 1.5 million rental units.

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

- We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing



accommodations to all persons on an equal basis;

- We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our resident's tenancy;
- We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and
- We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.

CAA offers a Certificate in Residential Management, which includes a course on fair housing law. In addition, the CAA website provides links to the Fair Housing Institute and Fair Housing Network.

C. Laws Governing Lending

Community Reinvestment Act (CRA)


The Community Reinvestment Act (CRA), enacted in 1977, requires the Federal Reserve and other federal banking regulators to encourage financial institutions to help meet the credit needs of the communities in which they do business, including low- and moderate-income (LMI) neighborhoods.

Banking Regulators for the CRA

Three federal banking agencies, or regulators, are responsible for the CRA. Banks that have CRA obligations are supervised by one of these three regulators. Each regulator has a dedicated CRA site that provides information about the banks they oversee and those banks' CRA ratings and Performance Evaluations.

- Federal Deposit Insurance Corporation (FDIC)
- Federal Reserve Board (FRB)
- Office of the Comptroller of the Currency (OCC)

Federal Reserve's Role



The Federal Reserve supervises state member banks--or, state-chartered banks that have applied for and been accepted to be part of the Federal Reserve System--for CRA compliance.

To carry out its role, the Federal Reserve must

- Examine state member banks to evaluate and rate their performance under the CRA;
- Consider banks' CRA performance in context with other supervisory information when analyzing applications for mergers, acquisitions, and branch openings; and
- Share information about community development techniques with bankers and the public.

Below, Figure 12, is the rating of banks by the CRA for Visalia. An institution's CRA Rating is assigned using a four-tiered rating system. These ratings are: Outstanding, Satisfactory, Needs to Improve, and Substantial Noncompliance. All banks rated by CRA in Visalia received a rating of "satisfactory."

Row #	ID	Agency	Exam Date	Bank Name	City	State	CRA Rating	Asset Size (x 1,000)	Exam Method
1	34156	FDIC	01/01/1998	BANK OF VISALIA	VISALIA	CA	Satisfactory	\$38,881	Small bank
2	34156	FDIC	03/01/2003	BANK OF VISALIA	VISALIA	CA	Satisfactory	\$108,676	Small bank
3	22832	OCC	05/09/1996	KAWEAH NATIONAL BANK	VISALIA	CA	Satisfactory	\$25,651	Not Reported
4	22832	OCC	04/06/1998	KAWEAH NATIONAL BANK	VISALIA	CA	Satisfactory	\$38,843	Small bank
5	22832	OCC	07/22/2002	KAWEAH NATIONAL BANK	VISALIA	CA	Satisfactory	\$80,433	Small bank
6	33341	FDIC	05/01/1992	KAWEAH THRIFT AND LOAN COMPANY	VISALIA	CA	Satisfactory	\$1,000	Not Reported
7	33341	FDIC	07/01/1994	KAWEAH THRIFT AND LOAN COMPANY	VISALIA	CA	Satisfactory	\$22,000	Not Reported
8	17381	OCC	08/19/1991	MINERAL KING NATIONAL BANK	VISALIA	CA	Satisfactory	\$140,358	Not Reported
9	17381	OCC	10/31/1993	MINERAL KING NATIONAL BANK	VISALIA	CA	Satisfactory	\$183,481	Not Reported
10	58728	FDIC	02/01/2011	SUNCREST BANK	VISALIA	CA	Satisfactory	\$74,080	Small bank
11	58728	FDIC	08/01/2013	SUNCREST BANK	VISALIA	CA	Satisfactory	\$99,942	Small bank
12	58728	FDIC	05/01/2019	SUNCREST BANK	VISALIA	CA	Satisfactory	\$928,677	Intermediate Small Institution
13	34156	FDIC	05/05/2008	VALLEY BUSINESS BANK	VISALIA	CA	Satisfactory	\$280,508	Small bank
14	34156	FDIC	08/01/2011	VALLEY BUSINESS BANK	VISALIA	CA	Satisfactory	\$341,340	Intermediate Small Institution
15	34156	FDIC	07/01/2013	VALLEY BUSINESS BANK	VISALIA	CA	Satisfactory	\$359,989	Intermediate Small Institution
16	34156	FDIC	01/01/2016	VALLEY BUSINESS BANK	VISALIA	CA	Satisfactory	\$401,993	Intermediate Small Institution
17	22496	FDIC	10/01/1991	VISALIA COMMUNITY BANK	VISALIA	CA	Satisfactory	\$92,000	Not Reported
18	22496	FDIC	03/01/1993	VISALIA COMMUNITY BANK	VISALIA	CA	Satisfactory	\$141,000	Not Reported
19	22496	FDIC	01/01/1995	VISALIA COMMUNITY BANK	VISALIA	CA	Satisfactory	\$123,756	Not Reported
20	22496	FDIC	12/01/1995	VISALIA COMMUNITY BANK	VISALIA	CA	Satisfactory	\$127,872	Not Reported

Figure 12. Rating of Banks

Source: Federal Financial Institutions Examination Council, Interagency CRA Rating Search for Visalia, CA, <https://www.ffiec.gov/craratings/> (Accessed October 1, 2019).



Home Mortgage Disclosure Act (HMDA)

The Home Mortgage Disclosure Act (HMDA) requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. These data help show whether lenders are serving the housing needs of their communities; they give public officials information that helps them make decisions and policies; and they shed light on lending patterns that could be discriminatory. The public data are modified to protect applicant and borrower privacy. HMDA was originally enacted by Congress in 1975 and is implemented by Regulation C.

Government Backed Loans

Larger numbers of approved loans are government backed. There are different types of government backed loans. They include loans from the Federal Housing Administration (FHA), VA Home Loans, and the Rural Housing Services/Farm Service Agency (RHA/FSA).

Federal Housing Administration


Loans from the Federal Housing Administration (FHA) loans have been helping people become homeowners since 1934. How do they do it? The Federal Housing Administration (FHA) - which is part of HUD - insures the loan, so your lender can offer you a better deal.

- Low down payments
- Low closing costs
- Easy credit qualifying

VA Home Loans

VA helps Service members, Veterans, and eligible surviving spouses become homeowners. As part of their mission to serve, they provide a home loan guaranty benefit and other housing-related programs to help qualifying individuals buy, build, repair, retain, or adapt a home for their own personal occupancy. VA Home Loans are provided by private lenders, such as banks and mortgage companies. VA guarantees a portion of the loan, enabling the lender to provide more favorable terms.

Rural Housing Services/Farm Service Agency (RHA/FSA)



FSA/RHS-guaranteed USDA's Rural Housing Service offers a variety of programs to build or improve housing and essential community facilities in rural areas. They provide loans, grants and loan guarantees for single- and multi-family housing, child care centers, fire and police stations, hospitals, libraries, nursing homes, schools, first responder vehicles and equipment, and housing for farm laborers. The FSA/RHS also provides technical assistance loans and grants in partnership with non-profit organizations, Indian tribes, state and federal government agencies, and local communities.

Conventional Loans

A conventional loan is a mortgage that is not sponsored by government but is available through a private lender. Conventional loans make up for most mortgages issued.³⁷ Some conventional loans must meet the requirements of Fannie Mae and Freddie Mac, the two largest buyers of mortgage loans in the United States. Studies of conventional loans in HMDA data have shown that commercial banks and thrift institutions lend less to areas (or tracts) that are low-income and predominantly minority-concentrated.³⁸ Such practices have the potential to constitute discrimination and are known as redlining. The practice of redlining is a barrier to fair housing.

D. Lending Findings

In analyzing the HMDA data, several findings revealed implications of potential impediments to fair housing. This section reviews lending practices of financial institutions and financing allowed to all households but with an emphasis on lending to minority and low-income households. However, a jurisdiction's control over lending is limited due to federal laws and regulations.

Disposition of Loans

According to Table 47 below, applications were nearly evenly split between loans for refinancing (2,752) and home purchase (2,657). Both Government-backed and conventional types of loans had an approval rate of nearly 60%.

³⁷ Investopedia, <https://www.investopedia.com/terms/c/conventionalmortgage.asp>, July 29, 2019.

³⁸ Glenn B. Canner, Stuart A. Gabriel and J. Michael Woolley, "Race, Default Risk and Mortgage Lending: A Study of the FHA and Conventional Loan Markets," *Southern Economic Journal* (July 1991): 259.



Table 47: Disposition of Home Loans (2017)				
Loan Type	Total Applicants	Percent Approved	Percent Denied	Percent Other
Totals	5,810	59.5%	13%	27.2%
Government-Backed	2,187	59.7%	12.1%	28.2%
Conventional	3,623	59.4%	14%	26.6%
Purpose of Loan				
Home Purchase	2,657	71.4%	5.8%	22.8%
Refinance	2,752	49.4%	17.8%	32.7%
Home Improvement	401	50.6%	31.9%	18%

Source: www.consumerfinance.gov, 2019.

Refinancing

Refinancing is the process of replacing an existing mortgage with a new loan. Typically, people refinance their mortgage in order to reduce their monthly payments, lower their interest rate, or change their loan program from an adjustable rate mortgage to a fixed-rate mortgage.

Home Improvement

A home improvement loan is used to remodel or repair a private residence.³⁹ Home improvement loans are usually short-term. They may or may not be secured by the homes whose work they finance, but those that are secured generally carry lower interest rates.

Demographics of Loans

An analysis of access to home loans presented findings that could potentially indicate the possible occurrence of discrimination or a lack of awareness in lending. Hispanic residents make up 50.3% of the City. However, of persons of the Hispanic race or ethnicity that apply for loans is only 38.8%. In contrast, the percentages of applicants of

³⁹ Brian O’Connell, “What Are Home Improvement Loans and How Do You Get One?” The Street, (July 2, 2018) <https://www.thestreet.com/how-to/home-improvement-loans-14638347>.

other races (White, Black, and Asian) are mostly even with their respective percentage of the City’s population. Such findings indicate that the Hispanic demographic may not be applying for home loans.

Table 48: Demographics of Loan Applicants vs. Total Population – (2019)			
	Percent of Applicant Pool	Percent of Total Population	Variation (Percentage Points)
White	42.4%	40.4%	+2
Black	1.9%	1.6%	+3
Hispanic	38.8%	50.3%	-11.5
Asian	4.5%	2.7%	+1.8
American Indian/Alaska Native	1.4%	.12%	+1.28
Native Hawaiian/ Pacific Islander	.5%	5%	-4.5
Information Not Provided	10.4%	unknown	unknown

Source: www.consumerfinance.gov, 2019.

Lending by Race/Ethnicity and Income

Lending by ethnicity and income in the City shows that, relative to their rate of applying for loans, persons of White race/ethnicity received the highest approvals in all income brackets. Applicants of Black race/ethnicity tied with White, also receiving the highest loan approvals in the low-income bracket at 61.1 percent.

In the middle-income bracket, Native Hawaiian/ Pacific Islander, White, and Hispanic received the highest approvals, 75, 70.1 and 67.8 percent respectively. The middle-income Black race/ethnicity received the lowest approval at 50 percent.

In the low-income bracket, American Indian/Alaska Native race/ethnicities and Native Hawaiian/ Pacific Islander received no approvals. The Asian race/ethnicity received lower approvals (51 percent) than Hispanic (54.8 percent).

For all races in the middle to upper income bracket for which race/ethnicity data was provided, approvals occurred between 50 and 75 percent, indicating that loan approvals are dependent on income.

Table 49: Lending Patterns by Race/Ethnicity and Income – Visalia (2019)			
	Approved	Denied	Withdrawn/ Incomplete
White			
Low (0-49% AMI)	61.1%	17.1%	21.8%
Moderate (50-79% AMI)	65.3%	10.7%	24.0%
Middle (80-119% AMI)	70.1%	12.4%	17.5%
Upper (≥120% AMI)	73.0%	9.9%	17.2%
Black			
Low (0-49% AMI)	61.1%	22.2%	16.7%
Moderate (50-79% AMI)	36.4%	27.3%	36.4%
Middle (80-119% AMI)	50.0%	14.3%	35.7%
Upper (≥120% AMI)	53.7%	22.0%	24.4%
Hispanic			
Low (0-49% AMI)	54.8%	21.9%	23.3%
Moderate (50-79% AMI)	62.0%	14.2%	23.8%
Middle (80-119% AMI)	67.8%	14.4%	17.8%
Upper (≥120% AMI)	62.9%	13.3%	23.8%
Asian			
Low (0-49% AMI)	51.0%	22.4%	26.5%
Moderate (50-79% AMI)	63.0%	29.6%	7.4%
Middle (80-119% AMI)	55.9%	23.5%	20.6%
Upper (≥120% AMI)	72.5%	9.9%	17.6%
American Indian/Alaska Native			
Low (0-49% AMI)	0	66.6%	33.3%
Moderate (50-79% AMI)	0	40%	60%
Middle (80-119% AMI)	57.1%	14.3%	28.6%
Upper (≥120% AMI)	53.5%	14%	32.6%

Native Hawaiian/ Pacific Islander			
Low (0-49% AMI)	0	0	0
Moderate (50-79% AMI)	0	66.6%	33.3%
Middle (80-119% AMI)	75%	25%	0
Upper (≥120% AMI)	75%	12.5%	12.5%
Information Not Provided			
Low (0-49% AMI)	100%	0	0
Moderate (50-79% AMI)	100%	0	0
Middle (80-119% AMI)	39.6%	24%	36.4
Upper (≥120% AMI)	53.5%	17.8%	28.8%

Source: www.consumerfinance.gov, 2019.

Lending by Tract

Applications by tract revealed that applicants receiving the highest approvals were from tracts with predominantly middle to upper incomes. The most denials were received by low income tracts and tracts that were substantially minority.

It is necessary to look at the applicant pool. Most applications are from the upper-income bracket. Applications by tract revealed that applicants receiving the highest approvals were from tracts predominantly in an upper income bracket at 60.4% approval rate. Middle-income tracts showed a 59.2% approval rate and tracts that were mostly in the moderate-income bracket received an approval rate of 54%. Tracts that are mostly low-income received the lowest approval rate at 40%.

The approval rate from tracts substantially minority is equal to the approval rate from tracts that are not substantially minority, an indication that loan approvals are dependent on income alone.

According to HMDA, the percentage of the median family income for the tract is compared to the median family income for the MSA/MD.

Table 50: Outcomes Based on Census Tract Income – Visalia (2019)								
	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%
Tract Income Level								
Low	103	1.8%	41	40%	28	27.5%	34	33.3%
Moderate	240	4.1%	130	54%	38	15.8%	72	29.9%
Middle	1410	24.2%	836	59.2%	218	15.5%	356	25.2%
Upper	4057	69.8%	2452	60.4%	489	12%	1116	27.5%
Minority Concentration								
Substantially Minority	3,694	63.6%	2,199	59.5%	507	65.6%	988	26.7%
Not Substantially Minority	2,116	36.4%	1,260	59.5%	266	34.4%	590	27.9%
Combined Characteristics								
Low/Moderate Income and/or Substantially Minority	307	5.3%	145	47.2%	62	20.2%	100	1.7%
All Other Census Tracts	5503	94.7%	3314	60.2%	711	13%	1478	25.4%
Total	5810	100%	3459	59.5%	773	13.3%	1578	27.1%

Source: www.consumerfinance.gov, 2019.

However, it is important to note that the Community Reinvestment Act’s report for 2019 does not show any census tracts in Visalia as “Distressed and Underserved.”⁴⁰

⁴⁰ Federal Financial Institutions Examination Council, “Distressed and Underserved Tracts, 2019,” under “Community Reinvestment Act,” <https://www.ffiec.gov/cra/distressed.htm>.

Chapter VI: Fair Housing Profile

This section discusses the institutional structure of the housing industry regarding fair housing practices. Fair housing services available to City residents will also be covered and shall include data regarding fair housing complaints received by the fair housing provider, how fair housing investigation and resolution of housing discrimination complaints are handled, and discrimination auditing/testing results will be discussed. The City can assist residents through providing education and outreach, including the dissemination of fair housing information.

A. Private Sector Practices and Fair Housing

The Fair Housing Act⁴¹ states that it is “the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States.”⁴² The Act carries out the policy by prohibiting discrimination in the sale, rental, and financing of dwellings, and in other real estate-related transactions because of race, color, religion, sex, familial status⁴³, national origin, or disability.

This section of the AI discusses the City’s efforts to determine and to evaluate the practices of the private sector as they relate to fair housing choice, including the policies and practices of real estate agents and property managers.

1. Home Purchase Process

When purchasing a home, a potential buyer must go through a process of steps, including:

- Search advertisements
- Obtaining a loan
- Working with a Real Estate Agent


a. Real Estate Advertisement

The process usually begins by searching for home for sale in advertisements. Homes for sale are advertised in magazines, newspapers, or the internet. Advertisements cannot include discriminatory references such as the use of words describing current

⁴¹ Title VIII of the Civil Rights Act of 1968, 42 U.S.C. §§ 3601-3619.

⁴² 42 U.S.C. § 3601.

⁴³ One or more individuals under the age of 18 years living with a parent or other person having legal custody of the individual or individual.



residents, the neighborhood in racial or ethnic terms, that adults or types of adults are preferred, or convenience of local religious institutions.

Under 42 U.S. Code § 3604 (c), discrimination in the sale or rental of housing and other prohibited practices, it is unlawful to make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.

In addition, as made applicable by section 803 of the Fair Housing Act, it shall be unlawful to make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.

The State of California expanded the list of protected classes in its own Fair Housing legislation. Under the California Fair Employment and Housing Act, it shall be unlawful to make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a housing accommodation that indicates any preference, limitation, or discrimination based on race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, or genetic information or an intention to make that preference, limitation, or discrimination.⁴⁴The National Fair Housing Alliance (NFHA) provides guidelines for responsible advertising to housing providers for their use. Basic guidelines they recommend include the following:

” Make sure your advertising is compliant with fair housing laws by focusing on the property and the amenities in your rental listing description—NOT on who you think an ideal renter would be.”

” Do not make statements that exclude persons in protected classes or express a preference for one personal characteristic over others.”

⁴⁴ Fair Employment and Housing Act, Section 12955.

Table 51 is from a sampling of 89 listings, 10 of which include references to something that could potentially be discriminatory in advertising. The results were filtered to show homes affordable according to HOME and Housing Trust Fund Homeownership Sales Price Limits for fiscal year 2019, which is \$221,000 for a 1-unit single family existing housing unit.

The income related listing says that its community is “exclusive and prestigious,” terms generally associated with income, implying that residents of such a background may be targeted by the advertisement. One listing is related to religion. Finally, eight listings are related to a particular familial status.

Table 51: Potentially Discriminatory Language in Listings of For-Sale Homes		
Discrimination Type	Number of Listings	Potentially Discriminatory Language*
No Discriminatory Language	79	
Income Related	1	Exclusive gated community of Bonaventure.... Be a part of this prestigious community....3544 Harvard Ct. E
Religion Related	1	Extra roomy family room, great for Bible Study...4640 Terrace St S.
Household Size/ Family Related	8	<p>Calling all investors or first-time home buyers! Enjoy this 3 beds and 2 bath home in a family oriented neighborhood...1836 Vine Ave W.</p> <p>Excellent location with easy walking distance to K-12 schools. Comfortable family home on a quiet street...1811 Sowell St S</p> <p>Remodeled 3/2 with a Garage conversion that can be used as a mother-in-Law or college student room...2737 Fairway Ct S</p> <p>Outdoor Access to the 3rd Bedroom for a Mother-in-laws Quarters or Guest Room...3020 College Ave E</p> <p>Charming 2 Bedroom/2 Bath Perfect For 1st Time</p>



		<p>Home Buyers! 2604 Tulare Ave E Spacious home located close to schools and major shopping area...1640 Princeton Ct. W</p> <p>Schools are just within walking distance for your family...2729 Sweet Ave E, Unit 1</p> <p>Home on a large 1/4 acre lot in the much desired N.W. quadrant of Visalia near shopping, newer schools, and both the La Valencia and Riggins Ranch gated neighborhoods...4522 Wren Ave W</p>
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Source: www.realtor.com, accessed August 2019; City of Visalia website, Maps, <https://visalia.maps.arcgis.com/apps/webappviewer/index.html?id=e78dfbb593044bf6bc1cf4f0d63c9160>.

b. Home Loans

The next step is to obtain financing for the home purchase. The potential homebuyer must apply for the loan and the lender must perform an evaluation of credit quality, determine ability to repay the loan and amount eligible for, and choose the type and terms of the loan, etc. Examples of discrimination,⁴⁵ based on race, color, national origin, religion, sex, familial status, or disability, in lending can include:

- Refusal to make a mortgage loan
- Refusal to provide information regarding loans or providing unequal information
- Imposing different terms or conditions on a mortgage loan, such as different interest rates, points, or fees
- Discrimination in appraising property
- Steering an applicant toward a bad mortgage loan product
- Providing inferior servicing of a mortgage loan

c. Real Estate Agents

Real Estate Agents can discriminate in ways such as providing different terms, conditions, or information related to the sale or rental of a dwelling to individuals with protected characteristics, or steering individuals with protected characteristics to a particular neighborhood or area at the exclusion of other areas.

2. Rental Housing Process

When searching for a home to rent, the process is somewhat similar to home purchase but does not require the same outlay of cash. Renting can involve the following steps:

- Search advertisements
- Viewing rental units
- Credit checks and security deposits

a. Advertisement for Rental Units

As with searching for homes for sale, the process for rentals also begins by searching in advertisements, usually in magazines, newspapers, or the internet. Advertisements for rental units cannot include discriminatory references that indicate preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination. Also, as referenced earlier, California State legislation prohibits discrimination against additional protected classes, which includes the additional classes of gender, gender identity,

⁴⁵ U.S. Department of Housing and Urban Development, "Understanding Fair Lending," under "Lending Discrimination," <https://files.hudexchange.info/resources/documents/Fair-Lending-Learning-the-Facts-Consumer-Guide.pdf>.

gender expression, sexual orientation, marital status, ancestry, source of income, disability, or genetic information or an intention to make that preference or limitation.

Table 52 is from a sampling of 33 rental listings, five of which include potentially discriminatory language found at Realtor.com. Results were filtered to reflect the affordable rent for a three-bedroom household using HUD’s fair market rent of \$1,312 (Table 31). Two listings refer to a potential preference for source of income. One listing does not allow dogs, which could be discriminatory against a disabled individual or family requiring a service animal. Two of the listings show a potential preference for familial status.

Table 52: Potentially Discriminatory Language in Rental Listings		
Discrimination Type	Number of Listings	Potentially Discriminatory Language
No Discriminatory Language	28	
Income Related	2	We are a large upscale apartment community...4620 W Douglas Ave No Section 8...2931 W Walnut Ave
Disability Related	1	No dogs allowed...1449 E Douglas, R-M-2
Household Size/ Family Related	2	This family home has a 2-car garage...1509 S Noyes St, R-1-5 Perfect for one person or a couple...444 S Tipton St, R-M-2

Source: www.realtor.com, accessed August 2019; City of Visalia website, Maps, <https://visalia.maps.arcgis.com/apps/webappviewer/index.html?id=e78dfbb593044bf6bc1cf4f0d63c9160>.

b. Viewing the Unit

As is discussed in the Fair Housing-Local Reports section below, testing concluded that discrimination in housing because of race has occurred (occurring half the time in the testing results, as described below) throughout Visalia. Protected, African- American, testers were subjected to multiple experiences of discriminatory treatment as compared to their control, Caucasian tester counterparts. At test sites, where discriminatory treatment occurred, protected testers were told that housing was unavailable when housing was made available to control testers and protected testers were denied the opportunity to view a dwelling when that opportunity was made available to the control tester.

c. Credit Check and Security Deposits

Much of the data collected for this report indicates that finding affordable housing in the City is difficult. Security deposits are a factor that contributes to home affordability. Substantial market research shows that not only is the lack of a down payment a barrier to ownership, but also money for the security deposit and the first month's rent is a significant barrier to rent homes on an income basis they can afford.⁴⁶

B. Fair Housing Complaints and Enforcement

Patterns of complaints and enforcement are useful to assess the nature and level of potentially unfair or discriminatory housing practices in the private sector. Several public and private agencies may receive complaints about unfair housing practices or housing discrimination.


Office of Fair Housing and Equal Opportunity (FHEO)

At the federal level, the Office of Fair Housing and Equal Opportunity (FHEO) of the Department of Housing and Urban Development (HUD) receive complaints of housing discrimination. FHEO will attempt to resolve matters informally. However, FHEO may act on those complaints if they represent a violation of federal law and FHEO finds that there is “reasonable cause” to pursue administrative action in federal court.

California Department of Fair Employment and Housing (DFEH)

At the state level, the Department of Fair Employment and Housing (DFEH) has a similar role to FHEO. DFEH also receives, investigates, attempts to settle, and can take administrative action to prosecute violations of the law. HUD and DFEH have overlap in jurisdiction, and depending on the nature of the case, may refer cases to one another.

⁴⁶ Andrea Riquier, “When the rent isn’t too high — but the security deposit is,” Market Watch (Mar 15, 2018), under “Capital Report,” <https://www.marketwatch.com/story/a-new-program-loans-for-rental-security-deposits-2018-03-15..>



DFEH is a HUD Fair Housing Assistance Program (FHAP) grantee, meaning that it receives funding from HUD to enforce federal fair housing law in the state.

Central California Legal Services (“CCLS”)

Central California Legal Services (“CCLS”) is a non-profit, public interest law firm that provides civil legal assistance to low-income populations in the San Joaquin Valley. CCLS staff serves eligible clients in the counties of Fresno, Tulare, Kings, Merced, Tuolumne, Mariposa, senior citizens in Madera County, and several other counties for health-related cases. Legal services may be provided in the areas of health, housing, domestic violence, utilities, employment law, elder’ law, immigration, and public benefits.

CCLS promotes equity and access to justice for clients in a variety of civil matters, including eviction proceedings. CCLS also assists clients in advocating for the development of high-quality affordable housing in their communities and homelessness prevention. According to CCLS, a major portion of their client community consists of households at or below the 125% Federal Poverty Level (“FPL”), which is approximately 30% Area Median Income (“AMI”) for Tulare County.

C. Fair Housing - Local Reports

The City contracts with the Fair Housing Council of Central California (FHCCC), a nonprofit organization, which provides resources to consumers and housing providers. The FHCCC investigates complaints involving housing discrimination and predatory lending practices. The FHCCC is committed to eliminating housing discrimination by ensuring compliance with federal and state housing laws.

The FHCCC provided information on fair housing complaints and cases for the period 2015, to present. The table below indicates the general breakdown of inquiries, cases, and demographics. Table 53 demonstrates that the majority of complaints were based on Disability/Access at 140 complaints. The next highest were based on National Origin at 121, followed by Familial Status at 26, and Race at 24.



Table 53: Complaints by Protected Classification (Fair Housing Council of Central California, 2019)	
Complaint Type	Total
Age	0
Familial Status	26
Gender	0
Disability/Accessibility	140
National Origin	121
Race	24
Religion	0
Sexual Orientation	0
Source of Income	0
Arbitrary	0
General Information	0
Total	311

Source: Fair Housing Council of Central California, 2019.

In addition to Fair Housing complaints, other housing issues reported by the public to the FHCCC include the following:

- 125 Referrals to Code Enforcement (Habitability)
- 255 Referrals to Legal Aide (Unlawful Detainers)
- 7 Referrals to Small Claims Advisor
- 6 Referrals to DFEH

Table 54 is a breakdown of persons served by the FHCCC from 2015 to 2019 by demographic, gender, type of referral, and zip code. The FHCCC referred the persons as described below for assistance appropriate to their complaints. Most complaints were

from the Hispanic race, which makes up nearly half of the City's population. For gender, most referrals were made to females, and most were referred based on safety.

Table 54: Clients Served by Fair Housing Council of Central California (2015 to 2019)					
Race	2015	2016	2017	2018	Jan-May 2019
Asian-Pacific	0	1	4	0	0
White	14	23	26	17	6
Black	4	3	7	9	3
Hispanic	18	35	39	23	18
Other	0	0	0	1	0
Total	36	62	76	50	27
Gender					
Male	12	15	28	9	10
Female	24	47	48	41	17
Total	36	62	76	50	27
Referrals					
HUD	0	0	0	0	0
Small Claims	1	0	4	0	3
DFEH	2	0	3	1	0
SAFETY	20	40	33	27	10
LEGAL	14	24	35	28	20
Intake	2	5	1	0	3
Total	39	69	76	56	36
Zip Code					
93277	17	26	36	19	14

93278	0	0	0	1	0
93279	4	1	0	0	1
93290	1	0	0	0	0
93291	8	21	29	23	9
93292	6	14	11	7	3
Total	36	62	76	50	27

Source: Fair Housing Council of Central California, 2019.

As mentioned, at the state level, the Department of Fair Employment and Housing (DFEH) has a similar role to FHEO. DFEH also receives, investigates, attempts to settle, and can take administrative action to prosecute violations of the law. Table 55 lists closed cases reported by DFEH since 2000. There are only four and the close reason for all is “No Cause Determination”.

Table 55: DFEH CLOSED CASES - Housing Complaints in the City of Visalia - 2000 to Present

No.	Record Type	Address Violation Occurred: City	Case File Date	Close Date	Basis	Harms	Close Reason
1	Housing	Visalia	1/9/2018	2/27/2018	Race	Denied rental/sale/lease	No Cause/ Determination
2	Housing	Visalia	4/24/2018	8/1/2018	Disability (physical or mental)	Denied equal terms and conditions	No Cause/ Determination
3	Housing	Visalia	8/29/2018	12/3/2018	Association with someone of a protected class; Disability (physical or mental);	Denied equal terms and conditions; Denied reasonable accommodation for a disability or medical condition; Evicted; Subjected to discriminatory statements/advertisement	No Cause/ Determination



					Familial status (Children)	; Other	
4	Housing	Visalia	2/8/2019	4/29/2019	Color	Evicted	No Cause/ Determination

Source: Department of Fair Employment and Housing (DFEH), 2019.

D. Rental Testing

The Fair Housing Council of Central California (FHCCC), conducted a project of systemic paired testing of the rental housing market within the City of Visalia. The purpose of this systemic testing project was to obtain a comparison of how people are treated, because of their race, when seeking housing. These comparisons may disclose that some housing providers may misrepresent housing as unavailable or unavailable to show, provide inferior information, provide inferior treatment, or offer unfavorable terms and conditions because of a prospective applicant's race. This testing project was focused on comparing the treatment of Caucasian home seekers and African- American home seekers by housing providers.

Paired testing is an investigative tool that documents the discriminatory conduct of housing providers. Systemic testing is necessary because most illegal housing discrimination victims do not report their complaints to government or legal entities. Many victims of housing discrimination may be unaware that their rights have been violated when housing providers who knowingly violate fair housing laws try to conceal their actions. Systemic testing is an important and powerful tool to employ in the discovery of previously unknown patterns of housing discrimination that affect the whole community. The United States Court of Appeals for the Seventh Circuit state:

“It is frequently difficult to develop proof in discrimination cases and evidence provided by testers is frequently' valuable, if not indispensable. The evidence produced by testers...is a major resource in society's continuing struggle to eliminate the subtle but deadly poison of racial discrimination.⁴⁷”

Federal fair housing law explicitly defines housing discrimination by a housing provider because of race as:

- Refusal to rent a dwelling when it is otherwise available
- To make a dwelling unavailable when it is otherwise available
- To make statements with respect to the rental of a dwelling that indicates any preference or limitation
- To have an intention to make any preference or limitation

⁴⁷ Richardson v. Howard, 712F.2d 319, 320 (7th Cir. 1983).

- To represent that a dwelling is not available for inspection when it is in fact so available
- To discriminate in terms, conditions, privileges, services or facilities in connection with the rental of a dwelling

The comparative testing undertaken for this systemic project depicts some housing providers engaging in many of these described discriminatory actions.

1. Methodology

This testing project was conducted throughout the City of Visalia and included ten individual test sites. These test sites were all multi-family housing complexes. Each of these test sites was located within a different census tract within the City, comprising different racial and ethnic populations.⁴⁸ This systemic testing project was concentrated on comparing differences in treatment and information provided by housing providers to trained testers based on the tester's race.

Testers who were assigned to complete these paired tests were divided into two groups. Caucasian testers were designated as the control tester and African-American testers were designated as the protected tester. Each tester was assigned a persona or profile that detailed the testers general life information such as family size and make up, household income, source of income, rental history, credit history and current housing status. Paired testers assigned to the same test sites were of the same gender.

For all paired tests, trained testers are provided with profiles of qualifications that would equally enable them to meet the rental requirements for each individual test site. Paired testers were also prodded to request specific, matching, types of rental units, i.e. size of unit, number of bedrooms, upstairs, downstairs, etc. Paired testers were dispatched to test sites as close in time to each other as possible and without intersecting with each other, with most tests completed one hour, or less, apart. After the completion of a site test assignment, each paired tester provided detailed information obtained from an interview with the housing provider. The tester information includes:

- Rental unit availability
- Rental unit pricing


⁴⁸ Tract data obtained from the Federal Financial Institutions Examination Council.

- Rental deposits
- Other rental fees/costs
- Application procedures described by the housing provider/agent
- Rental unit(s) shown (number, location, description)
- Rental units offered (number, location, description)
- Receipt of rental applications
- Tester's contact information requested by the housing provider
- Questions asked by the housing provider concerning tester's qualifications
- General statements made by the housing provider/agent
- Name and description of housing provider/agent
- Observations of signage displayed at rental office and complex's grounds
- Observations of people present at a rental office and at complex's grounds (race, ethnicity, gender, and age)

2. Testing Results

FHCCC completed the testing of ten housing providers within the City of Visalia in 2019. This was accomplished by conducting ten paired tests by trained testers of these housing providers at multi-family rental complexes. The sites tested were located throughout the City of Visalia.

The information provided by paired testers assigned to these test sites indicated instances of discriminatory treatment of protected (African American) testers compared to control (Caucasian) testers. Of the ten housing providers tested, protected testers encountered discriminatory treatment 50% of the time. Test sites located in census tracts where the overall minority population is greater than 60% resulted in discriminatory treatment of protected testers 50% of the time. Test sites located in census tracts where the overall minority population is under 60% also resulted in discriminatory treatment of protected testers 50% of the time. Tests conducted in



census tracts located in areas whose population is designated as being middle income had the highest level of discriminatory treatment of protected testers, 60%, during tests conducted in those areas. Interestingly, tests conducted in census tracts located in areas whose population is designated as upper income had a lower amount, 40%, of reported discriminatory treatment of protected testers during testing conducted in those areas.

Paired tests conclude that discrimination in housing because of race commonly occurs throughout the City. Protected, African- American testers were subjected to multiple experiences of discriminatory treatment as compared to their control, Caucasian tester counterparts. At test sites where discriminatory treatment occurred, protected testers were told that housing was unavailable when housing was made available to control testers and protected testers were denied the opportunity to view a dwelling when that opportunity was made available to the control tester. Protected testers were given inferior information about rental opportunities than control testers. Protected testers were offered less favorable terms and conditions than control testers. Protected testers were required to meet additional standards and qualifications than control testers.

The systemic testing results indicate that African American home seekers are likely to encounter obstacles in their housing choice that Caucasian home seekers do not experience. The indications are that African American home seekers will experience discriminatory treatment 50% of the time. That is one out of every two home seeking efforts.

The systemic testing results clearly demonstrate that housing providers operating within the City of Visalia need comprehensive training regarding federal and state fair housing laws. Federal law demands that everyone has the right to choose where they want to live based on real qualifications, not to be denied because of discriminatory factors.

E. Hate Crimes

Generally, a hate crime is a criminal act that is motivated by bias toward particular social groups. Hate crimes occur when a perpetrator targets a victim based on the perpetrator's perception that the victim belongs to a particular social group, typically defined by race, ethnicity, religion, sexual orientation, disability, gender, or gender

identity. Incidents of hate crimes may involve physical assault, property damage, bullying/harassment, and verbal abuse or insults.⁴⁹

Hate crimes become a fair housing concern when the acts described above intimidate residents from utilizing their home and/or neighborhood. This may mean that residents either choose to avoid locating to a particular neighborhood or home based on the perception of being a victim or move from their current residence or neighborhood as a result of being a victim.


California law defines a hate crime as a criminal act committed, in whole or part, because of the actual or perceived characteristics of the victim—disability, gender, nationality, race/ethnicity, religion, sexual orientation, or association with a person or group with one or more of these actual or perceived characteristics. The California Fair Employment and Housing Act and the federal Fair Housing Act make it a crime to threaten, harass, intimidate, or act violently toward a person who has exercised their right to free housing choice.

Basis of Complaints	Race/ Ethnicity	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
2012*	2	0	0	0	0	0	2
2013	1	0	1	0	0	0	2
2014	1	0	1	0	0	0	2
2015	2	0	1	0	0	0	3
2016	0	0	0	0	0	0	0
2017	1	0	0	0	0	0	1
Total	7	0	3	0	0	0	10

Source: U.S. Department of Justice Federal Bureau of Investigation, (2012-2017).

* = "Gender" and "Gender Identity" were not recorded in 2012.

⁴⁹ U.S. Department of Justice Federal Bureau of Investigation, "Hate Crime Statistics," under "Criminal Justice Information Services (CJIS)," <https://www.fbi.gov/services/cjis/ucr/hate-crime> (accessed July 18, 2019).



The Federal Bureau of Investigation (FBI) collects and reports incidents of hate crimes from law enforcement agencies across the United States in their Uniform Crime Reports, available on the FBI's website. According to the Uniform Crime Reports, there were ten hate crimes reported in the City between 2014 and 2019 (the most current years with available data). The only hate crimes were based on race/ethnicity (7 crimes) and sexual orientation (3 crimes).

Chapter VII: Five-Year Progress

An Analysis of Impediments to Fair Housing Choice for the City of Visalia was last completed in 2015. The following is a table summary of impediments identified in 2015 and actions taken to accomplish objectives and goals used in addressing the impediments identified in the City's previous AI.

Goal 1 : Expanding Affordable Housing Opportunities		
Housing Partnerships		
1.1	<p>Continue to explore the development and rehabilitation of affordable housing opportunities with local partners as well as outside developers. Partners will include:</p> <p>Tulare County Housing Authority Habitat for Humanity Christian Church Homes of Northern California Community Services and Employment Training (CSET)</p>	<p>Completed and ongoing:</p> <p>2015 the City partnered with Self Help Enterprises on the acquisition/rehabilitation of five (5) single family dwellings, resold to income qualifying households.;</p> <p>2016, the City partnered with Self Help Enterprises on the acquisition/rehabilitation of a five (5) unit multi-family development (Strawberry);</p> <p>2017, the City partnered with Tulare County Housing Authorities- Non-profit Kaweah Management Co in the acquisition/rehabilitation of an eight-(8) unit multi-family development (617-619 Santa Fe);</p> <p>2018 the City partnered with Self Help Enterprises for the acquisition/Rehabilitation of a six (6)-unit multi-family development (515-527 Encina) The City continues to work with</p>



		<p>local non-profit agencies in identifying affordable housing opportunities.</p> <p>The City continues these efforts in searching for funding opportunities with its partners in providing affordable housing opportunities.</p>
Affordable Housing Resources		
1.2	Maintain a list of nonprofit agencies and their services on the City’s website under affordable housing.	<p>Ongoing- The list of non-profit organizations the city is working with is listed on the website;</p> <p>The City website includes the link to “2-1-1” which has all Tulare county resources.</p>
Housing Choice for Special Populations		
1.3	<p>Continue to work with the Housing Authority and other local nonprofits to provide priority funding to assist in the development of new housing opportunities in non-minority concentrated areas.</p> <p>Continue to administer successful programs that provide funding and support for affordable housing.</p>	Ongoing.
1.4	Continue to facilitate the construction of affordable rental housing for very low- and low-income seniors by providing regulatory (e.g., density bonus,	Ongoing- 2017 the City partnered for the development of the 36 Highland Garden project which included financial incentives.

	<p>expedited permit processing, deferred fees, or relaxed parking requirements) and financial incentives (e.g., RDA set-aside funds), commercial, and medical services.</p> <p>Continue with the Senior Repair and Handicapped Program (SHARP) and Senior Home Minor Repair Program, which assists low-income elderly homeowners in rehabilitating their homes to address health and safety repairs, accessibility needs, and energy efficiency improvements.</p>	<p>Ongoing- The City has contracted with Self Help Enterprises for the administration of the CDBG funded Senior Mobile Home Repair and CalHome Reuse Down Payment programs.</p>
1.5	<p>Promote the construction of affordable for-sale and/or rental housing units with three or more-bedroom units affordable to very low- and low-income families.</p> <p>Publicize financial and regulatory incentive opportunities (e.g., expediting permit processing, deferred fees, density bonuses, or use of set-aside funds) to developers for these unit types including promoting the need for three or more bedroom units during pre-application meetings, contacting affordable housing developers, and creating informational fliers at the Community Development</p>	<p>Completed: The City continues to work with its non-profit partners in developing housing.</p> <p>Planning Department created the information brochure with incentives which is located on the City’s Planning Department webpage: https://www.visalia.city/depts/community_development/planning/handouts/default.asp</p> <p>Housing Element currently being updated and approved.</p>

	Department and in all general application packets.	
Goal 2: Outreach to Lenders		
2.1	Work with local lenders to provide information on financing for low- and moderate-income residents. Encourage local lenders to provide information in English and Spanish.	Ongoing: City's website provides a link to "2-1-1" United Way with all resources and links available.
2.2	Work with local lenders to promote the City's affordable housing programs. Provide local lenders information on the program in English and Spanish. Invite local lenders to attend program workshops.	Ongoing: -2017-18 required lenders and realtor to be certified to work with the CalHome Reuse Program; Ongoing: Contracted with Self Help Enterprises for the CalHome Reuse Program.
Education and Resources		
2.3	Encourage private lenders and other local lending institutions to host workshops in Visalia regarding the home-buying process and the resources available to low- and moderate-income homebuyers.	Ongoing including non-profit partners 2018 promoted the CalHome Reuse Program; educated Lenders/Realtors and required certification through the program. Contracted with Self Help Enterprises to administer the CalHome Reuse Program, including workshop-education
2.4	Continue to provide brochures or information on homeownership, rental assistance and rehabilitation assistance programs in English	Ongoing, contracted with Central CA Fair Housing Council



	<p>and Spanish.</p> <p>Make information on programs available on the City’s website and at community events promoting fair housing choice held by the City.</p>	
2.5	<p>Consider partnering with agencies to provide credit and financial counseling services, including assisting potential homebuyers in improving their credit, repairing bad credit, and providing education on affordability and financial responsibilities of homeownership and predatory lending avoidance.*</p>	<p>Ongoing; Self Help Enterprises provides counseling to eligible homebuyers of City funded programs.</p>
2.6	<p>As funding permits, work with other fair housing advocates to conduct additional fair housing workshops in Visalia to educate citizens about fair housing rights.</p>	<p>Contracted with Central Ca Fair Housing Council</p> <p>November 2016 Training conducted by CCFHC;</p>
<p>Unfair Lending and Insurance Practices</p>		
2.7	<p>Monitor complaints regarding unfair/predatory lending and assess lending patterns using the data collected under the Home Mortgage Disclosure Act (HMDA), the Community Reinvestment Act (CRA) and other data sources. As funding permits, work with non-profit agency that specializes in fair</p>	<p>Included with the update to the Analysis of Impediments 2020;</p> <p>Ongoing: Contract with CCFHC tracks information.</p>

* “and predatory lending avoidance” is a 2015 addition to a 2010 recommendation



	housing to provide data.	
2.8	Participate with HUD in efforts to improve access to homeowner’s insurance and to investigate predatory lending in the home purchase, home improvement, and mortgage refinancing markets.	Affordable housing program (Senior Home Repair) allows the initial cost of insurance to be included with the loan/funding.
Goal 3: Fair Housing Services Ongoing		
Apartment Owners/Managers		
3.1	Work in conjunction with apartment owner/manager associations to reach out to owners of small rental properties regarding fair housing laws.	Ongoing- Monitoring of affordable housing funded project; Self Help Enterprises
3.2	<p>Work with agencies and the property managers of affordable housing to ensure that fair housing laws are abided by in the selection of residents and that information of housing availability is appropriately advertised.</p> <p>Continue to provide outreach related to affordable housing opportunities through advertisements and literature available in English and Spanish.</p> <p>Periodically track income and demographic data related to affordable housing participants and evaluate additional strategies, if needed, to increase access to and</p>	<p>Ongoing; Non-profit developed projects have ongoing monitoring.</p> <p>2018 Promoted the CalHome Reuse Program; Contracted with Self Help Enterprises to administer and provide workshop/education.</p>



	knowledge of affordable housing opportunities in the City.	
Fair Housing Testing and Audit		
3.3	Support local non-profit agencies in applying for federal Fair Housing Initiative Program (FHIP) grants and conduct testing and audits as a means to affirming the nature and extent of fair housing issues in the community.	Contracted with CCFHC. 2017 provided letter of firm commitment of support and Certification of Consistency with the Consolidated Plan to Fair Housing Council in relation to grant applications, as needed.
Reasonable Accommodation		
3.4	Provide information on reasonable accommodation and on often-utilized disability adjustments to housing units.	Ongoing- Planning/Building Departments
Goal 4: Fair Housing Services New		
Entitlement Funding Activities		
4.1	Ensure access to fair housing services and education to all Visalia residents by increasing dedicated eligible entitlement dollars (CDBG Admin or Public Service/HOME Admin and Planning) to fair housing services.	Ongoing- Contracted with Central CA of Fair Housing Council (CCFHC) Ongoing contracts with Family Services to provide public services related to case management and street outreach.
4.2	Partner and contract with fair housing service providers for: Outreach Education Testing Enforcement	Ongoing- with CCFHC



4.3	Partner and contract with credit counseling and education/housing counseling service providers to increase access to financing, down payment, and closing costs assistance for underserved and underrepresented protected classes	Contracted with Self Help Enterprises for education on housing programs (Required for City programs).
4.4	Ensure “Subrecipient Agreement” includes the requirement that all entitlement dollar recipients comply with Fair Housing Act and all other Federal laws and Executive Orders as per “Playing by the Rules: A Handbook for CDBG Subrecipients on Administrative Systems” ⁵⁰	Included and Ongoing
4.5	Prominently display fair housing information in City-owned and operated buildings and other public spaces, such as libraries, recreation centers, and community centers.	Ongoing for programs.

⁵⁰ U.S. Department Of Housing And Urban Development Office of Community Planning and Development, Community Development Block Grant Program. “Playing by the Rules: A Handbook for CDBG Subrecipients on Administrative Systems.” March 2005.

Chapter VIII: Actions

This chapter will discuss the findings from the Analysis of Impediments to Fair Housing Choice. The following sections highlight possible impediments to fair housing. Actions to remove the impediments are then recommended.

A. Impediments Identified

The following are the impediments identified by the analysis. Many are similar to impediments identified in the 2015 to 2019 Analysis of Impediments.

B. Recommendations for Ongoing Actions

The following findings are reiterations of the impediments identified during the previous analysis of impediments.

1. Lending Practices

Based on the data provided by the Home Mortgage Disclosure Act (HMDA), several findings revealed implications of potential impediments to fair housing.⁵¹ It is recommended that the City continue, and improve upon, its ongoing efforts to reduce or eliminate the following impediments to fair housing. (See Chapter V, part D.)

Note: Not in order of priority.

Goal 1: Support Non-Discriminatory Lending Practices

Recommended Actions:

1.1 Provide financial literacy through publicly held workshops and develop programs to work with lenders and the public together find ways to protect consumers by prohibiting unfair and discriminatory practices based on the Fair Housing Act (FHA) and Equal Credit Opportunity Act (ECOA)

1.2 Continue to work with the fair housing provider to monitor discrimination

1.3 Continue work with non-profit organizations to assist in the construction and preservation of affordable units

1.4 Continue funding the Fair Housing Council of Central California (FHCCC) in providing education, conducting research analysis and other services that may assist in educating the public

⁵¹ *HMDA records from 2017*, Consumer Financial Protection Bureau, www.consumerfinance.gov, 2019.

1.5 Provide local lenders information on available financing for low-and moderate-income residents

1.6 Continue to work with local non-profit organizations to administer first-time homebuyer programs, such as the HOME-funded First-Time Homebuyer Program

C. Access to Opportunity

Having access to opportunity means residing in an area that is in close proximity to jobs, quality schools, adequate public transportation, and areas without high concentrations of poverty. Barriers to opportunity were indicated in the Opportunity Indicators, by Race/Ethnicity data table provided by HUD.⁵²

Goal 2: Support Access to Opportunity

Recommended Actions:

2.1 Continue to work with the Housing Authority and non-profit organizations to fund affordable housing in non-minority concentrated areas of the City

2.2 Improve access and conditions of public transportation; develop programs that provide public transit subsidy to persons and families in need

2.3 Support career advancement training within Visalia by partnering with providers such as Job Training Partnership Act (JTPA) and Workforce Investment Board (WIB)

2.4 Support the education system in planning processes to improve the quality of school systems

⁵² Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

D. Housing Discrimination

Findings suggest potential for housing discrimination in the City. This was found in 28 for-sale and 4 for-rent advertisements for housing units. Discrimination was also evidenced by data provided by the Fair Housing Council of Central California (FHCCC)

Goal 3: Support the Prevention of Housing Discrimination

Recommended Actions:

3.1 Publicize educational information on what constitutes a violation of the Fair Housing Act and remedies

3.2 Continue to coordinate with fair housing providers to provide workshops to educate the public, including landlords, realtors, non-profit agencies, and others about fair housing laws and regulations, and possible obstacles that affect individual or household access to housing in the City

3.3 Educate on modifying advertisements so disabled are not discouraged

E. Provide Opportunities for Affordable Housing

According to the Regional Housing Need and Sites Inventory, vacant sites within the inventory have been identified that would accommodate 2,557 units for households with Extremely Low to Very Low incomes, 2,946 units for low income households, 1,289 units for households with moderate incomes, and 2,262 for households with above moderate income. The most recent Regional Housing Need Allocation (issued for 2014 to 2023) indicates a housing need for:

- 2,557 Extremely Low and Very Low-Income units
- 2,946 Low-Income units
- 1,289 Moderate-Income units
- 2,262 Above Moderate-Income units

The surplus for extremely low/very low is 40 units, 1,415 units for low, 63 units for moderate and 350 units for above moderate.

The City permitted 2,835 units for construction between 2014 and 2018 consisting of 2,486 single-family units and 400 multi-family units⁵³ (see Table 46) - of the 2,835, over the five years, deed-restricted units were approved, which included 57 for very low and 196 for low income levels. Non-deed restricted units for low income included 42 units for very low and 204 units for low income. Additionally, 596 units were approved for moderate and 1,760 for above moderate-income levels.

Goal 4: Support the Development of Affordable Housing

Recommended Actions:

4.1 Continue to work with non-profit developers and other public agencies that increase Visalia's supply of affordable housing

4.2 Continue to facilitate the construction of affordable rental housing for very-low and low-income households by providing regulatory (e.g., density bonus, expedited permit processing, deferred fees, or relaxed parking requirements) and financial incentives

4.3 Continue supporting tenant-based rental assistance and rapid rehousing

F. Recommended Actions for Other Impediments

The following impediments are also similar and related to impediments identified in the past. However, they recommended new approaches to ongoing issues such as lack of affordable housing are the most common findings.

1. Land Use Policies and Practices

As mentioned, the City is currently updating their Housing Element. State law requires local jurisdictions in California to assess barriers to affordable housing as part of the General Plan Housing Element. Programs to address impediments to fair housing may be addressed through the implementation of the Housing Element, including maintaining and updating educational materials and conducting comparative rental tests.

The City has revised and implemented programs in the Housing Element to remove barriers to affordable housing through its previous Housing Element. These programs have included increasing the opportunities for by-right use of multiple-family

⁵³ City of Visalia, Building Permits Issued by Year

development, including for seniors and in mixed-use zoning designations. In addition, the Housing Element continues to maintain several programs aimed at working with building and housing agencies and providing education in ways that encourage the construction and maintenance of affordable housing in Visalia.

Goal 5: Update Land Use Policies and Practices to Facilitate Development of Affordable Housing

Recommended Actions:

5.1 Shortening review time for

Senior Housing

Housing in mixed use zoning designations, including designations carrying site inventory for lower income units


Emergency Shelters

5.2 Review accessory dwelling unit fee structures to study the feasibility and opportunity of reducing or deferring development and building and impact fees

5.3 Provide further incentives for affordable housing, including density bonuses, waiver or deferral of fees

2. Collaborating Regionally

Common findings throughout the data-gathering process through public outreach with regional stakeholders that deal with homelessness, poverty, and legal issues, suggest a lack of regional coordination and transfer of information. For example, priority needs mentioned in the community outreach findings indicate needs for specific types of housing to address homelessness, especially low-barrier shelters, which are not currently being implemented despite the need. Also, different stakeholders described different types of housing needed. For example, stakeholders that work with homeless expressed a need for one-bedroom units. Stakeholders that assist families in need expressed a need for 2 and 3-bedroom units. Further, other stakeholders said housing to accommodate seniors is the highest priority. Another finding includes a need for better coordination to address the overarching concern of ensuring landlords receive the support they need to provide housing to vulnerable populations in need.



Data from the surveys showed that there is a general sense of housing discrimination in the City: when asked if they believed there was housing discrimination within the City of Visalia, 38 percent of respondents said yes and 36 percent believe it is likely. From the survey, a comment when asked to identify homeless needs was: “Affordable housing and bridge housing are the most important. Landlords do not want to work with programs that deal with homeless because of the stigma.” Other results from the survey showed that landlord oversight is a challenge.

Issues, such as homelessness, affordable housing, jobs-housing balance, and access to frequent transit services, are important regional issues that require the collaboration of all communities throughout the region.

Goal 6: Improve Collaboration with Regional Organizations and Agencies

Recommended Actions:

6.1 When conducting outreach, include County-wide agencies and organizations

6.2 Hold regular meetings with organizations that serve the homeless as well as with governmental agencies to create awareness and collaboration

6.3 Work to ensure that service organizations have knowledge of updated plans of organizations such as the Continuum of Care and the Housing Authority of Tulare County

Appendix A

A. Community Outreach Summary

City of Visalia Housing Element and Analysis of Impediments to Fair Housing Choice Update

1. Stakeholder Meetings, June 2019

Local organizations, developers, and service providers were invited to attend stakeholder meetings on June 12 at Linwood Elementary, June 13 at Anthony Community Center, and June 26 at Annie R. Mitchell Elementary.


The meeting dates below list stakeholder attendees whose comments were compiled:

- June 12- Vice Mayor, Council Member
- June 13- Central California Legal Services; Kings Tulare Homeless Alliance
- June 26- Habitat for Humanity; Augusta Communities, Council Member, Planning Commissioner

At all three meetings, an overview presentation was presented by the consultant from Michael Baker International with information about the Housing Element, Analysis of Impediments to Fair housing Choice (AI), update process, and federal and state requirements. The presentation was followed by a roundtable discussion on the strengths and needs of the community.

Community Workshop, June 26, 2019

During the June 26 meeting at Annie R. Mitchell Elementary, a community workshop was held. Approximately 20 community members attended and provided their comments on the Housing Element and AI update. The workshop started with an overview presentation on the Housing Element and the AI. Then community members were asked to provide their comments at two interactive stations allowing participants to participate in the activities at their own pace. A member of the project team was available at each station to answer questions and guide the workshop participants through the activities. The following is a summary of the comments received during the community workshop.



The activity entailed a question and answer session, where, at the conclusion, participants would rate the top three priorities for CDBG funding. The categories discussed included economic development, housing, housing rehabilitation, ADA accessibility, and public transportation. The top priority was housing for low-income individuals and families and seniors. Second was economic development to support small business, and third was home rehabilitation for weatherization and to address abandoned homes to improve neighborhoods.

The questions asked to the participants were as follows:


1. What do you feel is the most common/pressing housing problem?
2. How do you feel we can overcome these problems?
3. What type of housing do you feel is needed most?
4. Do you feel there is local support for the development of affordable housing? If not, why?
5. Is there a need for broadband wiring and internet service in public housing and or certain areas of the city? Do you see a need to increase the number of internet service providers in Visalia?
6. How are low- and moderate-income families vulnerable to natural hazards (i.e., flooding). Where are these vulnerable areas?
7. How do you feel the City of Visalia should best spent future CDBG and HOME funding allocation?

Following the Q & A discussion participants were given post-it and asked How to spend Future CDBG

- Red post its- #1 priority
- Yellow post its- #2 priority
- Blue post its- #3 priority

Housing (Received the most (11) red post it notes; 1 yellow; 1 blue)

- Purchase mobile home to rent, including accessible units
- Senior elderly living

- 
- Low income- home ownership and rentals
 - Disabled
 - Homeless
 - Independent living

Housing Rehabilitation (Received the most (5) yellow post it notes; 1 blue)

- Weatherization
- Rehabilitation of homes
- Address abandoned homes to improve neighborhoods

Economic Development (Received the most (5) blue post it notes; 2 yellow; no red)

- Support small business
- Chamber of commerce- Microenterprise

Public Transportation (Received 2 yellow, 2 blue)

- More routes more often

ADA Accessibility (Received 2 blue, 1 yellow)

- Park – wheelchair swing/slide
- Homes- ADA access

2. Stakeholder One-on-Ones

- Boys & Girls
- United Way
- Self help
- Tulare County Health & Human Services Agency
- Tulare County Office of Education
- Kings Tulare Homeless Alliance
- Brandon Smith, Senior Planner, City of Visalia
- Devon Jones, Economic Development Manager, City of Visalia
- Miguel Perez, MPA, Program Coordinator, Housing Authority of the County of Tulare


B. Current Strengths in the City

- Visalia Rescue Mission (VRM) is a faith-based, 501(c)(3) nonprofit organization that has been serving homeless and economically disadvantaged individuals and families in Visalia and the greater Central Valley for the past 37 years. VRM provides emergency shelter and food services.
- CSET provides resources to connect the community to education and training, services to seniors, first-time homebuyer and foreclosure prevention counseling, facilitates youth and community development, services for homeless persons and families, and assists in creating jobs and economic resources.
- Self-Help Enterprises was established in 1965 and is a nationally recognized community development organization that works with low-income families to build and sustain healthy homes and communities.
- The Bethlehem Center is one of the only dining halls providing hot food prepared daily. Also providing Visalia's needy families of the community with pantry food boxes. The following comments were received during stakeholder consultations. The center is supported by St. Paul's Episcopal.
- Family Services of Tulare County provides legal, children's counseling, and trauma-informed services to survivors of domestic violence and their children. Family Services also provides a 33-bed emergency shelter to victims of domestic violence and their children.
- Habitat for Humanity of Tulare/Kings Counties works in partnership with volunteers and donors to build affordable homes for homeowners, assists with home repair for low-income homeowners in need, and sells homewares, appliances, and building materials at discounted prices.

- Proteus administers educational programs ranging from adult, youth, and dislocated worker programs, to programs related to energy conservation, emergency supportive services, foster family services, youth services, migrant child care, community youth centers, child development programs, prevention services, pesticide safety training, career and technical education classes, and other educational programs offered through the William M. Maguy School of Education, throughout the County and region.
- Continuum of Care-with offices located in Visalia, and developed in collaboration with the community, the Kings/Tulare Homeless Alliance is the designated Continuum of Care Program that provides a system of outreach and strategies to address the needs of homeless persons and persons at risk of homelessness. A Continuum of Care is recommended by the U.S. Department of Housing and Urban Development (HUD) and is composed of groups assisting the homeless in a specific geographic area.
- Tulare County Mental Health provides services for residents who are experiencing symptoms of mental illness and creates a system of care for individuals of all ages experiencing mental health problems. Programs are provided in several languages.
- Family Healthcare Network is a Health Center Program grantee under 42 U.S.C. 254b, and a deemed Public Health Service employee under 42 U.S.C. 233(g)-(n) and offers quality healthcare services regardless of ability to pay and without regard to religion, race, color, national origin, disability, age, and sex.

C. Service Needs

- Affordable/availability
- Social service funding to serve more low-income, disadvantaged, at-risk youth in the city
- Services that support Economic development
- Substantial need for Low barrier emergency shelter
- Expanding reach of existing services
- Developing New Housing
- Need low income housing, subsidized housing, transitional housing, senior housing is the #1 need, low income housing is #2 need, transitional housing is #3. Also need to build a mini shelter that is low barrier.
- Lack of units, primarily single one-bedroom units and affordable units.
- Multi-family

- 
- Ability to find money to purchase mobile homes. Lack of funding for buyer and agency. Buyers cannot get loans. Acquisition and infrastructure costs is a barrier.
 - Lack of housing; lack of permanent housing shelters, hotel vouchers. Having no shelter is a huge problem. All shelters are faith based and not low barrier except for St. Pauls’.
 - Safe, health, and affordable housing available to households at or below the 125% Federal Poverty Level (approximately 30% of the Area Median Income for Tulare County)
 - Need financing for affordable housing
 - Develop housing that can accommodate families with more than three children
 - Conditions of Housing/ Housing Choice
 - There are not enough low-cost choices for low-income housing, subsidized housing, transitional housing, or senior housing
 - Permanent supportive housing is lacking for extremely low income-30% AMI
 - More choices for entry level and short-term types of housing
 - As the owner of a mobile home park, 2-bedroom units are in demand, but as a resident, we need choices of housing for very low income
 - Landlords willing to lease to homeless/low income individuals is currently uncommon
 - Property owners willing to rent to people who have been evicted in the past