

# Analysis of Impediments to Fair Housing Choice



Clark County, Washington



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

Prepared for

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Cedar Creek Grist Mill Cover Photo by Team Hymas

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# Executive Summary

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# **EXECUTIVE SUMMARY:**

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

This document is the 2011 Analysis of Impediments to Fair Housing Choice (AI) for Clark County, Washington and the jurisdictions within the county, excluding Vancouver. This AI was conducted in conjunction with the City of Vancouver; however, a separate AI was produced for the city.

### **Analysis of Impediments Background**

An Analysis of Impediments to Fair Housing Choice, or AI, is a U.S. Department of Housing & Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sector.

The AI involves:

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

According to HUD, impediments to fair housing choice are:

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

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

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

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

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

## **Fair Housing Acts**

**Federal Fair Housing Act.** The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons<sup>1</sup>.

HUD has the primary authority for enforcing the Fair Housing Act. HUD investigates the complaints it receives and determines if there is a “reasonable cause” to believe that discrimination occurred. If reasonable cause is established, HUD brings the complaint before an Administrative Law Judge. Parties to the action can also elect to have the trial held in a federal court (in which case the Department of Justice brings the claim on behalf of the plaintiff)<sup>2</sup>.

**Washington Anti-Discrimination Law.** The State of Washington’s fair housing law—the Washington Law Against Discrimination, Chapter 49.60 of the Revised Code of Washington (RCW)—offers additional protections to the Federal Fair Housing Act. These additional protections include: Marital Status, Sexual Orientation, Gender Identity and Veteran’s Status.

The Washington State Human Rights Commission enforces the state’s fair housing laws and has the authority to receive, investigate and issue findings on complaints. According to the Commission’s website (<http://www.hum.wa.gov/index.html>), the role of the commission is that of “neutral fact-finder. [The Commission] gather[s]

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<sup>1</sup> This is a very general description of the Fair Housing Act and the actions and properties covered by the Act. For more detailed information on the Fair Housing Act, please see the full text, which can be found on the U.S. Department of Justice’s website, [www.usdoj.gov/crt/housing/title8.htm](http://www.usdoj.gov/crt/housing/title8.htm).

<sup>2</sup> “How Much Do We Know? Public Awareness of the Nation’s Fair Housing Laws”, The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

facts about the situation and then determine[s] whether there is cause to believe that discrimination occurred.”

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

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

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

## **Geographic Areas Covered**

The following communities participated in and are covered by this AI. The City of Vancouver’s AI was conducted in conjunction with the Clark County AI but is a stand-alone report.

Clark County AI Areas:

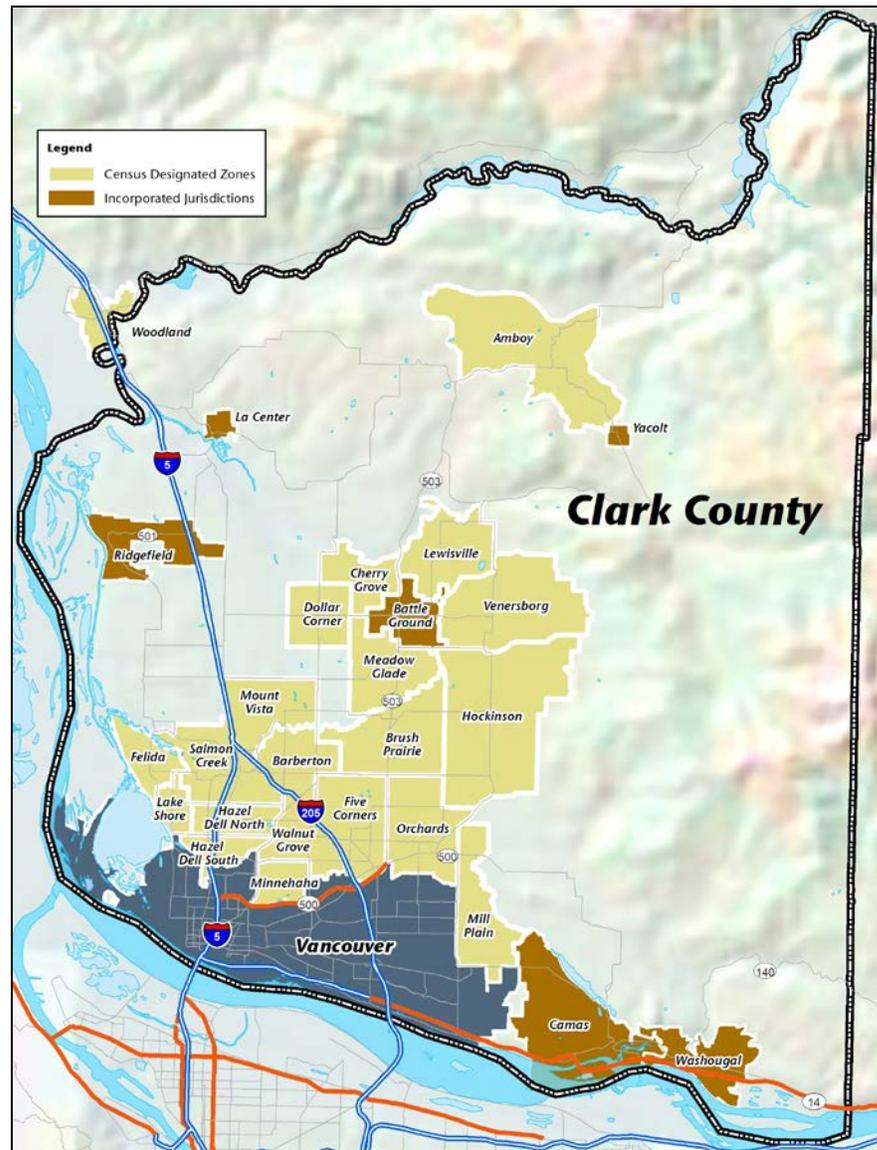
- Clark County
- Battle Ground
- Camas
- La Center
- Ridgefield
- Washougal
- Woodland
- Yacolt

The City of Woodland is partially located in Clark County; however, the proportion of Woodland residents residing in Clark County is minimal (85 residents, per the City of Woodland website). Woodland is included in this AI under an agreement the town has with the county which includes the county in the entitlement area.

Figure I-1 shows a map of the region and jurisdictions covered by the AI.

**Figure I-1.  
Regional Map  
of  
Jurisdictions**

Source:  
BBC Research &  
Consulting.



## Methodology

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

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

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

and city staff and stakeholders. Because the respondents to the survey were almost all from the City of Vancouver, the resident survey analysis was not included in determining the impediments for Clark County.

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

Zoning, land use and housing policy review. BBC reviewed the county's zoning, land use and planning and housing policies, including those of the local housing authority, for any potential barriers to fair housing and fair housing concerns.

Analysis of demographic, housing and lending data. In this task, data on mortgage lending approvals, subprime mortgages (from Home Mortgage Disclosure Act or HMDA data), recent legal cases and fair housing complaints were analyzed to detect potential discriminatory patterns. BBC also examined potential areas of racial, ethnic and low income household concentrations, as well as concentrations of persons with disabilities and female-headed households.

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

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

## **AI Findings**

The research conducted for the Clark County AI found few fair housing concerns and many positive practices related to fair housing within the county. These positive findings include:

Housing goals. Clark County and the jurisdictions within the county have land use and zoning practices and planning goals in place to mitigate fair housing barriers and encourage a balance of housing choices. In particular:

- Clark County has an ADA Compliance Office which works to ensure that businesses are following the policies of ADA and that county services, programs and activities are available to all citizens.
- Almost all jurisdictions have adopted Comprehensive Plans recently that have goals for diverse housing types. Battle Ground and Ridgefield, in particular, have very inclusive housing goals that address the needs of persons with disabilities. Washougal has a white paper available on its website that discusses the benefits of cottage housing.
- All jurisdictions offer a variety of minimum lot size requirements, which facilitates a diversity of housing types.

In addition, the Vancouver Housing Authority (VHA)—the main provider of affordable rental housing in Clark County—has policies and practices that are easy to understand and fair. In particular, the VHA offers fair housing protections that exceed those of the federal Fair Housing Act.

Few concentrated areas. An analysis of racial and ethnic concentrations found very few Census tracts in the county with higher than average proportions of minorities. The areas with higher-than-average minority populations are almost all located in Vancouver.

The dissimilarity index—a measure of the “evenness” of the geographic distribution of two different population groups—in Clark County is low, although higher than in Vancouver. The index ranges from 0 to 1, with a value of 1 representing full concentration. Clark County’s dissimilarity indexes were .20 (White v. Non-White comparison), .22 (Non-Hispanic v. Hispanic), .27 (White v. Asian) and .28 (White v. African American).

These compare to Vancouver’s dissimilarity indexes of .12 (White v. Non-White comparison), .17 (Non-Hispanic v. Hispanic), .25 (White v. Asian comparison) and .16 (White v. African American).

Low volume of complaints and legal cases. Since January 2006, a total of 61 complaints were filed with HUD by Clark County residents; 59 of these were filed by residents of Vancouver. The complaints were largely filed on the basis of disability (38% of all complaints) and race discrimination (28%). About half of the complaints were dismissed because they were not found to have a reasonable cause; one in six was settled.

The Board of County Commissioners as part of the Aging Readiness Plan recommended that the county develop a Universal Design Information Guide. Universal Design is a framework for the design of places, things, information, communication and policy to be usable by the widest range of people operating in the widest range of situations without special or separate design.

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

### **Fair Housing Impediments**

There exist, however, opportunities to improve fair housing conditions in Clark County. The research conducted for this study found the following impediments to fair housing choice:

Stakeholders perceive lack of transit options for low income, disabled and senior residents as a fair housing barrier. In addition to income levels and poor credit histories, stakeholders rated the lack of transit options for low income, disabled and senior residents as very high. In their open-ended comments in the fair housing

survey, stakeholders expressed a need for enhanced connectivity between Vancouver and destinations within Clark County.

Stakeholders' specific comments about public transit needs include:

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

**Why is this a barrier?** Limited transit may create an impediment to fair housing choice because it could have the effect of preventing certain protected classes from accessing housing, employment, services and amenities at the same level as other residents.

Information about fair housing is difficult to find; as such, fair housing knowledge may be low. Few of the Clark County jurisdictions included in the AI have housing information on their websites and, other than Clark County, none have information about fair housing or who to contact if a resident has fair housing concerns. As discussed in the Fair Housing Action Plan below, this variability creates an opportunity to improve the quality and consistency of fair housing information in the county.

In particular:

*Clark County* lists fair housing protected classes and fair housing contact organizations as part of its frequently asked questions (FAQ) under the CDBG program webpage. The information is appropriate and clear; however, it is hard to find. The fair housing contact information appears at the end of questions on the CDBG FAQ page (<http://www.clark.wa.gov/cdbg/faq.html>).

*Battle Ground*. Battle Ground does not have fair housing information on its website. The city does, however, articulate its goals related to housing provision on the planning department's website:

[http://www.cityofbg.org/departments/comm\\_dev\\_plan\\_info.php](http://www.cityofbg.org/departments/comm_dev_plan_info.php). These include:

- As the population of Battle Ground grows and ages, housing and services should be available so people and families can choose to age in place.
- New housing developments offer a range of options and locations and help create new neighborhoods, while in-fill housing is sensitive to existing housing types and neighborhood character.

*Camas.* Searches on Camas' home page for "housing discrimination" or even "housing" return an error message. The city has a "complaints" webpage that contains an option to send comments to city departments, as well as commonly requested forms.

*La Center.* La Center's website is attractive and easy to navigate; however, it lacks information on housing or community services (<http://www.ci.lacenter.wa.us/resources.html>). The closest link is found on the Resources page under Community Resources, Human Services Council. This live link takes the user to a webpage on pain relief (<http://www.irccv.org/>).

*Ridgefield.* A search for "housing discrimination" on Ridgefield's website returns housing policy documents and a document on non-discrimination in athletics.

*Washougal.* Similar to Battle Ground, Washougal has information about the city's housing vision on its Our City webpage: ([http://www.cityofwashougal.us/index.php?option=com\\_content&view=article&id=99:our-city&catid=44:community-development&Itemid=103](http://www.cityofwashougal.us/index.php?option=com_content&view=article&id=99:our-city&catid=44:community-development&Itemid=103)).

*Woodland* does not have information about fair housing on its web page other than references to fair housing within Consolidated Plan and related documents. .

*Yacolt* does not have fair housing on its webpage.

**Why is this a barrier?** Lack of fair housing information can become an impediment if such information is not equally available to all protected classes and/or if the lack of information prevents alleged victims from enforcing their fair housing rights.

Rental costs are high and Vancouver has a disproportionate number of subsidized rental units. The 2010 Census data reports a median rent, including utilities, of \$846 in the county. In Battle Ground, the median gross rent is \$1,029. Except in Yacolt, renters must earn more than \$30,000 to afford the median-priced rental unit.

An examination of the geographic location of the county's public housing units and other subsidized housing found that two-thirds are located within one zip code within the City of Vancouver. As Figure IV-2 demonstrated, there are few affordable housing developments outside of Vancouver and its immediate environs.

**Why is this a barrier?** Lack of affordable housing and concentrations of affordable housing in particular parts of a city or county can create fair housing barriers if the concentrations disproportionately affect protected classes and restrict their housing choices.

Hispanic and, to a lesser extent, Asian mortgage loan applicants are denied loans at much higher rates than Whites. Although the number of mortgage loan transactions

is small relative to the county overall, in Battle Ground, Camas and La Center, Hispanic and Asian applicants were denied loans at much higher rates than White applicants. These cities also have some of the highest housing costs in the county.

- In Battle Ground, Asians were denied loans 30 percent of the time and Hispanics were denied loans 37 percent of the time. This compares to 16 percent for Whites—or denial gaps of 14 and 21 percentage points respectively.
- In Camas, Hispanics were denied loans 26 percent of the time. This compares to 14 percent for Whites, or a denial gap of 12 percentage points.
- In La Center, Asians were denied loans 27 percent of the time and Hispanics were denied loans 33 percent of the time. This compares to 19 percent for Whites—or denial gaps of 10 and 14 percentage points respectively.

**Why is this a barrier?** There are many reasons why minorities may have higher mortgage loan denial rates than non-minorities. The most common reasons are differences in credit scores, higher debt to income ratios and lack of credit history. Yet patterns of differences in high denials, especially in certain neighborhoods, can signal disinvestment in minority-concentrated areas, as well as constrain housing choices for minorities.

### **Fair Housing Action Plan**

**ACTION ITEM 1** — Improve and make more uniform fair housing information on county and jurisdictional websites.

*Clark County.* Clark County should develop a fair housing webpage to which the jurisdictions can provide links.

The page should describe fair housing laws and residents' rights and provide links to websites for more information and filing complaints (e.g., link to the Washington State Human Rights Commission, Fair Housing Council of Oregon and HUD). All of this information should be provided in Spanish and English. We also recommend a Frequently Asked Questions section with answers to questions such as "If I am not a U.S. citizen but I feel that I have been discriminated against, what can I do?"

*Battle Ground.* Battle Ground should have fair housing information and links, similar to Clark County's, under the Human Services heading of its Community Resources webpage at <http://www.cityofbg.org/welcome/contacts.php>

*Camas.* The city has a "complaints" webpage that contains an option to send comments to city departments, as well as commonly requested forms. This would be a good page in which to place fair housing information, with phone numbers and links to fair housing agencies with which residents can file complaints.

*La Center.* Fair housing information and links similar to Clark County's should be added under the Community Resources list.

*Ridgefield.* Fair housing information and links should be added to the FAQ webpage (<http://www.ci.ridgefield.wa.us/resources/faqs.htm>)

*Washougal.* Fair housing information, with phone numbers and links to fair housing agencies with which residents can file complaints should be added under the Community Development links menu.

*Woodland.* Fair housing information, with phone numbers and links to fair housing agencies with which residents can file complaints should be added to the town's website.

*Yacolt* has a Community Links page to which fair housing information and links (again similar to Clark County's), should be added ([http://townofyacolt.com/index.php?option=com\\_content&view=article&id=110&Itemid=18](http://townofyacolt.com/index.php?option=com_content&view=article&id=110&Itemid=18))

**ACTION ITEM 2** — Establish fair housing points of contact within jurisdictions and educate landlords about fair housing. Clark County should take the lead on publicizing and sponsoring training for the small jurisdictions within the county, as needed. Each jurisdiction should have a designated individual ("fair housing specialist") to whom residents can be referred when they call with fair housing concerns. This individual should keep abreast of fair housing topics and attend regional fair housing trainings as they are offered.

In addition, the county should offer fair housing education and training sessions for landlords at least two times per year to increase provider understanding of fair housing laws and be a resource to the private sector on fair housing concerns.

**ACTION ITEM 3** — Increase the stock of affordable housing countywide, especially deeply subsidized rentals. As the housing market improves, the jurisdictions within the county, as well as Clark County, should seek opportunities to diversify their housing stock and create more opportunities for residents of all income levels to reside in their communities. This is consistent with the goals in many of the jurisdictions' Comprehensive Plans.

This action item is particularly important for Battle Ground, which has the most expensive median rent in the county and Camas, La Center and Ridgefield, which have the most expensive for sale housing.

To encourage the development of affordable housing in high cost areas, the most expensive jurisdictions within the county should offer fee waivers and other types of development incentives (e.g., density bonuses) for the production of affordable housing. Battle Ground, Camas and Washougal all have development fees that are about \$9,000 higher for single family unit development than Yacolt, the jurisdiction with the lowest fees.

**ACTION ITEM 4** — Monitor lending disparities. In the cities of Battle Ground, Camas and La Center, Asians and Hispanics were denied mortgage loans at much higher rates than were White applicants.

The county has supported the Community Housing Resource Center's (CHRC) financial literacy programs in the past and should continue these efforts to help narrow the gap in lending disparities. CHRC offers Finance Smart classes, which work with consumers to repair credit, help them to become bankable and develop solid financial management skills. The Center also offers Mortgage Default Prevention and Homebuyer Education workshops.

The jurisdictions and county should also monitor the disparities over time and, as needed, engage local lenders and community leaders in discussions about the reasons for the denials.

**ACTION ITEM 5** — Examine transit needs. Clark County should examine the gaps in public transit outside of Vancouver, especially the needs of persons with disabilities, seniors and low income residents. If significant gaps are found, the county should explore methods to address the gaps and incorporate public transit improvements into its next six-year transportation plan.

**SECTION I:**  
**Community and Housing Profile**

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# SECTION I.

## Community and Housing Profile

This section provides a community and housing profile for the jurisdictions included in the Clark County AI. The section includes the racial/ethnicity and income concentration maps required by HUD for AIs.

The data collected and analyzed for this section were primarily gathered from the following sources: the 2000 U.S. Census for historical context; 2005 to 2009 American Community Survey (ACS) 5-year survey for current estimates;<sup>1</sup> 2009 Claritas, a provider of commercial data estimates, for Census tract level estimates; and 2010 Census data where available.

Although some of the largest communities included in this study are represented in the ACS 1-year estimates, the 5-year estimates are used to ensure consistency for the entire study area.

### Housing and Demographic Summary

- Although the racial and ethnic diversity of the county changed somewhat during the past decade, Clark County is predominantly White, non-Hispanic. The majority of the county's minorities reside in Vancouver. Outside of Vancouver, Camas and the unincorporated area have the highest proportions of non-White residents.
- Battle Ground, Ridgefield and Washougal have higher than average percentage of single family households. Battle Ground and Washougal have the highest percentage of low income and impoverished households outside of Vancouver. Ridgefield has the highest percentage of people with disabilities than any other city in the county.
- Unemployment in the region has increased consistent with the economic downturn, but remains slightly higher than the U.S. average. The largest employers include medical, public sector and high-tech manufacturing fields that pay relatively high wages.
- Excluding Vancouver, nearly 70 percent of housing units in Clark County are owner-occupied. The most affordable communities for renters are La Center and Yacolt. Battle Ground, Washougal and Yacolt have home values below the countywide average.

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<sup>1</sup> The American Community Survey provides 1-year estimates for communities with populations greater than 65,000. Three-year estimates from the ACS are provided for communities with populations greater than 20,000. Since not all communities participating in this report are included in the 1-year estimates, the 3-year estimates are used for consistency.

- Rental rates have increased throughout the study area since 2000 with the exception of Yacolt. Battle Ground experienced the greatest percentage increase in rental costs during the past decade (38.5%); as a result of the increase, renter households must earn \$41,000 or more annually to afford the median rent. Yacolt offers the most affordable community for renters.
- The value of owner-occupied housing units in the county has increased in every community since 2000. This increases the difficulty for new homebuyers to enter the market which saw a 65 percent value increase in the past 10 years. Camas' median home value of \$342,500 is the highest in the study area, whereas the median home value of \$187,800 in Yacolt is lowest.

## Population Demographics

Figure I-1 displays population information for the participating jurisdictions for 2000 and 2010. The population of Clark County as a whole grew 23 percent between 2000 and 2010. Excluding Vancouver, Clark County grew by 31 percent. This was slower than any of the small incorporated jurisdictions within the county, which has population growth rates of between 48 percent (low end) and 122 percent (high end).

Overall, Clark County added 80,000 residents between 2000 and 2010. Growth of Vancouver contributed just 18,000 to the increase—the majority of the population increase was generated by growth in the unincorporated county (37,000 net new residents) followed by a much smaller level of growth in Battle Ground (8,200 people) and Camas (6,800 people).

**Figure I-1.**  
**Population by Community, Clark County, 2000 to 2010**

City	2000	2010	Percent Growth 2000-2010	Numerical Change
Vancouver	143,560	161,791	13%	18,231
Clark County	345,238	425,363	23	80,125
Clark County (excluding Vancouver)	201,678	263,572	31	61,894
Battle Ground	9,322	17,571	88	8,249
Camas	1,534	19,355	54	6,821
La Center	1,654	2,800	69	1,146
Ridgefield	2,147	4,763	122	2,616
Washougal	8,595	14,095	64	5,500
Woodland	3,790	5,509	45	1,719
Yacolt	1,055	1,566	48	511
Unincorporated	166,279	203,337	22	37,058

Source: 2000 and 2010 Census .

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

Figure I-2 displays the racial composition of each community's population in 2010. All of the communities are predominantly White (85% to 96%). The next largest racial group is Asian (the highest proportion is 6% in Camas) followed by African American (1% to 2%).

**Figure I-2.**  
**Racial Composition by Community, Clark County 2010**

City	White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other Race	Two or More Races	Hispanic or Latino
Vancouver	80.9%	2.9%	1.0%	5.0%	1.0%	4.3%	4.8%	10.4%
Clark County	85.4	2.0	0.9	4.1	0.6	2.9	4.0	7.6
Battle Ground	90.5	0.8	0.8	1.9	0.3	2.1	3.5	6.5
Camas	87.4	1.0	0.6	6.0	0.2	1.2	3.6	4.1
La Center	91.3	1.0	0.8	1.9	0.0	1.5	3.4	4.6
Ridgefield	92.4	0.9	0.8	2.0	0.1	0.9	2.8	5.1
Washougal	90.3	0.6	1.0	2.4	0.2	1.7	3.8	5.3
Woodland	86.4	0.9	0.7	0.8	0.2	8.4	2.7	16.6
Yacolt	95.8	0.5	1.1	0.4	0.0	0.2	2.0	2.1
Unincorporated	87.8	1.6	0.7	3.7	0.5	2.1	3.6	5.8

Source: American Fact Finder, Census 2010.

In 2010, 16 percent of all residents in the U.S. identified themselves as being of Hispanic origin—the fastest growing minority group in the U.S. and in most cities.

Figure I-3 reports the ethnicity of residents in Clark County communities. Overall, 7.6 percent of Clark County residents are of Hispanic descent. Although relatively small, the Hispanic population has grown considerably in Clark County (98% between 2000 and 2010). The Hispanic population grew in every community within Clark County, with four towns more than doubling their population of Hispanic residents. Ridgefield reported the strongest increase with a 545 percent growth rate. Woodland had the highest rate of persons of Hispanic descent at 16.6 percent.

**Figure I-3.  
Hispanic Ethnicity by Community, Clark County, 2000 and 2010**

City	2000		2010		Percent Growth
	<i>Count</i>	<i>Percent</i>	<i>Count</i>	<i>Percent</i>	
Vancouver	9,035	6.3%	16,756	10.4%	85.5%
Clark County	16,248	4.7	32,166	7.6	98.0
Clark County (excluding Vancouver)	7,213	3.6	15,410	5.8	113.6
Battle Ground	385	4.1	1,150	6.5	198.7
Camas	359	2.9	790	4.1	120.1
La Center	90	5.4	129	4.6	43.3
Ridgefield	38	1.8	245	5.1	544.7
Washougal	216	2.5	753	5.3	248.6
Woodland	279	7.4	912	16.6	227.8
Yacolt	20	1.9	33	2.1	65.0
Unincorporated	6,105	3.7	11,398	5.8	86.7

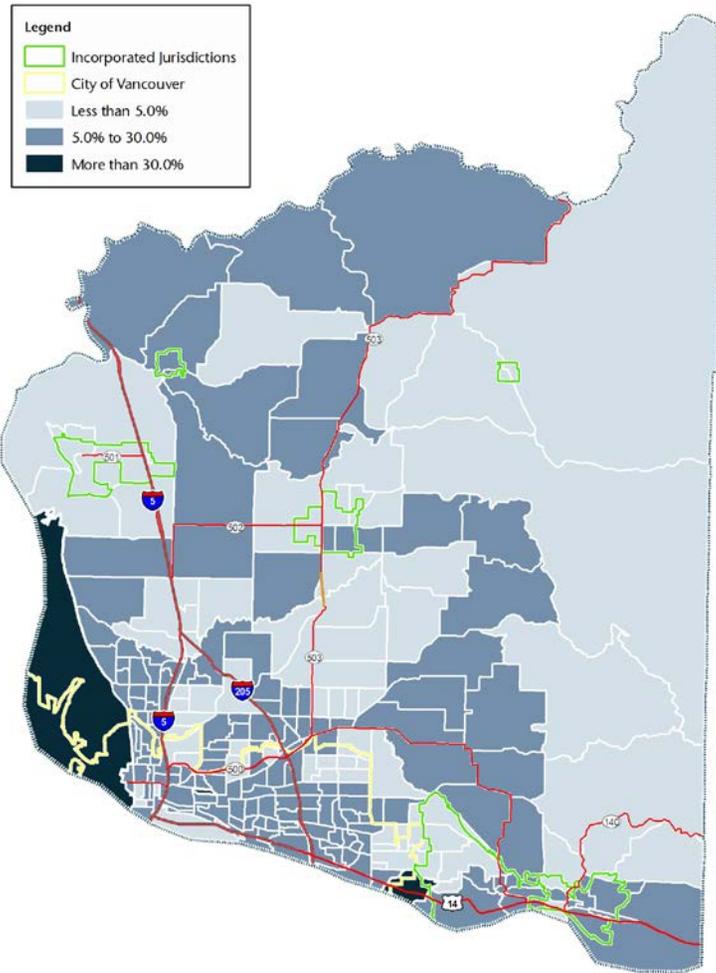
Source: 2000 and 2010 Census.

Figures I-4 through I-9 show where the city's major races and ethnicities—Non-White, Asian and Hispanic—reside in the county. The figures show both: 1) The overall racial composition of each Census block group; and 2) How the three distinct racial categories of persons are distributed throughout the county.

The race and ethnicity concentration maps reveal the following:

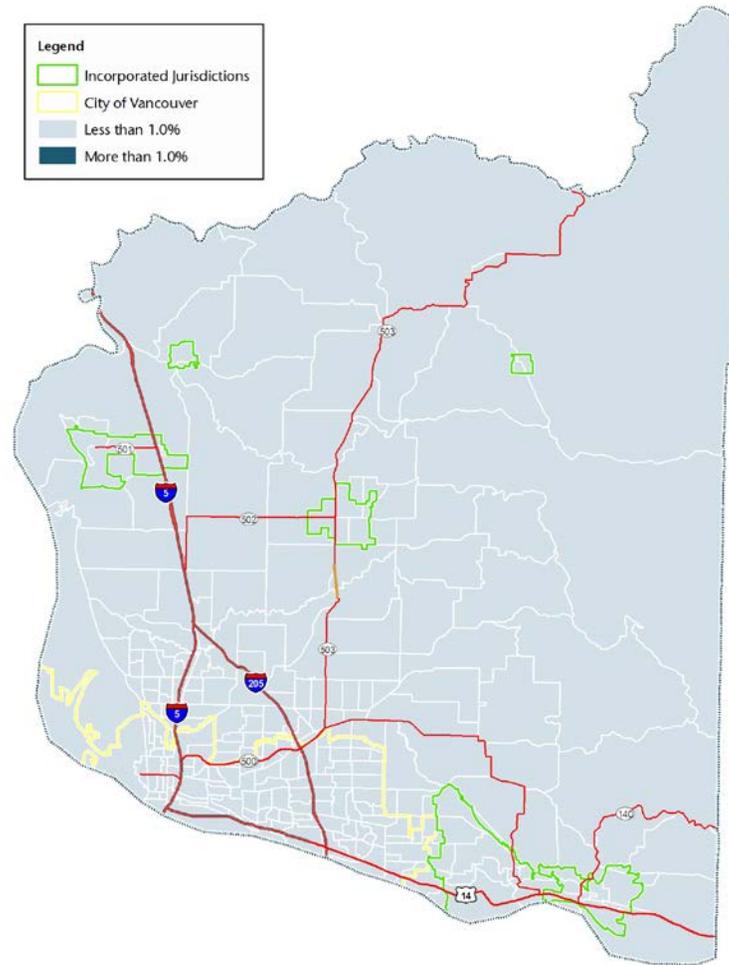
- In about half of the block groups in the county, excluding Vancouver, fewer than 5 percent of residents report their race as non-White. Most of the block groups with non-White proportions greater than 5 percent—and almost all with non-White proportions exceeding 30 percent—are located in Vancouver and immediately adjacent to Vancouver.
- In the vast majority of block groups in the county, less than 4 percent of residents report their race as Asian. Concentrations of Asian residents are small and appear in block groups within and adjacent to Vancouver.
- There are several block groups that show Hispanic concentrations; all but two are located in Vancouver. Like other minority populations, Hispanic residents mostly reside in Vancouver or in the areas immediately adjacent to the city.

**Figure I-4.**  
**Percent of Population that**  
**is Non-White by Block Group, Clark County, 2010**



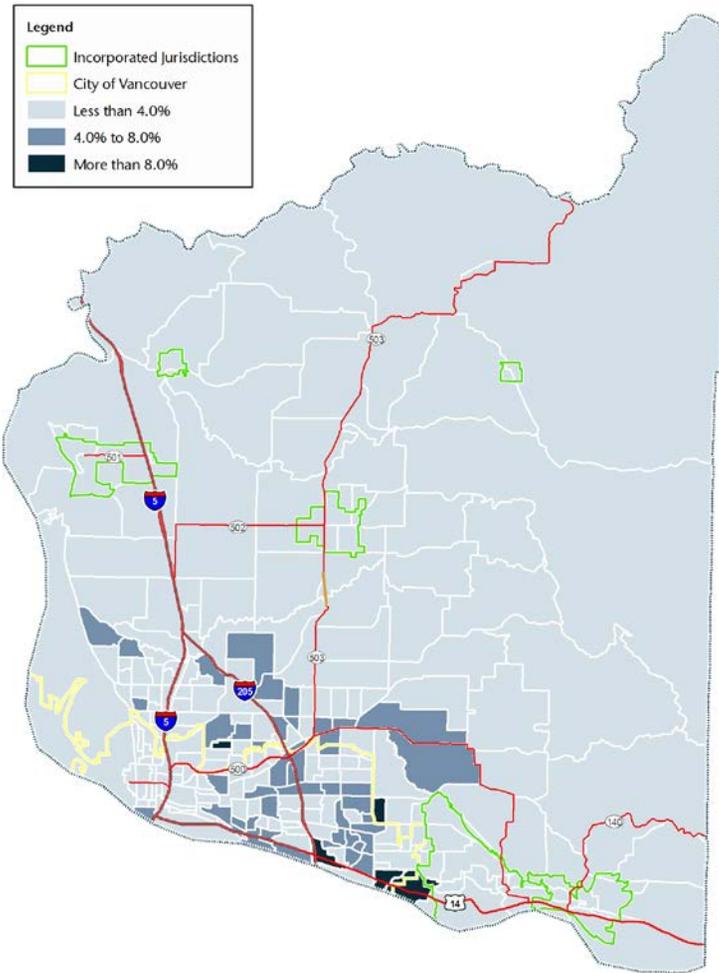
Source: Census 2010 and BBC Research & Consulting.

**Figure I-5.**  
**Distribution of Population that**  
**is Non-White by Block Group, Clark County, 2010**



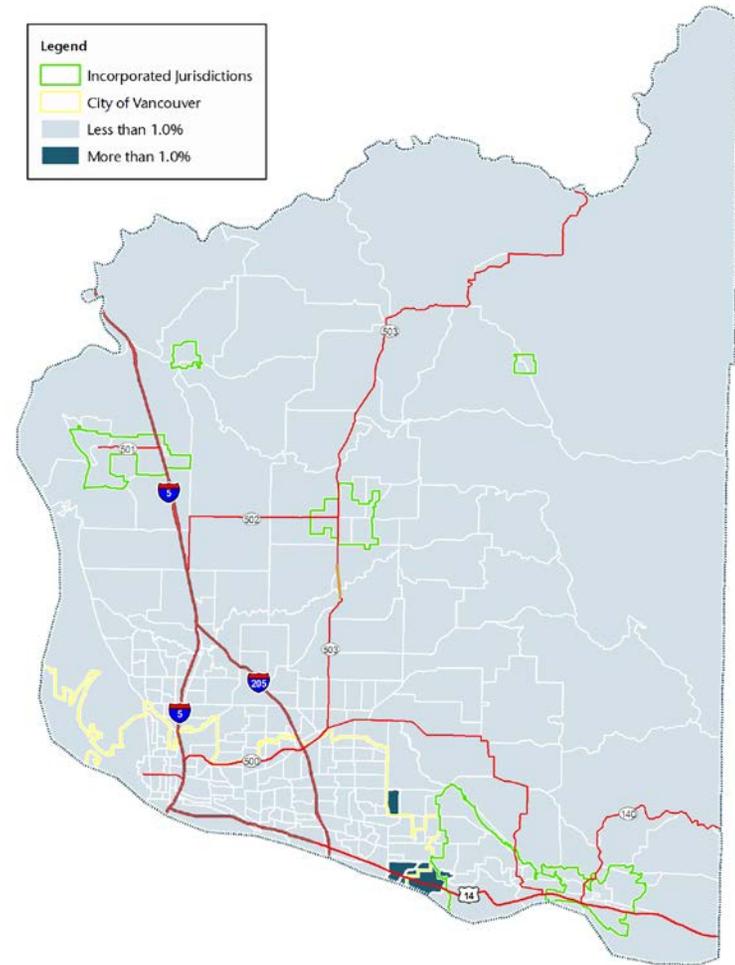
Source: Census 2010 and BBC Research & Consulting.

**Figure I-6.**  
**Percent of Population that is**  
**Asian by Block Group, Clark County, 2010**



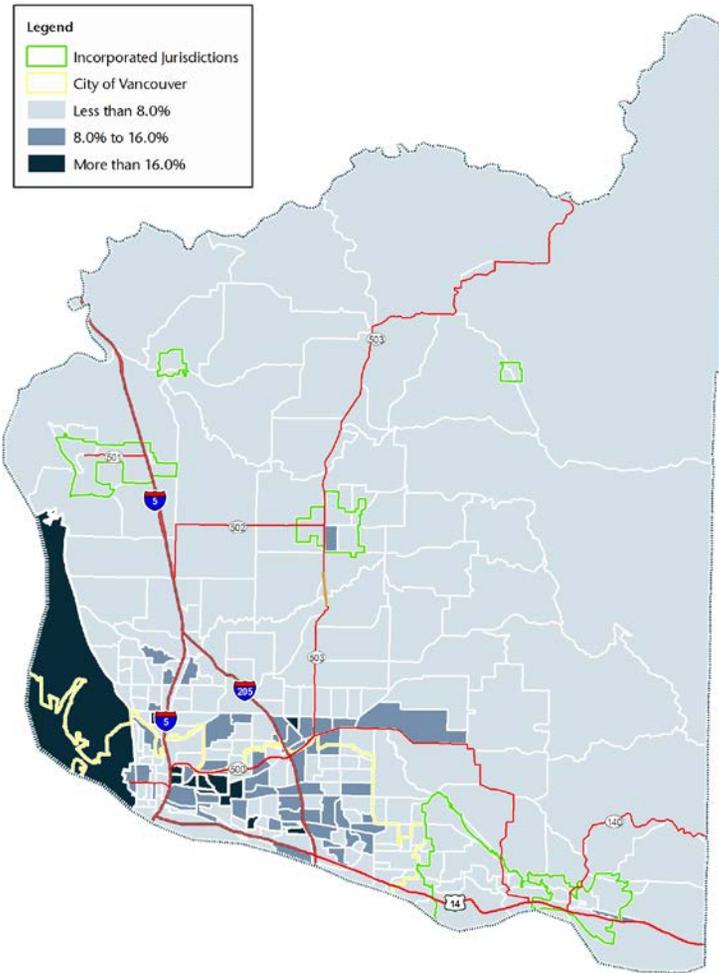
Source: Census 2010 and BBC Research & Consulting.

**Figure I-7.**  
**Distribution of Population that is**  
**Asian by Block Group, Clark County, 2010**



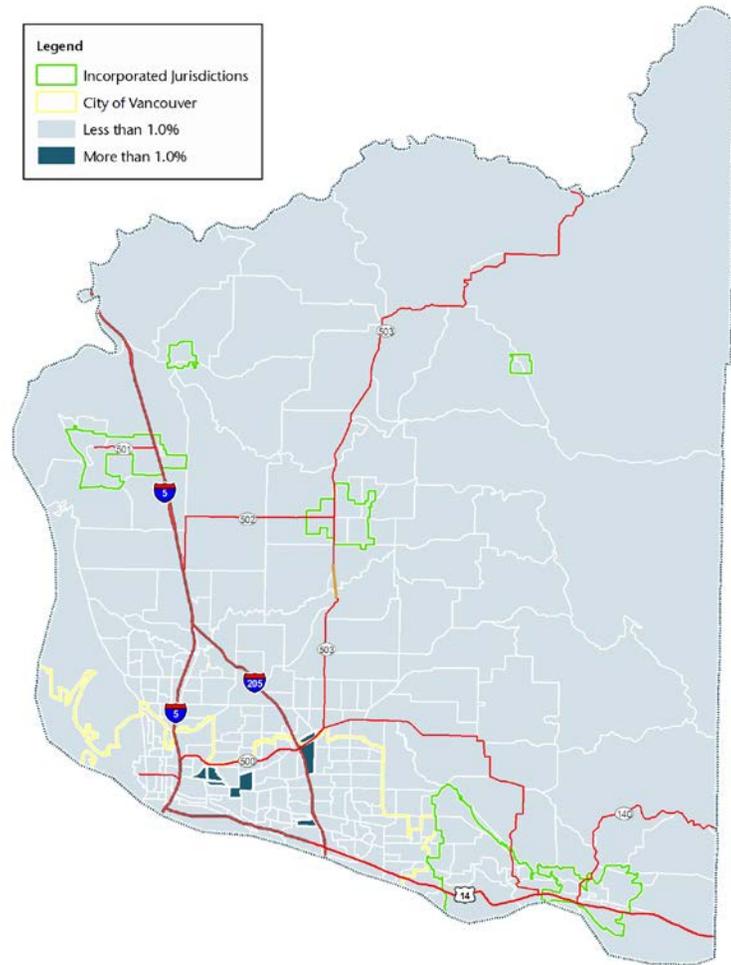
Source: Census 2010 and BBC Research & Consulting.

**Figure I-8.**  
**Percent of Population**  
**that is Hispanic by Block Group, Clark County, 2010**



Source: Census 2010 and BBC Research & Consulting.

**Figure I-9.**  
**Distribution of Population**  
**that is Hispanic by Block Group, Clark County, 2010**



Source: Census 2010 and BBC Research & Consulting.

## Clark County, Dissimilarity Index, 2010

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

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

The dissimilarity indices for Clark County between Whites and minority groups range between 0.2 and 0.28.<sup>2</sup> This means that there is small but still present segregation between Census tracts and the dispersion of White and non-White residents. Compared to Vancouver's dissimilarity index, Clark County had greater disparities between Whites and Non-Whites (.20 in Clark County v. .12 in Vancouver); Asians (although the disparity was slight, .27 v. .25); African Americans (large disparity, .28 in Clark County v. .16 in Vancouver); and Hispanics (.22 v. .17).

**Figure I-10.**  
**Clark County Dissimilarity Index**

Compared Racial/Ethnic Groups	Index of Dissimilarity
White vs Non-White	0.20
White vs Asian	0.27
White vs African American	0.28
Non-Hispanic vs Hispanic	0.22

Source: 2010 Census and BBC Research & Consulting.

## Familial Status

Communities within the study area are primarily comprised of family households, which include related persons living together. La Center and Yacolt have over 80 percent of their households as families. In Vancouver, 61 percent of households are family households, which is the lowest proportion of family households within the study area. Overall, 70 percent of households of Clark County are family households.

Familial status is protected under fair housing law. Surveys conducted by BBC as part of Analyses of Impediments to Fair Housing Choice (AI) have demonstrated some of the lowest support and awareness for fair housing protection based on familial status. Single parents may be particularly vulnerable to fair housing discrimination because of their lower incomes and, consequently, limited options in the housing market. As shown in Figure I-11, Vancouver has the highest proportion of single parent households of total households (18%). Outside of Vancouver,

<sup>2</sup> The calculation for the dissimilarity index is for Clark County overall, including Vancouver.

Battle Ground, Ridgefield, Washougal and Woodland have the highest rates of single family households of more than 14 percent. Camas, La Center, Yacolt and the unincorporated areas contain the smallest percentages of single parent households (10% to 11%).

**Figure I-11.**  
**Family Composition, Clark County, 2008**

	Vancouver	Clark County	Battle Ground	Camas	La Center	Ridgefield	Washougal	Woodland	Yacolt	Unincor- porated
<b>Number of Households</b>	<b>65,691</b>	<b>158,099</b>	<b>5,652</b>	<b>6,619</b>	<b>942</b>	<b>1,591</b>	<b>5,256</b>	<b>1,965</b>	<b>454</b>	<b>69,929</b>
Family Households	40,246	110,672	4,365	5,241	804	1,258	3,824	1,398	384	54,550
<i>With Children</i>	<i>18,931</i>	<i>52,276</i>	<i>2,663</i>	<i>2,929</i>	<i>402</i>	<i>714</i>	<i>1,828</i>	<i>746</i>	<i>232</i>	<i>24,577</i>
<i>Husband &amp; Wife</i>	<i>27,980</i>	<i>84,752</i>	<i>3,372</i>	<i>4,346</i>	<i>656</i>	<i>987</i>	<i>2,906</i>	<i>1,034</i>	<i>310</i>	<i>44,195</i>
Male Householder – No Wife	3,591	8,087	262	303	46	87	286	106	36	3,476
<i>With Children</i>	<i>1,949</i>	<i>4,455</i>	<i>164</i>	<i>192</i>	<i>33</i>	<i>61</i>	<i>161</i>	<i>65</i>	<i>17</i>	<i>1,878</i>
Female Householder – No Husband	8,675	17,833	731	592	102	184	632	258	38	6,879
<i>With Children</i>	<i>5,348</i>	<i>10,636</i>	<i>482</i>	<i>389</i>	<i>62</i>	<i>125</i>	<i>391</i>	<i>167</i>	<i>25</i>	<i>3,814</i>
<i>Percent of Single Parent Households</i>	<i>18.1%</i>	<i>13.6%</i>	<i>14.8%</i>	<i>11.1%</i>	<i>11.8%</i>	<i>14.8%</i>	<i>14.4%</i>	<i>16.6%</i>	<i>10.9%</i>	<i>10.4%</i>

Source: American Community Survey 2006-2008 3-year estimate.

The following map displays the percentage of single female parents to total households by Census tract. The highest proportions of single female parent households are in and around Vancouver.

**Figure I-12.**  
**Percent Single Female**  
**Parent Households by**  
**Census Tract, Clark**  
**County, 2010**

Source:  
Census 2010 and BBC Research &  
Consulting.



## Household Income

Figure I-13 displays the median household incomes of all municipalities within the study area, as well as for Clark County overall. As a point of comparison, the 2010 median household income in Washington is \$54,888.

Camas has the highest median household income in the county with \$81,174. Vancouver and Woodland have the lowest median household income in the county at \$50,280 and \$48,288.

Figure I-14 displays poverty rates by age for the study area. Overall, in Clark County, 10.5 percent of residents live in poverty. Woodland has the highest poverty rate in the study area (21%), while Camas and La Center have the lowest at 5.2 and 6.2 percent respectively.

Poverty is highest for the county's children—this is especially true of Woodland, where 33 percent of children are in poverty. Battle Ground and Yacolt have similar poverty rates for children and for seniors.

**Figure I-14.**  
**Poverty by Age and by Community, Clark County, 2009**

City	Total Population	Under 18 Cohort	18 to 64 Cohort	65 and Older Cohort
Vancouver	15%	21%	13%	9%
Clark County	11	14	9	8
Battle Ground	10	13	8	12
Camas	5	6	5	4
La Center	6	6	7	3
Ridgefield	10	10	11	4
Washougal	11	15	10	6
Woodland	21	33	14	18
Yacolt	11	10	11	9

Source: American Community Survey 2005-2009 5-year estimate.

**Figure I-13.**  
**Median Household Income, 2010**

City	2010 Estimated Median Household Income
Vancouver	\$50,280
Clark County	60,562
Battle Ground	59,812
Camas	81,174
La Center	69,451
Ridgefield	63,965
Washougal	52,542
Woodland	48,288
Yacolt	60,963

Source: Claritas 2010.

Figure I-15 shows where low income households (earning less than \$25,000—about the poverty level for a family of four) reside in the county. Again, concentrations occur within and adjacent to Vancouver, mostly on the western edge.

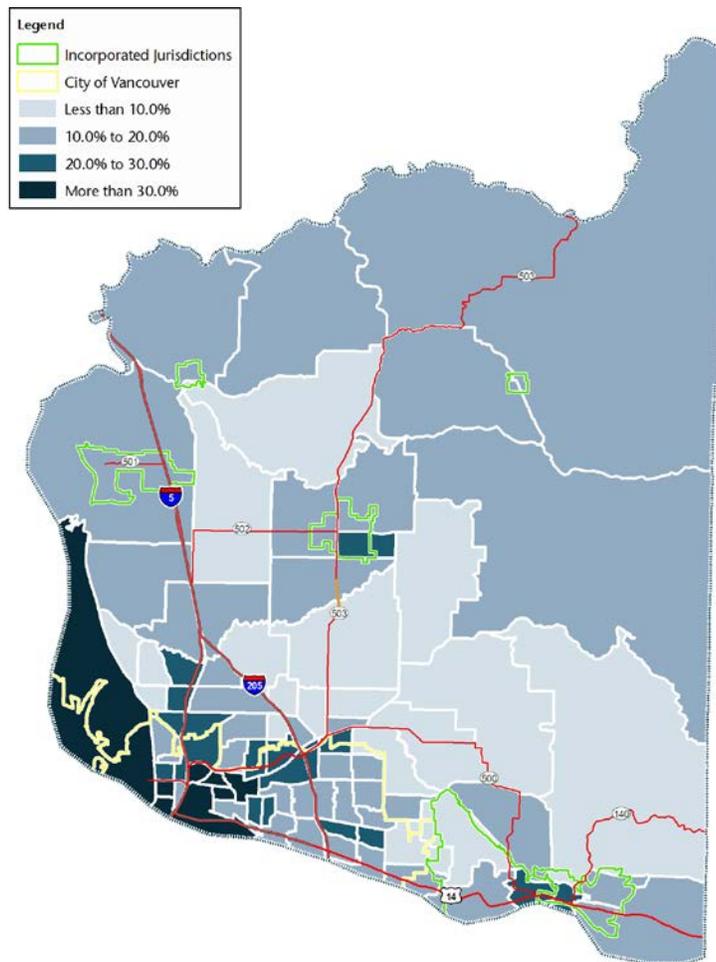
**Figure I-15.**  
**Percent Low Income**  
**Households, by Census**  
**Tract, Clark County, 2010**

Note:

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

Source:

CLaritas, 2010 and BBC Research & Consulting.



## Income Inequality

The Gini index of income inequality measures income inequality and the level in which income is spread throughout a region. Figure I-16 shows the Gini index on the national, state and local level. Index values range between 0 and 1 with figures closer to 0 achieving more a equal distribution of income. According to the calculations, Clark County has a Gini index of income inequality of 0.413. This indicates that income levels in Clark County are more evenly dispersed than Washington and the national average.

**Figure I-16.**  
**Gini Index of Income Inequality,**  
**2010**

	Gini Index
United States	0.468
State of Washington	0.441
Clark County	0.413

Note: Gini index figures closer to 0 represent a greater level of income equality.

Source: 2007-2009 American Community Survey.

## Persons with Disabilities

The Census defines a person with a disability as having a “long-lasting physical, mental, or emotional condition, which can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering.” Moreover, “this condition can also impede a person from being able to go outside the home alone or to work at a job or business.”<sup>3</sup>

People with disabilities may require housing that has accessibility features, is near public transit and supportive services and is affordable, if their ability to work is limited. Persons with disabilities are also at greater risk of experiencing housing discrimination, oftentimes due to a lack of knowledge about laws governing accommodations for the disabled.

The most recent disability data available is from the 2000 Census. Per the 2000 Census, the proportion of the population with disabilities within Clark County varied between 15 percent (Camas and La Center) and 24 percent (Ridgefield).

Figure I-17 applies 2000 incidence rates to the 2010 Census population estimates to derive a more recent estimated population for disabled persons within each participating community. For the county overall, almost 70,000 people are estimated to have disabilities as of 2010. The numbers are lowest in Yacolt (254 people with disabilities) and La Center and highest in Vancouver.

**Figure I-17.**  
**Persons with Disabilities by Community, Clark County, 2000 and 2010**

City	2000 Disability Percentage (5 years and older)	2010 Population (5 years and older)	Estimated 2010 Disabled Population
Vancouver	19%	150,304	29,009
Clark County	18	395,934	69,684
Battle Ground	19	15,867	2,951
Camas	15	17,961	2,730
La Center	15	2,626	402
Ridgefield	24	4,339	1,020
Washougal	18	13,038	2,347
Woodland	20	5,054	1,011
Yacolt	19	1,322	254
Unincorporated	19	182,080	33,867

Note: 2010 Population is for persons 5 years and older to stay consistent with disability statistics.

Source: 2000 and 2010 Census.

According to the 2000 Census, physical and employment disabilities are the most common disabilities in the study area. Employment disabilities occur when “physical, mental or emotional conditions make working at a job or business difficult.”<sup>4</sup>

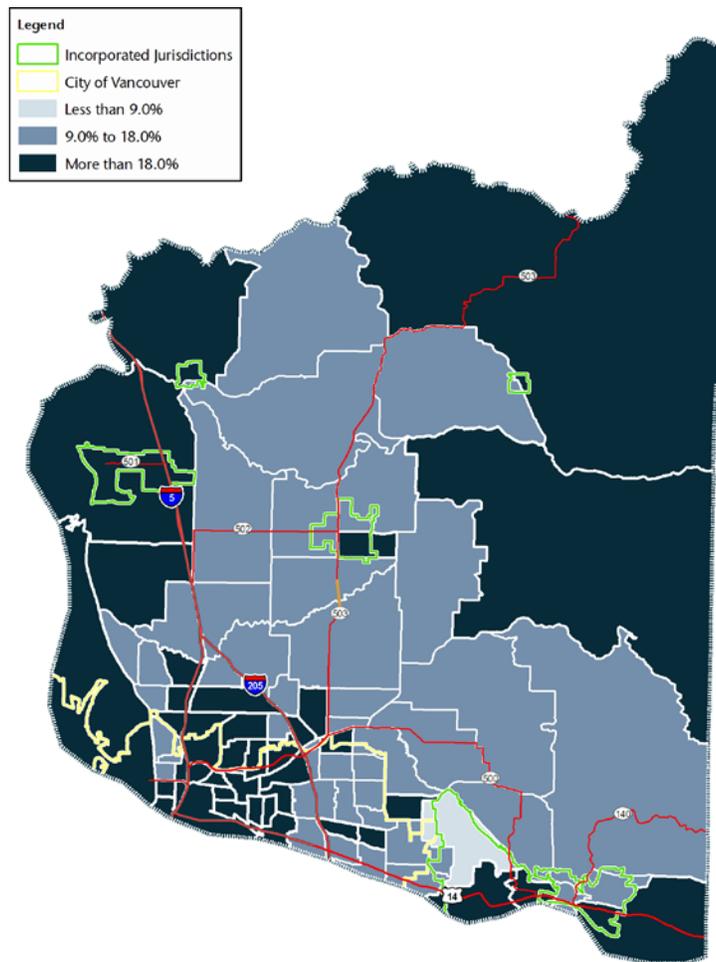
<sup>3</sup> Definition taken from the Census glossary.

<sup>4</sup> <http://www.Census.gov/prod/2003pubs/c2kbr-17.pdf>

Figure I-18 displays the geographic distribution of persons with disabilities in Clark County. As the map demonstrates, persons with disabilities reside throughout the county.

**Figure I-18.**  
**Percent of People with Disabilities by Census Tract, Clark County, 2000**

Source:  
2000 U.S. Census.



## Employment

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

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

Eighty-one percent of the regions' jobs (101,295) were in the private sector and the remaining jobs were in the government sector.

Figure I-19 displays the private and public sector employment distribution for Clark County.

**Figure I-19.**  
**Private and Public Sector Employment Distribution, Clark County, Q1 2011**

Source:  
Bureau of Labor Statistics  
QCEW,  
1<sup>st</sup> Quarter 2011.

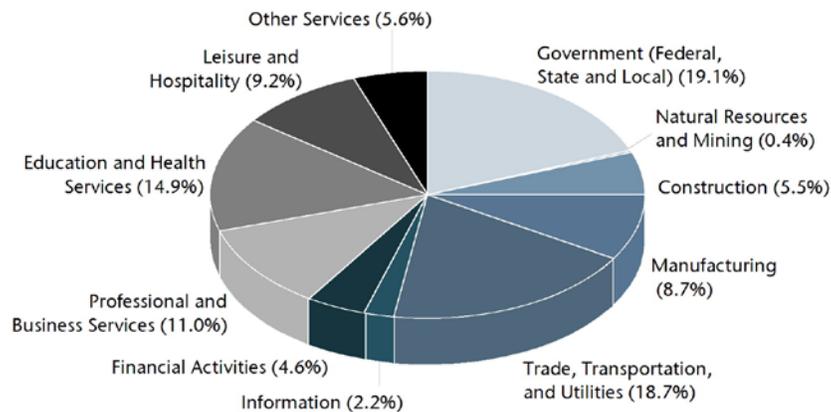


Figure I-20 shows average weekly wages and annual wages by industry. Two of the county's largest industries—Government and Professional and Business Services—have wages that pay around \$50,000/year.<sup>5</sup> Manufacturing jobs pay the largest wages in the county at \$55,000 per year; however, these jobs make up less than 9 percent of the region's employment.

**Figure I-20.**  
**Employment Sectors and Average Wages, Clark County, 2009**

	Percent of Total Employment	Average Weekly Wage	Average Annual Wage
Government (Federal, State and Local)	19.1%	\$1,012	\$52,624
Natural Resources and Mining	0.4	738	38,376
Construction	5.5	869	45,188
Manufacturing	8.7	1,053	54,756
Trade, Transportation and Utilities	18.7	745	38,740
Information	2.2	1,044	54,288
Financial Activities	4.6	993	51,636
Professional and Business Services	11.0	941	48,932
Education and Health Services	14.9	831	43,212
Leisure and Hospitality	9.2	331	17,212
Other Services	5.6	397	20,644

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

Source: Bureau of Labor Statistics QCEW.

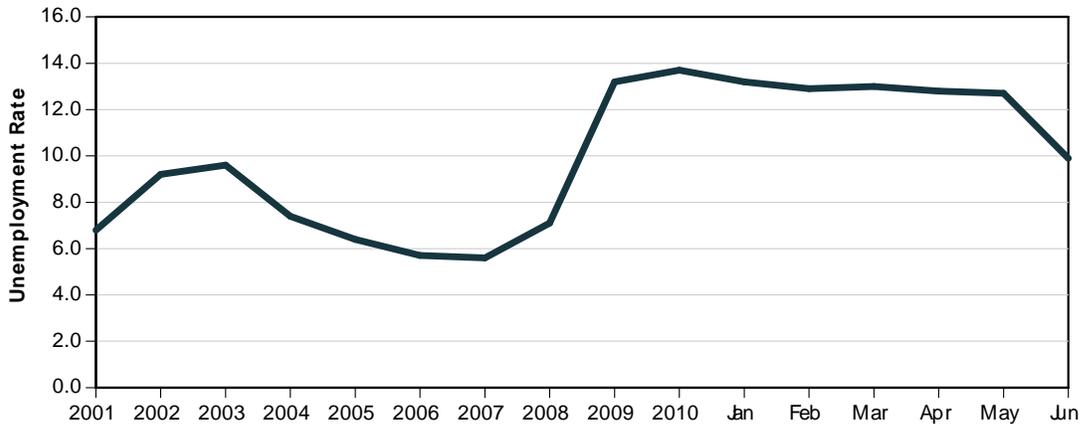
Clark County's wages currently trail the U.S. as a whole and are lower than average wages in the state of Washington. Per QCEW data from the 1<sup>st</sup> Quarter of 2011, the average annual wage in Clark County was \$41,600, compared with \$45,559 in the

<sup>5</sup> Average annual wage assumes full-time employment and 52 weeks/year pay.

U.S. and \$47,470 in Washington.<sup>6</sup> Disaggregated employment and wage data by industry was not available for Washington at the time this report was written.

**Unemployment.** As of June 2011, the unemployment rate in the Clark County was 9.9 percent, slightly higher than the 9.1 percent unemployment rate for the U.S. as a whole. As shown by Figure I-21, since 2010, unemployment has been at historic levels. Unemployment in June 2010 exhibited a downward trend.

**Figure I-21.**  
**Unemployment Rates, Clark County 2001-2011**



Source: Bureau of Labor Statistics.

## Housing

The 2010 Census reported 149,000 housing unit in Clark County. About half of these were located in Vancouver. The Census reports a housing vacancy rate of about 6 percent for the county overall.

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<sup>6</sup> Average annual wages applies a full-time, 52 week work year to average weekly wage statistics provided by the Bureau of Labor Statistics.

As shown in Figure I-22, Washougal has the highest percentage of vacant units at 7.4 percent; La Center has the lowest percentage at 4 percent.

**Figure I-22.**  
**Housing Unit, Vacancy and Occupied Housing Units, Clark County, 2010**

City	Housing Units	Vacancy Rates	Occupied Housing Units
Vancouver	70,005	6.2%	65,691
Clark County	149,290	5.7	140,824
Battle Ground	5,952	5.0	5,652
Camas	7,072	6.4	6,619
La Center	981	4.0	942
Ridgefield	1,695	6.1	1,591
Washougal	5,673	7.4	5,256
Woodland	2,108	6.8	1,965
Yacolt	484	6.2	454
Unincorporated	57,428	4.9	54,619

Source: 2010 Census.

Figure I-23 provides more details on the reasons for unit vacancies. Most units are vacant because they are for rent or for sale or for "other" reasons.

**Figure I-23.**  
**Reasons for Vacant Units, Clark County, 2010**

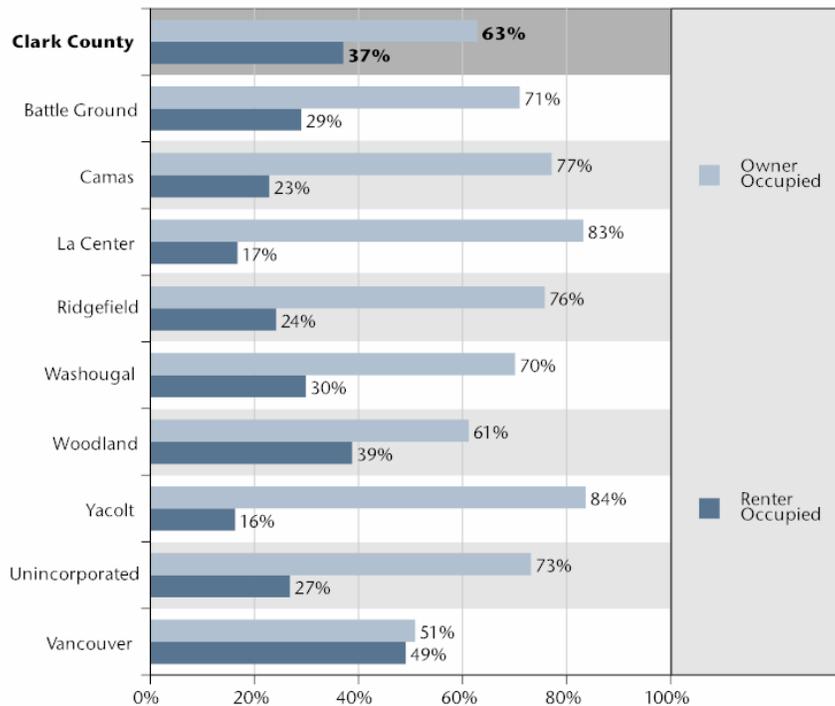
City	Total Vacant	For Rent	Rented but Not Occupied	For Sale	Sold but Not Occupied	For Seasonal, Recreational Use or Occasional Use	Other Vacant
Vancouver	4,314	49.6%	2.3%	18.5%	2.7%	7.1%	19.8%
Clark County	8,466	40.1	2.0	23.8	4.3	7.5	22.3
Battle Ground	300	40.3	1.0	26.3	8.7	3.3	20.3
Camas	453	24.3	1.1	28.3	11.3	9.9	25.2
La Center	39	7.7	2.6	35.9	15.4	2.6	35.9
Ridgefield	104	25.0	1.0	30.8	1.9	5.8	35.6
Washougal	417	32.6	2.6	30.9	3.8	6.5	23.5
Woodland	143	32.9	1.4	21.7	2.1	7.7	34.3
Yacolt	30	16.7	0.0	43.3	6.7	0.0	33.3
Unincorporated	2,809	30.5	1.8	29.2	5.1	8.5	24.8

Source: 2010 Census.

**Tenure.** Figure I-24 displays household tenure for Clark County and each community in the study area. Homeownership rates are highest in La Center and Yacolt at almost 80 percent and lowest in Vancouver. By comparison, the homeownership rate in the U.S. in 2010 was 65 percent.

**Figure I-24.**  
Tenure by  
Community, Clark  
County, 2010

Source:  
Census 2010.



**Figure I-25.**  
Overcrowding by  
Community, Clark County,  
2009

City	Percent over 1:1 Ratio
Vancouver	2.4%
Clark County	2.3
Battle Ground	4.3
Camas	0.9
La Center	1.8
Ridgefield	3.4
Washougal	2.3
Woodland	3.6
Yacolt	4.3

Source: American Community Survey  
2005-2009 5-year estimate.

**Overcrowding.** Overcrowding in housing can threaten public health, strain public infrastructure and neighborhoods, and points to the need for affordable housing. The amount of living space required to meet health and safety standards is not consistently specified; measurable standards for overcrowding vary by community. According to HUD, the most widely used measure assumes that a home becomes overcrowded when there is more than 1 household member per room.<sup>7</sup> Another frequently used measure is the number of individuals per bedroom, with a standard of no more than two persons per bedroom. Assisted housing programs usually apply this standard.

<sup>7</sup> The HUD American Housing Survey defines a room as an enclosed space used for living purposes, such as a bedroom, living or dining room, kitchen, recreation room, or another finished room suitable for year-round use. Excluded are bathrooms, laundry rooms, utility rooms, pantries, and unfinished areas.

In Clark County, 2.3 percent of households are living in overcrowded conditions. Battle Ground and Yacolt have the greatest proportion of households experiencing overcrowding (4.3%). Overall, according to the Census data, overcrowding is very low in the region.

**Housing costs.** This section discusses rent and housing costs in the study area, with an emphasis on affordability.

Rental costs. Per the 2005-2009 5-year ACS estimates, the median gross rent (including utilities) for Clark County was \$846. The highest median gross rent reported in the ACS was in Battle Ground (\$1,029). Overall, the median rent is not affordable in most communities to households earning less than \$30,000. Yacolt was the only exception which saw a 9.3 percent decrease in median gross rental rates and, as of 2010, was affordable to those earning \$27,200.

**Figure I-26.**  
**Median Gross Rent by Community, Clark County, 2000 and 2009**

City	Median Gross Rent		Percent Increase	Annual Rental Income Needed to Afford
	2000	2009		
Vancouver	\$671	\$820	22%	\$32,800
Clark County	684	846	24	33,840
Battle Ground	743	1,029	38	41,160
Camas	657	859	31	34,360
La Center	723	793	10	31,720
Ridgefield	725	842	16	33,680
Washougal	609	821	35	32,840
Woodland	544	711	31	28,440
Yacolt	750	680	-9	27,200

Source: American Community Survey 2005-2009 5-year estimate, 2000 Census.

Rental units with contract rents (excluding utilities) of \$500 to \$749 are the most abundant in the region. La Center is the most affordable community in the study area, with 22 percent of rental units requiring contract rents of \$500 or less. In contrast, Battle Ground offers some of the highest rents in the study area, followed by Vancouver, Camas, Washougal and Woodland.

**Figure I-27.**  
**Contract Rent Distribution by Community, Clark County, 2009**

	Vancouver	Clark County	Battle Ground	Camas	La Center	Ridgefield	Washougal	Woodland	Yacolt
Less than \$250	3%	3%	3%	2%	2%	3%	2%	2%	0%
\$250 to \$499	8	8	6	11	20	16	7	19	18
\$500 to \$749	45	41	25	42	34	43	48	44	61
\$750 to \$999	29	28	30	18	18	19	19	23	0
\$1,000 and more	13	17	31	21	21	19	20	11	21
<b>Total</b>	<b>30,482</b>	<b>47,292</b>	<b>1,136</b>	<b>1,271</b>	<b>145</b>	<b>213</b>	<b>1,272</b>	<b>691</b>	<b>38</b>

Note: No cash rent data is included in the contract rent distribution table. No cash rent for all of Clark County is 3 percent.

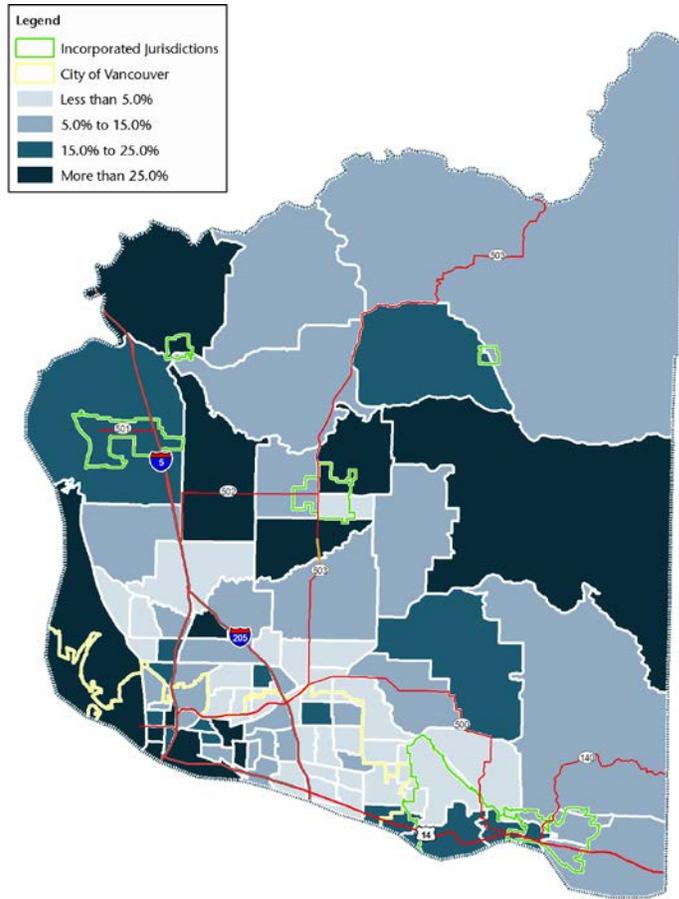
Source: American Community Survey 2005-2009 5-year estimate.

**Affordable rental locations by Census tract.** Figure I-28 illustrates the percentage of rental units that are priced at below \$500 in each Census tract in Clark County. The Census tracts with the highest proportions of affordable units are located in the far northern portion of the county and in western Vancouver.

**Figure I-28.**  
**Percentage of Affordable Rental Locations by Census Tract, Clark County, 2010**

Note:  
Affordable rental units are priced at less than \$500 per month.

Source:  
Claritas, 2010.



**Homeownership costs.** Homes throughout the study area have experienced steady appreciation since 2000. As of 2009, Camas had the highest median home values (\$342,500). Yacolt's median was more than \$150,000 lower than Camas' at \$187,800. The greatest increase in home values occurred in Battle Ground, Ridgefield and Washougal, where prices rose about 80 percent between 2000 and 2009. Camas and La Center were not far behind, however, with increases of 71 and 77 percent, respectively.

Compared to Clark County as a whole, the cities of Camas, La Center and Ridgefield all have a higher median home value. Battle Ground, Washougal, Woodland, Yacolt and Vancouver all have median home values lower than the county median value.

**Figure I-29.**  
**Median Home Value by Community, Clark County, 2000-2009 Estimate**

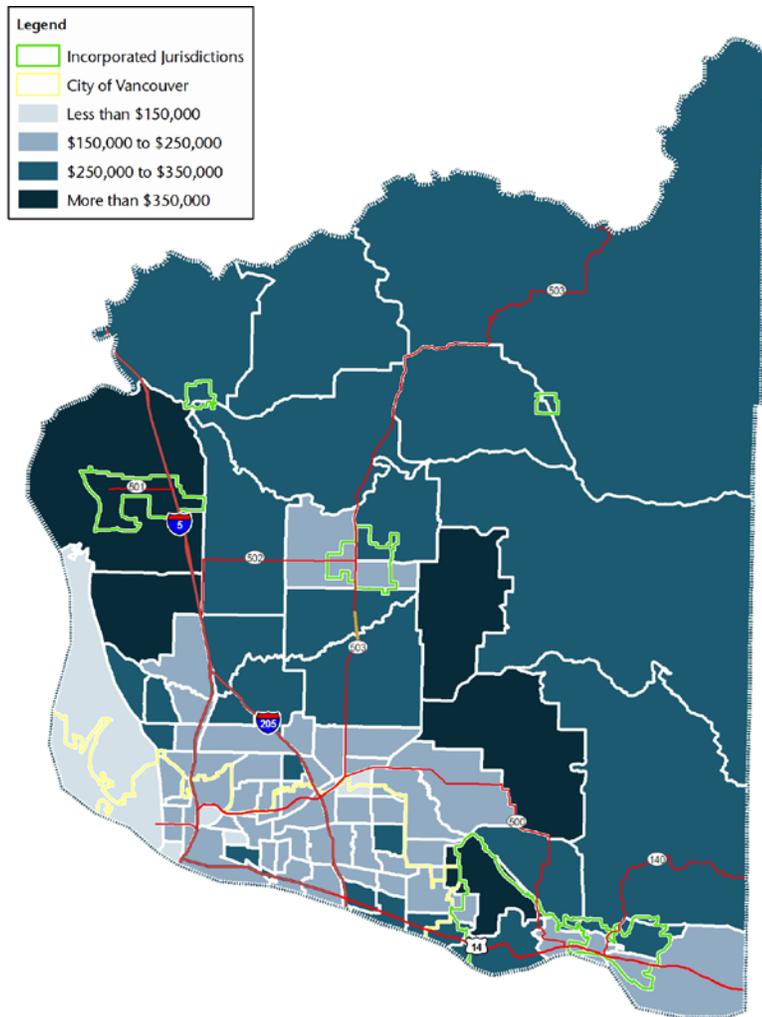
City	Median Value		Percent Change	Difference from Clark County	
	2000	2009		2000	2009
Vancouver	\$142,900	\$230,600	61%	(\$13,700)	(\$28,000)
Clark County	156,600	258,600	65	—	—
Battle Ground	136,700	245,100	79	(19,900)	(13,500)
Camas	193,500	342,500	77	36,900	83,900
La Center	173,200	296,200	71	16,600	37,600
Ridgefield	157,800	289,600	84	1,200	31,000
Washougal	134,900	248,300	84	(21,700)	(10,300)
Woodland	124,000	197,800	60	(32,600)	(60,800)
Yacolt	111,500	187,800	68	(45,100)	(70,800)

Source: American Community Survey 2005-2009 5-year estimate, 2000 Census.

For much of the county, the largest proportion of owner-occupied homes are valued at \$200,000 or more as shown in Figures I-30 and I-31. Woodland and Yacolt have the highest proportions of affordable homes to buy with one-fifth valued at less than \$150,000. Camas and La Center have the largest proportion of homes valued at \$300,000 or more (60% for Camas and 49% for La Center).

**Figure I-30.  
Median Home Value  
by Census Tract,  
Clark County, 2010**

Source:  
Claritas, 2010.



**Figure I-31.**  
**Value for Owner-Occupied Homes by Community, Clark County, 2005-2009**

City	Total Units	Less than \$100,000		\$100,000 to \$149,000		\$150,000 to \$200,000		\$200,000 to \$300,000		\$300,000 to \$500,000		\$500,000 or more	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Vancouver	33,303	2,068	6.2%	2,429	7.3%	7,219	21.7%	13,261	39.8%	6,589	19.8%	1,737	5.2%
Clark County	104,020	5,690	5.5	5,371	5.2	15,289	14.7	38,689	37.2	28,661	27.6	10,320	9.9
Battle Ground	3,778	154	4.1	117	3.1	695	18.4	1,951	51.6	817	21.6	44	1.2
Camas	4,793	51	1.1	236	4.9	535	11.2	1,077	22.5	1,792	37.4	1,102	23.0
La Center	669	25	3.7	41	6.1	73	10.9	204	30.5	296	44.2	30	4.5
Ridgefield	1,027	15	1.5	60	5.8	80	7.8	400	38.9	349	34.0	123	12.0
Washougal	3,459	306	8.8	184	5.3	505	14.6	1,308	37.8	837	24.2	319	9.2
Woodland	1,108	129	11.6	113	10.2	273	24.6	398	35.9	105	9.5	21	1.9
Yacolt	385	32	8.3	51	13.2	162	42.1	86	22.3	54	14.0	0	0.0

Source: American Community Survey 2005-2009 5-year estimate.

**SECTION II:**  
**Complaint and Fair Lending Analysis**

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## **SECTION II.**

### **Complaint and Fair Lending Analysis**

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

#### **Complaint and Legal Analysis Summary**

- Since January 2006, a total of 61 complaints were filed with HUD by residents in Clark County. The complaints were largely filed on the basis of disability and race discrimination (38% and 28% of the complaints, respectively). About half of the complaints were dismissed because they were not found to have a reasonable cause; one in six was settled.
- There was one fair housing legal case occurring in southwestern Washington in the past five years; none occurred in Clark County.
- In 2009, there were approximately 20,200 loan applications made in Clark County. For the county overall (excluding Vancouver), 61 percent of loans were approved and 18 percent were denied (the others were withdrawn by the applicants, closed for incompleteness, etc). This is very similar to Vancouver, where 59 percent of loans were approved and 19 percent were denied. Loan origination rates were highest for Whites (loans were originated 63% of the time) and lowest for American Indians/Alaskan Natives (47%).
- Subprime lending was minimal in 2009, with just 238 loans carrying subprime rates.

#### **Fair Housing Complaints**

Clark County residents who believe they have experienced discrimination may report their complaints to the following entities:

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

**HUD complaint procedures.** Housing discrimination complaints filed with HUD may be done online at (<http://www.hud.gov/complaints/housediscrim.cfm>), by calling 1-800-669-9777 or by contacting the HUD Regional Office of Fair Housing and Equal Opportunity in Seattle (206) 220-5101.

When HUD receives a complaint, the department will notify the person who filed the complaint, then notify the alleged violator and allow that person to submit a response. The complaint will be investigated to determine whether there has been a violation of the Fair Housing Act.

A complaint may be resolved in a number of ways. First, HUD attempts to reach an agreement between the two parties involved. If achieved, this "conciliation agreement" must lay out provisions to protect the filer of the complaint and public interest. If an agreement is signed, HUD will take no further action unless the agreement is breached, in which case HUD will recommend that the Attorney General file suit.

If a person needs immediate help to stop a serious problem being caused by a Fair Housing Act violation, HUD may assist as soon as a complaint is filed. HUD may authorize the Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of the complaint, if irreparable harm is likely to occur without HUD's intervention and there is substantial evidence indicating a violation of the Fair Housing Act.

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

Before filing a housing discrimination complaint, the WSHRC advises that people fill out an "online complaint questionnaire". This online form helps gather information to confirm that an investigation is necessary before filing a formal complaint with the WSHRC. At the end of the form, the complainant chooses where they want to make the questionnaire a formal complaint or request to speak to a WSHRC representative before making a decision. The filing of a discrimination charge must be done within 6 months of the date of the alleged violation.

**Northwest Justice Project complaint procedures.** To file a complaint with the Northwest Justice Project (NJP), people may call a legal hotline to speak with a representative and receive legal advice. There is no information about the procedures of filing a housing complaint beyond the first step in seeking legal advice. The website offers links to documents and forms that seek to provide information to the public in need of legal advice.

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

The FHCO staff will provide the options to file a lawsuit, file an agency complaint, or drop the case. Once a complaint is filed, there may be an attempt to conciliate, finding of cause, and a court hearing. From there, a judge determines if there is a real incident of housing discrimination. Residents must file a complaint with the FHCO within one year after the discriminatory act. If a resident chooses to file a private lawsuit, they must do so within two years.

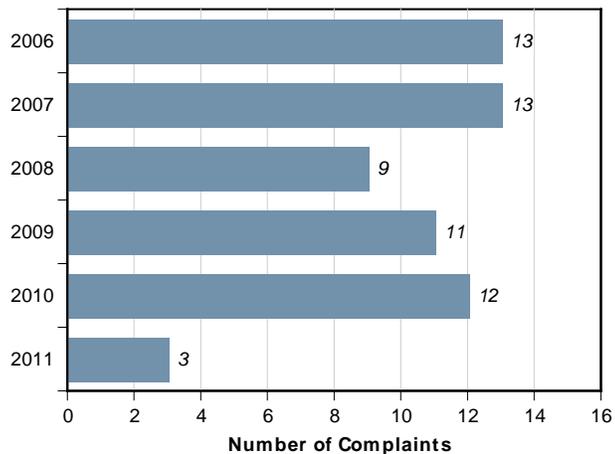
The FHCO website also provides a thorough set of frequently asked questions that define housing discrimination and common situations that warrant investigation.

Complaint trends. Since January 2006, a total of 61 complaints were filed with HUD by residents in Clark County. Figure II-1 shows the trends in complaint filings during the past five and one-half years.

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

Note:  
 A total of 78 separate complaints were filed.  
 Some complaints were filed for more than one reason.

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



Race and disability were the most common reasons for the complaints (at 38% and 28% of the complaints, respectively).

The vast majority of complaints filed in Clark County originated from people living in Vancouver. Just two of the 61 complaints were filed by residents outside of Vancouver; both were filed by residents of Washougal (and both of these involved discrimination related to national origin).

As shown in Figure II-3, the largest portion of cases (52%) was found to have no reasonable cause. About one in six complaints was resolved through conciliation or settlement agreement.

### Legal Cases

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

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

**Figure II-2.**  
**Basis of HUD Complaints, Clark County, January 2006 through July 2011**

	Number	Percent
Disability	26	38%
Family Status	6	9
National Origin	7	10
Race	19	28
Religion	2	3
Retaliation	6	9
Sex	3	4
<b>TOTAL</b>	<b>69</b>	<b>100%</b>

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

**Figure II-3.**  
**Outcome of HUD Complaints, Clark County, January 2006 through July 2011**

	Number	Percent
Complainant failed to cooperate	8	13%
Complaint withdrawn	1	2
Conciliation/settlement successful	11	18
No cause determination	32	52
No reason given	3	5
Unable to locate complainant	4	7
Withdrawn by complainant after resolution	2	3
<b>TOTAL</b>	<b>61</b>	<b>100%</b>

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

Housing Act in discrimination towards someone for not providing reasonable accommodations for a disability. The apartment management was required to compensate Mr. Price for discrimination and applied a civil penalty.

## **Fair Lending Analysis**

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

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

There were two banks in Clark County that were rated in the past 10 years. These banks are Bank of Clark County and First Independent Bank. Both of these institutions most recently received a “satisfactory” rating.

**Home Mortgage Disclosure Act (HMDA) Data analysis.** HMDA data are widely used to detect evidence of discrimination in mortgage lending. In fact, concern about discriminatory lending practices in the 1970s led to the requirement for financial institutions to collect and report HMDA data. The variables contained in the HMDA dataset have expanded over time, allowing for more comprehensive analyses and better results. However, despite expansions in the data reported, HMDA analyses remain limited because of the information that is *not* reported.

As such, studies of lending disparities that use HMDA data carry a similar caveat: HMDA data can be used to determine disparities in loan originations and interest rates among borrowers of different races, ethnicities, genders, and location of the property they hope to own. The data can also be used to explain many of the reasons for any lending disparities (e.g., poor credit history). Yet HMDA data do not contain all of the factors that are evaluated by lending institutions when they decide to make a loan to a borrower. Basically, the data provide *a lot* of information about the lending decision—but *not all* of the information.

Beginning in 2004, HMDA data contained the interest rates on higher-priced mortgage loans. This allows examinations of disparities in high-cost, including subprime, loans among different racial and ethnic groups. It is important to remember that subprime loans are not always predatory or suggest fair lending issues, and that the numerous factors that can make a loan “predatory” are not

adequately represented in available data. Therefore, actual predatory practices cannot be identified through HMDA data analysis. However, the data analysis can be used to identify where additional scrutiny is warranted, and how public education and outreach efforts should be targeted.

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

- Home purchase loan. A home purchase loan is any loan secured by and made for the purpose of purchasing a housing unit.
- Home improvement loan. A home improvement loan is used, at least in part, for repairing, rehabilitating, remodeling, or improving a housing unit or the real property on which the unit is located.
- Refinancing. Refinancing is any dwelling-secured loan that replaces and satisfies another dwelling-secured loan to the same borrower. The purpose for which a loan is refinanced is not relevant for HMDA purposes.

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

The most recent HMDA data is available for 2009. This section uses the analysis of 2009 HMDA data to determine:

- The geographic areas in Clark County communities where high-cost lending and loan denials are concentrated and the correlation of these areas with concentrations of minority and low income households;
- Disparities in high-cost lending and loan denials across different racial and ethnic groups.

**Number and types of loans.** In 2009, there were approximately 20,200 loan applications made in Clark County (excluding Vancouver). Figure II-4 presents the distribution of loan applications by jurisdiction alongside the overall population distribution of the county. The largest proportion of loan applications (66%) in the county was made in unincorporated areas, which also contains 77 percent of the county's population (excluding Vancouver). Compared to the population distribution, much higher proportions of loan applications came from residents in Camas and La Center than their share of the overall county population.

**Figure II-4.**  
**Loan Applications by Jurisdiction, Clark County (excluding Vancouver), 2009**

City	Total Loan Applications	Percentage in County	Percent of County Population (excluding Vancouver)
Battle Ground	1,543	8%	7%
Camas	2,367	12	7
La Center	727	4	1
Ridgefield	639	3	2
Washougal	707	3	5
Woodland	447	2	2
Yacolt	398	2	1
Unincorporated	13,375	66	77
<b>TOTAL</b>	<b>20,203</b>	<b>100%</b>	<b>100%</b>

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

Conventional loans were the most common type of loans applied for in 2009: 74 percent of all loan applications submitted in 2009 in the MSA were for conventional loans. The types of lenders used were similar across the jurisdictions, although Washougal and Yacolt had higher rates of government-guaranteed loan applications. Figure II-5 summarizes the types of lenders used in loan applications.

**Figure II-5.**  
**Type of Lenders in Loan Applications, Clark County, 2009**

	Conventional	FHA-insured	VA-guaranteed	FSA/RHS
Clark County (excluding Vancouver)	74%	21%	4%	1%
Battle Ground	71	21	4	3
Camas	81	16	3	0
La Center	82	14	3	1
Ridgefield	76	17	3	4
Washougal	69	24	7	0
Woodland	74	20	4	2
Yacolt	67	24	6	3
Unincorporated	73	22	5	0

Note: FSA/RHS is Farm Service Administration/Rural Housing Service.

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

Most loan applications in the study area were for refinancing of existing mortgages. Excluding Vancouver, 76 percent of loan applications submitted by residents were for refinances; 21 percent were for home purchases. Few applications were for home improvement loans. Refinance applications were highest for La Center and Yacolt. Camas and Ridgefield had the highest percentages of home purchase loan applications with 23 percent and 24 percent, respectively. Yacolt and Woodland had the smallest percentage of home purchase loans with 17 percent. Figure II-6 summarizes loan purpose by jurisdiction.

**Figure II-6.**  
**Purpose of Loan Applications, Clark County, 2009**

City	Refinancing	Home Purchase	Home Improvement
Clark County (excluding Vancouver)	76%	21%	3%
Battle Ground	77	21	2
Camas	75	23	2
La Center	81	16	3
Ridgefield	75	24	1
Washougal	76	21	3
Woodland	80	17	4
Yacolt	82	17	1
Unincorporated	74	21	3

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

**Loan denials.** In Clark County (excluding Vancouver), 61 percent of the loan applications were originated and 18 percent were denied. Camas applicants had the highest loan origination rate at 65 percent; Yacolt had the lowest at 57 percent. Similarly, Yacolt's denial rate of 23 percent was the highest in the study area followed by Woodland at 22 percent. Camas had the lowest denial rate of 14 percent.

**Figure II-7.**  
**Action Taken on Loan Applications, Clark County, 2009**

City	Loan Originated	Approved, But Not Accepted	Denied by Financial Institution	Withdrawn by Applicant	File Closed for Incompleteness	Total Loans
Clark County (excluding Vancouver)	61%	7%	18%	11%	3%	20,203
Battle Ground	62	8	17	10	3	1,543
Camas	65	7	14	11	3	2,367
La Center	59	7	20	10	4	727
Ridgefield	58	10	19	12	2	639
Washougal	59	7	21	11	3	707
Woodland	59	7	22	10	2	447
Yacolt	57	7	23	12	1	398
Unincorporated	61	7	18	11	2	13,375
<b>TOTAL</b>	<b>12,383</b>	<b>1,426</b>	<b>3,662</b>	<b>2,210</b>	<b>522</b>	

Note: Approved but not accepted means the borrower decided not to take the loan.

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

Denial rates by race and ethnicity. Overall in Clark County (again, excluding Vancouver), loans were originated for White applicants 63 percent of the time, compared to between 47 percent (American Indian and Alaskan Native) and 60 percent (Asian) for non-White applications. Loan denial rates were highest for American Indian and Alaskan Native applicants (29% of loans were denied). In general, loans were denied 22 percent of the time for minority applicants compared with 17 percent of the time for White applicants.

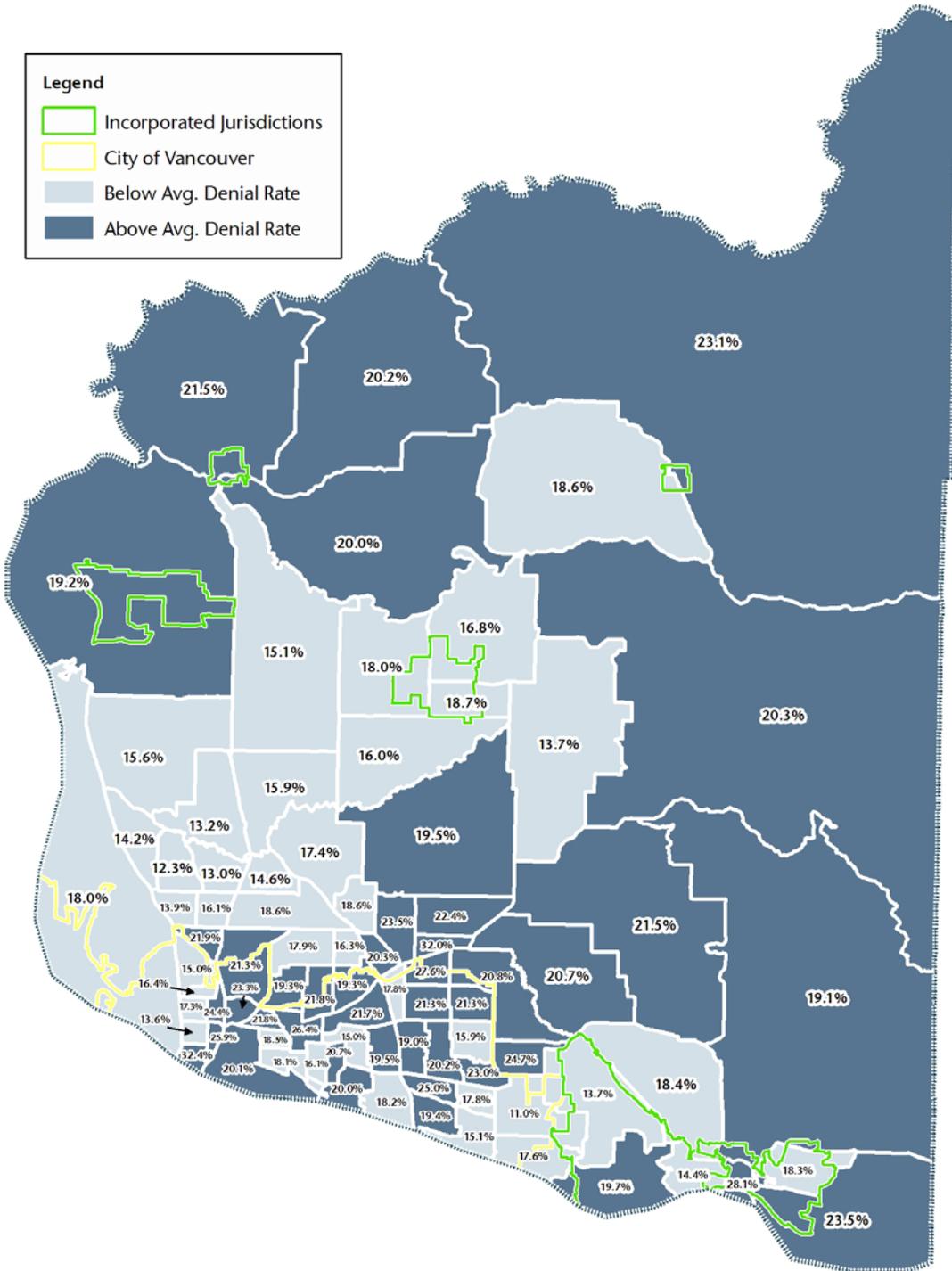
**Figure II-8.**  
**Result of Mortgage Loan Applications by Race/Ethnicity, Clark County, 2009**

	Loan Originated	Approved, But Not Accepted	Denied by Financial Institution	Withdrawn by Applicant	File Closed for Incompleteness	Total Loans
<b>Race</b>						
American Indian or Alaska Native	47%	5%	29%	15%	4%	138
Asian	59	6	22	9	2	679
Black or African American	53	6	22	14	3	201
Native Hawaiian or Other Pacific Islander	55	10	21	12	2	134
White	63	7	17	10	2	16,287
<b>Ethnicity</b>						
Hispanic or Latino	55	7	22	13	3	487
Not Hispanic or Latino	63	7	17	10	2	16,894
Total Loan Applications	61%	7%	18%	11%	3%	20,203
<b>Racial and Ethnic Differences</b>						
Asian/White	-4%	-1%	5%	-1%	0.1%	
Hispanic/Non-Hispanic	-8	-0.1	5	2	0.6	

Source: Home Mortgage Disclosure Act (HMDA), 2009, and BBC Research & Consulting.

Figure II-9 shows the geographic areas in Clark County where denial rates are above the county average. Denial rates are lowest in Camas, Washougal and the west central portion of the county.

**Figure II-9.**  
**Higher than Community Average Denials, Clark County, 2009**



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



**Subprime analysis.** This section examines the prevalence of subprime loans in the study area. For the purposes of this section, we define “subprime” as a loan with an APR 3 percentage points higher than comparable Treasuries.

Overall, just 1.1 percent of originated loans in Clark County received subprime rates. In Yacolt, 2.6 percent of originated loans were considered subprime, compared with only 0.6 percent in La Center and 0.9 percent in Camas.

**Figure II-10.**  
**Subprime Loans by Municipality, Clark County, 2009**

	Originated Loans	Subprime Loans	Percent Subprime
Clark County	19,965	238	1.1%
Battle Ground	1527	16	1.0
Camas	2,346	21	0.9
La Center	723	4	0.6
Ridgefield	627	12	1.9
Washougal	697	10	1.4
Woodland	437	10	2.3
Yacolt	388	10	2.6
Unincorporated	13,220	155	1.2

Source: Home Mortgage Disclosure Act (HMDA).

Of the subprime loans that were originated to borrowers in Clark County, 84 percent were made to borrowers who are racially White; 2 percent to African American borrowers; and 12 percent to borrowers where racial information was not available. Ethnically, 87 percent of subprime loans were made to non-Hispanic applicants, 12 percent were made to borrowers where ethnic information was not available and 2 percent were made to Hispanic residents. Therefore, it does not appear that subprime lending was disproportionately made to minority borrowers.

**Denials by jurisdiction and race/ethnicity.** The following maps of Clark County where denial rates were the highest and any existing correlations between high denial areas and racial and ethnic concentration areas. The jurisdiction pages also report the number of applications, percent of applications denied and top reasons for denial for the county’s largest racial and ethnic groups—Asians, Hispanics and Whites.

Clark County. In 2009, there were 20,203 applications made in Clark County, excluding Vancouver. Out of these applications, 3,662 or 18 percent were denied. Asians and Hispanics both had denial rates of 22 percent while Whites had 17 percent of their applications denied. Overall, the most common reason for denials was insufficient collateral and debt-to-income ratios.

**Figure II-11.  
Top Reasons for Denials, Clark County, 2009**

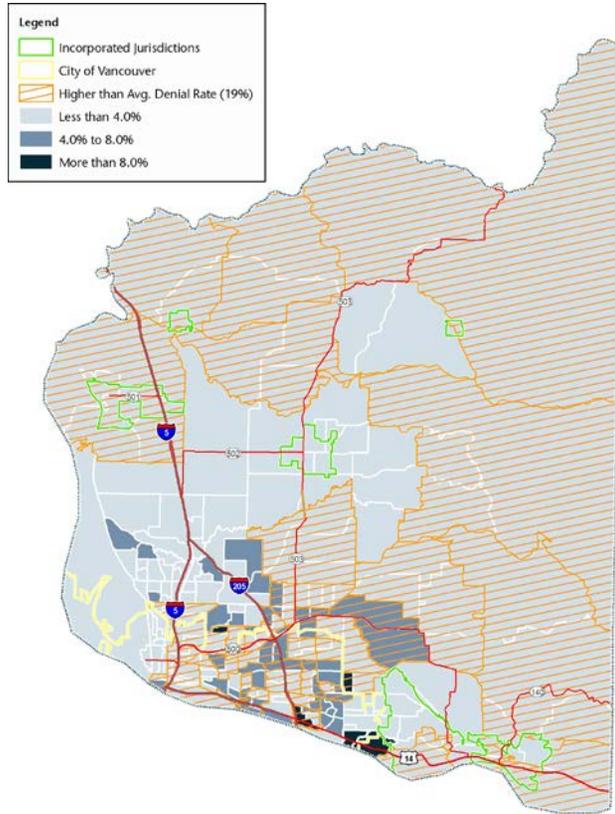
	Asian	White	Hispanic
Total Applications	545	14,063	409
<i>Percent Denied</i>	22.0%	17.0%	22.0%
Top Reasons for Denials:			
Debt-to Income Ratio	31.3%	19.9%	16.7%
Credit History	9.0	13.2	14.1
Collateral	26.1	37.4	30.8
Credit Application Incomplete	12.7	10.1	12.8
Other	13.4	12.1	14.1

Source: Home Mortgage Disclosure Act (HMDA).

Figures II-12 and II-13 show the higher than county-average denial rates overlaid with the maps of Asian and Hispanic concentrations. The maps do not suggest correlations with high denials and racial and ethnic distributions.

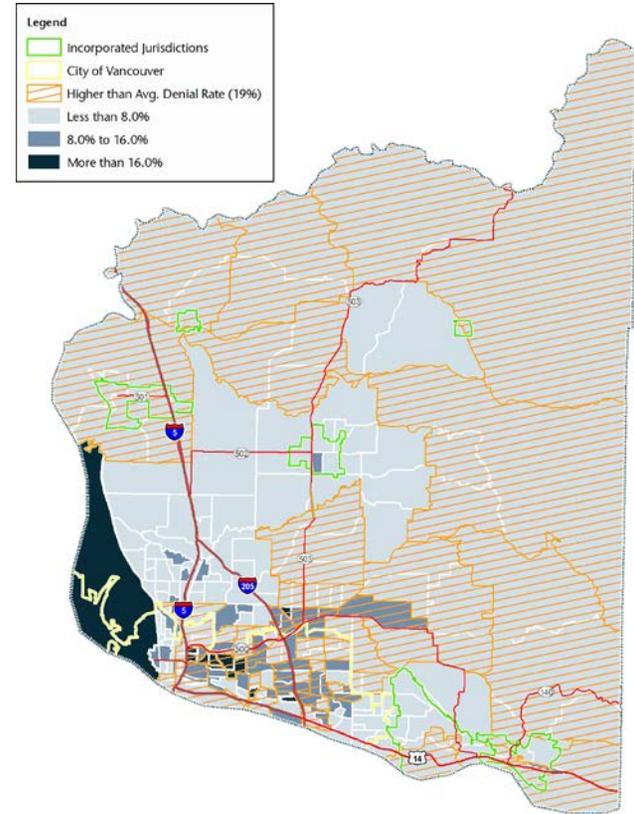
**Figure II-12.  
Clark County  
High Denial  
Areas overlaid  
on Percent  
Asian, 2009**

Source:  
Home Mortgage Disclosure  
Act (HMDA), 2009 and  
Census. 2010.



**Figure II-13.  
Clark County  
High Denial  
Areas overlaid  
on Percent  
Hispanic, 2009**

Source:  
Home Mortgage Disclosure  
Act (HMDA), 2009 and  
Census. 2010.



Battle Ground. In 2009, there were 1,543 loan applications made in Battle Ground. Out of these applications, 261 or 17 percent were denied. This denial rate is average compared to other jurisdictions in Clark County. Hispanics had the largest denial rate at 37 percent, followed by Asians with 30 percent, compared to Whites with 16 percent of their applications denied. Debt-to-income ratio and credit history were the top reasons for denials for Asians and collateral was the top reason for Whites and Hispanics.

**Figure II-12.**  
**Top Reasons for Denials, Battle Ground, 2009**

	Asian	White	Hispanic
Total Applications	27	1,252	30
<i>Percent Denied</i>	30%	16%	37%
Top Reasons for Denials:			
Debt-to Income Ratio	33%	16%	13%
Credit History	33	11	13
Collateral	17	38	50

Source: Home Mortgage Disclosure Act (HMDA).

Camas. In 2009, there were 2,367 applications made in Camas. Out of these applications, 329 or 14 percent were denied. This denial rate is below-average compared to other jurisdictions in Clark County. Hispanics experienced very high denial rates in Camas (26%). Debt-to-income ratio is the top reason for denials for Asians while credit history was the top reason for Hispanics.

**Figure II-13.**  
**Top Reasons for Denials, Camas, 2009**

	Asian	White	Hispanic
Total Applications	206	1,769	69
<i>Percent Denied</i>	16%	14%	26%
Top Reasons for Denials:			
Debt-to Income Ratio	42%	20%	20%
Credit History	35	41	60

Source: Home Mortgage Disclosure Act (HMDA).

La Center. In 2009, there were 727 applications made in La Center. Out of these applications, 146 or 20 percent were denied. This denial rate is above-average compared to other jurisdictions in Clark County. Hispanics had the largest denial rate with 40 percent of applications denied, followed by Asians with 25 percent, compared to Whites with 19 percent of their applications denied. Credit history was the top reasons for denials for Asians and Hispanics and lack of collateral was the most common reason for Whites.

**Figure II-14.**  
**Top Reasons for Denials, La Center, 2009**

	Asian	White	Hispanic
Total Applications	8	618	10
<i>Percent Denied</i>	<i>25%</i>	<i>19%</i>	<i>40%</i>
Top Reasons for Denials:			
Credit History	100%	9%	66%
Collateral	0	42	0
Debt –to-Income Ratio	0	24	33

Source: Home Mortgage Disclosure Act (HMDA).

Ridgefield. In 2009, there were 639 applications made in Ridgefield. Out of these applications, 123 or 19 percent were denied—about the same rate as the county overall. Asians and Whites had denial rates of 18 percent, followed by Hispanics with 17 percent. Debt-to-income ratio was the top reason for denials for Asians, incomplete credit application was the top reason for Hispanics and lack of collateral was the highest reason for Whites.

**Figure II-15.**  
**Top Reasons for Denials, Ridgefield, 2009**

	Asian	White	Hispanic
Total Applications	11	530	12
<i>Percent Denied</i>	<i>18%</i>	<i>18%</i>	<i>17%</i>
Top Reasons for Denials:			
Debt-to Income Ratio	100%	16%	0%
Collateral	0	40	0
Credit Application Incomplete	0	15	50

Source: Home Mortgage Disclosure Act (HMDA).

Washougal. In 2009, there were 707 applications made in Washougal. Out of these applications, 146 or 21 percent were denied. This denial rate is above average compared to other jurisdictions in Clark County. Whites had the largest denial rate with 20 percent of loans denied, followed by Hispanics with 18 percent and Asians with 17 percent of their applications denied. Collateral was the top denial reason for all Asians and Whites while 67 percent of the denial reasons for Hispanics were for “other” reasons.

**Figure II-16.**  
**Top Reasons for Denials, Washougal, 2009**

	Asian	White	Hispanic
Total Applications	6	583	17
<i>Percent Denied</i>	17%	20%	18%
Top Reasons for Denials:			
Collateral	100%	41%	33%
Other	0	12	67

Source: Home Mortgage Disclosure Act (HMDA).

Woodland. In 2009, there were 447 applications made in Woodland. Out of these applications, 96 or 21 percent were denied. This denial rate is above average compared to other jurisdictions in Clark County. American Indian or Alaskan Natives had the largest denial rate with 60 percent of loans denied, followed by Hispanics with 25 percent of loans denied. Whites had 20 percent of their applications denied. Collateral was the top denial reason for all American Indian or Alaskan Natives, Whites and Hispanics.

**Figure II-16.**  
**Top Reasons for Denials, Woodland, 2009**

	American Indian or Alaskan Native	White	Hispanic
Total Applications	5	382	8
<i>Percent Denied</i>	60%	20%	25%
Top Reasons for Denials:			
Collateral	50%	52%	100%
Debt-to-income Ratio	0	16%	0
Credit History	0	14	0
Credit Application Incomplete	0	12	0

Source: Home Mortgage Disclosure Act (HMDA).

Yacolt. In 2009, there were 398 applications made in Yacolt. Out of these applications, 92 or 23 percent were denied. This denial rate is above-average compared to other jurisdictions in Clark County. There were no denials for Asians or Hispanics which respectively had 2 and 6 total applications. Collateral was the top reason for denials for Whites.

**Figure II-17.**  
**Top Reasons for Denials, Yacolt, 2009**

	Asian	White	Hispanic
Total Applications	2	332	6
<i>Percent Denied</i>	0%	22%	0%
Top Reasons for Denials:			
Debt-to Income Ratio	0%	13%	0%
Collateral	0	52	0
Credit Application Incomplete	0	15	0

Source: Home Mortgage Disclosure Act (HMDA).

Unincorporated Clark County. In 2009, there were 13,342 applications made in the unincorporated areas of Clark County. Out of these applications, 2,460 or 18 percent were denied—the same as the county overall, as would be expected. Asians had the largest denial rate at 25 percent, followed by Hispanics with 21 percent and Whites with 17 percent of their applications denied. Debt-to-income ratio was the top reason for denials for Asians; collateral was the top reason for Hispanics and Whites.

**Figure II-18.**  
**Top Reasons for Denials, Unincorporated Clark County, 2009**

	Asian	White	Hispanic
Total Applications	429	11,061	348
<i>Percent Denied</i>	25%	17%	21%
Top Reasons for Denials:			
Debt-to Income Ratio	27%	21%	18%
Collateral	23	35	24
Credit Application Incomplete	16	9	16

Source: Home Mortgage Disclosure Act (HMDA).

## **SECTION III: Public Outreach**

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## **?SECTION III: Public Outreach**

This section details the public outreach process for the AI.

### **Public Input Elements**

The public outreach for the AI consisted of two surveys:

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

BBC designed the survey instruments and city staff distributed and promoted the surveys. A total of 76 residents and 42 stakeholders responded to the surveys. Of the 76 respondents only 5 or 7 percent lived in unincorporated Clark County. As such, too few residents responded and thus data for Clark County residents are not reported. All of the survey data reported in this chapter reflects the perspective and experience of stakeholders.

### **Stakeholder Profile**

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

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

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

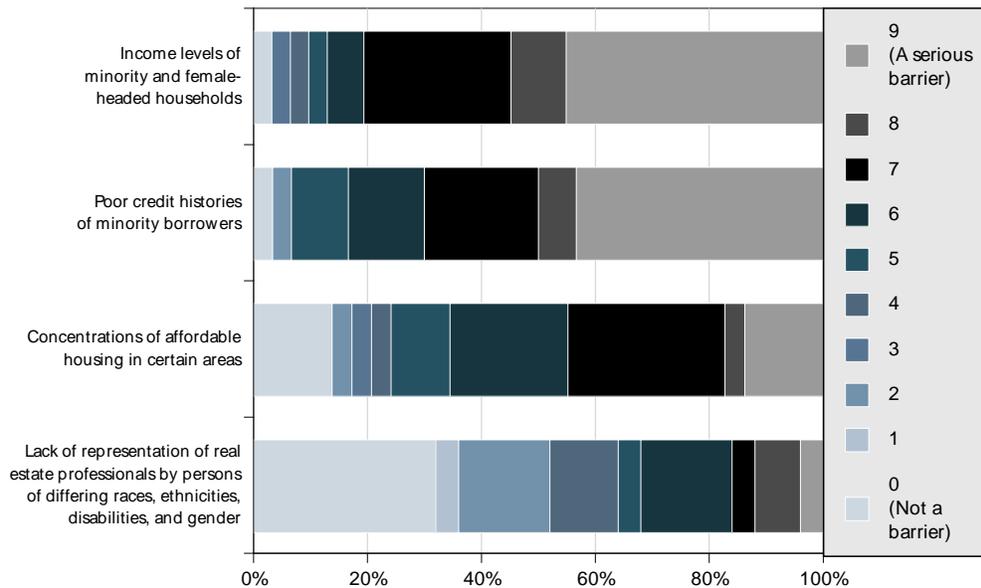
## Potential Barriers to Fair Housing

This section explores stakeholders' opinions regarding potential barriers to fair housing. Stakeholders rated the seriousness of potential barriers to fair housing within several categories:

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

Economic, demographic and housing factors. Income levels of minority and female-headed households and minority borrowers' poor credit histories were the top barriers to fair housing associated with economic, demographic and housing factors according to stakeholders (Figure III-1). These two barriers had an average rating of 7.3.

**Figure III-1.**  
**Potential Economic, Demographic and Housing Barriers to Fair Housing — Stakeholders**



Note: n=33.

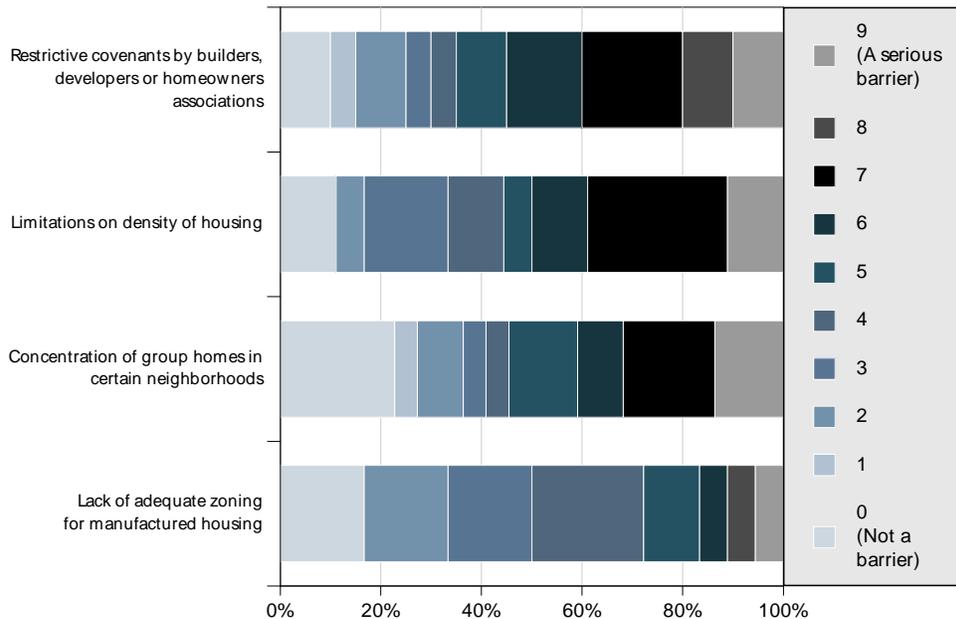
Source: BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.

Several stakeholders noted other potential economic, demographic and housing barriers of concern in Vancouver and Clark County, and these factors include:

- “Language seems to be the largest barrier I've seen so far. Many minority communities cannot even fill out the application because of this barrier.”
- “Some individuals in our area maintain strong prejudice against Hispanic households, falsely associating Hispanic families with increases in crime and decreases in property values.”
- “Those who are currently homeless not having the funds for first month rent plus security deposit.”
- “1. Poor credit histories are the norm for most poor people in need of housing. 2. No supported housing resources for people living with significant persistent mental illness in our community. 3. Not enough housing with rents based on income for individuals living below federal poverty line. 4. No "wet"/harm reduction housing for poor individuals who continue to use alcohol or drugs. Our Community NEEDS housing for individuals, families and people with young children that is based on household income. Excellent Renters class should develop a similar program for Excellent Renters for People in Shared Housing (it's the norm in NY and SF), as it makes funding dollars go further and people at large lack skills to do so successfully over time.”
- “People who are on TANF do not receive enough per month to pay for even a studio apartment. The local housing authority does not even take applications anymore, so there's no hope of getting subsidized housing, which is the only way people on TANF can afford housing.”
- “It is difficult to find housing for people with criminal convictions.”

Land use and zoning factors. Figure III-2 presents stakeholders’ ratings of land use and zoning factors. Of the four land use and zoning factors evaluated, restrictive covenants by builders, developers or homeowners associations and limitations on density of housing had an overall average rating of about 5.0. Overall, land use and zoning are perceived to be a modest barrier.

**Figure III-2.  
Potential Land Use and Zoning Barriers to Fair Housing — Stakeholders**



Note: n=24.

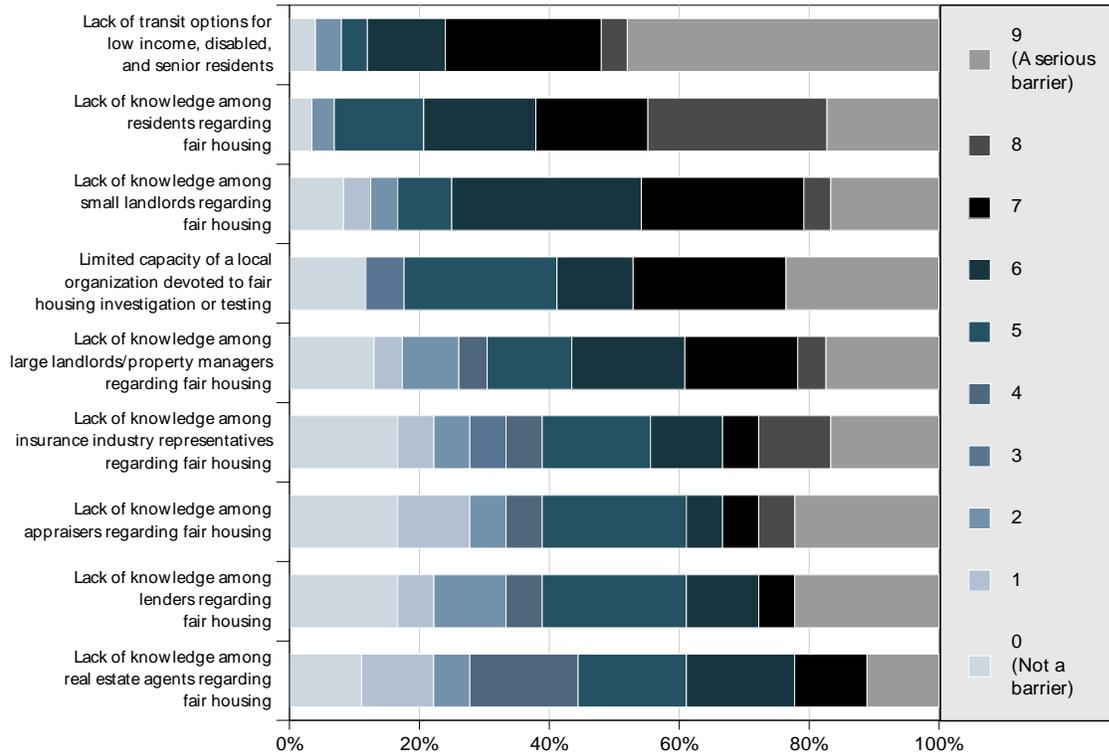
Source: BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.

A few respondents suggested additional zoning and land use factors that may be barriers to fair housing. These include:

- “There is not a lot of building going on right now, and there are not enough shared living situations available. Single moms or dads just don't have a chance, let alone a single mother with four kids.”
- “Placing housing opportunities too near to schools and parks; placing housing opportunities too far from bus/transportation lines.”
- “Lack of transitional type housing.”

Capacity issues. Stakeholders consider the lack of transit options for low income, disabled and senior residents to be the most serious barrier to fair housing due to capacity issues (with a rating of 7.3), as shown in Figure III-3. A lack of knowledge among resident regarding fair housing law was the second most serious capacity issue. One stakeholder commented that, “I think that there is plenty of knowledge getting its way out there but fear seems to be the big item.”

**Figure III-3.**  
**Capacity Issues as Potential Barriers to Fair Housing — Stakeholders**

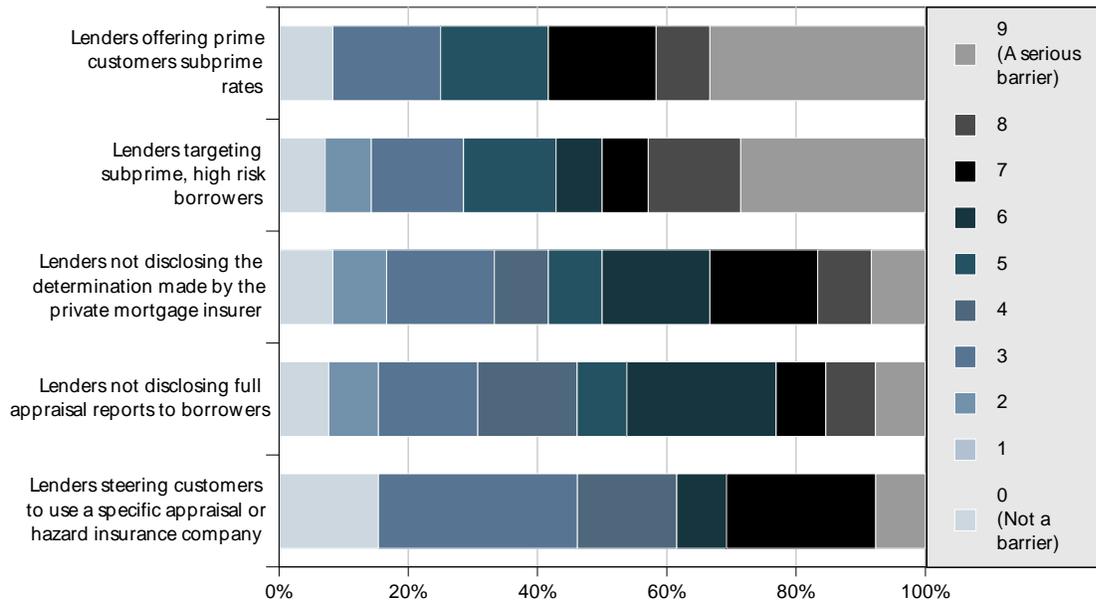


Note: n=29.

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

Lending activities. Among lending activities rated, stakeholders considered lenders offering prime borrowers subprime rates (6.2 rating) and lenders targeting subprime, high risk borrowers (5.9 rating) to be the most serious potential barriers to fair housing, as depicted in Figure III-4. One stakeholder wrote, "I think that lenders — after talking to a realty agent yesterday — are being more cautious and making the buyers jump through hoops."

**Figure III-4.**  
**Lending Issues as Potential Barriers to Fair Housing — Stakeholders**

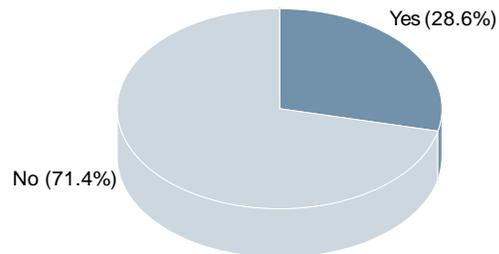


Note: n=14.

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

While most stakeholders do not think that there are particular predatory lending practices that are a serious problem in the area, nearly 30 percent think that there are practices that pose a serious problem, as shown in Figure III-5.

**Figure III-5.**  
**Are there particular predatory lending practices that are a serious problem in Vancouver or Clark County? — Stakeholders**



Note:  
n=21.

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

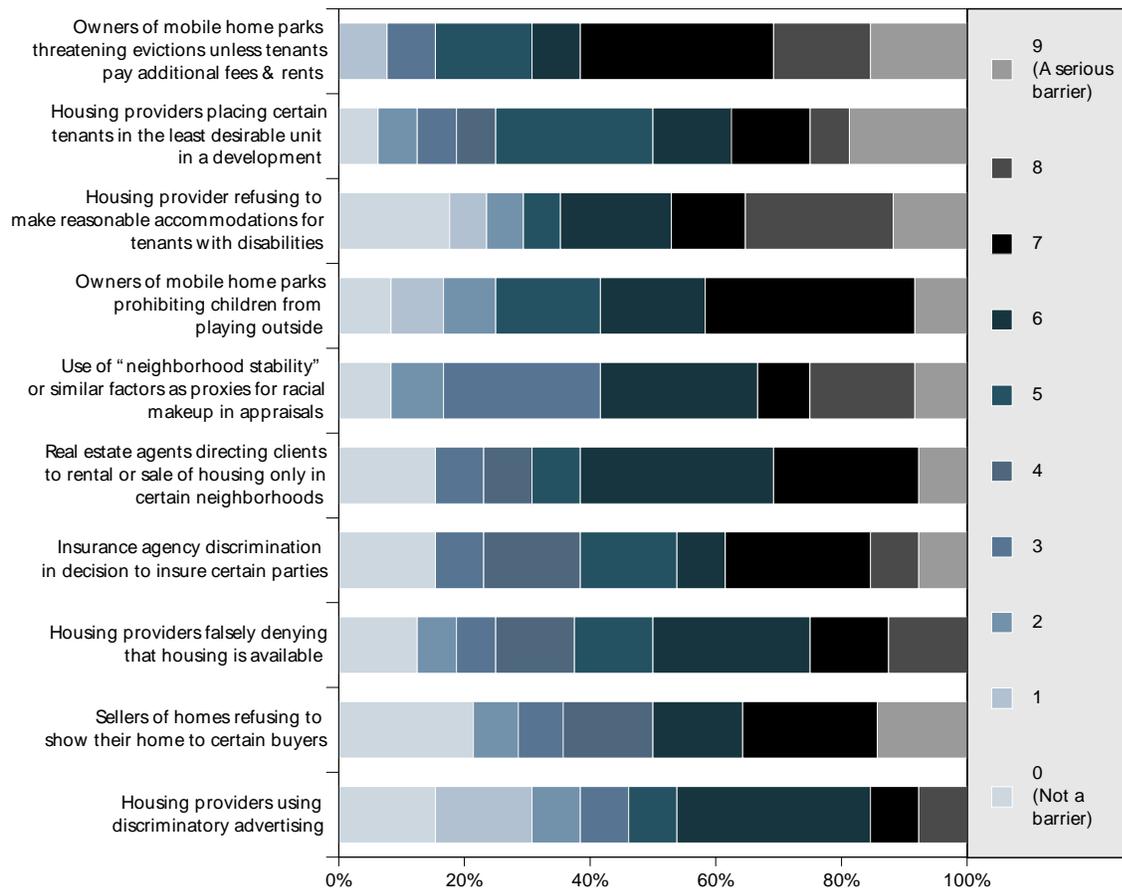
Those who responded that particular predatory lending practices are a serious problem mentioned the following:

- "Check cashing businesses."
- "I used to work for a refinancing company that only preyed on the financially weak."
- "Historically, Rent to Own properties would target lower income families and single moms in our community. I do not know if currently that is the case or not."

- “Encouraging households to continue borrowing money against their mortgage until they are no longer able to pay the monthly mortgage.”

Real estate activities. On average, stakeholders rated owners of mobile home parks threatening evictions unless tenants pay additional fees and rents as the most serious potential barrier to fair housing among real estate activities (rating of 6.3), followed by housing providers placing certain tenants in the least desirable units in a development (5.6 rating). Figure III-6 presents stakeholders’ ratings of the seriousness of real estate activities as barriers to fair housing.

**Figure III-6.**  
**Real Estate Activities as Potential Barriers to Fair Housing — Stakeholders**



Note: n=varies by response from 14 to 33.

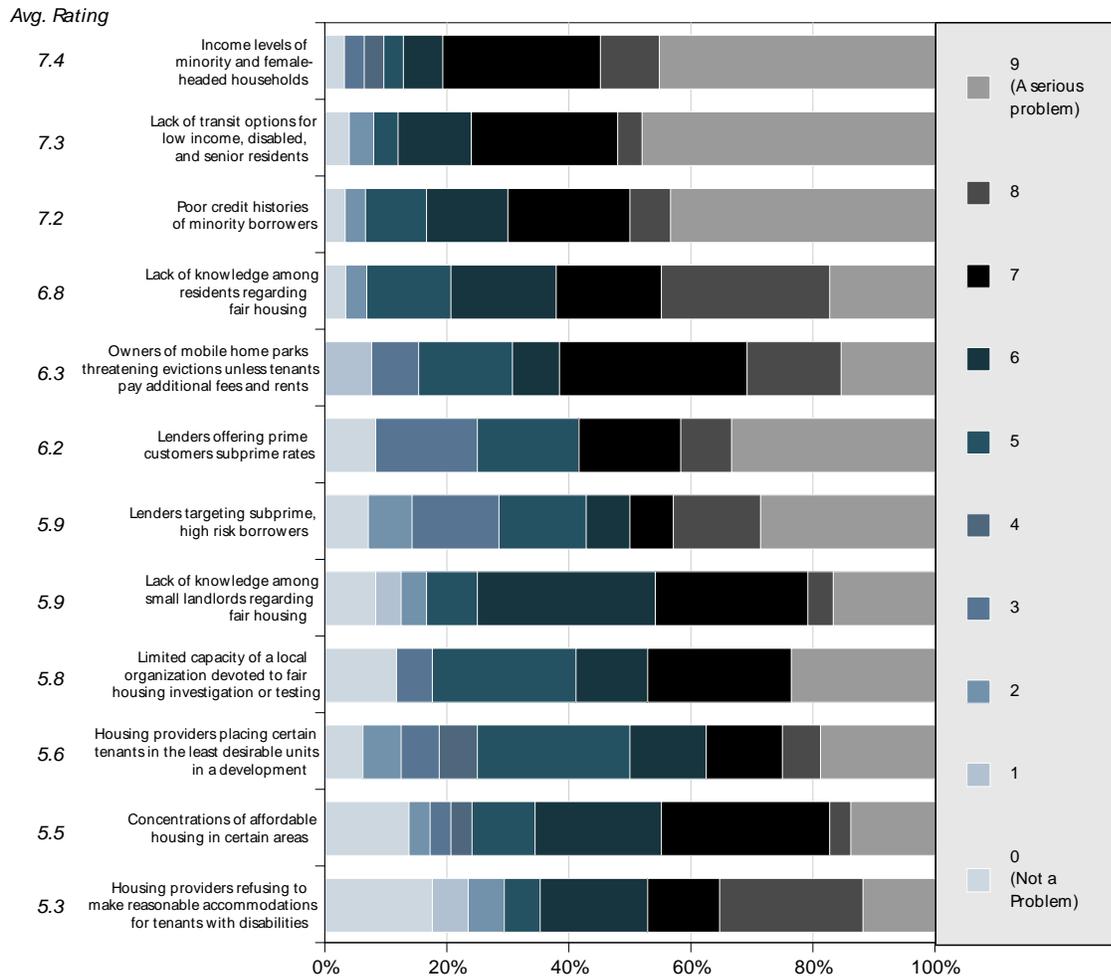
Source: BBC Research & Consulting from the 2011 City of Vancouver and Clark County Stakeholder Fair Housing Survey.

Summary of most serious potential barriers to fair housing — stakeholders. Figure III-7 summarizes the most serious barriers to fair housing as rated by stakeholders. Based on the average rating, the following are the three most serious potential barriers to fair housing:

- Income levels of minority and female-headed households, with a rating of 7.4;

- Lack of transit options for low income, disabled, and senior residents, with a rating of 7.3; and
- Poor credit histories of minority borrowers, with a rating of 7.2.

**Figure III-7.**  
**Most Serious Potential Barriers to Fair Housing — Stakeholders**



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

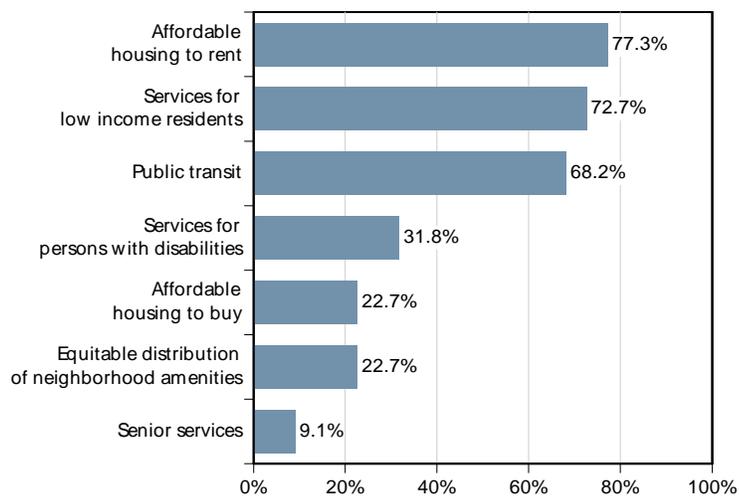
## Needed Services and Housing Types

Stakeholders identified types of services and housing that they believe are missing in Vancouver or Clark County. As shown in Figure III-8, affordable housing to rent was noted as a need by nearly 80 percent of stakeholders, followed closely by services for low income residents and public transit.

**Figure III-8.**  
**Types of Services and Housing Missing in Vancouver or Clark County**

Note:  
n=22

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



The needs identified by stakeholders are discussed in more detail, in descending order of need based on Figure III-8.

**Affordable housing to rent.** As shown in Figure III-8, affordable housing to rent was the service that nearly 80 percent of all stakeholders reported as a need — the greatest among all needs examined. Stakeholders cited a need for affordable rental housing throughout Clark County and in Vancouver and Camas. With regards to affordable rental housing needs, stakeholder comments included:

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

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

- "Affordable, safe housing for single caregivers and their children."
- "Bus passes are too high in cost."

- “Resources for security deposits.”
- “Three to four bedroom apartments for the low income residents.”
- “Education and assistance with advocacy about fair housing.”

**Public transit.** With regard to public transit, stakeholders’ expressed a need for enhanced connectivity between the city of Vancouver and destinations within Clark County. Expanded service and hours of service, particularly within the county was mentioned. Stakeholders’ specific comments about public transit needs include:

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

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

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

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

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

- “Low income housing is often in areas without groceries, transportation etc...”

- "There is a lack of sidewalks, good lighting and healthy option grocery stores in most poor areas of Clark County."

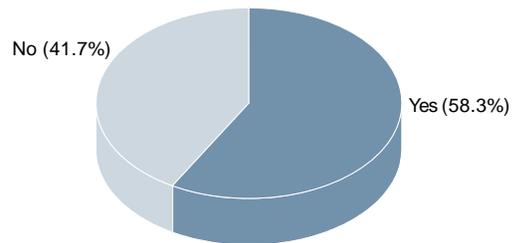
**Senior services.** The few respondents who identified senior services as a need stated that seniors need fair housing education and that seating by bus stops is needed.

### Fair Housing Knowledge and Communications

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

**Adequacy of fair housing resources.** Stakeholders' perspectives on whether or not there is adequate information, resources and training on fair housing law in Vancouver and Clark County were mixed. As shown in Figure III-9, about 60 percent of stakeholders believe there is adequate fair housing information.

**Figure III-9.**  
**Do you feel there is adequate information, resources and training on fair housing law?**



Note:  
 n=24.

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

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

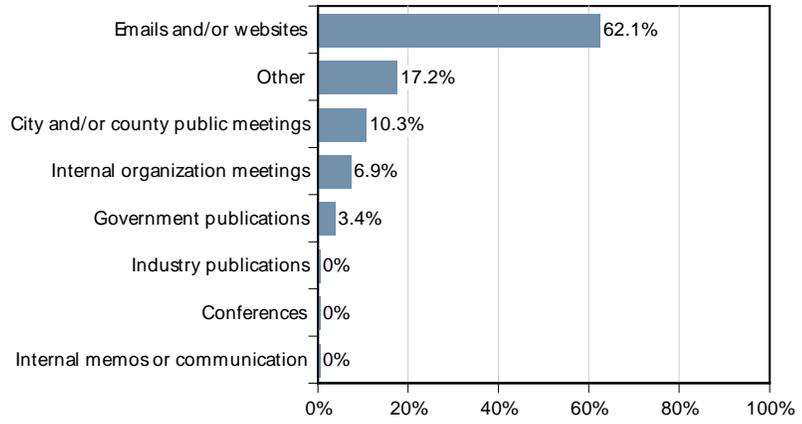
- "Regular Forums with up-to-date information."
- "Landlords need more training in housing assistance programs. Social service agencies need more information on possible housing options."
- "Brief, easy to read information could be available to share with clients and to have available in target areas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

**Communicating with stakeholders.** When asked about the best way to communicate to professionals in their field about fair housing issues, email and websites were the preferred method by more than 60 percent of stakeholders, as shown in Figure III-10. Suggestions in the "other" category include town hall meetings in low income neighborhoods, outreach and presentations to groups and associations, events and trainings.

**Figure III-10.**  
**What is the best way to communicate with professionals in your field about fair housing issues?**

Note:  
n=29.

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



**SECTION IV:**  
**Public Policies and Practices**

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## SECTION IV.

### Public Policies and Practices

This section contains an analysis of public sector barriers to fair housing choice in the context of housing policies and procedures and land use policies. This section addresses the following topics:

- Policies of the Vancouver Housing Authority (VHA);
- Concentrations of public housing and HUD subsidized rental units;
- Placement of and zoning for group homes; and
- General zoning and land use laws that may restrict the placement of affordable housing or encourage areas of minority concentration.

The policy review conducted in this section revealed no fair housing concerns.

#### Subsidized and Affordable Housing

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

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

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

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

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

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

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

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

**Location of units.** Figure IV-1 shows the zip codes in which the housing units are located. As the exhibit demonstrates, there is a concentration of public housing in the 98661 zip code; 66 percent of all units owned and operated by VHA are located in this zip code. Seventy-one percent of workforce housing units are concentrated in the Vancouver zip codes of 98660, 98683, 98682 and 98685. About 70 percent of transitional/shelter units are located in the Vancouver zip code of 98663. About half of the housing with services are located in Hazel Del North, an unincorporated suburb north of Vancouver. Subsidized units are mainly located in Vancouver with the exception of 11.5 percent in Battle Ground and 7.3 percent in Camas.

**Figure IV-1.  
Number and Location of  
Public Housing Units, Clark County,  
2011**

Zip Code	Public Housing Units	
	Number	Percent
98607	14	3.7%
98642	9	2.4
98660	33	8.7
98661	249	65.7
98663	4	1.1
98664	10	2.6
98665	9	2.4
98682	20	5.3
98683	12	3.2
98684	19	5.0
<b>TOTAL</b>	<b>379</b>	

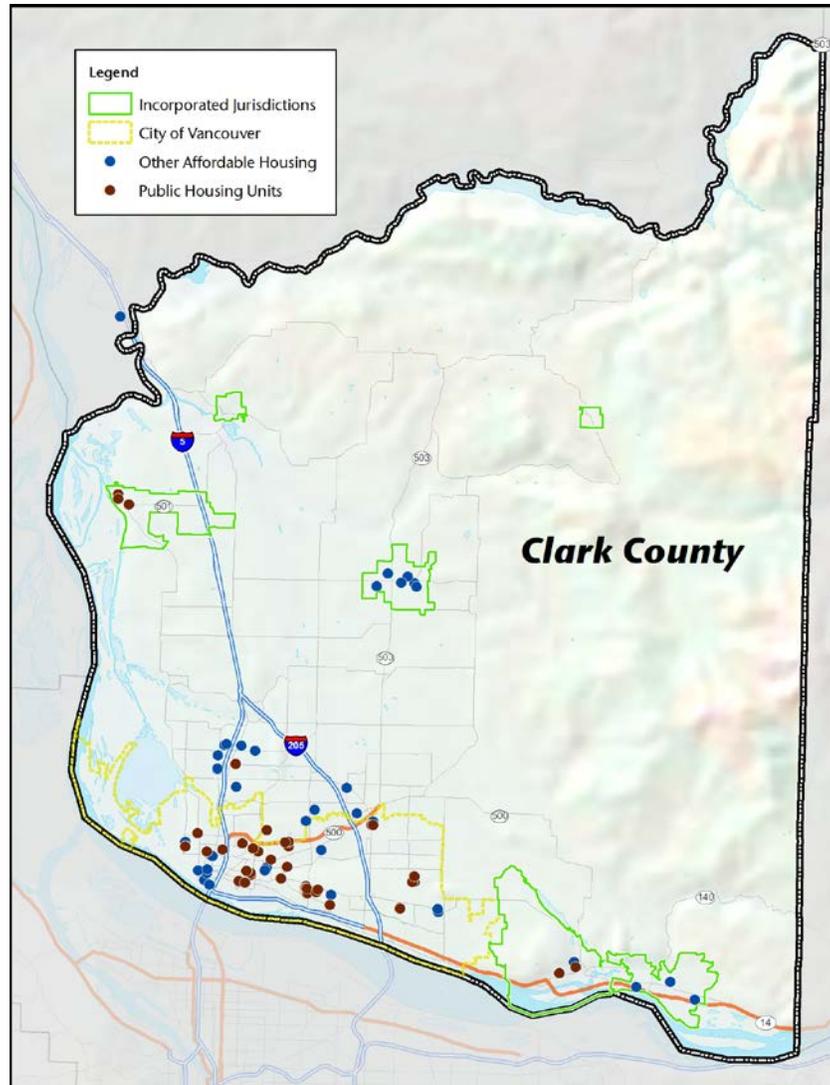
Source: Vancouver Housing Authority.

Figure IV-2 shows a more specific geographic location of the public housing units. Most are located in the central portion of Vancouver.

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

**Figure IV-2.  
Public Housing Units,  
Subsidized and  
Affordable Rental  
Units, Clark County,  
2011**

Source:  
Vancouver Housing Authority.



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

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

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

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

Preferences for residents applying for VHA housing and vouchers include:

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

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

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

Figure IV-3 summarizes the characteristics of the VHA.

**Figure IV-3.**  
**Vancouver Housing Authority, Summary**

HUD Performance Designation	Housing Choice Vouchers			Public Housing		
	Wait List Status	Wait List Length	Preferences	Wait List Status	Wait List Length	Preferences
High Performing	Closed	2,000 families, currently placing those put on list in 2004	Graduates from transitional programs, people involuntarily displaced, elderly, disabled and families with children	Varies	3-4 bedroom units, 1-2 years; 1 bedroom units, 10 years	Graduates from transitional programs, people involuntarily displaced, elderly, disabled and families with children

Source: Vancouver Housing Authority.

## Other Policies

Sale/conversion of public housing. The VHA is currently selling many of their owned and operated single-family public housing units. Due to reduced HUD capital funds, low per unit operating funds (relative to Section 8 vouchers), the VHA is selling public housing units and offering the occupants tenant and project based vouchers. The VHA is only selling single-family units, which are scattered and hard to manage efficiently. This transition from public housing to Section 8 housing choice vouchers

assists the VHA financially from the sale of the properties while providing more assistance per household (e.g., \$250 per unit for a public housing unit v. \$500 per family for a housing voucher).

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

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

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

### **County HOME Project Selection De-concentration Criteria**

The Clark County Community Housing and Development Unit of the Department of Community Services select HOME projects through an annual competitive application process. Points are awarded for various aspects of a proposed project including income levels of households in the proposed project area. Projects located in census tracts that do not have a concentration of low-moderate income population based on HUD income data receive additional points. Census tracts with less than 31% low-moderate income population receive five points; census tracts with 31% - 50% low-moderate income population receive three points.

### **Land Use Policy Review**

BBC reviewed Clark County's codes, the county's and cities' Comprehensive Plans and development fees to assess potential fair housing concerns, as well as policies that encourage or discourage the development of affordable housing.<sup>1</sup> This section summarizes the findings from this review.

*Does the code definition of "family" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?* No, Clark County defines family and household as individuals customarily living together as a single housekeeping unit and using common cooking facilities related by genetics, adoption, or marriage, or a group of not more than six (6) unrelated individuals.

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<sup>1</sup> The review of Vancouver's land use policies and zoning regulations appears in the city's separate AI.

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

*Zoning Regulation Impediment: Does the Code definition of "disability" the same as the Fair Housing Act? The county code does not define "disability".*

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

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

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

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

*Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants? No.*

*Does the zoning ordinance address mixed uses? Yes, the code contains regulations on permitted mixed use properties.*

*How are the residential land uses discussed? The county code divides residential zones between two districts: single family low-density and the medium and higher residential district. In the single family district, detached units, single accessory dwelling units and duplexes on corner lots are permitted. There are some uses, such as bed and breakfast units, schools and churches that are permitted conditionally in the single family district.*

In the medium and high density districts, the code permits higher density multifamily developments and boarding houses as well as a mixture of uses including office and retail. The R1-6 and R1-5 districts are intended to provide for higher densities where a full range of community services and facilities are present or will be present at the time of development.

*What standards apply? The county code includes a comprehensive list of permitted and conditional uses within zoning districts which include development guidelines regarding density, landscaping, setbacks and building code.*

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

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

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

*Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities? No, there is no mention of accessibility requirements in the zoning code. However, the county provides information sources regarding ADA compliance and reasonable accommodation for services, programs and activities in the county. There is no direct mention of housing compliance.*

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

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

*Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking. Handicapped parking is not discussed in the multifamily zoning district regulations. The zoning code only refers to handicapped parking enforcement: handicapped parking shall be identified by a sign advising drivers that such area or parking stall shall be used for handicapped parking only, and noting that unauthorized vehicles need not be cited but will be towed and impounded at the owners' expense.*

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

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

*How are "special group residential housing" defined in the jurisdiction zoning code?*

The county defines: "Congregate care facility" means any home or private facility maintained and operated for the care, boarding, housing, and training of six or more handicapped persons who require assistance in taking responsibility for themselves and guidance as necessary in activities of daily living, social and recreational activities and opportunities. A congregate care facility does not provide medical, nursing or social casework services.

*Does the jurisdiction's planning and building codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the*

*Fair Housing Act?* Accessibility is not specifically mentioned in the zoning code, but Clark County has an ADA Compliance Office. *Is there any provision for monitoring compliance?* The ADA Compliance Office ensures that businesses are following the policies of ADA and county services, programs and activities are available to all citizens.

The State of Washington Administrative Code contains regulations relating to accessibility including the standards of barrier free facilities, Fair Housing Amendment Act of 1988, the Americans with Disabilities Act of 1990, the Rehabilitation Act of 1973 and the Architectural Barrier Act. The code requires that any changes to a building must be in accordance with accessibility measures outlined by the state and federal law.

**Comprehensive Plans.** In 1990, the Washington State Legislature adopted the Growth Management Act (GMA). The purpose of the GMA is to control and sustain growth in the state through local government planning. The GMA aims to protect natural resources and environmentally sensitive areas, establish urban growth boundaries, create comprehensive plans and implement the plans through capital investments and development regulations. The act also includes the Growth Management Hearings Board to hear cases of non-compliance with the GMA and local planning policy.

According to the GMA, all State of Washington jurisdictions' Comprehensive Plans must include: "A housing element ensuring the vitality and character of established residential neighborhoods that: (a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth; (b) includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single family residences; (c) identifies sufficient land for housing, including, but not limited to, government-assisted housing, housing for low income families, manufactured housing, multifamily housing, and group homes and foster care facilities; and (d) makes adequate provisions for existing and projected needs of all economic segments of the community."

Seven of the eight incorporated areas in Clark County (including Clark County) have completed and adopted a Comprehensive Plan. The Plans have a number of components that encourage fair housing development by offering a variety of housing types, promoting a mix of uses in certain areas and other planning policies.

The following figure shows the year the most recent Comprehensive Plan was adopted by the jurisdictions, along with whether the Plans address diverse housing types, mixed uses and include a plan to implement the goals and objectives.

**Figure IV-4.  
Comprehensive Plans, Clark County**

	Year Adopted	Promotes Diverse Types of Housing?	Supports Mixed-use?	Allows Accessory Dwelling Units?	Discusses Planned/ Clustered Developments?	Includes Action Plan/Implementation?
Clark County	2007	Yes	Yes	Yes	Yes	Yes, includes policies
Battle Ground	1995/2010	Yes	Yes	Yes	Yes	Includes goal and objectives
Camas	2004	Yes	Yes	Yes	Yes	Yes, includes goals, policies & strategies
La Center	2009	Yes	Yes	N/A	N/A	Yes, via municipal code
Ridgefield	2010	Yes	Yes	Yes	Yes	Yes, includes measurable policies
Washougal	2003	Yes	No	Yes	Yes	Yes, includes policies
Yacolt	N/A	N/A	N/A	N/A	N/A	N/A
Vancouver	2011	Yes	Yes	Yes	Yes	Yes, includes measurable policies

Note: Clark County Plan includes 2008, 2009 and 2010 amendments .Battle Ground Comp Plan, Adopted 1995, updated 2010. La Center Comp Plan is only a map and the municipal code accompanies the map. Ridgefield, the 2010 plan updates the 2005 and 2008 plans. Vancouver Comp Plan 2011 Draft is under review.

Source: Clark County website and municipal websites of Battle Ground, Camas, La Center, Ridgefield, Washougal, Yacolt and Vancouver.

The following section outlines the specific goals, objectives or policies present in each jurisdiction’s Comprehensive Plan for diverse housing types and mixed land use.

**Diverse housing types:**

The following outlines the goals and policies from each jurisdiction’s Comprehensive Plan regarding diverse housing types. If the jurisdictions goals are not listed, they are not contained in the Comprehensive Plan (or, in Yacolt’s case, the city does not have a Comprehensive Plan).

Battle Ground and Ridgefield, in particular, have very inclusive housing goals that address the needs of persons with disabilities. Washougal has a white paper available on its website that discusses the benefits of cottage housing.

**CLARK COUNTY**

*Framework Plan Policy 2.1.0:*

Communities, urban and rural, should contain a diversity of housing types to enable citizens from a wide range of economic levels and age groups to live within its boundaries and to ensure an adequate supply of affordable and attainable housing. Housing options available in the county include single family neighborhoods and mixed use neighborhoods (e.g., housing above commercial storefronts, traditional

grid single family neighborhoods, townhouses, multifamily developments, accessory units, boarding homes, cooperative housing, and congregate housing).

#### CITY OF BATTLE GROUND

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*Housing Goal 1:* The City will encourage a range of housing types and prices to meet the needs of the citizens of Battle Ground.

**Objectives:**

*Policy HO1.1:* The City will provide the opportunity to develop an adequate supply of housing to meet the needs and preferences of Battle ground's households now and in the future.

*Policy HO1.2:* The City will support the creation of a variety of housing types that are attractive and affordable to potential homebuyers at all income levels.

*Policy HO1.3:* The City will work to balance density goals and housing type targets with other City goals and objectives.

*Policy HO 1.6:* The City will treat residential structures occupied by persons with handicaps the same as similar residential structures occupied by a family or other unrelated individuals.

*Policy HO 1.7:* The City will treat residential structures occupied by group care for children that meets the definition of "familial status" the same as similar residential structures occupied by a family or other unrelated individuals.

#### CITY OF CAMAS

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*Housing Goal 1:* To increase opportunities in housing diversity by promoting the creative and innovative use of land designated for residential and commercial use.

*Housing Goal 2:* To consider the impact of new regulations on the cost or supply of housing.

*Housing Goal 3:* To encourage a variety of residential site planning alternatives that increase housing opportunities on residential or commercial land (where appropriately zoned) in a manner that complements or enhances the character of existing development, protects sensitive environmental features, and considers transit corridors and land use patterns.

*Policy HO-4U:* Encourage new residential development to achieve a substantial portion of the maximum density allowed on the net buildable acreage.

- Policy HO-5:* Provide opportunities and incentives through the Planned Residential Development (PRD) and Planned Unit Development (PUD) process for a variety of housing types and site planning techniques that can achieve the maximum housing potential of the site.
- Policy HO-7:* Allow accessory dwelling units in single family houses subject to specific development, design, and owner occupancy standards.
- Policy HO-8:* Encourage in-fill development on vacant or under-utilized sites, subject to design review guidelines, that have adequate urban services and ensure that the development is compatible with the surrounding neighborhoods.

#### CITY OF RIDGEFIELD

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- Policy HO-4:* *Housing options*
- Maintain a continuous and adequate supply of residential land to meet long-range multiple-family and single family housing needs, as well as all economic segments, within the RUGA. Urban residential development shall be preceded by annexation. No single type of housing should comprise over 75% of new development.
- Policy HO-5:* *Housing for special needs*
- Encourage self-determination and independence among individuals with special needs. City development regulations shall treat households with special needs equivalent to the general population and shall not discriminate against these households. Land use regulations shall address only land use impacts (traffic, noise, appearance, etc.) of housing for people with special needs, without consideration for the special circumstances of special needs households.

#### CITY OF WASHOUGAL

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- Housing Goal 1:* To provide for a range of housing types and values to meet the needs of all citizens of Washougal.
- Policy 1-A:* The City will zone a sufficient supply of public land for residential use which is supported by public services...
- Policy 1-B:* The City will designate no more than 75% of the residential land for new development for single family housing.
- Policy 1-C:* The City will provide for 25% of the housing supply for multifamily housing.

*Mixed-use:* The following outlines the goals and policies from each jurisdiction's Comprehensive Plan regarding mixed-use zoning code.

#### CLARK COUNTY

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*Economic Development 9.1.2:* Revise commercial and industrial development standards to allow for mixed use developments and ensure compatibility with nearby residential and public land uses.

*Community Design 10.1.3:* Establish development standards to encourage mixed use developments in urban and rural centers, while providing buffering for each use from the adverse effects of the other.

#### CITY OF BATTLE GROUND

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*Livability Goal 1:* An integrated mix of uses

***Objectives:***

*LO1.1:* Encourage a lively and active downtown area through a mix of uses.

*LO1.2:* Encourage a mix of uses in new neighborhood centers that serve the local neighborhood and create a unique neighborhood identity.

*LO1.3:* Protect and strengthen existing mixed-use areas.

*LO1.4:* Encourage development in new mixed-use areas to have compatible building orientation.

*LO1.5:* Endeavor to promote the placement of new mixed-use development in a manner that creates compatibility and support among uses.

#### CITY OF CAMAS

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*Policy HO-6:* Encourage mixed-use housing opportunities in residential /commercial settings throughout the city.

*Strategy HO-5:* Ensure that mixed-use development complements and enhances the character of the surrounding residential and commercial uses. (Policy HO-5 and Policy HO-6)

CITY OF LA CENTER –

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**Municipal Code: 18.150.040, Mixed-use (MX) district**

**Purpose:** The mixed-use (MX) district requires mixed-use developments to provide the community with a mix of mutually supporting retail, service, office and medium or high density residential uses. The zone is designed to promote cohesive site planning and design that integrates and interconnects two or more land uses into a development that is mutually supportive. It can provide incentives to develop a higher density, active, urban environment than generally would be found in a suburban community.

CITY OF RIDGEFIELD –

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**Land Use Policy-5 – Mixed-use development**

Facilitate development that combines multiple uses in single buildings or integrated sites. Target areas for mixed use development include the Lake River waterfront and the central city core.

Minimum lot size per unit. A key element of the zoning/development code to facilitate fair and balanced housing choice is the minimum lot size per unit requirement. Zoning codes should, ideally, include minimum lot requirements that are feasible for all types of developments. Overly large lot requirements may discourage or hinder affordable housing development. Jurisdictions must also have enough vacant land zoned for a diversity of housing types.

The lot requirements for each residential zoning district according to Clark County Code are shown below.

**Figure IV-5.  
Clark County Lot Size Requirements**

Zoning District	Residential Density for PUDs (d.u./acre)	Minimum Lot Area (sq. ft.)	Maximum Average Lot Area (sq. ft.)	Average Minimum Lot Width (feet)	Average Minimum Lot Depth (feet)
R1-20	2.2 to 1.4	20,000	30,000	100	10
R1-10	4.4 to 2.9	10,000	15,000	80	90
R1-7.5	5.8 to 4.1	7,500	10,500	50	90
R1-6	7.3 to 5.1	Average 6,000; 5,000 per duplex unit	8,500	50	90
R1-5	8.7 to 6.2	Average 5,000; 4,000 per duplex unit	7,000	45	65

Source: Clark County.

According to the Clark County Comprehensive Plan, minimum density for single family should average eight dwelling units per acre within the Vancouver urban growth area, six units per acre with the Battle Ground, Camas, Ridgefield, and Washougal urban growth area, and four units per acre within the La Center urban growth area.

To increase the range and affordability of housing, the county's 20-Year Plan has a general goal that no more than 75 percent of new housing stock shall be of a single product (e.g., single family detached residential).

Minimum lot sizes. Figure IV-6 presents the minimum lot size by density level for the jurisdictions. All jurisdictions offer a variety of lot size requirements, which facilitates a diversity of housing types.

**Figure IV-6.**  
**Jurisdiction Lot Size Requirements**

Jurisdiction	Density Level			
	<i>Very Low</i>	<i>Low</i>	<i>Medium</i>	<i>High</i>
Minimum Lot Size (square feet)				
Clark County	20,000	10,000	6,000	4,000
Battle Ground	8,700	6,200	4,300	2,000
Camas	16,000	7,000	5,000	1,800
La Center	7,500	6,000	3,000	1,400
Ridgefield	8,500	7,500	5,000	2,000
Washougal	15,000	10,000	7,500	5,000

Source: Zoning code and land use regulations of individual cities.

Development impact fees. Development fees vary by jurisdiction with Yacolt having the lowest fees and Camas having some of the highest fees.

**Figure IV-7.  
Development Impact Fees, by Jurisdiction**

	<b>School Area Impact Fees</b>		<b>Annual Review Fee (for zoning changes)</b>	
	<i>Single Family Impact Fee</i>	<i>Multifamily Impact Fee</i>	<i>Combined Annual Review<sup>1</sup></i>	<i>Environmental Checklist Review</i>
Unincorporated Clark County	\$5,497.00	\$2,793.00	\$8,113.00	\$1,987.00
Battle Ground	6,104.00	1,813.00	8,113.00	1,987.00
Camas	5,528.00	3,269.00	8,113.00	1,987.00
La Center	6,991.00	2,626.00	8,113.00	1,987.00
Ridgefield	4,490.00	2,314.00	8,113.00	1,987.00
Washougal	5,857.00	4,795.00	8,113.00	1,987.00
Yacolt	2,500.00	1,300.00	8,113.00	1,987.00
Vancouver	4,117.00	3,030.49	8,113.00	1,987.00

	<b>Traffic Impact Fees</b>		<b>Park Impact Fee</b>	
	<i>Single Family Impact Fee</i>	<i>Multifamily Impact Fee</i>	<i>Single Family Impact Fee</i>	<i>Multifamily Impact Fee</i>
Unincorporated Clark County	-	-	\$228.50	\$166.98
Battle Ground	2,802.00	1,904.90	2,770.46	2,615.33
Camas	3,321.00	2,181.00	2,290.00	1,717.00
La Center	593.82	412.63	-	-
Ridgefield	2,478.63	1,517.74	1,933.09	1,533.14
Washougal	2,741.33	1,904.90	1,880.00	1,880.00
Yacolt	-	-	-	-
Vancouver	-	-	1,525.80	1,114.91

Note: 1) Includes rezones in conjunction with annual review; Unincorporated Clark County fees are calculated as an average of unincorporated area fees.

Source: Clark County, Washington and Cities of Battle Ground, Camas, La Center, Ridgefield, Washougal, Yacolt and Vancouver, WA.

Housing for persons with disabilities. The Clark County Comprehensive Plan contains a special section on “Special Needs Housing.” The section describes the county’s priority to encourage housing opportunities for individuals with special needs. The Plan calls for all cities and communities to not discriminate or hinder this population through land use regulations. The Plan calls for locational choices and accessibility accommodations.

The Clark County Consolidated Housing and Community Development Plan defines “Adult family home” as a single family dwelling or duplex licensed as such by the State of Washington, housing a maximum of six (6) residents where staff assumes

the responsibility for the safety and well-being of the residents. Care is provided by staff and may include provision of meals, laundry, and assistance with activities of daily living, and may include nursing care. Staff may or may not reside in the same dwelling. "Family" means individuals customarily living together as a single housekeeping unit and using common cooking facilities related by genetics, adoption, or marriage, or a group of not more than six (6) unrelated individuals.

Public transportation. C-TRAN is the public transit provider in the Vancouver. The service provides 19 local routes in Vancouver and Clark County and seven express commuter routes into Downtown Portland. There are also 4 routes that connect with the Portland MAX light rail network and a reservation based connector service to other cities in Clark County. The routes follow most major roads in Vancouver and connect major employment centers, hospitals and public schools. The highest concentrations of routes are in and around Downtown Vancouver. The service provides "Park and Ride" centers for suburban commuters to access the downtown region.

Individual adult fares are \$1.55, day passes are \$3.75 and monthly passes are \$54 for the C-Zone pass and \$90 for the All-Zone pass. Significant discounts are offered to children, honored (seniors and those with disabilities), and Medicare cardholders. There are also discounts offered to low income earners. All recipients of discounts must qualify and have proper ID. C-TRAN offers discount passes for students and faculty of schools. There are classes available to educate those in how to use the public bus system, read maps and bus schedules.

The citizens of Clark Country recently adopted C-Tran Proposition No. 1, which authorizes an increase in the sales and use tax by 0.2 percent. C-Tran is looking to the new tax revenue and cost cutting to maintain an operating budget to provide service to the communities of Clark County. Because of the recession, an elimination of State matching funds, and increased demand for transit services, C-Tran was bracing for a 35 percent cut of bus and paratransit services. The measure will provide the necessary funding to support bus service into the future.

**SECTION V:**  
**Fair Housing Impediments and Action Plan**

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## **SECTION V: Fair Housing Impediments and Action Plan**

This section discusses the fair housing impediments identified through the research conducted for the Clark County Analysis of Impediments to Fair Housing Choice (AI). It begins with an overview of the findings from the AI research, identifies the fair housing impediments and concludes with a recommended Fair Housing Action Plan (FHAP).

### **AI Findings**

The research conducted for the Clark County AI found few fair housing concerns and many positive practices related to fair housing within the county. These positive findings include:

Housing goals. Clark County and the jurisdictions within the county have land use and zoning practices and planning goals in place to mitigate fair housing barriers and encourage a balance of housing choices. In particular:

- Clark County has an ADA Compliance Office which works to ensure that businesses are following the policies of ADA and that county services, programs and activities are available to all citizens.
- Almost all jurisdictions have adopted Comprehensive Plans recently that have goals for diverse housing types. Battle Ground and Ridgefield, in particular, have very inclusive housing goals that address the needs of persons with disabilities. Washougal has a white paper available on its website that discusses the benefits of cottage housing.
- All jurisdictions offer a variety of minimum lot size requirements, which facilitates a diversity of housing types.

In addition, the Vancouver Housing Authority (VHA)—the main provider of affordable rental housing in Clark County—has policies and practices that are easy to understand and fair. In particular, the VHA offers fair housing protections that exceed those of the federal Fair Housing Act.

Few concentrated areas. An analysis of racial and ethnic concentrations found very few Census tracts in the county with higher than average proportions of minorities. The areas with higher-than-average minority populations are almost all located in Vancouver.

The dissimilarity index—a measure of the “evenness” of the geographic distribution of two different population groups—in Clark County is low, although higher than in Vancouver. The index ranges from 0 to 1, with a value of 1 representing full concentration. Clark County’s dissimilarity indexes were .20 (White v. Non-White

comparison), .22 (Non-Hispanic v. Hispanic), .27 (White v. Asian) and .28 (White v. African American).

These compare to Vancouver's dissimilarity indexes of .12 (White v. Non-White comparison), .17 (Non-Hispanic v. Hispanic), .25 (White v. Asian comparison) and .16 (White v. African American).

Low volume of complaints and legal cases. Since January 2006, a total of 61 complaints were filed with HUD by Clark County residents; 59 of these were filed by residents of Vancouver. The complaints were largely filed on the basis of disability (38% of all complaints) and race discrimination (28%). About half of the complaints were dismissed because they were not found to have a reasonable cause; one in six was settled.

As part of the Clark County Aging Readiness Plan, adopted by the Board of County Commissioners on February 7, 2012, it was recommended that the county develop a Universal Design Information Guide. Universal Design is a framework for the design of places, things, information, communication and policy to be usable by the widest range of people operating in the widest range of situations without special or separate design.

The Plan also calls for the incorporation of universal design principals in Clark County's Building Code review process and other building activities. A Commission on Aging will prioritize the various universal design recommendations and develop an implementation schedule.

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

### **Fair Housing Impediments**

There exist, however, opportunities to improve fair housing conditions in Clark County. The research conducted for this study found the following impediments to fair housing choice:

Stakeholders perceive lack of transit options for low income, disabled and senior residents as a fair housing barrier. In addition to income levels and poor credit histories, stakeholders rated the lack of transit options for low income, disabled and senior residents as very high. In their open-ended comments in the fair housing survey, stakeholders expressed a need for enhanced connectivity between Vancouver and destinations within Clark County.

Stakeholders' specific comments about public transit needs include:

- "Public transit is decent in city of Vancouver, poor in outer areas."
- "Multiple locations have no service, limiting access to get folks to work and therefore restricting where they can live."

- “Frequent bus services connecting the Vancouver downtown with outlying areas of Clark County.”
- “Low cost bus passes for low income.”
- “Medical appointment transportation assistance that is easier to access.”

**Why is this a barrier?** Limited transit may create an impediment to fair housing choice because it could have the effect of preventing certain protected classes from accessing housing, employment, services and amenities at the same level as other residents.

Information about fair housing is difficult to find; as such, fair housing knowledge may be low. Few of the Clark County jurisdictions included in the AI have housing information on their websites and, other than Clark County, none have information about fair housing or who to contact if a resident has fair housing concerns. As discussed in the Fair Housing Action Plan below, this variability creates an opportunity to improve the quality and consistency of fair housing information in the county.

In particular:

*Clark County* lists fair housing protected classes and fair housing contact organizations as part of its frequently asked questions (FAQ) under the CDBG program webpage. The information is appropriate and clear; however, it is hard to find. The fair housing contact information appears at the end of questions on the CDBG FAQ page (<http://www.clark.wa.gov/cdbg/faq.html>).

*Battle Ground*. Battle Ground does not have fair housing information on its website. The city does, however, articulate its goals related to housing provision on the planning department’s website:

[http://www.cityofbg.org/departments/comm\\_dev\\_plan\\_info.php](http://www.cityofbg.org/departments/comm_dev_plan_info.php). These include:

- As the population of Battle Ground grows and ages, housing and services should be available so people and families can choose to age in place.
- New housing developments offer a range of options and locations and help create new neighborhoods, while in-fill housing is sensitive to existing housing types and neighborhood character.

*Camas*. Searches on Camas’ home page for “housing discrimination” or even “housing” return an error message. The city has a “complaints” webpage that contains an option to send comments to city departments, as well as commonly requested forms.

*La Center*. La Center’s website is attractive and easy to navigate; however, it lacks information on housing or community services (<http://www.ci.lacenter.wa.us/resources.html>). The closest link is found on the

Resources page under Community Resources, Human Services Council. This live link takes the user to a webpage on pain relief (<http://www.irccv.org/>).

*Ridgefield.* A search for “housing discrimination” on Ridgefield’s website returns housing policy documents and a document on non-discrimination in athletics.

*Washougal.* Similar to Battle Ground, Washougal has information about the city’s housing vision on its Our City webpage: ([http://www.cityofwashougal.us/index.php?option=com\\_content&view=article&id=99:our-city&catid=44:community-development&Itemid=103](http://www.cityofwashougal.us/index.php?option=com_content&view=article&id=99:our-city&catid=44:community-development&Itemid=103)).

*Yacolt* does not have fair housing on its webpage.

**Why is this a barrier?** Lack of fair housing information can become an impediment if such information is not equally available to all protected classes and/or if the lack of information prevents alleged victims from enforcing their fair housing rights.

Rental costs are high and Vancouver has a disproportionate number of subsidized rental units. The 2010 Census data reports a median rent, including utilities, of \$846 in the county. In Battle Ground, the median gross rent is \$1,029. Except in Yacolt, renters must earn more than \$30,000 to afford the median-priced rental unit.

An examination of the geographic location of the county’s public housing units and other subsidized housing found that two-thirds are located within one zip code within the City of Vancouver. As Figure IV-2 demonstrated, there are few affordable housing developments outside of Vancouver and its immediate environs.

**Why is this a barrier?** Lack of affordable housing and concentrations of affordable housing in particular parts of a city or county can create fair housing barriers if the concentrations disproportionately affect protected classes and restrict their housing choices.

Hispanic and, to a lesser extent, Asian mortgage loan applicants are denied loans at much higher rates than Whites. Although the number of mortgage loan transactions is small relative to the county overall, in Battle Ground, Camas and La Center, Hispanic and Asian applicants were denied loans at much higher rates than White applicants. These cities also have some of the highest housing costs in the county.

- In Battle Ground, Asians were denied loans 30 percent of the time and Hispanics were denied loans 37 percent of the time. This compares to 16 percent for Whites—or denial gaps of 14 and 21 percentage points respectively.
- In Camas, Hispanics were denied loans 26 percent of the time. This compares to 14 percent for Whites, or a denial gap of 12 percentage points.

- In La Center, Asians were denied loans 27 percent of the time and Hispanics were denied loans 33 percent of the time. This compares to 19 percent for Whites—or denial gaps of 10 and 14 percentage points respectively.

**Why is this a barrier?** There are many reasons why minorities may have higher mortgage loan denial rates than non-minorities. The most common reasons are differences in credit scores, higher debt to income ratios and lack of credit history. Yet patterns of differences in high denials, especially in certain neighborhoods, can signal disinvestment in minority-concentrated areas, as well as constrain housing choices for minorities.

### **Fair Housing Action Plan**

**ACTION ITEM 1** – Improve and make more uniform fair housing information on county and jurisdictional websites.

*Clark County.* Clark County should develop a fair housing webpage to which the jurisdictions can provide links.

The page should describe fair housing laws and residents' rights and provide links to websites for more information and filing complaints (e.g., link to the Washington State Human Rights Commission, Fair Housing Council of Oregon and HUD). All of this information should be provided in Spanish and English. We also recommend a Frequently Asked Questions section with answers to questions such as "If I am not a U.S. citizen but I feel that I have been discriminated against, what can I do?"

*Battle Ground.* Battle Ground should have fair housing information and links, similar to Clark County's, under the Human Services heading of its Community Resources webpage at <http://www.cityofbg.org/welcome/contacts.php>

*Camas.* The city has a "complaints" webpage that contains an option to send comments to city departments, as well as commonly requested forms. This would be a good page in which to place fair housing information, with phone numbers and links to fair housing agencies with which residents can file complaints.

*La Center.* Fair housing information and links similar to Clark County's should be added under the Community Resources list.

*Ridgefield.* Fair housing information and links should be added to the FAQ webpage (<http://www.ci.ridgefield.wa.us/resources/faqs.htm>)

*Washougal.* Fair housing information, with phone numbers and links to fair housing agencies with which residents can file complaints should be added under the Community Development links menu.

*Yacolt* has a Community Links page to which fair housing information and links, (again similar to Clark County's) should be added

[http://townofyacolt.com/index.php?option=com\\_content&view=article&id=110&Itemid=18](http://townofyacolt.com/index.php?option=com_content&view=article&id=110&Itemid=18)

**ACTION ITEM 2** – Establish fair housing points of contact within jurisdictions and educate landlords about fair housing. Clark County should take the lead on publicizing and sponsoring training for the small jurisdictions within the county, as needed. Each jurisdiction should have a designated individual (“fair housing specialist”) to whom residents can be referred when they call with fair housing concerns. This individual should keep abreast of fair housing topics and attend regional fair housing trainings as they are offered.

In addition, the county should offer fair housing education and training sessions for landlords at least two times per year to increase provider understanding of fair housing laws and be a resource to the private sector on fair housing concerns.

**ACTION ITEM 3** – Increase the stock of affordable housing countywide, especially deeply subsidized rentals. As the housing market improves, the jurisdictions within the county, as well as Clark County, should seek opportunities to diversify their housing stock and create more opportunities for residents of all income levels to reside in their communities. This is consistent with the goals in many of the jurisdictions’ Comprehensive Plans.

This action item is particularly important for Battle Ground, which has the most expensive median rent in the county and Camas, La Center and Ridgefield, which have the most expensive for sale housing.

To encourage the development of affordable housing in high cost areas, the most expensive jurisdictions within the county should offer fee waivers and other types of development incentives (e.g., density bonuses) for the production of affordable housing. Battle Ground, Camas and Washougal all have development fees that are about \$9,000 higher for single family unit development than Yacolt, the jurisdiction with the lowest fees.

**ACTION ITEM 4** – Monitor lending disparities. In the cities of Battle Ground, Camas and La Center, Asians and Hispanics were denied mortgage loans at much higher rates than were White applicants.

The county has supported the Community Housing Resource Center’s (CHRC) financial literacy programs in the past and should continue these efforts to help narrow the gap in lending disparities. CHRC offers Finance Smart classes, which work with consumers to repair credit, help them to become bankable and develop solid financial management skills. The Center also offers Mortgage Default Prevention and Homebuyer Education workshops.

The jurisdictions and county should also monitor the disparities over time and, as needed, engage local lenders and community leaders in discussions about the reasons for the denials.

**ACTION ITEM 5** – Examine transit needs. Clark County should examine the gaps in public transit outside of Vancouver, especially the needs of persons with disabilities, seniors and low income residents. If significant gaps are found, the county should explore methods to address the gaps and incorporate public transit improvements into its next six-year transportation plan.

The following exhibit summarizes the Clark County Fair Housing Action Plan, including the program years in which the action items will be accomplished. The Accomplishments columns will be filled in as the action items are completed.

**Figure V-1.**  
**Fair Housing Action Plan Matrix, Goals and Accomplishments, Clark County, 2012 – 2016**

Action Item	Impediments Addressed	Activities	Goals					Accomplishments					
			2012	2013	2014	2015	2016	2012	2013	2014	2015	2016	
1. Improve and make more uniform fair housing information on county and jurisdiction websites.	<ul style="list-style-type: none"> <li>■ Information about fair housing is difficult to find</li> <li>■ Some jurisdictional websites do not contain fair housing information</li> </ul>	<ul style="list-style-type: none"> <li>• Amend websites to contain fair housing information recommended in Action Plan</li> </ul>	✓										
2. Establish fair housing points of contact. Educate landlords about fair housing.	<ul style="list-style-type: none"> <li>■ Information about fair housing is difficult to find</li> <li>■ Fair housing knowledge may be low due to lack of information</li> </ul>	<ul style="list-style-type: none"> <li>• County should be more pro active in fair housing information and educational efforts.</li> <li>• County and jurisdictions should designate a fair housing specialist who attends training</li> <li>• County should sponsor fair housing trainings for landlords to increase awareness</li> <li>• Investigate Testing</li> </ul>	✓	✓	✓	✓	✓						
3. Explore opportunities to increase the stock of affordable housing countywide, especially deeply subsidized rentals.	<ul style="list-style-type: none"> <li>■ Rental costs are high</li> <li>■ Maintain geographically diverse housing</li> </ul>	<ul style="list-style-type: none"> <li>• Investigate fee waivers and development incentives for construction of subsidized rentals</li> <li>• Investigate an affordable housing location policy</li> </ul>	✓	✓	✓	✓	✓						

Source: BBC Research & Consulting.

**Figure V-1. (CONTINUED)**

**Fair Housing Action Plan Matrix, Goals and Accomplishments, Clark County, 2012 – 2016**

Action Item	Impediments Addressed	Activities	Goals					Accomplishments				
			2012	2013	2014	2015	2016	2012	2013	2014	2015	2016
4. Monitor lending disparities.	<ul style="list-style-type: none"> <li>■ Hispanic and, to a lesser extent, Asian loan applicants have higher denial rates than non-Hispanic Whites</li> </ul>	<ul style="list-style-type: none"> <li>• Monitor lending disparities between Hispanic, Asian and White applicants for mortgage loans.</li> </ul>	✓		✓		✓					
		<ul style="list-style-type: none"> <li>• Sponsor financial literacy workshops targeted to borrowers having difficulty accessing credit</li> </ul>			✓	✓	✓	✓				
5. Examine transit needs.	<ul style="list-style-type: none"> <li>■ Stakeholders perceive lack of transit as a fair housing barrier.</li> </ul>	<ul style="list-style-type: none"> <li>• Examine gaps in public transit for protected classes</li> </ul>			✓							
		<ul style="list-style-type: none"> <li>• Explore means to address gaps in public transportation</li> </ul>				✓	✓					

Source: BBC Research & Consulting