

TRI-CITIES ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

2010-2015

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EXECUTIVE SUMMARY

In 1968 the US Congress passed the Fair Housing Amendments of the Civil Rights Act of 1968 to provide protection against discriminatory practices in housing. Specifically, they required federal governmental agencies to administer their programs in ways which prevent discrimination in housing and encourage actions and policies that affirmatively further fair housing.

The cities of Richland, Kennewick, and Pasco currently operate, individually and cooperatively, Federal programs administered by the US Department of Housing and Urban Development (HUD) to provide community development and housing assistance to low and moderate income persons. As a condition to receiving annual federal grants under the Community Development Block Grant Program and the HOME Program, the cities are required to periodically undertake steps that affirmatively further fair housing as follows:

- Conduct an Analysis of Impediments to Fair Housing,
- Take appropriate action to overcome the effects of impediments identified through that analysis, and
- Maintain records reflecting the analysis and actions.

This report provides the cities with an assessment of the impediments to fair housing found in the area and recommends steps to overcome the impacts of the identified impediments. It is intended to be a tool to the cities in working with other agencies, and organizations, including the banking and real estate industries toward elimination of unfair housing practices.

THE ASSESSMENT PROCESS

During the fall and winter of 2010 consultants hired by the three cities conducted the assessment using several sources of information and input on fair housing practices and issues in the Tri-cities area.

Basic research was conducted on the characteristics of the populations protected by the Fair Housing Laws, housing needs and other demographic data pertinent to the community. Data on housing and demographics of the community was obtained from the US Census, the Washington State Office of Finance Management, the US Department of Housing and Urban Development (HUD), the National Low Income Housing Coalition, and the National Fair Housing Alliance. In addition, data and analyses in the recently adopted Tri-cities Consolidated Plan provided a base for understanding both local conditions and trends. Local laws, policies and practices were reviewed as well as public data and records on housing complaints filed over the past five years. Finally, interviews with representatives and staff of key private and public sector organizations (as noted in the Appendix) were a critical component in identifying issues and exploring specific recommendations.

TRI-CITIES POPULATION AND HOUSING

The Tri-Cities has a very diverse population, with marked differences between the cities. A substantial portion of the population is Hispanic, particularly in Pasco. In addition to this diversity, the Tri-Cities can expect an increase in the relative number of elderly residents. Some will be due to the aging of the “baby boomers” and some to in-migration as people seek to take advantage of the more moderate climate, slower pace of living, and more attractive costs of living. This will result in changes in demand for housing and services – including types and costs of units, location of housing, access to services and care, and increased transportation options.

Housing development in the Tri-Cities has tended toward single-family and, to a much lesser extent, higher-end multifamily, in recent years. Housing costs in the Tri-Cities have not plummeted, as they have in other areas, in response to the economic recession. A significant factor discussed by individuals interviewed for this report is the lack of available rental housing, particularly housing affordable to lower-income households, the elderly and persons with disabilities. Vacancy rates hovering around 1% provide limited choice and increase barriers to attaining housing stability.

SUMMARY OF RECOMMENDATIONS

Three Impediments to Fair Housing were identified through the process. These are briefly outlined below along with specific recommendations for the community to consider in working toward the elimination of those impediments. For the best possible success, the cities should work together with the broader community in a cooperative effort over time to impact these issues.

Many of the protected populations seeking rental or homeownership opportunities lack the skills and knowledge to obtain and remain in affordable housing.

Recommendations

- Post information about fair housing and remedies on public web sites, at libraries, laundromats, and other locations with wide public access. Post information in Spanish, at a minimum.
- Provide fair housing information to agencies working with protected classes.
- Support programs and activities which provide consumers with the knowledge and skills to identify and respond to their rights under fair housing laws and to understand both rental agreements and purchase agreements.
- Support the provision of workshops and education on unfair lending practices, including predatory lending. Take full advantage of agencies providing no-cost education and/or financial counseling and encourage consumers to take advantage of those resources in advance of purchasing housing (and other consumer goods). Immigrants and refugees are particularly susceptible to predatory practices.
- Support community activities and programs that provide counseling and training on application requirements, preventing/resolving credit history problems, and documentation issues.

- Support the provision of English language classes for persons with limited English language skills.

There is a lack of awareness of the issues related to fair housing and the impediments to fair housing in the Tri-Cities.

Recommendations

- Explore partnerships in the community (e.g., agencies, realtors, lenders, advocates) to provide a venue and materials for fair housing training. Many of the agencies interviewed in preparation of this document indicated a willingness to provide resources, space and time.
- Work with realtors, landlords, lenders and others in the housing industry to have contracts provided in the language of the consumer.
- Support activities to educate the community, including landlords and tenants on the rights of persons with disabilities.
- Support efforts to educate the community on the need for reasonable accommodations for persons with disabilities, including keeping service/companion animals.
- In order to increase full community awareness, consider holding public forums and/or discussion sessions with public officials, including City Councils, on fair housing issues facing the Tri-Cities area.

Extremely low rental vacancy rates, lack of new lower priced rental units and a housing stock that is increasingly balanced toward single family housing impact the ability of many households to obtain affordable housing meeting their needs.

Recommendations

- Continue to support land use, zoning and other policies that provide adequate housing choice to fit the needs of the population, including those with special needs and limited incomes.
- Encourage the development of new housing to meet the projected need for elderly housing and the inclusion of an adequate supply of units accessible to the disabled.
- Advocate for the retention of critical State social services programs operated by the County that provide services and support for persons with severe disabilities.
- Advocate for additional housing funding resources at the state level such as the State Housing Trust Fund. Aggressively pursue funding sources to create new housing in the Tri-Cities.
- Utilize the local “2060” housing assistance resources for housing which reflects these needs.

FAIR HOUSING LAWS

FEDERAL LAWS

Title VIII of the Civil Rights Act of 1968, as amended (Fair Housing Act), prohibits discrimination in the sale, rental and financing of dwellings, and in other housing-related transactions, based on:

- Race or color
- National origin
- Religion
- Sex
- Familial status (including children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under age 18)
- Handicap (disability)

The Fair Housing Act covers most housing.¹ In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker and housing operated by organizations and private clubs that limit occupancy to members.

In the **sale and rental of housing**: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale or rental
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In **mortgage lending**: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan, or
- Set different terms or conditions for purchasing a loan.

¹ This discussion is taken directly from the HUD publication in 2002, *Fair Housing: Equal Opportunity for All*. (www.hud.gov/fairhousing)

In addition, it is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right.
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Additional protections for **persons with disabilities**: The landlord may not refuse to allow:

- Reasonable modifications to the dwelling or common use areas, at the tenant's expense and where the unit can be restored to the original condition, or
- Reasonable accommodations in rules, policies, practices or services, if necessary for the disabled person to use the property.

Buildings constructed after March 1991 are subject to accommodation requirements, depending on the number of units and presence of an elevator.

Familial status is protected unless the building or community qualifies as housing for older persons, that is:

- It is specifically designed for and occupied by elderly persons under a federal, state or local government program
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80 percent of the occupied units, and adheres to a policy that demonstrates intent to house persons who are 55 or older.

The US Department of Housing and Urban Development (HUD) has been given the authority and responsibility for administering this law. This authority includes handling of complaints, engaging in conciliation, monitoring conciliation, protecting individual's rights regarding public disclosure of information, authorizing prompt judicial action when necessary, and referring to the State or local proceedings whenever a complaint alleges a discriminatory housing practice.

STATE LAW

Washington State has adopted a fair housing law, which is substantially equivalent to federal law and extends protection to the same populations. In addition it extends protection on the basis of marital status, sexual orientation (2006 addition), and military or veteran status (honorable discharge) (2007 addition).

Chapter 49.60 RCW is a state law that prohibits discriminatory practices in the areas of employment, places of public resort, accommodation, or amusement, in real estate transactions, and credit and insurance transactions on the basis of race, creed, color, national origin, families with children, sex, marital status, sexual orientation, age, honorably discharged veteran or military status, or the presence of any sensory mental, or physical disability or the use of a trained dog guide or service animal by a person with a disability; and prohibits retaliation against persons who oppose a discriminatory practice, and those who file health care and state employee whistleblower complaints. (www.hum.wa.gov)

The Washington State Human Rights Commission has a cooperative agreement with the Department of Housing and Urban Development to process and investigate dual-filed housing complaints for which the Commission receives funding under the Fair Housing Assistance Program (FHAP). Most of the Commission's housing cases are dual-filed with HUD – the exceptions are cases covered under State but not covered under federal law.

BACKGROUND INFORMATION

The Tri-Cities today is experiencing a relatively rapid population growth, including an increase in seniors because of the climate, pace of life and cost of living. The economy remains strong compared to most of the country and, importantly, while its economy has become more diversified over the years, its workforce needs are still heavily tied to the 586 square mile Hanford cleanup site and associated high-tech industries.

Although the ultimate impact is not yet known, the rapid increase in federal resources allocated to the area in 2008 and 2009 will cause further volatility in the area's employment, population, and housing. At the same time, with the advent of the wine industry, the nature of the agricultural sector continues to evolve with less reliance on the food processing industry. While these and other factors bond the three communities, each of the communities has a special degree of distinction and its own identity.

DEMOGRAPHICS

All three communities have seen substantial growth between 2000 and 2009, most notably Pasco with 70% recent growth in population. Most of the growth is the result of in-migration, although annexations have been important contributors, particularly in Kennewick where annexations between 2000 and 2009 accounted for 40% of the population growth.

Rapid growth creates demand for housing and services. The current low vacancy rates (1%) are indicative of this demand. Several factors have contributed to the population growth, including an increase in mobility between the three cities with the I-182 bridge over the Columbia River in 1985, and the development of several new residential subdivisions offering housing at relatively modest prices.

Table 1: Tri-Cities Population 1990-2009

Location	Year			Change 2000-9
	1990	2000	2009	
Kennewick	42,155	54,693	67,180	23%
Pasco	20,337	32,066	54,490	70%
Richland	32,315	38,708	47,410	22%
Benton County	112,560	142,475	169,300	19%
Franklin County	37,473	49,347	72,700	47%
Washington State				13%

Sources: US Census 1990, 2000; Washington OFM 2009.

A major impact over the next three years will be a large population influx as a result of new jobs resulting from federal funding to expedite the Hanford cleanup under the national economic recovery program – approximately \$2 billion in federal funds have been allocated.

Table 2: Race/Ethnicity 2000

Location	Race		Ethnicity*	
	White Alone	Non- White	Hispanic	Non- Hispanic
Kennewick	83%	17%	16%	84%
Pasco	53%	47%	53%	47%
Richland	90%	10%	5%	95%
Benton County	86%	14%	13%	17%
Franklin County	62%	38%	47%	53%
Washington State	82%	18%	8%	12%

*May be of any race.

Source: US Census.

The Tri-Cities have a diverse population. Pasco, in particular, has a large Hispanic population. Agriculture and associated seasonal workers was the historical origin. Over the years, those workers have settled in the area, built families and businesses and are an integral part of Pasco, the other cities, and the counties.

There continues to be a large percentage of foreign-born residents – Hispanic and non-Hispanic. People look for opportunities in agriculture and other economic sectors. Inability to speak English well, or at all, can be a barrier for those speaking Spanish, as well as those with other native languages (for example, Russian and Ukrainian). Inability to read English, or read at all, affects people’s ability to understand contracts. This lack of understanding was noted as an important concern in issues related to fair housing, including predatory lending.

HOUSEHOLDS

Two-thirds of the households, or more, are family households. In 2000 there were more large families (5 or more persons) in Pasco than in the other two cities. The number of households comprised of single individuals is important to note. In 2000 about 9% of households in each of the cities were comprised of

single, elderly persons. As the “baby boomers” age and retired persons look for living opportunities in the Tri-Cities, this will change the demand for housing and services.

Table 3: Types of Households 2000

Location	Family Households		Non-Family Households	
	2-4*	5+*	Singles	Other
Kennewick	57%	11%	26%	6%
Pasco	51%	24%	20%	4%
Richland	60%	9%	27%	4%
Benton County	60%	12%	23%	5%
Franklin County	55%	23%	18%	4%
Washington State	56%	10%	26%	8%

*People in household.

Source: US Census.

INCOME

Table 4 reflects the substantial diversity in household income between the three cities. It is also clear that median earnings for women and men differ, due in no small part to different occupations. This has implications, of course, for women raising children on their own and for elderly women whose financial circumstances may be reduced upon death of a spouse. Median household income varies by race and ethnicity as well. There are a number of contributing factors including educational attainment, which is tied to types of positions available.

Disparities in median income, such as shown in the table, affect the ability to secure suitable, affordable housing. In addition, median income is the mid-point – 50% of households are earning less, often substantially less.

Table 4: Income 1999

Income Measure	Location		
	Kennewick	Pasco	Richland
Median household	\$41,213	\$34,540	\$53,092
Median family	\$50,011	\$37,342	\$61,482
Median earnings male*	\$41,589	\$29,016	\$52,648
Median earnings female*	\$26,022	\$22,186	\$30,472
Median household white alone**	\$43,678	\$42,665	\$53,237
Median household Hispanic**	\$29,176	\$26,673	\$45,707

*Working full-time, year-round.

**Householder.

Source: US Census.

Table 5 examines the level of poverty in each of the cities as of the 2000 census. More than half of women with children under 5 years of age (and no husband present) were living in poverty in Kennewick and Pasco, and nearly half in Kennewick. Persons with disabilities who must rely on SSI as a major or exclusive source of income and elderly residents living on limited fixed incomes are examples of

community members living in often extreme poverty. Poverty, compounded with special needs, reduces housing choice.

Table 5: Persons Living in Poverty 1999

Population	Location		
	Kennewick	Pasco	Richland
Individuals	13%	23%	8%
Households	11%	21%	8%
Families	10%	20%	6%
Females alone w/children <5	56%	67%	43%

Source: US Census.

HOUSING NEEDS OF SPECIAL POPULATIONS

FRAIL ELDERLY

The elderly (and frail elderly) population of Tri-Cities communities is growing at a high rate and will require action in order to meet the specific needs of this population, both for housing and services. In 2007, there were 17,700 people over 65 in Benton County (11% of the total population), and 5,287 people over 65 in Franklin County (8% of the total population).²

Table 6: Population Over 65 as a Percent of Total Population 2000-2030

Location	Year						
	2000	2005	2010	2015	2020	2025	2030
Benton County	10%	10%	11%	13%	15%	16%	18%
Franklin County	9%	8%	7%	7%	8%	9%	9%

Source: Washington OFM, Medium Forecast, October 2007.

Table 6 shows a steady increase in population over 65 from 2000 to 2030. Benton County’s elderly population will rise from 10% to 18% during that time.³ Given the weak production levels of multi-family housing (19 units in the Tri-cities in 2008), there will be a supply side issue within a matter of a few short years. In addition, affordability is already a growing issue as the extremely low vacancy rates (in the 1% range) are driving rents up.

During the Consolidated Planning focus group sessions, nutrition and affordable housing were identified as priority needs for the Tri-Cities elderly population. Assisted housing for the elderly, as well as subsidized affordable rental housing and increasing ADA accessibility was also noted as priority needs. A related issue was the aging of parent care-givers of children with disabilities, especially developmental disabilities.

In 2007, 2,334 people over 65 years old had a disability in Franklin County – nearly half of the total population over 65 (46%), compared to just 12% of the total population. Similarly, 46% of people over

² American Community Survey, 2007

³ Washington Office of Financial Management, Medium Forecast, October 2007.

65 in Benton County had a disability in 2007 – 7,843 people.⁴ The 2007 American Community Survey found 2,158 people in Benton County and 504 people in Franklin County who were age 85 and older.

Many frail elderly have difficulty obtaining suitable affordable housing with supportive services. Among the elderly, the incidence of low income is higher than in the general population and many of the frail elderly have fixed social security incomes. Many are limited to care that can be obtained through Medicaid. Independent living and in-home support costs force many into group living facilities and into facilities that have openings for Medicaid-paid care. Medicaid assisted living and nursing home beds are limited: six facilities between Richland and Kennewick advertise financially assisted residential care for the elderly or persons with disabilities.

PERSONS WITH DISABILITIES

In 2007, the American Community Survey reported 7,008 people in Franklin County with a disability (12% of the population). Of those, 1,023 were children ages 5 to 15, and 2,334 were over 65 years of age. In Benton County, 23,831 people were living with a disability (16% of the population) – 1,784 were children age 5 to 15 and 7,843 were over 65.

As many persons with disabilities rely on social security supplemental income (the majority income source within the disabled community), housing for persons with disabilities is a tremendous affordability problem. Persons on social security supplemental income can afford less than \$200 a month for rent and utilities (approximately 1/3 of total SSI income). Without rent assistance, this extremely low-income group of individuals has little choice but to live in over-crowded or sub-standard units, reside in homes of parents or siblings homes well into adulthood, couch surf, or become homeless.

Focus groups and survey respondents identified assisted living, affordable rental units, job training, and emergency assistance (shelter, food, medicine) as priority needs for Tri-Cities residents with disabilities.

PERSONS WITH DEVELOPMENTAL DISABILITIES

In 2006-2007 DSHS reported 583 clients in Kennewick, 287 in Richland, and 433 in Pasco with developmental disabilities.⁵

Housing for adult developmentally disabled persons is a severe affordability need. As with other disabled persons, they most likely live on social security supplemental income and thus have extremely low incomes. With the advent of de-institutionalization, which began occurring in the 1970's, most persons with developmental disabilities live in community settings within the general population. Adult clients also pay for their own rent, food and transportation, though they may receive other funded

⁴ American Community Survey, 2007.

⁵ Washington State Department of Social and Health Services, Data Analysis Division, February 5, 2009

services to pay for other living expenses, skills development or job training. Focus groups identified a major concern with the aging parents of children with developmental disabilities.

MENTAL ILLNESS

Mental illness ranges from mild and short-term depression to chronic, lifetime conditions such as schizophrenia. The Washington State Department of Social and Health Services provided clients with 1,670 mental health services in Kennewick in 2006-2007: 74 cases of inpatient evaluation and treatment, 35 cases with in-patient services in state institutions, and 1,664 cases in community services. In Richland, there were 1,010 clients: 59 inpatient evaluation and treatment, 20 state institutions, and 1,003 community services. In Pasco, there were 998 clients: 49 inpatient evaluation and treatment, 25 state institutions, and 991 community services.⁶

Focus groups revealed a need for a crisis response center to triage and provide immediate stabilizing services for persons with mental illness who are found in crisis. Currently, many people coming out of jails with mental illness or substance abuse issues do not have housing or financial resources creating a crisis. Both temporary housing (shelter and transitional) and permanent supportive housing with intensive services, were described as critical needs. The 2009 homeless count noted that 32% of the individuals found homeless suffered from mental illness. A total of 54% of the homeless persons surveyed in the count indicated that “mental illness” was a reason for them becoming homeless.⁷

PERSONS WITH HIV/AIDS

As of 2008, Benton County had a cumulative history of 115 HIV diagnoses. Of those, 19 were newly diagnosed between 2003 and 2008. Eighty-five people in Benton County currently have HIV, and 53 of those people have AIDS. Franklin County records a total history of 71 persons diagnosed with HIV – 26 of them diagnosed between 2003 and 2008. Of those currently living, 57 people have HIV and 34 of them have AIDS.⁸

Locally the incidence of the disease is relatively small; however, the disease is becoming increasingly prevalent in suburban and rural areas. Locally the Benton-Franklin Health District has developed a Bilingual Outreach Project to educate migrant farm workers about the risks of contracting HIV/AIDS. A Spanish-speaking outreach worker provides information at labor camps, English as a second language classes, jails, and alcohol and drug dependency treatment facilities.⁹

⁶ Washington State Department of Social and Health Services, Research and Data Analysis Division, February 2009. Note: these numbers do not add up, likely due to an overlap of cases between programs.

⁷ 2009 Point in Time Count Review of Findings, Benton-Franklin Community Action Committee, July 2009.

⁸ Washington State’s HIV/AIDS Surveillance Report, September 2004.

⁹ Washington State Department of Health’s Health Education and Resource Exchange.

HOUSING AVAILABILITY

The housing markets of Pasco, Kennewick, and Richland are surprisingly different given the proximity of the communities. Even more remarkable is the sudden growth in owner-occupied units overall and especially in Pasco, which has traditionally experienced the lowest incidence of homeownership. Kennewick is the closest to Pasco in new development for buyers although the new developments in Kennewick tend to offer larger and more costly housing units.

The Tri-Cities housing stock in 2000 was primarily made up of single-family detached homes with the highest percentage in Richland (63%), followed by Pasco (54%) and Kennewick (53%). Those percentages have increased significantly in Pasco and Kennewick since 2000, as new-single family subdivisions have been developed. The vast majority of housing permits in the two-county area have been for single-family housing – 98% of all residential permits in 2008.

Rental housing is relatively less expensive than single-family housing – yet households at the lower income levels (50% of median income or less) are typically already priced out of the single-family homeowner market and face limited opportunities without receiving some type of financial assistance. Given the significant low-income population in the Tri-Cities (particularly in Pasco), its high growth rate, and low production levels of new rental housing, very low-income families and individuals – plus large families requiring several bedrooms – face significant challenges in obtaining adequate housing they can afford.

As discussed above, persons with special needs face particular challenges in finding housing and may be more vulnerable to discrimination, whether actual or as a result of limited choice. Governmental assistance will be necessary to bring housing costs into affordable ranges. The limited amount of funds available from the HOME and CDBG entitlements limits the potential for impacting the need for affordable housing. In 2008 and 2009, state-generated funding from the Housing Trust Fund and from the “2060” Revenues has fallen, resulting in reduced ability of the cities and developers to leverage HUD funds for new rental housing.

FAIR HOUSING COMPLAINTS

Several Federal, State and local agencies have roles in working with persons who have complaints on The Washington State Department of Financial Institutions provides both education and legal assistance in cases of financial fraud. They also regulate and examine all state-chartered financial services institutions as well as provide outreach to protect consumers from fraudulent activities.

The Washington State Human Rights Commission has a cooperative agreement with the Department of Housing and Urban Development to process and investigate dual-filed housing complaints for which the Commission receives funding under the Fair Housing Assistance Program (FHAP). Most of the

Commission's housing cases are dual-filed with HUD – the exceptions are cases covered under State law but not covered under federal law.

The Northwest Fair Housing Alliance has an established mission to eliminate housing discrimination and to ensure equal housing opportunity for the people of Washington State through education, counseling and advocacy.

The Fair Housing Center of Washington plays a role in promoting and enforcing fair housing through its community education programs, complaint investigation and advocacy and its information and referral system.

HUD has the responsibility of enforcing the Fair Housing Act. Complaints that are filed may be investigated directly by HUD or may be investigated and processed by local certified agencies. In the state of Washington, the Washington State Human Rights Commission is the certified agency for fair housing and receives reimbursement from HUD under the Fair Housing Assistance Program. The Commission has separate jurisdiction over claims of discrimination covered under State law that are not otherwise covered under federal law.

The Northwest Fair Housing Alliance (NWFHA), located in Spokane, assists people in Eastern and Central Washington who have been discriminated against in housing because of race, color, national origin, disability, familial status (presence of children), marital status, religion, gender (sexual harassment or domestic violence may qualify), or sexual orientation with the investigation and filing of fair housing complaints with the Department of Housing and Urban Development (HUD) and the Washington State Human Rights Commission (WSHRC).¹⁰ Their mission statement indicates the Alliance's goal is to eliminate housing discrimination and to ensure equal housing opportunity for people in Washington State through education, counseling and advocacy.

After a complaint is filed, it is normally investigated to determine whether there is reasonable cause to believe the Fair Housing Act has been violated. HUD will also try to help conciliate the complaint and resolve the issue before taking it further. If conciliation is not reached and there is reasonable cause, the complaint goes before an Administrative Law Judge to be heard. The Administrative Law Judge can order relief, and award damages, attorney's fees and costs. Either the respondent or complainant may choose to have the case decided in Federal District Court.

NATIONAL TRENDS

HUD annually prepares a report outlining the fair housing complaints filed nationally. The most recent report, *The State of Fair Housing Report – Annual Report on Fair Housing FY 2009*, summarized that a total of 10,242 complaints were received during the year – 8,165 by Fair Housing Assistance Programs (FHAPs) and 2,077 by HUD. Forty-four percent (44%) of the complaints were filed for discrimination

¹⁰ www.nwfairhouse.org.

based upon disability, 31% based upon race/ethnicity, 21% based on familial status, 13% based on national origin and 10% based on sex. The most common complaint was based on the terms and conditions of sale or rental of property while 22% were based on a lack of reasonable accommodation (for disabilities).

The *2010 Fair Housing Trends Report* prepared by the National Fair Housing Alliance¹¹ was based on the analysis of 30,213 fair housing claims and complaints reported by member agencies, HUD, the Department of Justice and state and local government agencies in 2009 (this compares with the 17,453 complaints filed just 10 years before in 1999). Of the total complaints made in 2009, 19,924 were received by the Fair Housing Alliance member organizations. The Alliance estimates that the more than 30,000 total complaints received nationally in 2009 from all sources represents less than 1% of the total fair housing law violations that occurred in the country.¹²

A series of national studies on the experiences of African Americans, Hispanics, and Asians and Pacific Islanders in the housing market has found evidence of consistent adverse treatment in cases of refinancing of existing mortgages. While there was a 97% approval rate of refinancing applications by Whites, only 50% of Blacks received approvals.¹³

Although disability was the most common basis for discrimination in national complaints filed with HUD and FHAP agencies in FY 2005 (49%), a recent HUD study suggests that those complaints also represent only a small fraction of incidents of disability discrimination in the housing market. In July 2005, HUD released its first study of housing discrimination against persons with disabilities. The study, *Discrimination against Persons with Disabilities: Barriers at Every Step*, examined the Chicago-area rental market and found that hearing-impaired people experienced adverse treatment in half the calls made using a telephone-operator relay to search for rental housing. Mobility-impaired people using wheelchairs experienced consistent adverse treatment 32% of the time when they visited rental properties.¹⁴

In December 2010, the Washington State Department of Financial Institutions (WDFI) announced that, as a result of charges filed against Countrywide Home Loans (CHL) for discriminating against ethnic and racially protected classes by offering loan products that were less favorable than those offered to non-protected classes, a \$650,000 settlement had been reached benefitting victims of the company's practices. In the settlement, DFI identified 123 victims of alleged discriminatory pricing. Each of these Washington residents will receive a settlement ranging from \$997 to \$26,176. The amount received depends upon the type of loan, the number of predatory features in the loan and whether or not the consumer was foreclosed upon.¹⁵

¹¹ www.nationalfairhousing.org

¹² National Fair Housing Alliance. *2010 Fair Housing Trends Report*.

¹³ FY2009 Annual Report on Fair Housing, HUD Office of Fair Housing and Equal Opportunity.

¹⁴ FY2005 Annual Report on Fair Housing, HUD Office of Fair Housing and Equal Opportunity.

¹⁵ WA State Department of Financial Institutions, December 23, 2010 News Release. www.dfi.wa.gov.

HUD COMPLAINTS IN TRI-CITIES

Over the past five years 27 fair housing complaints have been filed with the Department of Housing and Urban Development involving cases in the three cities.¹⁶ The bases for the formal complaints were (note several included multiple allegations):

- Disabilities (13)
- Sex (6)
- Race (4)
- Familial status (4)
- National Origin (3)

The complaints covered the following issues:

- Refusal to rent/negotiate to rent (16)
- Discrimination in terms/conditions/privileges relating to facilities or services (10)
- Failure to make reasonable accommodation for disabilities/design issues (7)
- Discrimination in terms/conditions/privileges relating to rental agreements (3)
- Steering (1)
- Other (1)

All but one of these cases is closed. Most of them (17) were closed with a “no cause determination” indicating that a violation was not established in the case. There were successful conciliations negotiated in the process of resolving 4 other cases and 5 cases were withdrawn by the complainant. Notably, in 3 of the 4 cases that were successfully resolved, reasonable accommodations was the issue.

COMPLAINTS FILED WITH WASHINGTON STATE HUMAN RIGHTS COMMISSION

The Washington State Human Rights Commission database reveals that a total of 37 fair housing complaints were filed in Benton County alone, with additional complaints in Franklin County from 1999 to 2008.¹⁷ The number of complaints over the last 5 years of the period was significantly higher than in the early years, with 26 of the complaints filed after 2003.

These complaints do not necessarily represent complaints associated with violations exclusive to Washington State law. While the Commission has responsibility for those complaints, they also receive complaints filed with HUD. Therefore, the reported complaints from 1999 to 2008, most likely include cases reported above in the discussion of federal cases.

Given that, family status, race and disability account for the majority of the bases of complaints. Circumstances around rental terms and conditions were the most frequent alleged violations, followed by refusal to rent.

¹⁶ FOIA Request to the Seattle Office of the US Department of Housing and Urban Development. Report of complaints filed between January 1, 2006 and December 31, 2010.

¹⁷ Washington State Human Rights fair housing complaints database 1999 – 2008.

Records on disposition of the complaints revealed that more than one-half resulted in a determination of “no reasonable cause” and approximately 25% resulted in “pre-finding settlement” or “administrative closure/general/resolved” while most of the rest were “withdrawn.”

COMPLAINTS FILED WITH THE NORTHWEST FAIR HOUSING ALLIANCE

According to the Northwest Fair Housing Alliance (NWFHA) since October 1, 2008 when they began maintaining an electronic database on inquiries, 36 contacts were made from individuals in the three cities involving fair housing and non-fair housing issues.¹⁸

Records of the NWFHA for the five year period from January 8, 2006 through January 7, 2011 indicate 22 fair housing intakes from persons in the three cities were processed. By far the most frequent were the 15 cases involving disabilities (6 of these requested a reasonable accommodation). Other intakes involved 5 National Origin (Hispanic), one based on sex and one based on familial status. One of the National Origin cases was filed as a complaint to HUD in 2010.

CONCLUSIONS ON COMPLAINT DATA

It is generally believed that complaints actually filed represent only a small percentage of the complaints that could be filed. On the other hand, as we can see in the data of each of the organizations handling complaints, that most are determined to be without appropriate cause under the Law.

The following observations can be made from a review of the data. The most common bases for complaints filed with the organizations were disabilities, followed by familial status, race and national origin. Refusal to rent and discrimination in terms/conditions/privileges relating to rental agreements and to facilities and services were the most commonly alleged violations. The data of the State Human Rights Commission clearly demonstrated that while the number of complaints filed remains small, it has grown significantly in the past five years. It is not clear whether this is a result of increased awareness by consumers, diligence by local agencies or a growing number of situations leading to filing complaints.

HOUSING SALES AND FINANCING

HOME MORTGAGE DISCLOSURE ACT (HMDA)

The Federal Financial Institutions Examination Council (FFIEC) prepares and distributes aggregate reports on behalf of the Federal Deposit Insurance Corporation, Federal Reserve Board, National Credit Union Administration, Office of the Comptroller of the Currency, Office of Thrift Supervision, and the

¹⁸ Records of the NWFHA. January 1, 2006 – January 7, 2011.

Department of Housing and Urban Development. The Home Mortgage Disclosure Act (HMDA) data cover home purchases and home improvement loans. The data include information on race, ethnicity, gender and income of applicants, which allows an analysis of lending nationally and at the local (regional) level.

Table 7 shows the applications that resulted in loan originations and the percent denied by type of institution broken down by race, ethnicity, overall minority status and income of applicants. This is consistent with the census which in recent decades contains expanded race identifiers, including the option of selecting more than one race. While lending institutions have been more rigorous about collecting demographic information about applicants, there are still gaps which should be recognized in interpreting the summary data.

The 2009 summary was derived from loan applications reported by 97 institutions with a home or branch office in the Metropolitan Statistical Area/Metropolitan Division (MSA/MD) and 239 institutions without a home or branch office in the area. The MSA/MD is an area that has at least one urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties.

The data in Table 7 include loan applications for single family and small multifamily units (1 to 4 dwellings). The largest number of applications (9,331) was for refinance loans – 3 to 4 times as many applications than for conventional home purchase loans and FHA, VA, FSA/RHS loans. Most (79%) of the FHA, VA, FSA/RHS loan applications resulted in a loan origination and just 9% were denied. The remainder were approved but not accepted, withdrawn by the applicant, or were incomplete.

Among conventional loan applications in 2009, 76% resulted in a loan origination and 9% were denied. A much lower percentage of refinance loan applications resulted in loan originations – just 56% of refinance loan applications in 2009 resulted in a loan origination and 19% were denied. Not surprisingly across all loan types presented, the percent of loan originations increased and denials decreased as incomes of applicants increased.

The HMDA data are useful in identifying possible discrepancies in loans. Review of the 2009 aggregate reports for the Kennewick-Pasco-Richland MSA/MD does demonstrate that Hispanic/Latino and minority applicants had lower percentages of loan originations and higher percentages of denials than non-Hispanic/Latino and non-minority applicants, especially with regard to conventional and refinance loans. The information did not provide enough data to determine if this was due to a consistent pattern of racial discrimination or if there are other factors affecting decision. Lenders consider many factors in rating loans, such as debt to income ration, employment history, credit history, collateral and cash on hand. Additional research is required to determine the real cause of differences observed in the table.

**Table 7: 2009 Home Mortgage Disclosure Act (HMDA) Aggregate Report
Disposition by Race/Ethnicity of Applicant, Kennewick-Pasco-Richland MSA/MD**

Race, Ethnicity and Income of Applicant	FHA, VA, FSA/RHS Loans			Conventional Loans			Refinance Loans		
	N	Orig.*	Denied	N	Orig.	Denied	N	Orig.	Denied
By Race									
White (Hispanic & Non-Hispanic)	2,437	79%	8%	1,877	77%	9%	7,973	58%	18%
By Ethnicity									
Hispanic/Latino	422	73%	14%	142	58%	18%	983	34%	37%
Non-Hispanic/Latino	2,045	80%	7%	1,790	78%	8%	7,331	60%	16%
By Minority Status									
White, Non-Hispanic/Latino	1,961	81%	7%	1,681	78%	8%	6,876	60%	16%
Minority and/or Hispanic/Latino	556	75%	13%	291	68%	13%	1,590	42%	31%
By Income of Applicants									
Less than 50% of MSA/MD Median	426	72%	14%	192	61%	19%	657	36%	38%
50%-79% of MSA/MD Median	904	80%	8%	355	72%	14%	1,457	45%	26%
80%-99% of MSA/MD Median	426	78%	9%	228	79%	10%	1,203	53%	24%
100%-119% of MSA/MD Median	312	86%	4%	245	76%	9%	1,147	55%	18%
120% or more of MSA/MD Median	550	81%	7%	1,108	79%	6%	3,946	63%	14%
Total Applications	2,631	79%	9%	2,147	76%	9%	9,331	56%	19%

*Applications accepted and resulting in origination of a loan. There were also applications that were approved but not accepted by the applicant or withdrawn.

Source: FFIEC. 2009 Home Mortgage Disclosure Report, Aggregate Report. (www.ffiec.gov)

PREDATORY LENDING

State Interest and Usury Law, RCW 19.52.020(1), limits the amount of interest that can be charged to consumers at either 12% per year or 4% above the auction quotes for Federal Reserve 26-week Treasury Bills (whichever is the greater). The usury law applies to consumer loans that are not related to a credit card debt, a retail installment contract or a consumer lease.

In recent years there has been a proliferation of “Payday Loan Stores” which are often located in areas where low and moderate income persons and/or where ethnic/minority groups are prominent. These stores offer short term loans to meet the emergency cash needs of borrowers. Many of the loans have resulted in pushing persons further into poverty and ruining credit. The state has limited the number of payday loans that can be made to 8 per individual and has placed limits on the amount of the loan.

According to the State Department of Financial Institutions (WDFI), the following are among the common predatory lending practices:¹⁹

- **Equity stripping:** The lender makes a loan based upon the equity in your home, whether or not you can make the payments. If you cannot make payments, you could lose your home through foreclosure.

¹⁹ WA State Department of Financial Institutions website information, www.dfi.wa.gov.

- **Bait-and-switch schemes:** The lender may promise one type of loan or interest rate but without good reason, give you a different one. Sometimes a higher (and unaffordable) interest rate does not kick in until months after you have begun to pay on your loan.
- **Loan Flipping:** A lender refinances your loan with a new long-term, high-cost loan. Each time the lender "flips" the existing loan you must pay points and assorted fees.
- **Packing:** You receive a loan that contains charges for services you did not request or need. "Packing" most often involves making the borrower believe that credit insurance must be purchased and financed into the loan in order to qualify.
- **Hidden Balloon Payments:** You believe that you have applied for a low rate loan requiring low monthly payments only to learn at closing that it is a short-term loan that you will have to refinance within a few years.

Falsification of documents is another predatory practice, including falsification of appraisals to sell properties for more than they are worth and encouraging misrepresentation on loan documents. One practice reported in the Tri-Cities was use of another person's social security number, which resulted in the document being illegal. People who are illiterate or unable to read and understand contracts they are signing are vulnerable to predatory practices.

Other unregulated predatory lending businesses have offered very low interest rates for home loans in order to entice less knowledgeable homeowners or homebuyers to take out a loan. These businesses often charge extremely high fees and/or include quickly escalating interest rates which go far beyond regulated lending industry standards. Persons with limited financing experience, limited English skills or fear of loss of their property if immediate lending is not approved often fall prey to these practices and in doing so end up damaging their credit when they are unable to meet payments.

A recent phenomenon is the rise of on-line internet services offering payday loans. Many of these operate outside of the regulations and are not licensed in the State of Washington. A recent cease and desist order was obtained in October 2010 by WDFI against an on-line payday loan business operating out of Costa Rica.

COMMUNITY REINVESTMENT ACT

The Community Reinvestment Act (CRA) was enacted by Congress in 1977 to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low and moderate income neighborhoods.²⁰ The CRA requires supervisory agencies to assess performance periodically. The four federal bank supervisory agencies are: the Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (FRB), Office of Thrift Supervision (OTS), and Federal Deposit Insurance Corporation (FDIC). Performance is evaluated in terms of the institution (capacity, constraints and business strategies), the community (demographic and economic

²⁰ This discussion and ratings were taken from the Federal Financial Institutions Examination Council web site (www.ffiec.gov).

data, lending, investment, and service opportunities), and competitors and peers. Ratings assigned are: outstanding, satisfactory, needs to improve, and substantial noncompliance.

The following ratings pertain to banks rated between 1994 and 2010 in Pasco and Kennewick. No listings were shown for financial institutions in Richland. All institutions shown had satisfactory or better ratings.

Table 8: FFIEC Interagency CRA Ratings 1994-2010

Bank Name	City	Date	Agency	Rating	Assets (thousands)	Exam Method
Bank Reale	Pasco	2009	FDIC	Satisfactory	\$36,464	Small bank
Columbia Trust Bank	Pasco	2003	FDIC	Satisfactory	\$134,568	Small bank
American National Bank	Kennewick	1994	OCC	Satisfactory	\$66,988	NR*
Community First Bank	Kennewick	2010	FDIC	Satisfactory	\$135,829	Small bank
Pacific One Bank	Kennewick	1997	OCC	Satisfactory	\$163,520	NR*

*Not reported.

Source: Interagency CRA ratings, www.ffiec.gov.

BROKERAGE SERVICES

Real estate brokers are a key contact for potential home buyers. The broker is in a position to influence choice of location and type of housing as well as providing information about financing options. National studies (HUD 2000 *Housing Discrimination Study*) indicate that minority customers are given full information about housing options less frequently than white customers. Hispanic home seekers, for example, experience this type of discrimination at least 25% of the time.

ADVERTISING

The Fair Housing Act makes it illegal to advertise any preference, limitation, or otherwise encourage discrimination because of race, color, religion, sex, national origin, handicap, or familial status. Most newspapers will publish a statement to that effect, and perhaps include the HUD Equal Housing Opportunity logo along with information on where to phone to complain of discrimination. These inform the public that discriminatory advertising is illegal, that the newspaper screens ads with obviously discriminatory statements, and provides an avenue for victims of discrimination.

The surge in internet advertising has changed the rental and sales marketing dramatically in recent years. This makes it difficult to track and enforce fair housing violations in current advertising practices.

FAIR HOUSING POLICIES AND ACTIONS IN TRI-CITIES

PUBLIC POLICIES AND ADMINISTRATIVE ACTIONS

There are three primary areas of local public policies that touch on fair housing issues – local building codes, zoning ordinances and maps, and comprehensive plans.

BUILDING CODES

Each of the three cities updates their local Building Codes related to handicapped accessibility as the Washington State Building Codes are adopted (2003 ANSI/IBC). This will assure that construction will take into account the latest standards to improve accessibility for the elderly and disabled.

ZONING ORDINANCES AND MAPS

Richland is the most fully developed with limited land available for new development while Pasco has large tracts of property available for development. Over the past few years, housing growth has occurred primarily in Pasco, which has permitted more housing than the other two cities combined in the past two years. However, this growth has been largely single family as there were no multi-family housing developments permitted from 2005-2008.

Pasco has recently revised its Municipal Code to allow for an increase in housing density in its R-2 to R-4 zoning classifications which can have the impact of increasing the number of units developed and increasing affordability. In addition, the City is in the process of considering changes to allow additional re-zoning of R-1 designations for R-2 and R-3 development.

Richland updated its zoning ordinance in 2009 to provide for mix-use development in the Central Business District. These will allow less expensive and small apartments in the core area next to transportation and services. It will also increase the potential access of elderly and persons with disabilities to affordable housing.

Kennewick allows accessory apartments in all residential zones provided they are built within the existing structure. Its Alternative Residential Provisions allow densities to increase in all residentially-zoned properties. The City is currently considering a staff recommendation to amend the zoning ordinance to permit mixed-use zones as an incentive to constructing affordable housing.

COMPREHENSIVE PLANS

Comprehensive Plans set the policies on which current quality of life and future development of a community is based. As such, they provide a guide to local public planning which may affect fair housing. Some examples follow.

The 2009 Kennewick Comprehensive Plan provides in Housing Goal 3 that policies will support the development “...of a variety of housing types and densities to meet the diverse needs of the population.” Among the tools described are housing for special needs populations, accessory apartments, and zero lot lines in order to promote affordability of housing for all segments of the community.

Pasco’s 2007 Comprehensive Plan Housing Goal 1 “Encourages housing for all economic segments of the city’s population.” It further describes the goal of providing a diversity of housing types to accommodate the elderly, physically challenged, mentally impaired, and the special needs populations, e.g., congregate housing.”

The Housing Element of the City of Richland’s Comprehensive Plan provides in Housing Goal 2 for flexibility in zoning codes to allow for variety in housing types and locations to meet diverse housing needs. This includes allowing “...a range of housing choices for seniors and special needs households...”

CURRENT FAIR HOUSING ACTIONS

The three cities have taken a number of affirmative steps to increase fair housing opportunities since the last Assessment of Impediments in 2005. Many of these have been carried out in conjunction with other agencies and organizations in the area. Among these activities are:

- Provided workshops in cooperation with local banks to discuss homeownership opportunities and discuss ways to avoid predatory lending.
- Kennewick and Richland cooperated to hire the NW Fair Housing Alliance to provide a half-day workshop on fair housing attended by 100 persons.
- Distributed flyers and posters on fair housing to libraries and sub-recipients.
- Richland placed fair housing information materials written in both English and Spanish in the utility bill mailings.
- Partnered with HUD and the Washington State Human Rights Commission to conduct a half-day workshop on fair housing.
- Partnered with Consumer Credit Counseling of the Tri-Cities to conduct a workshop which had fair housing as one of its areas of focus.
- All three cities partnered with the NWFHA to staff a booth at the Columbia Center during Homeownership Month.
- All three cities partnered to conduct a fair housing workshop at Columbia Basin Community College for 65 persons.
- The Richland ADA officer distributed information on programs and facilities of the city which are accessible.
- The City of Richland received two complaints which were referred to HUD for resolution.

IMPEDIMENTS TO FAIR HOUSING

Impediments to fair housing are defined as:²¹

- 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 choice.
- Any actions, omissions, or decisions that have this effect.

Impediments to fair housing choice include actions that:

- Constitute violations, or potential violations, of the Fair Housing Act.
- Are counterproductive to fair housing choice, such as:
 - Community resistance when minorities, persons with disabilities and/or low-income persons first move into white and/or moderate- to high-income areas.
 - Community resistance to siting of housing facilities for persons with disabilities because of the persons who will occupy the housing.
- Have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin.

CONCLUSIONS AND RECOMMENDATIONS

1. Many of the protected populations seeking rental or homeownership opportunities lack the skills and knowledge to obtain and remain in affordable housing.

As a result, they are particularly susceptible to discriminatory unfair rental and lending practices. A well-informed consumer is a major factor in preventing discrimination in housing. Lack of awareness of the law is an impediment, as is lack of awareness of options and/or fear of seeking redress. Educating consumers should include rights of legal immigrants and illegal immigrants, as well as general information about fair housing.

Recommendations

- Post information about fair housing and remedies on public web sites, at libraries, laundromats, and other locations with wide public access. Post information in Spanish, at a minimum.
- Provide fair housing information to agencies working with protected classes.
- Support programs and activities which provide consumers with the knowledge and skills to identify and respond to their rights under fair housing laws and to understand both rental agreements and purchase agreements.

²¹ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, *Fair Housing Planning Guide, Volume 1*.

- Support the provision of workshops and education on unfair lending practices, including predatory lending. Take full advantage of agencies providing no-cost education and/or financial counseling and encourage consumers to take advantage of those resources in advance of purchasing housing (and other consumer goods). Immigrants and refugees are particularly susceptible to predatory practices.
- Support community activities and programs that provide counseling and training on application requirements, preventing/resolving credit history problems, and documentation issues.
- Support the provision of English language classes for persons with limited English language skills.
- Encourage the availability and use of reliable translation services to benefit persons with limited English language skills.

2. There is a lack of awareness of the issues related to fair housing and the impediments to fair housing in the Tri-Cities.

While it is important to educate consumers, it is also important to continue to work with realtors, lenders, appraisers, landlords, condominium boards, builders and other providers to raise awareness about fair housing and impediments to fair housing. The dialogue should be extended to city officials, city attorneys, planning commission members, and others in a position to make decisions about housing and policies in the Tri-Cities.

Recommendations

- Explore partnerships in the community (e.g., agencies, realtors, lenders, advocates) to provide a venue and materials for fair housing training. Many of the agencies interviewed in preparation of this document indicated a willingness to provide resources, space and time.
- Work with realtors, landlords, lenders and others in the housing industry to have contracts provided in the language of the consumer.
- Support activities to educate the community, including landlords and tenants on the rights of persons with disabilities.
- Support efforts to educate the community on the need for reasonable accommodations for persons with disabilities, including keeping service/companion animals.
- In order to increase full community awareness, consider holding public forums and/or discussion sessions with public officials, including City Councils, on fair housing issues facing the Tri-Cities area.

3. Extremely low rental vacancy rates, lack of new lower priced rental units and a housing stock that is increasingly balanced toward single family housing impact the ability of many households to obtain affordable housing meeting their needs.

First, the Tri-Cities rental vacancy rates are in the 1% range, while the housing industry considers 5% a “balanced rental market.” As a consequence Tri-Cities rents have increased by 9% from 2009 to 2010, placing pressure on lower income persons and households. In addition, people with limited

income with disabilities and other special needs, or who are elderly, in larger families, people with poor credit/rent history or with criminal histories, and those lacking citizenship documentation are particularly vulnerable. Having multiple applicants for vacant units creates a situation in which landlords and sellers can be highly selective, with the effect of reducing housing choice, particularly for the most vulnerable.

Recommendations

- Continue to support land use, zoning and other policies that provide adequate housing choice to fit the needs of the population, including those with special needs and limited incomes.
- Encourage the development of new housing to meet the projected need for elderly housing and the inclusion of an adequate supply of units accessible to the disabled.
- Advocate for the retention of critical State social services programs operated by the County that provide services and support for persons with severe disabilities.
- Advocate for additional housing funding resources at the state level such as the State Housing Trust Fund. Aggressively pursue funding sources to create new housing in the Tri-Cities.
- Utilize the local “2060” housing assistance resources for housing which reflects these needs.

APPENDIX

Organizations Consulted

- Banner Bank, Kennewick
- Aging and Long Term Care, Area Agency on Aging
- Columbia Legal Services
- Consumer Credit Counseling
- Kennewick Housing Authority
- Windermere Group One, Richland
- Northwest Justice Project
- Pasco/Franklin County Housing Authority
- Lourdes Counseling Center
- Benton Franklin Community Action Committee
- Pasco Planning Department
- Richland Planning Department
- Washington State Human Rights Commission
- Seattle Regional and Spokane Field Offices
- Northwest Fair Housing Alliance
- Benton Franklin Rental Owners Association
- Benton and Franklin Counties Department of Human Services
- Tri-Cities Hispanic Chamber of Commerce

Note that the Consolidated Plan was recently completed for the Tri-Cities. Development of the plan including extensive outreach in the community, including discussion of housing availability, vulnerable populations, barriers to affordable housing, and impediments to fair housing.