West Penn Rural Fair Housing Initiative

Affirmatively Furthering Fair Housing

A Review of the Analysis of Impediments to Fair Housing Choice in Western Pennsylvania

Prepared by Southwestern Pennsylvania Legal Services, Inc. 2013
# Table of Contents

**Introduction**.........................................................................................................................1

**Jurisdiction Summaries**

- City of Altoona..........................................................................................................................4
- Beaver County.............................................................................................................................10
- City of Erie...............................................................................................................................18
- City of Johnstown......................................................................................................................29
- Millcreek Township....................................................................................................................36
- City of Sharon............................................................................................................................42
- Borough of State College...........................................................................................................50
- Washington County....................................................................................................................57
- Westmoreland County................................................................................................................66

**Core Issues Addressing Fair Housing**..................................................................................76

- Segregation..............................................................................................................................79
- Racially and Ethnically Concentrated Areas.............................................................................83
- Access to Opportunity...............................................................................................................89
- Health and Housing..................................................................................................................94
- Housing and Transportation......................................................................................................96
- Economic Competitiveness.........................................................................................................98
- Lending Discrimination..............................................................................................................101
- Creation of a Positive Fair Housing Environment...................................................................106
- Review of Past Fair Housing Complaints ...............................................................................114

**Conclusions and Recommendations**......................................................................................117

- City of Altoona........................................................................................................................117
- Beaver County..........................................................................................................................119
- City of Erie..............................................................................................................................120
- City of Johnstown.....................................................................................................................122
- Millcreek Township..................................................................................................................123
- City of Sharon..........................................................................................................................124
- Borough of State College..........................................................................................................126
Washington County ................................................................. 127
Westmoreland County ............................................................. 129
General Recommendations ......................................................... 130
   The United States Department of Housing and Urban Development .................... 130
   Consulting Groups ................................................................... 131
Glossary of Terms ...................................................................... 132
Index of Tables ........................................................................... 136
Introduction

The West Penn Rural Fair Housing Initiative, through a Fair Housing Education and Outreach Grant (#FH400G11097) provided by the United States Department of Housing and Urban Development (“HUD”), has prepared the following report, with Southwestern Pennsylvania Legal Services, Inc. acting as the lead agency, examining the Analysis of Impediments to Fair Housing Choice (“AI”) of the nine (9) entitlement jurisdictions located within the 24 county coverage area in Western Pennsylvania. These jurisdictions are the City of Altoona, Beaver County, the City of Erie, the City of Johnstown, Millcreek Township, the City of Sharon, the Borough of State College, Washington County, and Westmoreland County.

Section 808(e)(5) of the Fair Housing Act mandates that the Secretary of HUD administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing (“AFFH”). The obligations of AFFH have never been defined statutorily, however HUD has defined it as requiring grantees receiving funds through the Community Development Block Grant (“CDBG”) and other formula grant programs (e.g. HOME and ESG) to prepare an AI, take appropriate actions to overcome the impediments identified, and maintain records reflecting the analysis and actions taken. As of the writing of this report, HUD has not enacted any regulation that specifically defines when a grantee must update their AI or what information must be included in them. HUD has defined the AI as “A comprehensive review of potential impediments and barriers to the right to be treated fairly when seeking housing. The AI is expected to cover public and private policies, practices, and procedures affecting housing choice and assess how they all affect the location, availability, and accessibility of housing. Grantees are also to develop strategies and actions to overcome these barriers based on history, circumstances, and experiences. The AI is a tool that is intended to serve as the basis for fair housing planning; provide essential information to policymakers,

---

1 HUD has proposed a new rule that would provide more guidance as well as the data needed to better fulfill the statutory obligation to affirmatively further fair housing. HUD’s Statement of Regulatory Priorities can be found at: http://www.reginfo.gov/public/jsp/eAgenda/StaticContent/201210/Statement_2500.html
administrative staff, housing providers, lenders, and fair housing advocates; and assist in building public support for fair housing efforts.”

Despite the lack of formal regulations regarding the AI, HUD has issued some guidance recommending that grantees update their AI every three (3) to five (5) years, depending on their planning cycle. Additionally, in 1996, HUD issued the Fair Housing Planning Guide, which provided grantees with a “suggested format” for the AI. (See Table 1 for HUD’s suggested format for the AI). This suggested format identifies various elements, which, absent a formal regulation, provide a jurisdiction with a guide as to what information should likely be included or addressed in the AI.

This report will review and analyze the AIs from each of the nine (9) entitlement jurisdictions. The report consists of three (3) sections; the first section provides summaries of the nine (9) entitlement jurisdictions, including demographic and housing data, trends in population and housing stock, and identification of the impediments to fair housing choice, as well as the jurisdictions goals and strategies to address them. In the second section the nine (9) AIs and identified impediments to fair housing choice will be analyzed against nine (9), HUD identified, Core Issues Addressing Fair Housing. These Core Issues include Segregation; Racially and Ethnically Concentrated Areas; Access to Opportunity; Health and Housing; Housing and Transportation; Economic Competitiveness; Lending Discrimination; Creation of a Positive Fair Housing Environment; and the Review of Past Fair Housing Complaints. The final section of the report discusses the strengths and weaknesses of each AI against the nine (9) Core Issues as well as the HUD suggested format. Additionally, this section will provide the jurisdictions with our recommendations for future planning.

The preparation and planning of this report consisted of a multi-step process and involved several staff members from the West Penn Rural Fair Housing Initiative. At the outset a multitude of journal articles and presentations focusing on AFFH and the AI process were studied and reviewed. The next action involved either a meeting with, or a brief presentation to

---

2 U.S. Gov’t Accountability Office, GAO-10-905, Housing and Community Grants: HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions’ Fair Housing Plans (2010), pg. 5.
3 All nine (9) jurisdictions covered in this Report currently operate on five (5) year planning cycles.
the County Commissioners of the 24 counties in the coverage area. Concurrently, the project gathered and reviewed the planning documents for the nine (9) entitlement and 21 non-entitlement counties. These documents included the Consolidated Plans, AIs, CAPERs, and Annual Action Plans from the entitlement jurisdictions, and the Comprehensive Plans and other planning documents from the non-entitlement counties. In an effort to expand project knowledge in the subject area, several staff members attended the National Community Reinvestment Coalition (“NCRC”) training event *Supporting Inclusive Communities Through Fair Housing Planning* in Orlando, Florida. The final action in this process involved the scheduling of face-to-face meetings with the Planning or Redevelopment Departments in the nine (9) entitlement jurisdictions to discuss the AI as well as the AFFH efforts they have undertaken.

The project reviewed the material and information gathered and, for each of the nine (9) entitlement jurisdictions made preliminary recommendations regarding how it could be improved.

Data and recommendations for each to follow.
The City of Altoona ("Altoona") covers an area of approximately 10 square miles, situated in the Allegheny Mountains in north-central Blair County.

With the loss of industry and employment, the population in Altoona has been steadily decreasing since 1930. From 1930 to 2008, Altoona’s population had decreased by 43%, from 82,054 to 46,756 residents. The 2008 U.S. Census Bureau estimated population figures as used in the 2010 Analysis of Impediments to Fair Housing Choice ("AI") are broken down as follows:
City of Altoona Population (2008)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>44,605</td>
<td>95.4%</td>
</tr>
<tr>
<td>African American</td>
<td>1,122</td>
<td>2.4%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>234</td>
<td>0.5%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Hispanic</td>
<td>468</td>
<td>1.0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>46,756</strong></td>
<td></td>
</tr>
</tbody>
</table>

A look at the 2010 Census figures show that this declining trend has continued for the population at large, however Altoona has seen a 58% increase in their minority population from 1,824 in 2008, to 2,885 minority residents in 2010. A breakdown of the 2010 Census figures is as follows:

City of Altoona Population (2010)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>43,435</td>
<td>93.8%</td>
</tr>
<tr>
<td>African American</td>
<td>1,540</td>
<td>3.3%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>63</td>
<td>0.1%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>211</td>
<td>0.5%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>155</td>
<td>0.3%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>916</td>
<td>2.0%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>606</td>
<td>1.3%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>46,320</strong></td>
<td></td>
</tr>
</tbody>
</table>

Altoona also has a large percentage of disabled individuals. The AI states that over 23% of the population over five-years old reports having a disability. An examination of the Census 2000 data shows that 10,628 residents over five-years old reported having at least one type of disability.

---

4 As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.
The AI failed to identify any areas of racial and/or ethnic minority concentration. However, according to the available dissimilarity index data from 2000, Altoona is considered a “moderately segregated” city in regards to its African American to White population.\(^5\) Altoona’s index score of 45.3 means that 45.3% of African American residents would have to move to a different location in Altoona in order to achieve full integration with the White population. The AI failed to provide a census track or block group breakdown of demographic and/or population information.

Altoona also has a large percentage of low- and moderate-income (“LMI”) households. Based upon the data provided in Altoona’s 2010 Consolidated Plan, HUD determined that there were 9,051 LMI households in Altoona; this is equivalent to 47.3% of the City’s total households. The AI failed to identify any areas of concentrations of LMI households.

In 2008, the median household income for all households in Altoona was $35,156. The AI failed to provide any further breakdown regarding median household income. The AI also failed to provide any information regarding unemployment, other than to state, “About 58% of our Census 2000 population participated in our labor force….\(^6\)” It is believed that the unemployment rate for Altoona in 2010 was 8.5%. The AI also failed to provide a demographic breakdown regarding unemployment.

The AI also failed to provide any detailed information regarding the housing stock for the City. According to the 2007-2011 American Community Survey (“ACS”), the majority of the housing stock in Altoona is Single Family units, with 16,109 units; this represents 75.8% of 21,245 total housing units. The 4,929 Multi-Family units make up 23.2% of the total stock, with the remaining 207 units, 1% of total stock, coming from mobile homes, trailers, and other similar housing. According to the AI over 65% of the occupied housing units in the City are owner occupied, however, no further breakdown regarding homeownership was provided.

Despite Altoona’s decreasing population the 2007, estimates provided in the AI show that the housing stock has remained relatively steady since 1970. A look at the Census 2000 and

\(^5\) As provided in the 2011 Analysis of Impediments to Fair Housing Choice for the City of Johnstown.
2007-2011 ACS data show that Altoona only lost 437 units from 2000 to 2011. The AI did not provide any information regarding the changes in the number of different types of housing units. The AI also failed to provide any information regarding the number of affordable rental units (units renting for less than $500 a month). According to the 2007-2011 ACS, there were 2,688 affordable units in Altoona; these units represented 42.7% of the 6,292 occupied units paying rent. This was a sharp decrease from 2000, when 75%, or 4,877 of the 6,482 units were affordable, as shown in the chart below.

### Occupied Units Paying Rent

<table>
<thead>
<tr>
<th>Units Renting for:</th>
<th>2000</th>
<th>2011</th>
<th>Change 2000-2011</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>1,016</td>
<td>292</td>
<td>-724</td>
<td>-71.3%</td>
<td></td>
</tr>
<tr>
<td>$200 to $299</td>
<td>972</td>
<td>690</td>
<td>-282</td>
<td>-29.0%</td>
<td></td>
</tr>
<tr>
<td>$300 to $499</td>
<td>2,889</td>
<td>1,706</td>
<td>-1,183</td>
<td>-40.9%</td>
<td></td>
</tr>
<tr>
<td>$500 to $749</td>
<td>1,396</td>
<td>2,259</td>
<td>863</td>
<td>61.8%</td>
<td></td>
</tr>
<tr>
<td>$750 to $999</td>
<td>115</td>
<td>971</td>
<td>856</td>
<td>744.3%</td>
<td></td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>89</td>
<td>365</td>
<td>276</td>
<td>310.1%</td>
<td></td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>5</td>
<td>9</td>
<td>4</td>
<td>80.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>6,482</td>
<td>6,292</td>
<td>-190</td>
<td>-2.9%</td>
<td></td>
</tr>
<tr>
<td><strong>Affordable Units</strong></td>
<td>4,877</td>
<td>2688</td>
<td>-2189</td>
<td>-44.9%</td>
<td></td>
</tr>
</tbody>
</table>

*Source: U.S. Census Bureau*

According to Altoona’s AI from approximately 2005 to 2010, there had been eight (8) housing discrimination complaints discussed and resolved locally or filed with the Pennsylvania Human Relations Commission (“PHRC”). All clients filed their own complaint through the internet. This figure also included tenants living outside of Altoona who needed questions answered before filing their own complaint. The AI failed to provide any information regarding the bases of the complaints discussed, resolved, or filed. The AI also failed to provide any information regarding housing discrimination complaints filed with HUD originating from Altoona. During the three (3) years that the West Penn Rural Fair Housing Initiative has been operating as a Fair Housing Initiatives Program (“FHIP”), we have filed three (3) housing discrimination complaints with HUD originating from Altoona, two (2) of which were on the basis of disability, while the other one (1) was on the basis of disability and race.
Impediments to Fair Housing Choice

In their 2011 Analysis of Impediments to Fair Housing Choice, the City of Altoona identified four (4) impediments to fair housing choice.

Impediment #1
Fair Housing Public Awareness & Education

Altoona’s goal to address this impediment is to “Expand educational activities on advertising policies and practices.”

They have identified four (4) strategies in order to achieve this goal:
1) Mail information to all housing managers, landlords, real estate agents, lenders, etc. to help publicize events.
2) Research new material for distributions at presentations, fairs, etc.
3) To work with Southwestern PA Legal Services on enforcement.
4) Participate at local meetings that are housing related such as emergency shelters, special housing task force etc. to distribute information.

Impediment #2
Fair Housing Improve Knowledge to Homeowners, Homebuyers and Renters

Altoona’s goal to address this impediment is to “Include participation and services to landlords, contractors and real estate agents.”

They have identified three (3) strategies to achieve this goal:
1) Target members of protected classes and inform them as to their rights under the Fair Housing Act.
2) Encourage accessible design.
3) To educate clients in shelters on the Fair Housing laws and to promote decent affordable housing.
Impediment #3

Homebuyer Education & Fair Housing Laws

Altoona’s goal to address this impediment is to “Conduct homebuyer training to low-moderate income persons and tenants who may be potential homeowners.”

They have identified two (2) strategies in order to achieve this goal:

1) Meet with other organizations that provide homebuyer training and discuss possible way to have low to moderate income persons attend a free homebuyer training and fair housing workshop.
2) Encourage faith based organizations to be more informational on directing people to the fair housing programs offered.

Impediment #4

Fair Housing Workshops for Housing Professionals, Tenants, and Landlords

Altoona’s goal to address this impediment is to “Include workshops for the housing professionals in updates and changes to the fair housing laws.”

They have identified two (2) strategies in order to achieve this goal:

1) Work with other organizations such as local lenders, contractors, realtors, advocacy groups, non profit organizations to discuss the needs of housing workshops, education needed, for tenants, first time homebuyers, and persons with disabilities on their rights and responsibilities in the sale and rental of housing.
2) Conduct one workshop for housing professionals.
Beaver County

Beaver County ("Beaver") is situated over 444 square miles in southwestern Pennsylvania, making it one of the smaller counties in the State. It is bordered by four (4) counties in Pennsylvania: Allegheny, Butler, Lawrence, and Washington. Additionally, Beaver borders Columbiana County in Ohio and Hancock County in West Virginia.

Beaver has experienced a gradual decrease in its population over the past several decades. This trend continued in 2006, as reported in the 2008 Beaver County Analysis of Impediments to Fair Housing Choice ("AI") when they reported a total population of 175,736 residents a 3.1% decrease from 2000. The 2006 ACS population figures as used in the AI are broken down as follows:
Beaver County Population (2006)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>161,360</td>
<td>91.8%</td>
</tr>
<tr>
<td>African American</td>
<td>10,975</td>
<td>6.2%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>419</td>
<td>0.2%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>517</td>
<td>0.3%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>814</td>
<td>0.5%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1,651</td>
<td>0.9%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,627</td>
<td>0.9%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>175,736</strong></td>
<td></td>
</tr>
</tbody>
</table>

An examination of the 2010 Census data shows that the gradual declining trend has continued as Beaver’s population decreased by 5,197 residents from 2006 to 2010. Despite the overall decrease, the minority population has increased by 6.1% from 16,003 in 2006, to 16,976 in 2010. The breakdown of the 2010 Census figures is as follows:

**Beaver County Population (2010)**

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>155,561</td>
<td>91.2%</td>
</tr>
<tr>
<td>African American</td>
<td>10,676</td>
<td>6.3%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>181</td>
<td>0.1%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>764</td>
<td>0.4%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>403</td>
<td>0.2%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>2,954</td>
<td>1.7%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,998</td>
<td>1.2%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>170,539</strong></td>
<td></td>
</tr>
</tbody>
</table>

Beaver also has a large percentage of disabled individuals. According to the AI in 2000, 16,922 residents reported having at least one disability, while an additional 14,490 residents reported having two or more disabilities. All told, 31,412 residents, or 18.5% of the population over five-years old reported having at least one type of disability. The AI further provides that, by 2006 the number of residents with at least one disability jumped from 16,922 to 29,099.

---

6 See fn. 4
The AI failed to provide any information regarding the County’s dissimilarity index score, but does state that Beaver is considered “highly segregated,” with the majority of minorities residing in a few boroughs and cities along the Ohio and Beaver Rivers in the north central area of the County. In Beaver, three (3) municipalities were identified as areas of concentrations of African American residents. These municipalities were Aliquippa City (36%), Midland Borough (21%), and Beaver Falls City (18%).

Beaver also has a large percentage of LMI persons. Based upon the Census 2000 data, HUD determined that there were 29,895 LMI persons in Beaver; equivalent to 41% of the population for which this rate is calculated. In 2000, 38 census block groups were areas of concentrations of LMI persons, with five (5) of these census block groups also being areas of concentrations of African American residents.

In 2000, the median household income for all households in Beaver was $36,995. White, Asian, Hispanic, and Other Race households all had median household incomes in excess of $36,995, with White’s earning $38,100, Asian’s $48,068, Hispanic’s $43,906 and, Other Race’s $45,313. However, African American households earned significantly less with a median household income of only $22,166. These disparities are also prevalent when looking at the unemployment data for Beaver. In 2000, the County’s unemployment rate was 5.4%, which was lower than the State’s rate of 5.7%. Whites, Women, and Asians had the lowest unemployment rates at 4.8%, 5.1%, and 5.0% respectively. The highest unemployment rate was experienced by African Americans at 14.3%, nearly three times that of Whites.

The AI failed to provide specific information regarding the make-up of the housing stock for Beaver. The only information that can be extracted from the AI is that in 2000, there were 54,379 owner occupied units and 16,722 rental units. According to the 2010 Beaver County Comprehensive Plan, in 2006, the majority of the housing stock in Beaver was Single Family

---

7 HUD’s formula for calculating low- and moderate-income persons includes persons residing in households and excludes persons residing in group quarters. The group quarter population includes persons under formally authorized supervised care or custody such as correctional institutions, nursing homes, and juvenile institutions. The group quarter population also includes non-institutionalized persons living in group quarters such as college dormitories, military quarters, and group homes.
homes, with 59,748 units; this represents 75% of 79,394 total housing units. The 15,534 Multi-Family units make up 20% of the total stock, with the remaining 4,112 units, 5% of total stock, coming from mobile homes, trailers, and other similar housing. According to the AI, the overall home ownership rate, in 2000, for Beaver was 75%. Of the 54,379 homeowners, 52,204 (96%) were White households. Racial and ethnic minority homeowners numbered only 2,175 (4%) households.

Despite the decreasing population of Beaver, the housing stock had steadily increased, with 1,629 units added from 2000 to 2006. An examination of the 2007-2011 ACS data indicates that this trend may have reversed with Beaver losing 1,100 units from 2006 to 2011. A closer look at the data indicates that a majority of the lost housing stock has come from Multi-Family units and rental units. The AI reported that between 2000 and 2006, the number of affordable rental units (units renting for less than $500 a month) decreased by 1,703, from 14,166 to 12,463 units. Taking the data from the AI along with the 2007-2011 ACS, Beaver has lost 190 rental units from 2000 to 2011. While 190 lost rental units may not appear to be significant, the number of affordable rental units decreased by a staggering 4,606 as illustrated in the chart below.

### Occupied Units Paying Rent

<table>
<thead>
<tr>
<th>Units Renting for:</th>
<th>2000</th>
<th>2011</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>1,486</td>
<td>669</td>
<td>-817</td>
<td>-55.0%</td>
</tr>
<tr>
<td>$200 to $299</td>
<td>2,441</td>
<td>1,133</td>
<td>-1,308</td>
<td>-53.6%</td>
</tr>
<tr>
<td>$300 to $499</td>
<td>6,506</td>
<td>4,025</td>
<td>-2,481</td>
<td>-38.1%</td>
</tr>
<tr>
<td>$500 to $749</td>
<td>4,887</td>
<td>5,660</td>
<td>773</td>
<td>15.8%</td>
</tr>
<tr>
<td>$750 to $999</td>
<td>1,238</td>
<td>3,126</td>
<td>1,888</td>
<td>152.5%</td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>142</td>
<td>1,709</td>
<td>1,567</td>
<td>1103.5%</td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>22</td>
<td>210</td>
<td>188</td>
<td>854.5%</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>16,722</td>
<td>16,532</td>
<td>-190</td>
<td>-1.1%</td>
</tr>
<tr>
<td><strong>Affordable Units</strong></td>
<td>10,433</td>
<td>5,827</td>
<td>-4,606</td>
<td>-44.1%</td>
</tr>
</tbody>
</table>

*Source: U.S. Census Bureau*

Beaver, though small in area, is the twentieth most populated county in Pennsylvania. According to the AI from 2001-2006, there had been 59 housing discrimination complaints dually filed with HUD and PHRC. Of the 59 complaints, 32 were filed on the basis of disability,
21 on the basis of race, and six (6) on the basis of familial status. The AI reports that 30 of the complaints were resolved through settlement/conciliation, while in 27 of the complaints there was a “no probable cause finding.” PHRC was unable to proceed with the remaining two (2) complaints. During the three (3) years that the West Penn Rural Fair Housing Initiative has been operating as a FHIP, we have filed 12 housing discrimination complaints with HUD originating from Beaver County. Of the 12 complaints filed 10 were on the basis of disability, one (1) was on the basis of race, and one (1) was on the basis of race, familial status, and disability.

**Impediments to Fair Housing Choice**

In their 2008 Analysis of Impediment to Fair Housing Choice, Beaver identified five (5) impediments to fair housing choice.

*Impediment #1*

Black households may not consider housing opportunities across a broad range of municipalities and neighborhoods that provide a desirable quality of life and may contain affordable housing.

The AI does not provide any information regarding their goal to address this impediment.

They have identified one (1) strategy in order to address this impediment:

1) Increase & Enhance Fair Housing Education and Outreach.

*Impediment #2*

Black households have far fewer options than White households when purchasing a home or renting a unit. Black households have a greater degree of difficulty in securing mortgage application approval.

The AI does not provide any information regarding their goal to address this impediment.

They have identified two (2) strategies in order to address this impediment:

1) Increase & Enhance Fair Housing Education and Outreach.
2) Continue the Affordable Housing Program and Projects in Beaver County.
Impediment #3

Lower income minority households have fewer affordable housing options.

The AI does not provide any information regarding their goal to address this impediment.

They have identified two (2) strategies in order to address this impediment:

1) Increase & Enhance Fair Housing Education and Outreach.
2) Continue the Affordable Housing Program and Projects in Beaver County.

Impediment #4

Persons with disabilities are denied affordable housing options when landlords do not agree to make reasonable accommodations as required by federal fair housing law.

The AI does not provide any information regarding their goal to address this impediment.

They have identified one (1) strategy in order to address this impediment:

1) Increase & Enhance Fair Housing Education and Outreach.

Impediment #5

Housing options for members of the protected classes who could potentially reside in group homes are severely limited by municipalities that overly restrict the permitting process for group homes in violation of federal fair housing law.

The AI does not provide any information regarding their goal to address this impediment.

They have identified one (1) strategy in order to address this impediment:

1) Increase & Enhance Fair Housing Education and Outreach.
The AI does provide further information on the strategies identified to address the identified impediments to fair housing choice.

For the strategy “Increase and Enhance Fair Housing Education and Outreach”, they have identified eight (8) planned initiatives to implement this strategy:

1) Facilitate Fair Housing Training for realtors, municipal officials and planners, landlords, low-income housing developers, housing authority staff, fair housing testers, and local mortgage lenders.

2) Make three presentations annually to local churches, soup kitchens, high school seniors, housing authority residents and/or nonprofit organizations on Fair Housing issues.

3) Develop a webpage on the Beaver County Collaborative Action Network website dedicated exclusively to Fair Housing Issues.

4) Continue development of an up-to-date, centralized housing database for Beaver County on the BCCAN or County website.

5) Distribute wallet-sized cards with Fair Housing contact information at public libraries, WIC offices, rental housing locations, churches, soup kitchens, county assistance offices, etc.

6) Establish a dedicated phone number for all inquiries and complaints on fair housing issues; provide referrals to Legal Services and regional fair housing advocacy organizations. List the phone number in the white and blue pages of local phone directories.

7) Disseminate current information on Fair Housing rights in the form of posters and pamphlets throughout Beaver County. In addition, utilize public service announcements on cable television.

8) Provide a comprehensive monthly report to Community Development detailing Fair Housing activities. Information will be incorporated into the annual CAPER.
For the strategy “Continue the Affordable Housing Programs and Projects in Beaver County,” they have identified four (4) planned initiatives to implement this strategy:

1) Continue the commitment by the CDP Office to affordable housing activities (rehabilitation, homeownership, new construction). These activities provide a valuable opportunity to improve housing choice for members of the protected classes who are most often low-moderate income households.

2) Continue to ensure that housing units rehabilitated or constructed with federal funds comply with ADA requirements.

3) Expand accessibility requirements to universal design for all housing projects financed with federal funds.

4) Support the initiatives of housing providers who work to provide affordable housing for the disabled.

The AI does not provide a correlation of the planned initiatives and the identified impediments to fair housing choice.
City of Erie

The City of Erie ("Erie") is located in northwestern Erie County along the shores of Lake Erie. The City covers approximately 28 square miles in total area.

With the decline in manufacturing and industry, the population in Erie has been steadily decreasing since 1960. From 1960 to 2010, Erie’s population had decreased by 26.5%, from 138,440 to 101,786 residents. Despite this decrease, Erie remains Pennsylvania’s fourth largest city, behind only Philadelphia, Pittsburgh, and Allentown. The Census 2010 population figures as used in the 2011 Analysis of Impediments to Fair Housing Choice ("AI") are broken down as follows:
A look back at the Census 2000 figures shows that, while the population at large has decreased, the minority population has increased by 26.2%, from 20,167 in 2000, to 25,459 minority residents in 2010. A breakdown of the Census 2000 figures is as follows:

---

**City of Erie Population (2000)**

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>83,550</td>
<td>80.6%</td>
</tr>
<tr>
<td>African American</td>
<td>14,724</td>
<td>14.2%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>232</td>
<td>0.2%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>818</td>
<td>0.8%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>1,991</td>
<td>1.9%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>2,402</td>
<td>2.3%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>4,572</td>
<td>4.4%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>103,717</strong></td>
<td></td>
</tr>
</tbody>
</table>

---

Erie also has a large percentage of disabled individuals. According to the Census 2000 data, 20,161, or 21.4% of the population over five-years old reported at least one type of disability. The AI reported that in 2009, 18% of the population over five-year old reported at least one type of disability.

---

\[8\] See fn. 4
According to the dissimilarity index data from 2000, the AI stated that Erie is one of the more segregated cities in the State and is considered a “moderately segregated” city. Erie’s White/African American dissimilarity index score of 51.6 means that 51.6% of African American residents would have to move to a different location in Erie in order to achieve full integration with the White population. Additionally, Erie has high index scores for White/Multi-Race (43.9) and White/Hispanic (48.2).

In Erie, eight (8) of the 30 census tracts were identified as areas of concentrations of African American residents. These census tracts were Tract 4 (27%), 7 (33.3%), 8 (33.7%), 13 (57.5%), 14 (33.2%), 15 (50.4%), 17 (36.4%), and 18 (49.6%). Fourteen census tracts reported a percentage of African American residents higher than the City’s overall 16.8%. Additionally, two (2) tracts were identified as areas of concentrations of Hispanic residents. These tracts were Tract 12 (17.9%) and 15 (18%). Thirteen census tracts reported a percentage of Hispanic residents higher than the City’s overall 6.9%. Finally, nine (9) census tracts reported a percentage of Asian/Pacific Islander residents higher than the City’s overall 1.5%.

Erie also has a very large number of LMI persons. Based upon the data provided in the AI, HUD determined that there were 51,747 LMI persons in Erie. In 2010, 45 of Erie’s 96 census block groups were areas of concentrations of LMI persons, of these 45, 20 were located in areas also identified as areas of concentration of minority residents.

In 2009, the median household income for all households in Erie was $33,293. Only White households exceeded the City’s median household income, earning $35,013. Asian households earned the least at $16,495, followed by Hispanic households at $21,414, and African American households at $22,023. In 2009, the City’s unemployment rate was 11%, which was higher than the State’s rate of 9.1% and the County’s rate of 9.6%. The lowest unemployment rates were for Whites (9.1%) and Females (9.9%). The highest unemployment rates were experienced by African Americans at 24.6% and Males at 12%.

In 2009, the AI reported that the majority of the housing stock in Erie consists of Single Family homes, with 27,558 units or 60% of the 45,942 total units. The 18,170 Multi-Family
units represented 39.5% of the total stock, with the remaining 214 units, or 0.5% of the total stock coming from mobile homes, trailers, and other similar housing. Despite the prevalence of Single Family homes, the homeownership percentages in Erie are low, especially for minorities. The AI reports that White households are almost twice as likely as minorities to be homeowners in Erie. In 2000, among Whites, 60.5% owned their home, compared to 33.4% of African Americans, 28.2% of Asians, and 27.7% of Hispanics.

Despite the decreasing population in Erie, the housing stock has remained relatively stable, with only 634 units lost from 1990 to 2010. The AI reported that the loss of housing stock severely impacted the areas of concentrations of minority residents with a loss of 1,393 units in the eight (8) previously identified census tracts.

While Erie has not seen a dramatic decrease in the overall housing stock, they have seen a sharp reduction in the total number of affordable rental units (units renting for less than $500 per month); the AI reports a loss of 5,456 units (-46.8%) from 2000 to 2009. During this same period, there was a 116.2% increase in the number of units renting for $500 or more a month. Unfortunately, this trend has continued. An examination of the data from the 2007-2011 ACS, as illustrated below, shows a loss of an additional 658 affordable units.

<table>
<thead>
<tr>
<th>Units Renting for:</th>
<th>2000</th>
<th>2011</th>
<th>Change 2000-2011</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>1,682</td>
<td>504</td>
<td>-1,178</td>
<td>-70.0%</td>
</tr>
<tr>
<td>$200 to $299</td>
<td>2,138</td>
<td>1,316</td>
<td>-822</td>
<td>-38.4%</td>
</tr>
<tr>
<td>$300 to $499</td>
<td>7,835</td>
<td>3,721</td>
<td>-4,114</td>
<td>-52.5%</td>
</tr>
<tr>
<td>$500 to $749</td>
<td>4,544</td>
<td>6,816</td>
<td>2,272</td>
<td>50.0%</td>
</tr>
<tr>
<td>$750 to $999</td>
<td>615</td>
<td>3,621</td>
<td>3,006</td>
<td>488.8%</td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>219</td>
<td>1,180</td>
<td>961</td>
<td>438.8%</td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>120</td>
<td>271</td>
<td>151</td>
<td>125.8%</td>
</tr>
<tr>
<td>Totals</td>
<td>17,153</td>
<td>17,429</td>
<td>276</td>
<td>1.6%</td>
</tr>
<tr>
<td>Affordable Units</td>
<td>11,655</td>
<td>5,541</td>
<td>-6,114</td>
<td>-52.5%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau
According to Erie’s AI, from January 2005 to November 2010, 70 housing discrimination complaints were filed with HUD or the Erie Human Relations Commission (“EHRC”). Of these 70 complaints, 28 were filed on the basis of race, 25 on the basis of sex, 17 on the basis of disability, 13 on the basis of familial status, and eight (8) on the basis of national origin. Several of the complaints alleged discrimination on multiple bases. Of the 70 complaints, 55 had been closed as of November 2010. Of these 55, 10 were successfully settled through conciliation, 38 were closed as a result of a “no probable cause determination,” and seven (7) were closed because the complainant failed to cooperate, could not be located, or the complaint was not timely filed. Of the remaining 15 complaints, eight (8) were found to have “probable cause” and seven (7) were pending investigation. During the three (3) years that the West Penn Rural Fair Housing Initiative has been operating as a FHIP, we have filed two (2) housing discrimination complaints with HUD originating from Erie, both of which were on the basis of disability.

**Impediments to Fair Housing Choice**

In their 2011 Analysis of Impediments to Fair Housing Choice, the City of Erie identified 14 impediments to fair housing choice.

*Impediment #1*

The City lacks an over-arching housing policy that establishes the foundation for comprehensive planning.

Erie’s goal to address this impediment is for the “Establishment of fair housing as a priority in the City’s long range planning.”

They have identified one (1) strategy in order to achieve this goal:

1) Adopt a diversity policy that clearly states the City’s commitment to affirmatively further fair housing.

*Impediment #2*

The City’s migrant working and refugee populations may require language accommodations to ensure that all residents can access programs and services.
Erie’s goal to address this impediment is to have “Increased meaningful access to persons with limited English proficiency (LEP), in particular Erie’s migrant worker and refugee populations.”

They have identified three (3) strategies to achieve this goal:

1) Conduct the four-factor analysis to determine the extent to which the translation of vital documents is necessary.
2) Continue to provide other language services (interpreters, translators, etc.) on an as-needed basis.
3) Amend the City’s affirmative marketing plan to include outreach strategies specific to Hispanics, refugees, and migrant workers.

**Impediment #3**

There exists a continuing need for quality fair housing education, outreach and training, as well as real estate testing.

Erie’s goal to address this impediment is to have an “Increased fair housing awareness among housing providers and residents.”

They have identified four (4) strategies in order to achieve this goal:

1) Support the efforts of local and regional fair housing advocacy organizations in undertaking paired real estate testing, both for rental and sales housing, through continued funding which may be used for testing.
2) Effectuate a fair housing outreach and training strategy that is aimed at the most significant need, as determined by testing and tracking the bases and nature of fair housing complaints, with support from local and regional fair housing advocacy organizations.
3) Continue to provide funding to St. Martin’s Center and the CHRB for regular fair housing training to landlords throughout Erie.
4) Create a fair housing guide that outlines fair housing requirements. Post on the City’s website.
Impediment #4

Minority households have a greater difficulty becoming home owners in Erie because of lower incomes.

Erie’s goal to address this impediment is to have “Higher home ownership rates among minority households.”

They have identified two (2) strategies in order to achieve this goal:

1) Continue to support the efforts of local fair housing advocates (such as St. Martin’s Center) and certified housing counselors to increase home ownership among minorities, residents of LMI census tracts, and LMI residents.

2) As part of the Consolidated Planning process, map the location of all new CDBG/HOME-assisted housing projects. Analyze this information to determine the relative breakdown of projects in impacted areas versus projects in non-impacted areas.

Impediment #5

Refugees and migrant workers may have greater difficulty obtaining decent, affordable housing due to little or no credit history and/or references from previous landlords.

Erie’s goal to address this impediment is to “Increase access to decent, affordable housing for refugees and migrant workers.”

They have identified two (2) strategies in order to achieve this goal:

1) Continue to support housing counseling centers and local service providers, such as St. Martin’s Center, to provide additional financial management education and credit counseling, in particular for refugee and migrant worker populations.

2) Encourage HACE to increase the effectiveness of its credit/budget counseling referral program to prepare immigrants and refugees to obtain affordable housing.

Impediment #6

The City’s supply of housing that is affordable to households up to 80% of median household income is inadequate.
Erie’s goal to address this impediment is to have an “Increased supply of housing affordable to low and moderate income households.”

They have identified one (1) strategy in order to achieve this goal:

1) Continue to provide incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families, specifically in non-impacted areas. Continue providing financial incentives for affordable housing projects located outside of impacted areas through CDBG and HOME funds.

**Impediment #7**

The City’s supply of affordable and accessible housing units is inadequate to meet demand.

Erie’s goal to address this impediment is to have “An adequate supply affordable and accessible housing units for persons with disabilities, especially residents of public and assisted housing communities.”

They have identified two (2) strategies in order to achieve this goal:

1) Consider applying a minimum set-aside requirement of accessible units to all assisted housing projects it supports, including those financed with non-federal funds.
2) Encourage that all new housing units financed with HOME funds meet visitability standards.

**Impediment #8**

A number of landlords choose not to participate in the Section 8 Housing Choice Voucher program, which may contribute to the concentration of voucher holders in impacted areas.

Erie’s goal to address this impediment is to have an “Increased supply of housing affordable to low and moderate income households.”
They have identified one (1) strategy to in order to achieve this goal:

1) Continue outreach efforts to large landlords with units outside of impacted areas. Conduct marketing campaign to recruit additional landlords, in particular those with units in areas south of the City’s Target area.

**Impediment #9**

Members of the protected classes could be more fully represented on boards and commissions dealing with housing issues.

Erie’s goal to address this impediment is to have “Increased representation among members of the protected classes on appointed boards and commissions.”

They have identified one (1) strategy in order to achieve this goal:

1) Conduct a survey of each of the appointed citizens who are currently members of public boards or commissions to identify members of the protected classes. Thereafter, each new appointment should be surveyed in a similar manner. Records on the membership of appointed boards and commissions will assist City’s officials in making appointments that reflect the City’s diversity.

**Impediment #10**

The City’s process for allocating and reporting CDBG, HOME and NSP funds could be improved from a fair housing perspective.

Erie’s goal to address this impediment is to adopt “Policies and practices that affirmatively further fair housing choice.”

They have identified two (2) strategies in order to achieve this goal:

1) The City should ensure that its recently adopted Site and Neighborhood Selection requirements are incorporated as part of the application review and approval process for all applicable HOME-assisted projects.

2) Map the addresses of all new affordable housing initiatives as part of the CAPER process.
Impediment #11
The City’s zoning ordinance should be amended to allow for a wider definition of families, in particular for permanent group homes.
Erie’s goal to address this impediment is to adopt “Policies and practices that affirmatively further fair housing choice.”
They have identified one (1) strategy in order to achieve this goal:
1) Initiate discussions with city solicitor regarding amending the zoning ordinance to remove undue burdens on the development of group homes for persons with disabilities, as defined in the Fair Housing Act.

Impediment #12
Mortgage loan denials and high-cost lending disproportionately affect minority applicants.
Erie’s goal to address this impediment is the “Elimination of mortgage discrimination.”
They have identified two (2) strategies in order to achieve this goal:
1) Continue to engage HUD-certified housing counselors to target credit repair education through existing advocacy organizations that work extensively with minorities.
2) Encourage its CDBG subrecipient agencies involved in credit and budget counseling to market home ownership opportunities to all minorities, regardless of income, including middle and higher income minorities.

Impediment #13
Foreclosures appear to disproportionately affect minority households in Erie.
Erie’s goal to address this impediment is “Mitigation of the impacts of foreclosures on the protected classes.”
They have identified one (1) strategy in order to achieve this goal:

1) Continue to work with St. Martin’s Center, MLK Center, and the Booker T. Washington Center to mitigate the impacts of foreclosure by supporting increased buyer education and counseling, as well as supporting legislative protections for borrowers.

Impediment #14

The real estate advertising practices of The Erie Times-News do not meet fair housing standards.

Erie has established two (2) goals to address this impediment: 1) “Published commitment to only accept advertisements that are in compliance with the Fair Housing Act;” and 2) “Elimination of discriminatory language referencing restrictions on pets in rental units.”

They have identified one (1) strategy for each of the goals:

1) Encourage The Erie Times-News to consistently include the equal housing logo and a commitment to not knowingly accepting advertisements that are in violation of the Fair Housing Act on all of its online real estate databases.

2) Encourage The Erie Times-News that rental real estate ads stating “no pets” or ads that seek to restrict or prohibit the types of pets allowed include the phrase “except companion/service animals permitted under fair housing laws.”
City of Johnstown

The City of Johnstown ("Johnstown") is located in southwestern Cambria County along the Little Conemaugh and Stonycreek Rivers. The City covers approximately 5.89 square miles in total area.

With the loss of industry and employment, the population in Johnstown has been steadily decreasing since 1960. From 1960 to 2009, Johnstown’s population had decreased by 60.2%, from 53,949 to 21,489 residents. The 2009 Census population figures as used in the 2011 Analysis of Impediments to Fair Housing Choice ("AI") is broken down as follows:
City of Johnstown Population (2009)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>18,584</td>
<td>86.5%</td>
</tr>
<tr>
<td>African American</td>
<td>2,519</td>
<td>11.7%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>11</td>
<td>0.1%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>100</td>
<td>0.5%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>107</td>
<td>0.5%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>528</td>
<td>2.5%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>554</td>
<td>2.6%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>21,489</strong></td>
<td></td>
</tr>
</tbody>
</table>

A look at the 2010 Census figures show that this declining trend has continued for the population at large, however, Johnstown has seen a dramatic 28.7% increase in their minority population, from 3,265 in 2009, to 4,202 minority residents in 2010. A breakdown of the 2010 Census figures is as follows:

City of Johnstown Population (2010)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>16,776</td>
<td>80.0%</td>
</tr>
<tr>
<td>African American</td>
<td>3,068</td>
<td>14.6%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>35</td>
<td>0.2%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>56</td>
<td>0.3%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>145</td>
<td>0.7%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>898</td>
<td>4.3%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>664</td>
<td>3.2%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>20,978</strong></td>
<td></td>
</tr>
</tbody>
</table>

Johnstown also has a large percentage of disabled individuals. According to the AI and Census 2000 data, 6,301 residents, or 28.4% of the population over five-years old reported at least one type of disability.

According to dissimilarity index data from 2000, the AI stated that Johnstown is considered a “moderately segregated” city in regards to its African American to White

---

9 See fn. 4
population. Johnstown’s index score of 46 means that 46% of African American residents would have to move to a different location in Johnstown in order to achieve full integration with the White population. In Johnstown, four (4) census tracts were identified as areas of concentrations of African American residents. These census tracts were Tract 2 (30.3%), 3 (22.1%), 8 (27.4%), and 10 (39.0%). Additionally, Tracts 6 and 10 have a high percentage of Hispanic residents with 7.4% and 9.4% respectfully.

Johnstown also has a very large percentage of LMI persons. Based upon the data provided in the AI, HUD determined that there were 14,219 LMI persons in Johnstown; which is equivalent to 61% of the population for which this rate is calculated.¹⁰ In 2010, 28 of Johnstown’s 35 census block groups were areas of concentrations of LMI persons, with all of the areas of concentration of minority residents also being areas of concentration of LMI persons.

In 2009, the median household income for all households in Johnstown was $24,508. Both White and Hispanic households earned less than the median, with Whites earning $24,193 and Hispanics $11,406. Only African American households exceeded the City’s median household income, earning $25,938. In 2009, the City’s unemployment rate was 9.6%, which was higher than the State’s rate of 6.8%. The lowest unemployment rates were for Whites (9.5%) and Males (9.3%), both of which were higher than the State’s rates. The highest unemployment rates were experienced by Hispanics at 24.3% and African Americans at 10.3%.

The majority of the housing stock in Johnstown is Single Family units, with 8,984 units; which represents 68.8% of 13,063 total housing units. The 4,008 Multi-Family units make up 30.7% of the total stock, with the remaining 71 units, 0.5% of total stock, coming from mobile homes, trailers, and other similar housing. Despite having a higher median income, African Americans were less likely than Whites to own their home, with only 44.7% of African American household homeowners compared to 50.4% of White households.

Johnstown’s decreasing population has correlated with a steady decline in the housing stock, with 1,577 units lost from 1990 to 2009. It should be noted that despite the overall

¹⁰ See fn. 7
decreasing trend, 260 units were added to the housing stock from 2000 to 2009. The loss of housing stock severely impacted the minority and LMI population of Johnstown.

From 1990 to 2009, 54% of the total units lost, 808, were in the four (4) identified areas of concentrations of African American residents. This loss represented 20.9% of the total units in those four (4) areas. Johnstown has also seen a sharp reduction in the total number of affordable rental units (units renting for less than $500 per month), the AI reports a loss of 1,496 units (-32.2%) from 2000 to 2009. During this same period, there was an increase of 781.8% in the number of units renting for $700 to $999 a month from 77 in 2000, to 679 in 2009. Unfortunately, this trend has continued. An examination of the data from the 2007-2011 ACS, as illustrated below, shows a loss of additional 230 affordable units.

**Occupied Units Paying Rent**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>1,277</td>
<td>744</td>
<td>-533 -41.7%</td>
</tr>
<tr>
<td>$200 to $299</td>
<td>1,116</td>
<td>750</td>
<td>-366 -32.8%</td>
</tr>
<tr>
<td>$300 to $499</td>
<td>2,250</td>
<td>1,423</td>
<td>-827 -36.8%</td>
</tr>
<tr>
<td>$500 to $749</td>
<td>575</td>
<td>1,523</td>
<td>948 164.9%</td>
</tr>
<tr>
<td>$750 to $999</td>
<td>34</td>
<td>479</td>
<td>445 1308.8%</td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>11</td>
<td>66</td>
<td>55   500.0%</td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>9</td>
<td>0</td>
<td>-9   -100.0%</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>5,272</td>
<td>4,985</td>
<td>-287 -5.4%</td>
</tr>
<tr>
<td><strong>Affordable Units</strong></td>
<td>4,643</td>
<td>2,917</td>
<td>-1,726 -37.2%</td>
</tr>
</tbody>
</table>

*Source: U.S. Census Bureau*

With Johnstown’s relatively small geographic area and population there have been a small number of housing discrimination complaints filed. According to Johnstown’s AI from January 2005-December 2010, there had only been five (5) housing discrimination complaints filed with HUD. Of these five (5) complaints, three (3) were filed on the basis of race, while the other two (2) were filed on the basis of disability. Additionally, according to the AI, from 2006-February 2011, there had been four (4) housing discrimination complaints filed with PHRC. Of the four (4) complaints, three (3), were filed on the basis of race, one (1) on the basis of disability, and one (1) on the basis of sex. (One of the complaints alleged multiple bases)
During the three (3) years that the West Penn Rural Fair Housing Initiative has been operating as a FHIP, we have filed five (5) housing discrimination complaints with HUD originating from Johnstown. Of the five (5) complaints, four (4) were filed on the basis of disability, while the other one (1) was filed on the basis of race.

**Impediments to Fair Housing Choice**

In their 2011 Analysis of Impediments to Fair Housing Choice, the City of Johnstown identified five (5) impediments to fair housing choice.

*Impediment #1*

The City's fair housing programs are limited to periodic outreach and education efforts. Its fair housing efforts could be improved by expanding its programs and improving its documentation of activities.

Johnstown’s goal to address this impediment is to have “Increased diverse fair housing programs in the City of Johnstown.”

They have identified four (4) strategies in order to achieve this goal:

1) Outreach to local service organizations, including Community Action Partnership, to provide additional fair housing training and informational brochures. Coordinate with organizations to track the efforts of the members of the protected classes to locate affordable housing.

2) Partner with Southwest Legal Services to implement a fair housing testing program within the City of Johnstown.

3) In evaluating the effectiveness of activities designed to affirmatively further fair housing, the City should improve upon its efforts to document the location and frequency of its fair housing programs.

4) Partner with local service providers, such as Community Action, to provide fair housing training and additional resources for staff and clients.
**Impediment #2**

The City does not currently have Affirmative Marketing Policies or Site and Neighborhood Selection Policies for its CDBG and HOME assisted housing projects.

Johnstown’s goal to address this impediment is to have an “Adopted written policy incorporating Site and Neighborhood Standards for HOME-assisted units.”

They have identified one (1) strategy to achieve this goal:

1) Prepare a written policy that encompasses HUD’s Affirmative Marketing Policy and Site and Neighborhood Standards. Incorporate this policy as part of the application review and approval process for all applicable HOME-assisted rental housing projects.

**Impediment #3**

The City's supply of housing that is affordable to households up to 80% of median household income and members of the protected classes is increasingly inadequate, in particular within the rental market.

Johnstown’s goal to address this impediment is to have an “Increased supply of housing units that are affordable to LMI households.”

They have identified two (2) strategies in order to achieve this goal:

1) Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families. Improve existing housing stock through better code enforcement.

2) Continue to partner with regional affordable housing developers to increase the supply of affordable housing for rent and for purchase for families throughout the City and Cambria County. Expand fair housing choice by stimulating the construction and/or substantial rehabilitation/conversion of affordable rental housing for families outside of impacted areas.
Impediment #4

Minority households are less likely to be homeowners in Johnstown than White households.

Johnstown’s goal to address this impediment is to have “Increased home ownership rates among minority households.”

They have identified two (2) strategies in order to achieve this goal:

1) Continue to strengthen partnerships with local lenders that will offer homebuyer incentives to purchase homes in the City.
2) Continue to identify collaborative initiatives for the City, fair housing advocates, certified housing counselors, and financial lenders to increase home ownership among minorities, residents of low-moderate income census tracts, and low-moderate income residents.

Impediment #5

The real estate advertising practices of The Tribune-Democrat do not meet fair housing standards.

Johnstown’s goal to address this impediment is “Consistence adherence to Fair Housing standards in rental advertisements in the City.”

They have identified two (2) strategies in order to achieve this goal:

1) Recommend to The Tribune-Democrat and Our Town that it include the equal housing logo and a commitment to not knowingly accepting advertisements that are in violation of the Fair Housing Act on its online real estate databases.
2) Encourage The Tribune-Democrat and Our Town to consistently include the equal housing logo and a commitment to not knowingly accepting advertisements that are in violation of the Fair Housing Act on all of its printed and online real estate classified sections.
Millcreek Township

Millcreek Township (“Millcreek”) is located in northwestern Erie County and is the largest suburb of the City of Erie. The Township covers approximately 29.5 square miles in total area, making it one of the largest municipalities in Pennsylvania.

The population in Millcreek has been increasing since 1980. From 1980 to 2007, Millcreek’s population had increased by 19%, from 44,303 to 52,856 residents. The 2007 DemographicsNow population figures as used in the 2008 Millcreek Township Analysis of Impediments to Fair Housing Choice (“AI”) is broken down as follows:
A look at the 2010 Census figures shows that the population has continued to increase, adding 659 residents from 2007 to 2010. During this time the minority population increased by 40% from 2,023 in 2007, to 2,838 minority residents in 2010. A breakdown of the 2010 Census figures is as follows:

**Millcreek Township Population (2010)**

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>50,677</td>
<td>94.7%</td>
</tr>
<tr>
<td>African American</td>
<td>793</td>
<td>1.5%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>67</td>
<td>0.1%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>986</td>
<td>1.8%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>284</td>
<td>0.5%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>708</td>
<td>1.3%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>983</td>
<td>1.8%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>53,515</td>
<td></td>
</tr>
</tbody>
</table>

Millcreek in their AI reported a relatively small percentage of disabled individuals.\(^{11}\) According to the AI, 3,850 residents, or 8% of the population over five-years old, reported at least one type of disability.\(^{12}\) However, a closer look at the Census 2000 data indicates that 6,721 residents, or 12.9% of the population over five-years old, reported at least one type of disability.

---

\(^{11}\) See fn. 4  
\(^{12}\) Figure represents the number of residents over the age of five (5) that reported having only one type of disability.
The AI states that there are no areas of concentration of racial or ethnic minorities in Millcreek. It further provides that, even though the percentages of minority residents are low, they are evenly distributed throughout the twelve (12) census tracts that comprise Millcreek.

Millcreek has a relatively small percentage of LMI persons. Based upon the data provided in the AI, HUD determined that there were 14,434 LMI persons in Millcreek; which is equivalent to 28.2% of the population for which this rate is calculated. Because of Millcreek’s generally affluent population HUD established an “exception criteria” to the LMI percentage required for CDBG eligibility, lowering the LMI percentage requirement from 51% to 37.1%. Using this “exception criteria,” in 2000, 10 of Millcreek’s 42 census block groups were identified as areas of concentrations of LMI persons.

In 2000, the median household income for all households in Millcreek was $45,019. According to the AI, White, African American, Asian, and Hispanic households, all had median household incomes in excess of $45,019, with White households earning the least at $45,043 and Asian households earning the most at $65,385. With such relatively high median household incomes, it should come as no surprise that Millcreek’s unemployment rate in 2000 was only 3.6%, which was significantly lower than the State’s rate of 5.7% and the County’s rate of 5.8%. The highest rate of unemployment was experienced by Hispanics at 16.1%; it is important to note that this percentage equated to only 37 individuals.

The majority of the housing stock in Millcreek is Single Family units, with 15,871 units; this represents 71% of the 22,367 total housing units. The 4,920 Multi-Family units make up 22% of the total stock, with the remaining 1,576 units, 7% of total stock, coming from mobile homes, trailers, and other similar housing. The overall homeownership rate, in 2000, for all households in Millcreek was 72%; among White households, the rate was 73%, while Hispanics owned their homes at a 60% rate, and only 35% of African American households owned their home.

13 See fn. 7
The AI failed to provide any historical information regarding the housing stock. However, an examination of the 2007-2011 ACS shows that Millcreek has experienced an increase in its housing stock to correlate with its increasing population. An examination of the data from Census 2000 and the 2007-2011 ACS shows that Millcreek gained 1,381 units, from 22,367 in 2000, to 23,748 in 2011.

Despite the increases in the total housing stock, the AI reported that from 1990 to 2000, there has been a 34.9% decrease in the number of affordable rental units (units renting for less than $500 per month), from 3,784 in 1990, to 2,464 in 2000. Unfortunately, this trend has accelerated over the past decade. An examination of the 2007-2011 ACS data shows that from 2000 to 2011 the number of affordable rental units plummeted by 68.6% to 773, a loss of 1,691 units. During this same period, there was a 57.5% (1,877 units) increase in the number of units renting for $500 or more a month, as shown in the chart below.

### Occupied Units Paying Rent

<table>
<thead>
<tr>
<th>Units Renting for:</th>
<th>2000</th>
<th>2011</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>183</td>
<td>62</td>
<td>-121</td>
<td>-66.1%</td>
</tr>
<tr>
<td>$200 to $299</td>
<td>299</td>
<td>240</td>
<td>-59</td>
<td>-19.7%</td>
</tr>
<tr>
<td>$300 to $499</td>
<td>1,982</td>
<td>471</td>
<td>-1,511</td>
<td>-76.2%</td>
</tr>
<tr>
<td>$500 to $749</td>
<td>2,198</td>
<td>2,031</td>
<td>-167</td>
<td>-7.6%</td>
</tr>
<tr>
<td>$750 to $999</td>
<td>783</td>
<td>1,830</td>
<td>1,047</td>
<td>133.7%</td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>126</td>
<td>1,013</td>
<td>887</td>
<td>704.0%</td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>157</td>
<td>267</td>
<td>110</td>
<td>70.1%</td>
</tr>
<tr>
<td>Totals</td>
<td>5,728</td>
<td>5,914</td>
<td>186</td>
<td>3.2%</td>
</tr>
<tr>
<td>Affordable Units</td>
<td>2,464</td>
<td>773</td>
<td>-1,691</td>
<td>-68.6%</td>
</tr>
</tbody>
</table>

*Source: U.S. Census Bureau*

The AI does not provide any information regarding housing discrimination complaints filed with HUD or PHRC. It states that written requests were made to HUD and PHRC, but as of the date of the AI, those requests remained unfulfilled. The AI does state that from 2006-2008, 10 to 15 fair housing complaints had been filed with EHRC, however, none of those originated from Millcreek. During the three (3) years the West Penn Rural Fair Housing Initiative has been
operating as a FHIP, we have filed one (1) housing discrimination complaint, on the basis of
disability, with HUD originating from Millcreek.

**Impediments to Fair Housing Choice**

In their 2008 Analysis of Impediments to Fair Housing Choice, Millcreek Township
identified three (3) impediments to fair housing choice.

**Impediment #1**

There appears to be little focus on fair housing by the Township. There is no formal
tracking system for fair housing complaints in the Township.

The AI does not provide any information regarding their goal to address this impediment.

They have identified six (6) recommended activities to address this impediment:

1) Continue to partner with St. Martin Center to provide public outreach on fair housing
law and issues to track fair housing complaints in Millcreek.

2) Continue to partner with St. Martin Center to provide mortgage counseling to
potential homebuyers in Millcreek. Poor or no credit histories were the most
frequently cited reasons for denial of home mortgage loans in the Township.

3) Include on the Township’s webpage contact information for fair housing complaints,
inquires, etc.

4) Encourage applications from minorities and other members of the protected classes
for the Township Planning Commission.

5) Partner with the City of Erie to co-sponsor fair housing activities.

6) Adopt the proposed revised zoning ordinance.

**Impediment #2**

There remains a great need for quality accessible housing for persons with disabilities in
Millcreek Township.

The AI does not provide any information regarding their goal to address this impediment.
They have identified three (3) recommended activities to address this impediment:

1) Support the initiatives of nonprofit housing developers and organizations who work to provide affordable housing for persons with disabilities.

2) Encourage ECHA (Erie County Housing Authority) to conduct a Section 504 analysis to identify the accessibility needs of its units, particularly in Millcreek.

3) Continue the Township’s Architectural Barrier Removal/Adaptive Home Modification Program.

**Impediment #3**

Continue to create and expand affordable housing activities for LMI persons and households in the Township.

The AI does not provide any information regarding their goal to address this impediment.

They have identified two (2) recommended activities to address this impediment:

1) Continue the Township’s single family owner-occupied housing rehab program, rental housing rehab program, and weatherization activities.

2) Encourage ECHA to conduct a Section 504 analysis to identify the accessibility needs of its units, particularly in Millcreek. ¹⁴

---

¹⁴ This recommended activity appears to be erroneously listed under this impediment. This activity does not appear in Millcreek’s CAPER for this impediment.
The City of Sharon ("Sharon") is located in southwestern Mercer County on the Shenango River near the Ohio state border. The City covers approximately 3.76 square miles in total area.

With the loss of industry, manufacturing, and employment, the population in Sharon has been steadily decreasing over the past several decades. From 1990 to 2000, Sharon’s population had decreased by 6.7%, from 17,493 to 16,328 residents. The Census 2000 population figures as used in the 2009 Analysis of Impediments to Fair Housing Choice ("AI") is broken down as follows:
### City of Sharon Population (2000)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>14,114</td>
<td>86.4%</td>
</tr>
<tr>
<td>African American</td>
<td>1,771</td>
<td>10.8%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>29</td>
<td>0.2%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>38</td>
<td>0.2%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>37</td>
<td>0.2%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>339</td>
<td>2.1%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>144</td>
<td>0.9%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>16,328</strong></td>
<td></td>
</tr>
</tbody>
</table>

A look at the 2010 Census figures shows that this declining trend has accelerated for the population at large, with a 14% decline from 2000 to 2010. However, Sharon has seen a dramatic increase in their minority population, with a 28% increase from 2,354 in 2000, to 3,005 minority residents in 2010. A breakdown of the 2010 Census figures is as follows:

### City of Sharon Population (2010)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>11,285</td>
<td>80.4%</td>
</tr>
<tr>
<td>African American</td>
<td>2,048</td>
<td>14.6%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>35</td>
<td>0.2%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>79</td>
<td>0.6%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>69</td>
<td>0.5%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>525</td>
<td>3.7%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>252</td>
<td>1.8%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>14,038</strong></td>
<td></td>
</tr>
</tbody>
</table>

The AI failed to discuss the disabled population, but an examination of the Census 2000 data shows that 3,852 residents, or 24% of the population over five-years old reported at least one type of disability.\(^\text{15}\)

The AI also failed to provide any information regarding the available dissimilarity index data, or speak to possible segregation in the City. The AI did identify four (4) of the 17 census

---

\(^\text{15}\) See fn. 4
block groups as areas of concentrations of minorities. These census block groups were Tract 302, Block 1 (25.3%), Tract 305, Block 3 (33.9%), Tract 306, Block 1 (33.6%), and Tract 306, Block 3 (52.6%).

Sharon also has a large percentage of LMI persons. Based upon the data provided in the AI, HUD determined that there were 8,578 LMI persons in Sharon, equivalent to 54.1% of the population for which this rate is calculated.\(^9\) In 1999, four (4) of Sharon’s 17 census block groups were identified as areas of concentrations of LMI persons, with three (3) of those four (4) areas also identified as areas of concentration of minority residents.

In 1999, the median household income for all households in Sharon was $26,945. The AI failed to provide a demographic breakdown regarding household income. According to the AI, in late 2008, Mercer County experienced a spike in their unemployment rate. In 2009, the unemployment rate exceeded 12.5%, which was higher than the State’s rate of less than 9%. The AI failed to provide a demographic breakdown regarding the unemployment rate.

The majority of the housing stock in Sharon is Single Family units, with 5,444 units; this represents 73.7% of 7,388 total housing units. The 1,927 Multi-Family units make up 26.1% of the total stock, with the remaining 17 units, 0.2% of total stock, coming from mobile homes, trailers, and other similar housing. In 2000, 62.9%, or 4,273 of the households in Sharon were considered homeowners. The vast majority, 93.1% of homeowners in Sharon were White households, while only 5.9% were Black households.

The AI failed to provide any historical data regarding the housing stock in Sharon; however, a review of the 2007-2011 ACS, data shows that there were 187 units lost from 2000 to 2011. This 2.5% decrease in the housing stock was substantially less than the 14% population decrease over the same period. A further look at these numbers shows that there was an 11.8% decrease in the number of rental units, from 2,406 units in 2000 to 2,123 units in 2011. Sharon has also seen a drastic reduction in the total number of affordable rental units (units renting for less than $500 per month), losing 609 units (-36.6%) from 2000 to 2011. During this same

\(^9\) See fn. 7
period, there was an increase of 43.8% (744 to 1070 units) in the number of units renting for $500 or more a month, as illustrated in the chart below.

### Occupied Units Paying Rent

<table>
<thead>
<tr>
<th>Units Renting for:</th>
<th>2000</th>
<th>2011</th>
<th>Change 2000-2011</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>350</td>
<td>173</td>
<td>-177</td>
<td>-50.6%</td>
<td></td>
</tr>
<tr>
<td>$200 to $299</td>
<td>395</td>
<td>378</td>
<td>-17</td>
<td>-4.3%</td>
<td></td>
</tr>
<tr>
<td>$300 to $499</td>
<td>917</td>
<td>502</td>
<td>-415</td>
<td>-45.3%</td>
<td></td>
</tr>
<tr>
<td>$500 to $749</td>
<td>662</td>
<td>765</td>
<td>103</td>
<td>15.6%</td>
<td></td>
</tr>
<tr>
<td>$750 to $999</td>
<td>52</td>
<td>267</td>
<td>215</td>
<td>413.5%</td>
<td></td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>15</td>
<td>38</td>
<td>23</td>
<td>153.3%</td>
<td></td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>15</td>
<td>0</td>
<td>-15</td>
<td>-100.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>2,406</td>
<td>2,123</td>
<td>-283</td>
<td>-11.8%</td>
<td></td>
</tr>
<tr>
<td><strong>Affordable Units</strong></td>
<td>1,662</td>
<td>1,053</td>
<td>-609</td>
<td>-36.6%</td>
<td></td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau

With Sharon’s relative small geographic area and population there has been a low number of housing discrimination complaints filed. According to the AI, from January 2000- September 2009, there had been six (6) housing discrimination complaints filed with HUD, five (5) of which were resolved through conciliation or settlement, while one (1) resulted in a “no cause determination.” Of these six (6) complaints, four (4) were filed on the basis of race, two (2) on the basis of disability, one (1) on the basis of familial status, and one (1) on the basis of retaliation. Some of the complaints filed alleged multiple bases. Additionally according to the AI, from 2003-2008, there had been 10 housing discrimination complaints filed with PHRC originating from Mercer County. The AI failed to provide a breakdown regarding the specific originating location of the complaints. Lastly, the AI reported that the Shenango Valley Urban League received 15 housing complaints from 2002-2009. No further information was provided in the AI regarding the complaints filed with the Shenango Valley Urban League. During the three (3) years that the West Penn Rural Fair Housing Initiative has been operating as a FHIP, we have not filed any housing discrimination complaints with HUD originating from Sharon.
Impediments to Fair Housing Choice

In their 2009 Analysis of Impediment to Fair Housing Choice, the City of Sharon identified six (6) impediments to fair housing choice.

Impediment #1

There is a lack of decent, safe, and sound housing which is affordable to lower income persons and families, limiting housing choice.

Sharon’s goal to address this impediment is to “Increase the supply of decent, safe, and sound housing that is affordable to lower income households, both renter and owner occupants.”

They have identified four (4) strategies in order to achieve this goal:

1) Improve the existing housing stock in the City through rehabilitation which will increase the supply of available decent, safe, and affordable housing.
2) Support, promote and provide funds for the development of new affordable rental housing. This will increase the supply of affordable housing units and reduce the number of low-income households waiting for public housing and rental assistance.
3) Increase homeownership opportunities for low- and moderate-income households by providing funds for housing counseling, and downpayment assistance.
4) Support, promote and provide funds for construction of new single family affordable housing for low-income families.

Impediment #2

There is a lack of awareness of rights and responsibilities under the Fair Housing Act and a need to continually monitor and enforce the Fair Housing Act.

Sharon’s goal to address this impediment is to “Increase tenant awareness of their rights and the responsibilities of landlords under the Fair Housing Act through education, advocacy, monitoring, and enforcement to eliminate discrimination in housing and provide fair housing options to all individuals and families.”
They have identified five (5) strategies to achieve this goal:

1) Continue to fund and support public education, training and programs concerning the rights and responsibilities covered by the Fair Housing Act.
2) Maintain and support efficient and effective fair housing monitoring, investigation, and enforcement strategies by the Shenango Valley Urban League.
3) Fund and support the delivery of financial literacy counseling for low-income and minority households.
4) Fund and support the delivery of fair housing services to at-risk groups and victims of housing discrimination.
5) Fund and support the Shenango Valley Urban League's Human Relations Services.

Impediment #3

There is a lack of accessible affordable housing that is decent, safe, and sound, which limits housing choice for handicapped persons and makes it a fair housing concern.

Sharon’s goal to address this impediment is to “Increase the supply of decent, safe, and sound housing that is affordable and accessible to lower-income households who are physically challenged and the frail elderly.”

They have identified four (4) strategies in order to achieve this goal:

1) Assess the supply of accessible, affordable housing by preparing an inventory of accessible units, accessibility features, and promote accessible units to disabled and frail elderly renters.
2) Increase the supply of accessible housing by providing targeted rehabilitation assistance and ensure that new multi-family construction meets accessibility provisions of the Fair Housing Act.
3) Support educational programs to inform the public of the need to provide accessible housing accommodations for persons who are disabled and/or the frail elderly.
4) Support applications from non-profit agencies for Federal funds under the HUD Section 811 and 202 Supportive Housing Programs to develop housing for persons who are physically challenged and the elderly.
Impediment #4

There is a lack of economic opportunities and jobs which prevent low-income households from improving their income and impact their ability to move outside of low-income areas, which reduces fair housing choice.

Sharon’s goal to address this impediment is to “Increase job opportunities to increase family income and allow for more housing choice.”

They have identified three (3) strategies in order to achieve this goal:

1) Strengthen the City's economy by promoting activities that produce new job opportunities for low- and moderate-income persons.
2) Support and enhance workforce development and job training to improve job skills for the unemployed and under-employed.
3) Promote entrepreneurship and small business development to provide economic opportunities to low-income persons.

Impediment #5

There are concentrations of low-income and minority households in certain areas of the City.

Sharon’s goal to address this impediment is to “Promote new affordable housing choices outside areas of low-income and minority concentration in order to lessen concentrations in impacted areas.”

They have identified three (3) strategies in order to achieve this goal:

1) Increase the supply of affordable housing units outside areas of concentrated low-income and minority groups.
2) Develop and financially support initiatives for new housing construction to diversify neighborhoods of the City.
3) Develop and financially support initiatives to develop mixed-income housing in areas with high concentrations of low-income and minority households.
Impediment #6

There is a high percentage of both owner occupied and renter occupied households whose housing cost exceeds 30% of their total household income.

Sharon’s goal to address this impediment is to “Reduce the number of families whose housing costs exceed 30% or more of their total household income.”

They have identified four (4) strategies in order to achieve this goal:

1) Provide financial assistance to homeowners to rehab their properties and install energy cost saving measures.
2) Provide tenant-based rental assistance funds to those households who are severely cost overburdened by 50% or more.
3) Promote the development of more housing that is affordable for the very-low income households.
4) Provide homebuyer assistance to purchase existing housing by low-income home buyers.
Borough of State College

The Borough of State College (“State College”) is located in southern Centre County and home to The Pennsylvania State University, better known as Penn State. The Borough covers approximately 4.5 square miles in total area.

The population in State College has been increasing since 1970. From 1970 to 2007, State College’s population had increased by 21.5%, from 32,833 to 39,893 residents. The 2005-2007 ACS population figures as used in the 2009 Fair Housing Analysis Update for The Borough of State College (“FHAU”) is broken down as follows:
### Borough of State College Population (2005-2007)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>33,814</td>
<td>86.6%</td>
</tr>
<tr>
<td>African American</td>
<td>889</td>
<td>2.3%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>96</td>
<td>0.2%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>3,791</td>
<td>9.6%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>471</td>
<td>1.2%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>542</td>
<td>1.4%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,242</td>
<td>3.1%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>39,603</td>
<td></td>
</tr>
</tbody>
</table>

A look at the 2010 Census figures shows that the population has continued to increase, adding 2,431 residents from the 2005-2007 estimates to 2010. During the same time the minority population increased by 22.2% from 5,789 in 2005-2007, to 7,075 minority residents in 2010. A breakdown of the 2010 Census figures is as follows:

### Borough of State College Population (2010)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>34,959</td>
<td>83.2%</td>
</tr>
<tr>
<td>African American</td>
<td>1,602</td>
<td>3.8%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>64</td>
<td>0.2%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>4,138</td>
<td>9.8%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>418</td>
<td>1.0%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>853</td>
<td>2.0%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,629</td>
<td>3.9%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>42,034</td>
<td></td>
</tr>
</tbody>
</table>

State College has a small percentage of disabled individuals. According to the Census 2000 data provided in the FHAU, 2,390 or 6.4% of the population over five-years old reported at least one type of disability. The FHAU, citing the 2005-2007 ACS indicates that the number has decreased to 2,287 or 5.9% of the population over five-years old reported having at least one type of disability.

---

17 See fn. 4
According to the available dissimilarity index data from 2000, State College is considered a “moderately segregated” borough in regards to its African American to White population. State College’s index score of 31.8 means that 31.8% of African American residents would have to move to a different location in State College in order to achieve full integration with the White population. State College has adopted a definition of an area of racial or minority concentration that differs from the standard HUD definition. In State College an area of racial or minority concentration, as defined in their Consolidated Plan, is a census tract where the population of a race is greater than one (1) standard deviation from the average for a race. Based on this definition the FHAU states that three (3) of the nine (9) census tracts in the Borough met their definition of an area of racial or minority concentration. These tracts were Census Tract 121, 122, and 128. However, if HUD’s definition of an area of racial and ethnic minority concentration were used, none of the nine (9) census tracts would be identified as areas of racial and ethnic minority concentration. Even though there would be no areas of concentration using the HUD definition, four (4) census tracts housed a percentage of minorities greater than the Borough’s overall rate of 15.7%. These tracts were Census Tract 121 (24.5%), 122 (17%), 124 (15.8%), and 128 (22.8%). A further examination of the 2010 Census data shows that Census Tract 128, by HUD’s definition, would be considered an area of concentration of minority residents as well as an area of concentration of Asian residents. (See Table 2 for breakdown of State College population by census tract).

State College, despite its small size, has a very large percentage of LMI persons. Based upon the data provided in the FHAU, HUD determined that there were 18,440 LMI persons in State College; which is equivalent to 72.1% of the population for which this rate is calculated. In 2000, 13 of State College’s 20 census block groups were areas of concentrations of LMI persons.

---

18 See fn. 5
19 A geographic area where the percentage of a specific group of individuals is 10 percentage points higher than that of the overall jurisdiction.
20 See fn. 7
In 2000, the median household income for all households in State College was $54,949. The FHAU failed to provide a demographic breakdown as it relates to household income. Additionally, the FHAU failed to address the topic of unemployment entirely.

The majority of the housing stock in State College is Multi-Family units, with 8,699 units; this represents 69.7% of 12,488 total housing units. This figure is not surprising, with the presence of Penn State and its large student population. The 3,732 Single Family units make up 29.9% of the total stock, with the remaining 57 units, 0.4% of total stock, coming from mobile homes, trailers, and other similar housing. Only 22% (2,743 units) of the total housing units are owner occupied; the FHAU failed to provide a demographic breakdown as it relates to homeownership.

State College’s increasing population has correlated with a steady increase in the housing stock, with the FHAU reporting 1,128 units added from 1990 to 2005-2007. An examination of the data from the 2010 Census and 2007-2011 ACS, show that this trend has continued. State College reported 13,007 units in the 2010 Census and 13,722 in the 2007-2011 ACS.

The FHAU failed to provide a breakdown of the number of rental units and the corresponding monthly rental cost. However, taking the Census 2000 data along with the 2007-2011 ACS figures we can see that State College has added 560 rental units to their housing stock. Unfortunately, the number of affordable rental units (units renting for less than $500 per month), has decreased by 73.2% from 2,957 units in 2000, to only 793 in 2011. During this same period, there was an increase of 43.7% in the number of units renting for $500 or more a month, as illustrated in the following chart.
### Occupied Units Paying Rent

<table>
<thead>
<tr>
<th>Units Renting for:</th>
<th>2000</th>
<th>2011</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>41</td>
<td>20</td>
<td>-21</td>
<td>-51.2%</td>
</tr>
<tr>
<td>$200 to $299</td>
<td>416</td>
<td>81</td>
<td>-335</td>
<td>-80.5%</td>
</tr>
<tr>
<td>$300 to $499</td>
<td>2,500</td>
<td>692</td>
<td>-1,808</td>
<td>-72.3%</td>
</tr>
<tr>
<td>$500 to $749</td>
<td>3,657</td>
<td>2,601</td>
<td>-1,056</td>
<td>-28.9%</td>
</tr>
<tr>
<td>$750 to $999</td>
<td>1,384</td>
<td>3,343</td>
<td>1,959</td>
<td>141.5%</td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>878</td>
<td>1,558</td>
<td>680</td>
<td>77.4%</td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>312</td>
<td>1,453</td>
<td>1,141</td>
<td>365.7%</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>9,188</td>
<td>9,748</td>
<td>560</td>
<td>6.1%</td>
</tr>
<tr>
<td><strong>Affordable Units</strong></td>
<td>2,957</td>
<td>793</td>
<td>-2,164</td>
<td>-73.2%</td>
</tr>
</tbody>
</table>

*Source: U.S. Census Bureau*

With State College’s relatively small geographic area and population there have been a small number of housing discrimination complaints filed. According to State College’s FHAU since June 1992, there had been 14 housing discrimination complaints filed with HUD originating from Centre County. The FHAU failed to provide a breakdown of the bases of the complaints filed with HUD. Of the 14 complaints, four (4) were resolved through conciliation or settlement, two (2) were closed after the complaint was withdrawn by complainant after resolution, seven (7) were closed as a result of a no probable cause finding, and one (1) was dismissed for lack of jurisdiction. Additionally according to the FHAU, from July 2001 and June 2007, there had been five (5) fair housing complaints reviewed by PHRC. The FHAU failed to provide any additional information regarding the complaints.

The FHAU also reported that since State College enacted their Fair Housing Ordinance in 1993, they have received 10 fair housing complaints. The FHAU failed to identify the bases of the complaints. The FHAU does state that four (4) of the complaints were withdrawn following successful mediation, two (2) were closed as a result of a “no probable cause finding,” one (1) case was sent to mediation, which was not successful, one (1) complaint was closed because the complainant already filed a complaint with HUD, one (1) was not processed because it was not covered by the ordinance, and one (1) did not move forward because the complainant did not respond to the respondent’s response. During the three (3) years that the West Penn Rural Fair
Housing Initiative has been operating as a FHIP, we have not filed any housing discrimination complaints with HUD originating from State College.

**Impediments to Fair Housing Choice**

In their 2009 Fair Housing Analysis Update, the Borough of State College failed to identify any impediments to fair housing choice. The FHAU does state that in their 1991 Analysis of Impediments to Fair Housing Choice, they identified five (5) impediments. The FHAU further states that no additional impediments were identified in their 2003 or 2009 Fair Housing Analysis Update. The following are the five (5) impediments identified in 1991.

*Impediment #1*

A lack of affordable housing and financing.

The FHAU does not provide any information regarding their goal or strategies identified to address this “impediment.”

*Impediment #2*

An inadequate supply of family-size units

The FHAU does not provide any information regarding their goal or strategies identified to address this “impediment.”

*Impediment #3*

A lack of local fair housing enforcement, focus, and support

The FHAU does not provide any information regarding their goal or strategies identified to address this “impediment.”

*Impediment #4*

Zoning barriers to affordable housing

The FHAU does not provide any information regarding their goal or strategies identified to address this “impediment.”
Impediment #5  
Non-specific acts of housing discrimination

The FHAU does not provide any information regarding their goal or strategies identified to address this “impediment.”
Washington County (“Washington”) is situated over 861 square miles in southwestern Pennsylvania, making it one of the larger counties in the state. It is bordered by five (5) counties in Pennsylvania: Allegheny, Beaver, Fayette, Greene, and Westmoreland. Additionally, Washington borders four (4) counties in West Virginia: Brooke, Hancock, Marshall, and Ohio.

Washington’s population has remained steady over the past few decades, with both increases and decreases observed. From 1990 to 2008, Washington’s population had increased by 1.9%, from 204,584 to 208,472 residents. The 2008 population figures from DemographicsNow as used in the 2011 Washington County Analysis of Impediments to Fair Housing Choice (“AI”) is broken down as follows:
An examination of the 2010 Census data shows that the fluctuating trend has continued as Washington’s population decreased by 652 (0.3%) from 2008 to 2010. Despite the overall decrease, the minority population increased by 5.6% from 11,521 in 2008, to 12,163 minority residents in 2010. The breakdown of the population from the 2010 Census is as follows:

Washington County Population (2010)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>195,657</td>
<td>94.1%</td>
</tr>
<tr>
<td>African American</td>
<td>6,757</td>
<td>3.3%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>251</td>
<td>0.1%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>1,358</td>
<td>0.7%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>630</td>
<td>0.3%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>3,167</td>
<td>1.5%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>2,366</td>
<td>1.1%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>207,820</strong></td>
<td></td>
</tr>
</tbody>
</table>

Washington also has a large percentage of disabled individuals.\(^{21}\) According to the Census 2000 data used in the AI, 37,438 residents, or 19.8% of the population over five-years old reported at least one type of disability.

According to dissimilarity index data from 2000, the AI states that Washington is considered a “somewhat segregated” county in regards to its minority population. Washington’s

---

\(^{21}\) See fn. 4
White/African American dissimilarity index score of 45.6 means that 45.6% of African American households would have to move to a different location in order to achieve full integration with the White population. In Washington, two (2) of the County’s 67 municipalities were identified as areas of concentrations of minority residents. These municipalities were Washington City (18.1%) and Donora Borough (17.9%). Ten other municipalities in the County reported rates of racial and ethnic minorities higher than the County’s overall rate of 4.7%. Together these 12 municipalities house 61.6% of all minorities in Washington.

Washington also has a large percentage of LMI persons. Based upon the Census 2000 data, HUD determined that there were 79,517 LMI persons in Washington; which is equivalent to 40.2% of the population for which this rate is calculated.\textsuperscript{22} In 2000, 52 census block groups were areas of concentrations of LMI persons. Additionally, the two (2) municipalities identified as areas of concentrations of minority residents, also contained a majority of LMI persons.

In 2000, the median household income for all households in Washington was $37,607. Only White and Asian households had median household incomes in excess of $37,607, with White households earning $38,104 and Asian households earning $51,667. African American households earned significantly less with a median household income of $25,985. This disparity is also prevalent when looking at the unemployment data for Washington. In 2000, the County’s unemployment rate was 5.3%, which was lower than the State’s rate of 5.7%. Only Whites and Women, at 4.7%, had unemployment rates lower than the county’s overall rate. The highest unemployment rates were experienced by African Americans at 13.4% and Other Races at 13.5%.

The AI failed to provide specific information regarding the make-up of the housing stock for Washington. The only information that can be extracted from the AI is that in 2000, there were 81,130 owner occupied units and in 2008, there were 17,538 renter-occupied housing units. An examination of the 2007-2011 ACS shows that the majority of the housing stock in Washington is Single Family homes, with 74,043 units; this represents 80% of the 92,813 total housing units. The 12,933 Multi-Family units make up only 14% of the total stock, with the

\footnote{\textsuperscript{22} See fn. 7}
remaining 5,837 units, 6% of total stock, coming from mobile homes, trailers, and other similar housing. The overall homeownership rate in 2000, for Washington was 77.1%. Of the 81,130 homeowners, 80,902 (97.3%) were White households. Racial and ethnic minority homeowners numbered only 1,668 (2.7%) households.

Just as the population of Washington has fluctuated, so has the housing stock. The Census 2000 data stated that there were 87,267 units, while the 2010 Census data stated 92,977 units, a 6.5% increase, and finally the ACS stated 92,813 units, a 0.18% decrease from the previous year. The overall increase in the housing stock has increased the total number of Single Family units as well as rental units. Despite the increases in the total number of units and rental units, Washington has seen a dramatic reduction in the total number of affordable rental units (units renting for less than $500 per month). The AI reports that between 2000 and 2006, the number of available affordable units decreased by 120 units. However, a closer look at the figures reveals that the loss is much more staggering. From 2000 to 2011, Washington lost 5,306 affordable units; this was a 47.9% reduction from 11,077 units in 2000, to 5,771 units in 2011. During this time, Washington has seen a substantial rise in the number of rental units renting for $500 and more per month, with an increase of 120.1%, from 5,159 units in 2000, to 11,357 units in 2011, as illustrated in the chart below.

### Occupied Units Paying Rent

<table>
<thead>
<tr>
<th>Units Renting for:</th>
<th>2000</th>
<th>2011</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>1,366</td>
<td>355</td>
<td>-1,011</td>
<td>-74.0%</td>
</tr>
<tr>
<td>$200 to $299</td>
<td>2,148</td>
<td>1,205</td>
<td>-943</td>
<td>-43.9%</td>
</tr>
<tr>
<td>$300 to $499</td>
<td>7,563</td>
<td>4,211</td>
<td>-3,352</td>
<td>-44.3%</td>
</tr>
<tr>
<td>$500 to $749</td>
<td>4,192</td>
<td>6,208</td>
<td>2,016</td>
<td>48.1%</td>
</tr>
<tr>
<td>$750 to $999</td>
<td>698</td>
<td>3,187</td>
<td>2,489</td>
<td>356.6%</td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>220</td>
<td>1,548</td>
<td>1,328</td>
<td>603.6%</td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>49</td>
<td>414</td>
<td>365</td>
<td>744.9%</td>
</tr>
<tr>
<td>Totals</td>
<td>16,236</td>
<td>17,128</td>
<td>892</td>
<td>5.5%</td>
</tr>
<tr>
<td>Affordable Units</td>
<td>11,077</td>
<td>5,771</td>
<td>-5,306</td>
<td>-47.9%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau
Washington, with its large land area, is the eighteenth most populated county in Pennsylvania. According to the AI from 2000-2008, there had been 17 housing discrimination complaints filed with HUD. Of the 17 complaints six (6) were filed on the basis of race, six (6) on the basis of disability, one (1) on the basis of sex, one (1) on the bases of sex and familial status, one (1) on the basis of national origin, one (1) on the basis of retaliation, and one (1) on the bases of race and religion. The AI reports that three (3) of the complaints were resolved through conciliation or settlement, one (1) was withdrawn by the complainant, one (1) was closed because of a trial, nine (9) were closed as a result of a “no probable cause finding,” and three (3) remained open.

The AI also provides that from 2000-2008, there had been 55 housing discrimination complaints filed with PHRC. Of the 55 complaints, the majority, 24, involved the rental of housing or commercial property, 12 were classified as “Other” and did not reference a particular alleged act of harm, four (4) involved the refusal to make reasonable accommodations, four (4) involved the sale of housing or commercial property, three (3) involved publication, three (3) involved harassment, one (1) involved operating non-accessible housing, and one (1) involved retaliation. During the three (3) years that the West Penn Rural Fair Housing Initiative has been operating as a FHIP, we have filed two (2) housing discrimination complaints with HUD originating from Washington County, both on the basis of disability.

**Impediments to Fair Housing Choice**

In their 2011 Analysis of Impediments to Fair Housing Choice, Washington identified eight (8) impediments to fair housing choice.

**Impediment #1**

Racial and ethnic minorities are somewhat segregated in the County's high-population centers and older, less affluent suburbs.

Washington established two (2) goals to address this impediment: 1) “Encourage Section 8 voucher holders to move to non-impacted neighborhoods,” and 2) “Expand affordable housing in non-impacted areas.”
They have identified three (3) strategies in order to achieve these goals:

1) Work with area landlords and property management companies, in conjunction with the Washington County Housing Authority (WCHA), to encourage their acceptance of vouchers in non-impacted neighborhoods of the County.

2) Provide HOME funds for new housing development in non-impacted areas of the County.

3) Support the development of new family housing in non-impacted areas of the County.

**Impediment #2**

Black households earn significantly less than White households, thus severely limiting housing choice, including location.

Washington’s goal to address this impediment is to “Provide incentives for employment training and apprenticeships aimed at residents of racially impacted neighborhoods.”

They have identified one (1) strategy in order to achieve this goal:

1) Establish a new Section 3 policy aimed at linking clients of CareerLink with contractors of County-funded housing and community development projects.

**Impediment #3**

Real estate ads in the local paper prohibiting pets may discourage persons with service animals from considering these units.

Washington’s goal to address this impediment is to “Encourage the local newspaper to include an exception statement for service animals in all real estate ads that make reference to pets.”

They have identified two (2) strategies in order to achieve this goal:
1) Send a letter to the Observer-Reporter Legal Advertising Department to alert them of the need to include the exception clause for service animals in rental housing ads that do not allow pets.

2) Encourage the Washington County Housing Authority to circulate a similar letter to Section 8 landlords.

**Impediment #4**

Interviews and focus groups with advocacy organizations reveal that both landlords and many elected officials and zoning board members lack a comprehensive understanding of fair housing law, including reasonable accommodation requirements.

Washington established two (2) goals to address this impediment: 1) “Encourage landlords, elected officials, and zoning board members to participate in fair housing education” and 2) “Facilitate fair housing education.”

They have identified one (1) strategy in order to achieve this goal:

1) Form a partnership with the Local Government Academy to host a fair housing seminar/workshop for area elected officials, municipal planners, zoning board members, planning commission members, other relevant municipal staff, and area landlords/property management companies.

**Impediment #5**

Interviews and focus groups with advocacy organizations reveal that many members of the protected classes are unaware of their fair housing rights and the existing affordable rental and for sale housing opportunities that exist throughout the County.

Washington’s goal to address this impediment is to “Increase and enhance fair housing outreach and education efforts to members of the protected classes.”

They have identified two (2) strategies in order to achieve this goal:

1) Conduct a fair housing workshop that is open to all County residents at least once per year.
2) Update and redistribute the existing Washington County Fair Housing Guide to help educate residents of their fair housing rights and the opportunities that exist for homeownership.

**Impediment #6**

Fair Housing complaints alleging discrimination based on race and disability comprised the majority of PHRC complaints. Acts of harm related to the rental of housing and/or commercial property represented a large majority of the complaints filed with HUD.  

Washington’s goal to address this impediment is to “Increase and enhance fair housing outreach and education efforts throughout the County.”

They have identified two (2) strategies in order to achieve this goal:

1) Update and redistribute the Washington County Fair Housing Guide. Post the guide on RACW’s website and on the websites of area partner organizations.

2) Post online directory (www.washingtonknows.org) of available organizations and resources in the County to assist with the housing and supportive services needs of residents on the RACW Website and other partner organizations' websites.

**Impediment #7**

Inadequate supply and inadequate available information relative to accessible dwelling units for Persons with Disabilities.

Washington established two (2) goals to address this impediment: 1) “Increase the supply of affordable, accessible housing” and 2) “Increase access to information regarding existing accessible units.”

They have identified three (3) strategies in order to achieve this goal:

1) Create and maintain a link to PHFA's affordable apartment locator, which provides info on accessible units, on RACW's website.

2) Create more incentives for property owners and investors to build/convert accessible units.

---

This appears to be a typo, with PHRC and HUD referred to in the incorrect sentences.
3) Continue to partner with area organizations and developers to increase the supply of affordable accessible housing in all parts of the County.

**Impediment #8**

Several municipal zoning ordinances are outdated, lack certain terms, definitions, and/or regulations, or are in violation of Federal fair housing law.

Washington established two (2) goals to address this impediment: 1) “Increase and enhance fair housing outreach and education efforts” and 2) “Perform a review of all municipal zoning ordinances in the County to evaluate compliance with federal fair housing laws.”

They have identified two (2) strategies in order to achieve this goal:

1) Facilitate fair housing training for planners, zoning board officers, planning commission members, and other municipal officials to educate them on compliance with the Federal fair housing laws, the Americans with Disabilities Act (ADA), and the Pennsylvania Landlord-Tenant Law.

2) Perform a review of all municipal zoning ordinances in the County over the next five years. Notify municipalities with outdated ordinances that contain potential fair housing violations via letter correspondence.
Westmoreland County

Westmoreland County ("Westmoreland") is situated over 1,036 square miles in southwestern Pennsylvania, making it the tenth largest county in the State. It is bordered by eight (8) different counties: Allegheny, Armstrong, Butler, Cambria, Fayette, Indiana, Somerset, and Washington.

Westmoreland’s population is slowly declining. Westmoreland reported in the 2010 Westmoreland County Analysis of Impediments to Fair Housing Choice ("AI"), that from 2000 to 2008, the population had decreased by 2.2%, from 371,993 to 363,881 residents. The 2008 population estimates from DemographicsNow as used in the AI are broken down as follows:
Westmoreland County Population (2008)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>346,330</td>
<td>95.7%</td>
</tr>
<tr>
<td>African American</td>
<td>8,705</td>
<td>2.4%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>293</td>
<td>0.1%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>3,468</td>
<td>1.0%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>587</td>
<td>0.2%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>2,485</td>
<td>0.7%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>2,361</td>
<td>0.7%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>361,868</strong></td>
<td></td>
</tr>
</tbody>
</table>

An examination of the 2010 Census data show that declining trend may have reversed, as Westmoreland’s population increased by 3,301 (0.9%) residents from the reported 2008 figures to 2010. Notwithstanding this perceived uptick in population, when comparing the figures from the Census 2000 to the 2010 Census, Westmoreland’s population decreased by 1.3%, from 369,993 in 2000, to 365,169 residents in 2010. Despite the overall decrease from 2000 to 2010, the minority population increased by 34% from 12,668 in 2000, to 16,987 minority residents in 2010. The breakdown of the population figures from the 2010 Census is as follows:

Westmoreland County Population (2010)

<table>
<thead>
<tr>
<th>Group</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>348,182</td>
<td>95.3%</td>
</tr>
<tr>
<td>African American</td>
<td>8,562</td>
<td>2.3%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>351</td>
<td>0.1%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>2,766</td>
<td>0.8%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>833</td>
<td>0.2%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>4,475</td>
<td>1.2%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>3,179</td>
<td>0.9%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>365,169</strong></td>
<td></td>
</tr>
</tbody>
</table>

Westmoreland also has a large percentage of disabled individuals. According to the AI, 33,672 residents, or 10% of the population over five-years old reported at least one type of disability. However, a closer examination of the Census 2000 data shows that the number of disability.

---

24 See fn. 4
disabled residents is significantly higher at 63,072 or 18.2% of the population over five-years old.

According to dissimilarity index data from 2000, the AI states that Westmoreland is considered a “somewhat segregated” county in regards to its minority population. Westmoreland’s White/African American index score of 54.1 means that 54.1% of African American households would have to move to a different location in order to achieve full integration with the White population. In Westmoreland, three (3) of the County’s 65 municipalities were identified as areas of concentration of African American residents. These municipalities were Arnold City (13%), Monessen City (14%), and Youngwood Borough (12%). Ten (10) other municipalities in the County reported rates of racial and ethnic minorities higher than the County’s overall rate of 3.4%. Together these 13 municipalities house 61.3% of all minorities in Westmoreland.

Westmoreland also has a large percentage of LMI persons. Based upon the Census 2000 data, HUD determined that there were 123,806 LMI persons in Westmoreland; this is equivalent to 39% of the population for which this rate is calculated. In 2000, 102 census block groups were identified as areas of concentration of LMI persons. Additionally, the three (3) municipalities identified as areas of concentrations of Black residents, also contained a majority of LMI persons.

In 2000, the median household income for all households in Westmoreland was $37,223. White, American Indian/Alaskan Native, Asian, and Hispanic households all earned incomes in excess of $37,223, with Asian households earning $127,242, the highest in the County. White households earned $37,250, which was only $27 more than the County median household income, while African American households earned $24,724, which was $12,499 less than the County median household income. This disparity between African American and White households was also prevalent when looking at the unemployment data for Westmoreland. In 2000, the County’s unemployment rate was 5.4%, which was lower than the State’s rate of 5.7%.

25 See fn. 7
Only African Americans, at 13.5%, experienced an unemployment rate greater than the County’s overall rate.

The AI failed to provide specific information regarding the make-up of the housing stock for Westmoreland. The only information that can be extracted from the AI is that in 2000, there were 116,847 owner occupied units. An examination of the Census 2000 data shows that the majority of the housing stock in Westmoreland is Single Family homes, with 125,247 units; this represents 75.8% of the 161,058 total housing units. The 23,483 Multi-Family units make up only 14.6% of the total stock, with the remaining 12,328 units, 7.6% of the total stock, coming from mobile homes, trailers, and other similar housing. The overall homeownership rate in 2000 for Westmoreland was 78%. Of the 116,847 homeowners, 114,770 (98.2%) were White households. Racial and ethnic minority homeowners numbered only 2,077 (1.8%) households.

Despite the decreasing trend in population, the overall housing stock in Westmoreland has increased from 2000 to 2011. The Census 2000 data stated that there were 161,058 units, while the 2007-2011 ACS stated there were 167,991 units, a 4.1% increase. The bulk of this increase in housing stock was in the Single Family units, however, the number of rentals also increased by 3,813 units. Despite this substantial increase in rental units, Westmoreland had experienced a dramatic reduction in the number of affordable rental units (units renting for less than $500 per month). The AI reported that between 2000 and 2006, the number of available affordable units decreased by 6,972 units. According to the 2007-2011 ACS data this unfortunate trend has continued, with another 2,211 affordable units lost from 2006 to 2011. From 2000 to 2011, Westmoreland lost 9,183 affordable units; this was a 46.6% reduction from 19,726 units in 2000, to 10,543 units in 2011. During this time, Westmoreland has seen a dramatic increase in the number of rental units renting for $500 and more per month, with an increase of 127.7%, from 9,760 units in 2000, to 22,223 units in 2011, as illustrated in the following chart.
**Occupied Units Paying Rent**

<table>
<thead>
<tr>
<th>Units Renting for:</th>
<th>2000</th>
<th>2011</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $200</td>
<td>2,881</td>
<td>1,184</td>
<td>-1,697</td>
<td>-58.9%</td>
</tr>
<tr>
<td>$200 to $299</td>
<td>3,108</td>
<td>2,434</td>
<td>-674</td>
<td>-21.7%</td>
</tr>
<tr>
<td>$300 to $499</td>
<td>13,737</td>
<td>6,925</td>
<td>-6,812</td>
<td>-49.6%</td>
</tr>
<tr>
<td>$500 to $749</td>
<td>8,101</td>
<td>13,415</td>
<td>5,314</td>
<td>65.6%</td>
</tr>
<tr>
<td>$750 to $999</td>
<td>1,161</td>
<td>6,162</td>
<td>5,001</td>
<td>430.7%</td>
</tr>
<tr>
<td>$1,000 to $1,499</td>
<td>299</td>
<td>1,945</td>
<td>1,646</td>
<td>550.5%</td>
</tr>
<tr>
<td>$1,500 or more</td>
<td>199</td>
<td>701</td>
<td>502</td>
<td>252.3%</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>29,486</td>
<td>32,766</td>
<td>3,280</td>
<td>11.1%</td>
</tr>
<tr>
<td><strong>Affordable Units</strong></td>
<td>19,726</td>
<td>10,543</td>
<td>-9,183</td>
<td>-46.6%</td>
</tr>
</tbody>
</table>

*Source: U.S. Census Bureau*

Westmoreland, with its large land area, is the tenth most populated county in Pennsylvania. According to the AI from 2000-2008, there had been 46 housing-related discrimination complaints filed with HUD. The breakdown of the bases of these complaints is as follows:

<table>
<thead>
<tr>
<th>Basis of Alleged Discrimination</th>
<th># of Complaints Filed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability</td>
<td>15</td>
</tr>
<tr>
<td>Race</td>
<td>13</td>
</tr>
<tr>
<td>Familial Status</td>
<td>4</td>
</tr>
<tr>
<td>Sex</td>
<td>2</td>
</tr>
<tr>
<td>Race &amp; Familial Status</td>
<td>2</td>
</tr>
<tr>
<td>Race &amp; Retaliation</td>
<td>2</td>
</tr>
<tr>
<td>National Origin</td>
<td>1</td>
</tr>
<tr>
<td>Retaliation</td>
<td>1</td>
</tr>
<tr>
<td>Race &amp; Disability</td>
<td>1</td>
</tr>
<tr>
<td>National Origin, Age, and Disability</td>
<td>1</td>
</tr>
<tr>
<td>Race, Sex, and National Origin</td>
<td>1</td>
</tr>
<tr>
<td>Disability &amp; Retaliation</td>
<td>1</td>
</tr>
<tr>
<td>Sex &amp; Harassment</td>
<td>1</td>
</tr>
<tr>
<td>Race &amp; Sex</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total Complaints Filed</strong></td>
<td><strong>46</strong></td>
</tr>
</tbody>
</table>

The AI reports that 17 of the complaints were resolved through conciliation or settlement, 14 were closed as a result of a “no probable cause finding,” three (3) were closed by a FHAP judicial dismissal, two (2) were closed because the complainant failed to cooperate, one (1) was
closed after the complaint was withdrawn after resolution, one (1) was dismissed for lack of jurisdiction, information was not provided for four (4) complaints, and four (4) others remained open.

The AI also provided that from 2000-2008, there had been 153 fair housing complaints filed with PHRC. Of the 153 complaints, the majority, 64, involved the rental of housing or commercial property, 33 were classified as “Other” and did not reference a particular harm, 16 involved the refusal to make reasonable accommodations, 13 involved publication, 10 involved the sale of housing, four (4) involved harassment, four (4) involved retaliation, three (3) involved the misrepresentation of the availability of housing, three (3) involved operating non-accessible housing, two (2) involved threats to compel or coerce, and one (1) involved discrimination in the furnishing of facilities, services, or privileges. The AI reports that there were six (6) findings of discrimination or a “probable cause determination.” There were also six (6) findings of non-compliance and 11 of the complaints remained open. During the three (3) years that the West Penn Rural Fair Housing program has been operating as a Fair Housing Initiatives Program, we have filed six (6) housing discrimination complaints with HUD originating from Westmoreland County, all of which were filed on the basis of disability.

The AI also reported on the number of calls made to a Fair Housing Hotline that the County operates. From January 2007 to April 2009, the Hotline received 40 calls. Of these 40 calls, 17 involved inquiries for affordable housing, 14 involved landlord-tenant issues, eight (8) involved general questions on housing issues, and one (1) caller left a message, but did not specify the reason for the call.

**Impediments to Fair Housing Choice**

In their 2010 Analysis of Impediments to Fair Housing Choice, Westmoreland identified eight (8) impediments to fair housing choice.
**Impediment #1**

Racial and ethnic minorities are somewhat segregated in the County's older, less affluent municipalities.

Westmoreland established three (3) goals to address this impediment: 1) “Encourage Section 8 voucher holders to move to non-impacted neighborhoods;” 2) “Expand affordable housing in non-impacted areas,” and 3) “Re-evaluate structure of the HOME Consortium at the end of its current certification period.”

They have identified three (3) strategies in order to achieve these goals:

1) Work with area landlords and property management companies, in conjunction with the Westmoreland County Housing Authority (WCHA), to encourage their acceptance of vouchers in non-impacted neighborhoods of the County.
2) Provide HOME funds for new housing development in non-impacted areas of the County.
3) Internal staff review and re-evaluation of the structure of the HOME Consortium at the end of its current certification period.

**Impediment #2**

Black households earn significantly less than White households, thus severely limiting housing choice, including location.

Westmoreland’s goal to address this impediment is to “Provide incentives for employment training and apprenticeships aimed at residents of racially impacted neighborhoods.”

They have identified one (1) strategy in order to achieve this goal:

1) Formation of a working group consisting of representatives of local branches of employment training agencies, notably the Private Industry Council (PIC) and PA CareerLink (through PIC), the County Department of Planning and Development, and housing/human service providers, such as Westmoreland Community Action, to
develop strategies for outreach and focusing of employment training programs in low-income racially impacted communities.

**Impediment #3**

Real estate ads in the local paper prohibiting pets may discourage persons with service animals from considering these units.

Westmoreland’s goal to address this impediment is to “Encourage the local newspaper to include an exception statement for service animals in all real estate ads that make reference to pets.”

They have identified two (2) strategies in order to achieve this goal:

1) Send a letter to the *Pittsburgh Tribune Review* Legal Advertising Department to alert them of the need to include the exception clause for service animals in rental housing ads that do not allow pets.

2) Encourage the Westmoreland County Housing Authority to circulate a similar letter to Section 8 landlords.

**Impediment #4**

Recent interviews and focus groups with advocacy organizations reveal that both landlords and many elected officials and zoning board members lack a comprehensive understanding of fair housing law, including reasonable accommodation requirements.

Westmoreland’s goal to address this impediment is to “Encourage landlords, elected officials, and zoning board members to participate in fair housing education.”

They have identified one (1) strategy in order to achieve this goal:

1) Host a fair housing seminar/workshop for area elected officials, municipal planners, zoning board members, planning commission members, other relevant municipal staff, and area landlords/property management companies.
Impediment #5

Recent interviews and focus groups with advocacy organizations reveal that many members of the protected classes are unaware of their fair housing rights and the existing affordable rental and for sale housing opportunities that exist throughout the County.

Westmoreland’s goal to address this impediment is to “Increase and enhance fair housing outreach and education efforts to members of the protected classes.”

They have identified three (3) strategies in order to achieve this goal:

1) Conduct a fair housing workshop at least once per year at one of the monthly Local Housing Options Team (LHOT) meetings.
2) Create and disseminate a County Fair Housing Guide to help educate residents of their fair housing rights and the opportunities that exist for homeownership.
3) Continue to maintain the Affordable Homes Westmoreland website.

Impediment #6

Fair Housing complaints alleging discrimination based on race and disability comprised the majority of HUD complaints. Acts of harm related to the rental of housing and/or commercial property represented a large majority of the complaints filed with PHRC.

Westmoreland’s goal to address this impediment is to “Increase and enhance fair housing outreach and education efforts throughout the County.”

They have identified three (3) strategies in order to achieve this goal:

1) Create and distribute a County Fair Housing Guide.
2) Continue to operate the Fair Housing Hotline and track/monitor complaints.
3) Create an online directory of available organizations and resources in the County to assist with housing and supportive services needs of residents. Post this directory on the Affordable Homes Westmoreland Website.

Impediment #7

Inadequate supply and inadequate available information relative to accessible dwelling units for Persons with Disabilities.
Westmoreland established two (2) goals to address this impediment: 1) “Increase the supply of affordable, accessible housing” and 2) “Increase access to information regarding existing units.”

They have identified four (4) strategies in order to achieve this goal:

1) Create and maintain a list of certified accessible public and private apartments.
2) Create more incentives for property owners and investors to build/convert accessible units.
3) Partner with area organizations and developers to increase the supply of affordable accessible housing.
4) Require that a certain percentage of units in all new multi-family construction projects of 20 or more units be accessible for people with disabilities (mobility or sensory).

Impediment #8

Several municipal zoning ordinances are outdated, lack certain terms, definitions, and/or regulations, or are in violation of Federal fair housing law.

Westmoreland established two (2) goals to address this impediment: 1) “Increase and enhance fair housing outreach and educational efforts” and 2) “Perform a review of all municipal zoning ordinances in the County to evaluate compliance with federal fair housing laws.”

They have identified two (2) strategies in order to achieve this goal:

1) Host a fair housing seminar/workshop for area elected officials, municipal planners, zoning board members, planning commission members, other relevant municipal staff, and area landlords/property management companies.
2) Perform a review of all municipal zoning ordinances in the County over the next five years. Notify municipalities with outdated ordinances that contain potential fair housing violations via letter correspondence.
Core Issues Addressing Fair Housing

“With the passage of the Fair Housing Act in 1968, we acknowledged that segregation didn’t happen in spite of government policy - it happened in large part because of it…. And we affirmed that government has a role to play in creating integrated, inclusive, diverse communities.”

“Our success is measured by whether HUD is increasing the number of low-poverty, racially diverse communities in America.”

Shaun Donovan, Secretary, United States Department of Housing and Urban Development.\textsuperscript{26}

The Fair Housing Act, Title VIII of the Civil Rights Act of 1964 [42 U.S.C. §§ 3601-3619], as amended in 1988, prohibits discrimination against individuals because of race, color, religion, sex, disability, national origin or familial status. The Act prohibits discrimination against protected class members in the sale, rental, conditions, and financing of dwellings and in other housing-related transactions.

Section 808(e) of the Fair Housing Act requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to “affirmatively further fair housing.”

As noted by NCRC in its Supporting Inclusive Communities through Fair Housing Planning Participant Manual Reference Guide, “HUD Grantees and sub-recipients are expected to follow Fair Housing Act requirements and affirmatively further fair housing in admission and occupancy policies; prevent discrimination against and/or segregation because of race, color, religion, sex, disability, familial status or national origin; reduce racial and national origin concentrations in the design of eligibility, selection and admissions policies; and take affirmative steps to overcome the effects of conditions which resulted in limited participation of persons because of their race, national origin, or other prohibited basis.”\textsuperscript{27}

\textsuperscript{26} National Community Reinvestment Coalition, Supporting Inclusive Communities through Fair Housing Planning, (2013), pg. 11 (herein after referred to as Manual)
\textsuperscript{27} Id. at 12.
The mandate to affirmatively further fair housing applies to what we will identify in this Report as entitlement jurisdictions these are Counties, Cities, Boroughs, and Townships that directly receive federal funding for housing programs. Western Pennsylvania’s nine (9) entitlement jurisdictions have not previously consulted with or worked together in seeking to meet their AFFH obligations; thus, each jurisdiction’s AI is different, although several jurisdictions utilized consultant groups, resulting in similar final reports.\textsuperscript{28}

In its FY 2010-2015 Strategic Plan, HUD has recognized that “Housing and community development efforts must address a complex network of individual, social, economic, and environmental factors in order to promote more diverse, inclusive communities and improve the sustainability of neighborhoods, communities, and regions.”\textsuperscript{29}

HUD further recognizes that “The nation’s current housing, economic, health, and energy crises demand that the federal government and its local partners effectively coordinate policies related to community development, climate change, energy efficiency, transportation, housing, and disaster preparedness. Today we know that ‘place’ influences outcomes- the place where a person lives is a reliable predictor of his or her long-term health, education, and employment outcomes. Families and individuals living in concentrated poverty experience greater inequity and often, as a result, more dismal outcomes.”\textsuperscript{30}

HUD identifies as one of its subgoals to “Ensure open, diverse, and equitable communities,”\textsuperscript{31} and notes that “An inclusive community is one in which all people- regardless of race, ethnicity, socioeconomic status, age, disability, or sexual orientation- have access to the same housing, transportation, health, education, and employment opportunities. Through inclusive development, education, enforcement of fair housing laws, and participation of

\textsuperscript{28} Six (6) jurisdictions (Beaver, Erie, Johnstown, Millcreek, Washington, and Westmoreland) used Mullin & Lonergan Associates Inc., Sharon used Urban Design Ventures, State College used Lisa Beede, and Altoona drafted their AI in house.


\textsuperscript{30} Id. at 33.

\textsuperscript{31} Id.
historically underrepresented populations in HUD policies and planning, HUD will affirmatively further fair housing and the ideals of an open society."\textsuperscript{32}

A consideration of these strategies and outcomes as promulgated by HUD will lead to a designation of nine (9) Core Issues addressing Fair Housing and previously identified by HUD, including:

1) Segregation
2) Racially and Ethnically Concentrated Areas
3) Access to Opportunity
4) Health and Housing
5) Housing and Transportation
6) Economic Competitiveness
7) Lending Discrimination
8) Creation of a Positive Fair Housing Environment
9) Review of Past Fair Housing Complaints

These Core Issues were considered by HUD when it reviewed the AI for Houston, Texas in 2011. HUD rejected the AI as “incomplete and unacceptable because it fails to identify and address patterns of segregation based on race and national origin, identify appropriate actions to address identified housing discrimination, address access to housing and services for persons with disabilities and persons with limited English proficiency; it fails to contain actions to address the impediments it does identify and it lacks references to maintaining documents and records to document its actions in addressing the identified impediments.”\textsuperscript{33}

HUD directed Houston to consider existing patterns of segregation and areas of racial and ethnic concentrations, and to consider other potential impediments, including deteriorating housing stock, environmental, and lending issues.

\textsuperscript{32} Id. at 36.
\textsuperscript{33} See John Henneberger, “HUD rejects City of Houston fair housing effort.” Texas Housers (February 8, 2012), Article and November 30, 2011 HUD letter to the City of Houston available at http://texashousers.net/2012/02/08/hud-rejects-city-of-houston-fair-housing-effort/.
These Core Issues are also addressed by HUD in other program instruments the Department is implementing, including the Regional Analysis of Impediments (‘‘Regional AI’’) and Fair Housing and Equity Assessments (‘‘FHEA’’).

The importance of these Core Issues is also seen in the National Commission on Fair Housing and Equal Opportunity’s (‘‘the Commission’’), December 2008 report, The Future of Fair Housing: Report of the National Commission on Fair Housing and Equal Opportunity as will be seen throughout this section.

The remainder of this section will describe each of the nine (9) Core Issues, reviewing and evaluating the AI and the impediments identified by the nine (9) entitlement jurisdictions against these Core Issues. Additionally, a summary as to performance and need for improvement (e.g. jurisdictions that identified no impediments addressing a particular Core Issue, or that could improve their actions as compared to other jurisdictions) will be provided.

Core Issue #1 – Segregation

The Merriam-Webster Dictionary defines Segregation as “the separation or isolation of a race, class, or ethnic group by enforced or voluntary residence in a restricted area, by barriers to social intercourse, by separate educational facilities, or by other discriminatory means.”

Fair Housing enforcement has traditionally considered housing discrimination against the protected classes of race, color, and national origin, often a by-product of racial segregation. Aggrieved individuals have complained of racial discrimination in housing, fair housing testing has confirmed it, and complaints alleging racial discrimination continue to be filed every year, all suggesting the continued existence of segregation.

The Commission in their report, The Future of Fair Housing, concluded that housing segregation continues to exist, and that “Segregation is rooted in historical practices but is maintained and sometimes worsened by continued discriminatory practices, including: present-day discrimination and steering in the private rental, sales, lending, and insurance markets;
exclusionary zoning, land use, and school policies at the state and local governmental level; continuing government policies affecting the location of subsidized housing; the limited choices provided to those who receive federal housing assistance; income and wealth differences; and bank and insurance disinvestment in minority neighborhoods.”\(^{34}\)

HUD has considered segregation in recent housing activities. In rejecting the Houston AI in 2011, HUD noted that the existing AI “did not identify as impediments actions known to the city that perpetuate segregation”\(^{35}\) and directed the City to perform a spatial deconcentration analysis to “identify the neighborhoods where housing for low and moderate income residents exist and how the city’s placement of affordable housing may have served to promulgate racial segregation. A review of the extent to which placement of this housing has contributed to segregation should be included in the AI.”\(^{36}\)

In both its Regional AI and FHEA instruments, HUD presently requires grantees to report on segregation, including a consideration of how land use and zoning have contributed to or been a barrier or impediment. In completing, the FHEA grantees must identify whether their region is segregated by race and/or national origin, and report on the possible contributors to segregation.

NCRC noted, “Racial and ethnic segregation has led to the concentration of existing affordable housing in central cities and older suburbs, perpetuating the isolation of people of color, particularly low-income people of color from life opportunities available to suburban white residents regardless of income.”\(^{37}\)


\(^{35}\) See fn. 33

\(^{36}\) Id.

\(^{37}\) Manual at pg. 19.
The dissimilarity index is a commonly used analytical formula to measure segregation between two groups.\(^{38}\) The index score provides a statistical measure of the relative separation or integration of the two selected groups across neighborhoods, or census tracts within a Borough, County, City, or Township. The correlating index score can be interpreted to indicate the percentage of one of the groups that would have to relocate to a different geographical area in order to achieve full integration with the other group used in the calculation. However, when a group’s population is less than 1,000, its dissimilarity index score may be high even when the group’s members are evenly distributed throughout the area. The index score can range in value from zero (0), indicating complete integration, to 100, indicating complete segregation. In the majority of areas, the index score lies somewhere in the middle. Index scores from zero (0) to 30 indicate a “low degree” of segregation, while scores between 30 and 60 indicate “moderate” segregation, and scores over 60 indicate “high” segregation.

All three (3) of the entitlement counties addressed segregation in their AI. Beaver reported in its AI that the location of areas of concentration of minority residents illustrated that Beaver is “highly segregated.” African American residents reside primarily in a limited number of boroughs and cities located along the Ohio and Beaver Rivers, in the north central section of the County, while White residents reside throughout the County. There were no dissimilarity index scores provided for Beaver in their AI.

Washington identified that the County is “somewhat segregated” in regards to its minority population. Their AI noted that African American and other minority residents live primarily in the high population urban centers and the older, less affluent suburbs. Washington did report a White/African American dissimilarity index score of 45.6, classifying Washington as “moderately segregated” in regards to its African American to White population.

Westmoreland similarly reported that racial and ethnic minorities are “somewhat segregated” in the County’s older, less affluent municipalities. They also reported a

\[
D = \frac{1}{2} \sum_{i=1}^{N} \left| \frac{b_i}{B} - \frac{a_i}{A} \right|
\]

where \(b_i\) is the minority population of the \(i^{th}\) area (i.e. census tract), \(B\) is the total minority population of the entire geographic entity, \(a_i\) is the majority population of the \(i^{th}\) area, \(A\) is the total majority population for the entire geographic entity.

\(^{38}\) The formula for Dissimilarity (\(D\)) is

\[
D = \frac{1}{2} \sum_{i=1}^{N} \left| \frac{b_i}{B} - \frac{a_i}{A} \right|
\]

where \(b_i\) is the minority population of the \(i^{th}\) area (i.e. census tract), \(B\) is the total minority population of the entire geographic entity, \(a_i\) is the majority population of the \(i^{th}\) area, \(A\) is the total majority population for the entire geographic entity.
White/African American dissimilarity index score of 54.1, classifying Westmoreland as “moderately segregated” in regards to its African American to White population.

Of the six (6) non-county jurisdictions, only three (3) of them discussed segregation in their AI. Erie reported that it is one of the most segregated cities in the State and is considered “moderately segregated.” Erie reported a White/African American dissimilarity index score of 51.6. Johnstown also reported that it is a “moderately segregated” city with a White/African American dissimilarity index score of 46. Finally, Millcreek reported that there were no areas of concentration of racial or ethnic minorities and that even though their percentage of minority residents was low; they were fairly distributed throughout the 12 census tracts in Millcreek.

The AIs for the three (3) remaining jurisdictions Altoona, Sharon, and State College, are deficient in regards to this Core Issue in that they failed to address the issue of segregation or utilize the dissimilarity index data to determine whether segregation was present among their minority population. However, using the dissimilarity index data provided in Johnstown’s AI, both Altoona and State College would be considered “moderately segregated” in regards to their African American to White population, with index scores of 45.3 and 31.8 respectively. There was no information available regarding the dissimilarity index score for Sharon. (See Table 3 for the Pennsylvania municipalities’ dissimilarity index rankings).

Only two (2) of the six (6) jurisdictions that spoke to the issue of segregation identified an impediment that addressed segregation. Washington identified that “Racial and ethnic minorities are somewhat segregated in the County’s high-population centers and older, less affluent suburbs.” The County proposed as strategies for action to encourage Section 8 voucher holders to move to non-impacted neighborhoods, and expand affordable housing in non-impacted areas. This action, while it may be effective, is also entirely dependent on landlords in non-impacted neighborhoods accepting the Section 8 voucher, which they may choose not to.

Westmoreland mirrored Washington, identifying that “Racial and ethnic minorities are somewhat segregated in the County’s older less affluent municipalities” as an impediment. The

---

39 Millcreek spoke to the issue of segregation, but concluded that there were no patterns of segregation present.
County’s proposed actions included encouraging Section 8 voucher holders to move to non-impacted neighborhoods, expanding affordable housing in non-impacted areas, and re-evaluating the structure of the HOME Consortium at the end of its current evaluation period. Similar to Washington, there is significant dependence on landlords in non-impacted neighborhoods to accept the Section 8 voucher which they may also choose not to do.

Beaver identifying that African American residents were highly segregated, Erie reporting that it was one of the most segregated cities in the State, and Johnstown reporting that their City was “moderately segregated,” certainly could have and should have identified segregation as a continuing impediment to fair housing choice, especially given the examples of Washington and Westmoreland. Encouraging Section 8 voucher holders to move to non-impacted areas as an action plan, without more, is likely to be of little consequence, as the voucher holder must still find a landlord with an affordable unit in a non-impacted area that was willing to accept the voucher as part of a rental agreement.

As will be seen subsequently, jurisdictions that identify a continuing need for Fair Housing education and identify recent discrimination complaints filed with HUD and/or PHRC, on the bases of race, color, or national origin, might certainly be more pro-active in addressing segregation, beginning with fair housing education and outreach efforts targeting the members of those protected classes.

Core Issue #2 – Racially and Ethnically Concentrated Areas

Segregation by race, class or other protected group status has the effect of making certain geographic areas unavailable to the class member. Nevertheless, individuals have to live somewhere, and segregation can and has led to larger numbers of the protected class congregating in concentrated areas, rather than being more evenly distributed geographically. Such areas of high group concentration can and have been identified as racially and ethnically concentrated areas.
The Commission Report recognized the importance of racially and ethnically concentrated areas as a HUD Core Issue, quoting a Commission witness, Professor John Powell, who testified that “In many regions, we are polarizing into socially, economically, and racially isolated enclaves of extreme high and low opportunity.” Professor Powell further testified, that “Fifty years of social science research has demonstrated that racially isolated and economically poor neighborhoods restrict employment options for young people, contribute to poor health, expose children to extremely high rates of crime and violence, and house some of the least-performing schools.”

NCRC has noted, “The concentration of existing affordable housing in central cities and older suburbs perpetuates the isolation of low-income residents and people of color from life opportunities available to suburban residents. One result is to reinforce the racial segregation which is intimately related to the concentration of poverty in urban core areas and in older, inner-ring suburbs…. Once these neighborhoods isolated by race or ethnicity and class have been assessed, the necessary steps must be taken to identify and ameliorate the gaps in public and private investment and infrastructure to encourage diversity and promote equal and fair access to housing, banking services, reputable education systems, transportation, etc.”

In its FHEA, HUD specifically seeks information on racially and ethnically concentrated areas, asking grantees to report on whether their region contains racially or ethnically concentrated areas of poverty, what actions have contributed to the creation of these areas, what trends over time have been observed, and what geographic or other barriers limit de-concentration. Grantees are directed to prioritize these areas for attention and establish goals leading to housing de-concentration and improved access to services.

Unlike with segregation, which may be seen as a more emotionally charged word and subject, and thus may be slighted accordingly in public discussion, most of the jurisdictions recognized problems presented by racially and ethnically concentrated areas within their borders. They also recognized that areas of concentration of LMI residents are problematic. Eight (8) of

---

40 Commissions Report at pg. 15.
41 Id at 18.
42 Manual at pg. 22.
the nine (9) entitlement jurisdictions addressed areas of concentration of racial and/or ethnic minorities as well as LMI persons in their AI. Five (5) of the jurisdictions identified a specific impediment(s) addressing this Core Issue.

Altoona’s AI failed to address or identify areas of concentration of racial and/or ethnic minorities. The AI also failed to provide any information or data, such as census tract or block group demographic and population breakdowns. Altoona’s AI further failed to identify any areas of concentrations of LMI persons, or provide any data regarding this particular group. Based upon the information that Altoona has provided, or in this case, not provided in their AI we are to assume that there are no areas of concentration of racial or ethnic minorities, or LMI persons residing in the City. This assumption is undoubtedly false. Altoona’s AI is clearly deficient as it relates to this Core Issue.

Beaver reported that three (3) of the County’s 59 municipalities were areas of concentration of African American residents, and that a majority of the County’s LMI residents resided in these three (3) areas. Beaver identified as an impediment “Black households may not consider housing opportunities across a broad range of municipalities and neighborhoods that provide a desirable quality of life and may contain affordable housing.” To address this impediment they proposed to increase and enhance fair housing education and outreach. While that is a worthy activity, it is not clear how increased education will address this impediment.

Erie reported in their AI that eight (8) of the 30 census tracts had been identified as areas of concentration of African American residents. Additionally, two (2) census tracts had been identified as areas of concentration of Hispanic residents. Erie also reported that 45 of their 96 census block groups were areas of concentration of LMI persons. Of those 45 census block groups, 20 were located in areas previously identified as areas of concentration of minority residents. The City identified two (2) impediments addressing these issues: the first impediment was that “The City’s supply of housing that is affordable to households up to 80% of median household income is inadequate.” The City vowed to continue to provide incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families, specifically in non-impacted areas; they also
stated that they would continue to provide financial incentives for affordable housing projects located outside of impacted areas through CDBG and HOME funds. The second impediment identified was that “The City’s supply of affordable and accessible housing units is inadequate to meet demand,” with actions including considering applying a minimum set-aside requirement of accessible units to all assisted housing projects it supports, including those financed with non-federal funds, and to encourage that all new housing units financed with HOME funds meet visitability standards.

Johnstown reported in its AI that four (4) of the 14 census tracts in the City were areas of concentration of African American residents. Additionally, they identified two (2) census tracts with high percentages of Hispanic residents. They also identified 28 census block groups as areas of concentrations of LMI persons, with the four (4) census tracts previously identified as areas of concentration of African American residents also being areas of concentration of LMI persons. The City listed as an impediment that “The City does not currently have Affirmative Marketing Policies or Site and Neighborhood Selection Policies for its CDBG and HOME assisted housing projects.” To address this impediment they propose to prepare and adopt a written policy that encompasses HUD’s Affirmative Marketing Policy and Site and Neighborhood Standards, and to incorporate this policy as part of the application review and approval process for all applicable HOME-assisted rental housing projects.

Millcreek reported that there were no areas of concentration of racial or ethnic minorities. They further stated that, even though their percentages of minority residents were low, they were evenly distributed throughout the Township. Millcreek did identify 10 of their 42 census block groups as areas of concentration of LMI residents. In response to this finding, the Township identified an impediment addressing this issue, the need to “Continue to create and expand affordable housing activities for LMI persons and households in the Township,” and proposed to continue owner- and renter-occupied housing rehab and weatherization activities. Whereas, these are worthwhile activities for Millcreek to undertake, it appears that what was identified as an impediment, is actually a goal and/or strategy to address an unidentified impediment.

43 Because of Millcreek’s, generally affluent population HUD established an “exception criteria” to the LMI percentage required for CDBG eligibility, lowering the LMI percentage requirement from 51% to 37.1%.
Sharon reported in their AI that of the 17 census block groups in the City, four (4) had been identified as areas of concentrations of minorities. Four (4) block groups were identified as areas of concentration of LMI individuals, and three (3) of these four (4) areas were also identified as areas of concentrations of minority residents. The City identified two (2) impediments addressing this issue: the first impediment was that “There is a lack of decent, safe, and sound housing which is affordable to lower income persons and families, limiting housing choice,” and the City proposed to increase the supply of decent, safe, and sound housing that is affordable to lower income households, both renter and owner occupants, by improving existing housing stock through rehabilitation, and promoting the development of new affordable housing, especially for low-income households. The second impediment recognized that “There are concentrations of low-income and minority households in certain areas of the City,” and proposed to increase the supply of affordable housing units outside areas of concentrated low-income and minority groups.

State College in their FHAU stated that they had adopted their own definition of an area of racial or minority concentration that differed from the standard HUD definition.\textsuperscript{44} They define an area of racial or minority concentration as a census tract where the population of a race is greater than one standard deviation from the average for a race. Based on this definition the Borough identified three (3) of the nine (9) census tracts as areas of racial or minority concentration. However, if the standard HUD definition was used, none of the nine (9) census tracts would be considered areas of racial or minority concentration, but four (4) of the tracts reported percentages of minorities greater than the Borough’s overall rate. (See Table 2 for breakdown of State College population by census tract). Additionally, they reported that 13 of the 20 census block groups in the Borough were areas of concentrations of LMI persons. Despite these, facts State College failed to identify an impediment regarding this issue.

Washington reported that two (2) of the County’s 67 municipalities were identified as areas of concentrations of minority residents, that 12 municipalities have higher rates of racial

\textsuperscript{44} A geographic area where the percentage of a specific group of individuals is 10 percentage points higher than that of the overall jurisdiction.
and ethnic minority residents than the County’s overall rate, and that 61.6% of all minority residents lived in these 12 municipalities. Additionally, Washington reported that 52 census block groups were areas of concentration of LMI persons. Furthermore, the two (2) municipalities identified as areas of concentration of minority residents, also housed a majority of LMI persons. However, Washington did not identify an impediment specifically addressing these issues.

Westmoreland reported that three (3) of the County’s 65 municipalities were identified as areas of concentration of African American residents, that 12 municipalities reported rates of racial and ethnic minorities higher than the County’s overall rate of 3.4%, and that 61.3% of all minority residents lived in these 12 municipalities. Additionally, Westmoreland reported that 102 census block groups were identified as areas of concentration of LMI persons, as were the three (3) municipalities identified as areas of concentration of African American residents. Similar to Washington, Westmoreland also failed to identify an impediment addressing these issues.

A common analytic tool for the jurisdictions that addressed this Core Issue was identifying the appropriate subdivisions within their jurisdiction [e.g. census tracts, census block groups, municipalities] and then examining the demographic breakdown of the population to determine whether any subdivision showed a minority population 10 percentage points higher than the rate for the jurisdiction as a whole. State College, Washington, and Westmoreland while reporting on the data as it relates to areas of concentration of racial and ethnic minorities as well as LMI persons, could have certainly followed the other jurisdictions and identified an impediment addressing their areas of concentrations. Altoona should have performed some type of analysis regarding this Core Issue either to identify areas of concentration or to demonstrate that such areas do not exist in their jurisdiction.

The actions proposed to address the identified impediments included education as well as more direct actions, such as Johnstown preparing a written policy that encompasses HUD’s Affirmative Marketing Policy and Site and Neighborhood Standards as a part of its housing

---

45 State College used their own definition of an area of concentration.
application review process and Sharon looking to increase rehabilitation of existing substandard housing. Education ideally would target landlords, housing officials, and planners in non-concentrated areas, which might also be the target for housing rehabilitation funding, thus creating opportunities for minorities to move into the newly established affordable housing units. However, jurisdictions should be cognizant that impacted areas might feature concentrations of both racial and ethnic minorities, and LMI persons, and examine whether the cause is the result of economic factors, rather than segregation.

Core Issue #3 – Access to Opportunity

NCRC described the intent and goals of access to opportunity as a Core Issue in stating, “The U.S. Department of Housing and Urban Development seeks to create strong, sustainable, inclusive communities and quality affordable homes for all. HUD seeks to utilize housing as a platform for improving the overall quality of life by building inclusive and sustainable communities free from discrimination. HUD through its grantees seeks to affirmatively connect people to opportunity and create positive, transformative change in the communities it funds.

Access to opportunity areas can provide resource-deprived minority and low and moderate income households with improved outcomes by stabilizing and increasing homeownership and other sustainable housing options, improving educational opportunities, stimulating investment and expanding employment opportunities. Currently, most affordable housing in our metropolitan regions is disconnected from high opportunity areas.”

This ideal of inclusive and sustainable communities was highlighted by the Commission, which identified the goal of the Fair Housing movement being to promote inclusive, diverse communities of choice. The Commission’s Report praised inclusive, diverse communities for containing the following:

---

46 Manual at pg. 23.
1) Having quality schools with diverse student bodies that enhance outcomes for all children.

2) Having a healthy, robust housing market that competes for buyers and renters from all racial and ethnic groups in a region and cannot be easily targeted by predatory lenders.

3) Contributing to the regional economy with a range of housing choices for workers of all income ranges, and helping to prevent the harmful concentration of racially isolated poverty at the core of the metropolitan region.

4) Incorporating accessible design and housing options that maximize inclusion of persons with disabilities in the built environment and in communications.

5) Successfully resisting sprawl and its negative social and environmental impacts by consolidating growth for a mixed income, diverse population along efficient transportation corridors and by bringing workers closer to regional job centers.

HUD’s FHEA also considers disparities in access to opportunity. Grantees are to report on existing areas of high opportunity in their region, and to report on disparities in neighborhood opportunity for racial and ethnic minorities. Additionally, grantees are to identify barriers to equal access and anticipated actions to overcome them.

Access to opportunity can be an antidote to segregation and areas of concentration of racial and ethnic minorities, where such areas otherwise combine substandard housing with substandard community resources. Creating a high opportunity area in such a setting injects resources (education, transportation, etc.) that did not exist there previously, but would now lead to an improved quality of life.

Seven (7) of the nine (9) entitlement jurisdictions addressed this Core Issue in their AI, with seven (7) jurisdictions identifying an impediment(s) addressing this Core Issue.

Altoona failed to address this issue at all in their AI. There was no discussion, information, or data provided about the privately assisted or public housing options available to
the residents of the City. The AI also failed to address any of the other qualities associated with access to opportunity. Altoona’s AI is deficient in regards to this Core Issue.

Beaver in its AI identified the privately assisted and public housing available through the Housing Authority of the County of Beaver as well as a breakdown of the waiting lists for public housing and Section 8 vouchers. Additionally, they identified as an impediment that “Black households may not consider housing opportunities across a broad range of municipalities and neighborhoods that provide a desirable quality of life and may contain affordable housing.” To address this identified impediment they proposed to increase and enhance fair housing education and outreach. Whereas this strategy and the eight (8) potential planned initiatives appear to be worthwhile activities to disseminate education and general information regarding Fair Housing issues, they do not appear to be the most effective strategies to address their identified impediment regarding this issue. Additionally, the creation and existence of an online centralized housing database is only going to be useful if it is thorough, complete, and continually updated; which is likely impossible. Additionally, presentations to the public on Fair Housing issues is a great way to disseminate information, however; the public is unlikely to have any interest in the subject and is unlikely to attend such a presentation.

Erie also identified the privately assisted and public housing available through the Housing Authority of the City of Erie, as well as breakdowns of the current tenants and Section 8 voucher holders, as well as their respective waiting lists. The City also identified four (4) separate impediments addressing this Core Issue. 1) “The City’s migrant working and refugee populations may require language accommodations to ensure that all residents can access programs and services,” and proposed to determine to what extent documents need to be translated, continue to provide language services, and amend the City’s affirmative marketing plan to include outreaches specifically to Hispanics, refugees, and migrant workers. 2) “Refugees and migrant workers may have greater difficulty obtaining decent, affordable housing due to little or no credit history and/or references from previous landlords,” and proposed to continue to supporting housing counseling centers and local service providers and to encourage the Housing Authority to increase the effectives of its credit/budget counseling referral program. 3) “A number of landlords choose not to participate in the Section 8 Housing Choice Voucher
program, which may contribute to the concentration of voucher holders in impacted areas,” with
the City to continue outreach efforts to large landlords with units outside the impacted areas and
to conduct a marketing campaign to recruit additional landlords. 4) “The City lacks an over-
arching housing policy that establishes the foundation for comprehensive planning,”
necessitating the City to adopt a diversity policy that clearly states the City’s commitment to
affirmatively further fair housing. These efforts appear to be a well thought out strategy to
increase the access to opportunity for those individuals residing in resource-deprived areas of
Erie.

Johnstown reported on the public housing available through the Johnstown Housing
Authority and their Section 8 Housing Choice Voucher Program, as well as the privately assisted
housing available. Johnstown identified as an impediment that “Minority households are less
likely to be homeowners in Johnstown than White households.” To address this impediment
they proposed to increase home ownership rates among minority households by strengthening
partnerships with local lenders to offer homebuyer incentives to purchase homes within the City,
and sought to collaborate with fair housing advocates, certified housing counselors, and financial
lenders to increase home ownership among minorities. These strategies, if carried out, would
likely be effective in achieving their goal of increasing homeownership rates among minorities.
However, because of the many factors beyond the City’s control, they may ultimately prove
unsuccessful.

Millcreek identified the privately assisted housing and the public housing available
through the Erie County Housing Authority, as well as the waiting lists for public housing and
Section 8 voucher and the applicants for privately assisted housing. Millcreek identified as an
impediment that “There remains a great need for quality accessible housing for persons with
disabilities in Millcreek Township.” They proposed to support nonprofit housing developers and
organizations that work to provide affordable housing for persons with disabilities, to encourage
the Housing Authority to conduct a Section 504 analysis to identify the need for accessible units,
and to continue the Township’s Architectural Barrier Removal/Adaptive Home Modification
Program. These strategies, if successfully implemented, would certainly aid Millcreek toward
eliminating the identified impediment by furthering their efforts to increase the access to opportunity for their disabled population.

Sharon in their AI only discussed, in very general terms, the public housing available to its residents through the Mercer County Housing Authority. They did, however identify as an impediment, “There is a high percentage of both owner occupied and renter occupied households whose housing cost exceeds 30% of their total household income.” To address this impediment they proposed to reduce the number of families whose housing cost exceeds 30% or more of their total household income by implementing the following four (4) strategies. 1) Provide financial assistance to homeowners to rehab their properties and install energy cost saving measures. 2) Promote the development of more housing that is affordable for the very-low income households. 3) Provide homebuyer assistance to purchase existing housing by low-income homebuyers. 4) Provide tenant-based rental assistance funds to those households who are severely cost burdened by 50% or more. All of these proposed strategies would certainly further Sharon’s efforts to increase access to opportunity for those residents who are currently cost-burdened in their existing housing.

State College in their FHAU covered the public housing available through the Housing authority of Centre County as well at the assisted housing available in the County. They identified a “Lack of Affordable Housing and Financing” as an impediment, but did not propose any actions to remedy this or provide any further information regarding this impediment. Without any further information, it is impossible to determine if their efforts in addressing a “Lack of Affordable Housing and Financing” will result in the underprivileged residents of the Borough having increased access to opportunity.

Both Washington and Westmoreland identified in their AI the privately assisted and public housing available through their Housing Authorities as well as breakdowns of the current tenants and voucher holders as well as their respective waiting lists. Both Counties identified this issue as a subject for an impediment, reporting “Inadequate supply and inadequate available information relative to accessible dwelling units for Persons with Disabilities.” Both jurisdictions proposed to increase access to information regarding existing accessible units, and
to increase the supply of affordable, accessible housing by creating more incentives for property owners and investors to build and/or convert accessible units. These efforts could certainly lead to their disabled population having increased access to areas of opportunity.

Analytic tools such as identifying White and minority homeownership rates and the numbers of households whose housing costs exceed 30% of their total household income were used by almost every jurisdiction; however, many of the jurisdictions failed to address these issues by identifying a specific impediment(s). Erie and Sharon both proposed proactive, affirmative actions that other jurisdictions might consider as means to increasing access to opportunity to their general population. While Millcreek, Washington, and Westmoreland proposed actions that would serve to increase access to opportunity for their disabled residents. Providing actual funding to protected class members to procure affordable housing, created from rehabilitation of older housing, installation of energy saving measures, etc., would foster an increase of protected class members finding housing in non-impacted areas, thus increasing their access to opportunity.

Core Issue #4 – Health and Housing

A common issue in landlord-tenant law is the tenant who finds that the apartment, house, or trailer that they rent is substandard. The tenant then requests repairs to be made by the landlord, the landlord refuses. The tenant must now confront deficiencies in heat, light or other necessities. Similarly, protected class members finding themselves in segregated or racially/ethnically concentrated areas often find that the housing is substandard, and carries the same infrastructure issues.

In July 2009, HUD’s Office of Healthy Homes and Lead Hazard Control issued The Healthy Homes Strategic Plan. In this plan HUD found that nearly 6 million households live with moderate or severe physical housing problems, including heating, plumbing, and electrical

---

deficiencies, as well as a lack of telephone service, and nearly 24 million households continue to face significant lead-based paint hazards.

The Plan found that children are typically more susceptible to biological, chemical, and physical exposures than adults, and that the burden of a home with physical problems falls disproportionately on racial and ethnic minorities. The Plan stated that 9.8% of African Americans, 7.6% of Hispanics and 6.9% of American Indians/Alaskan Natives live with moderate to severe housing problems, as compared to 4% of non-Hispanic Whites.

HUD has announced programs such as the Healthy Homes Initiative, which seeks to assist state and local governments to remedy unsafe housing conditions and alleviate the acute shortage of decent and safe dwellings for low-income persons.

In its FHEA, HUD asks grantees to identify areas where affordable housing options are missing and identify types of affordable housing most suited to each type of opportunity. The assessment requires a physical structure analysis, identifying how the provision of municipal services, which includes water, sewage, and electricity, have contributed to or been a barrier or impediment.

There was limited attention paid by the entitlement jurisdictions to this Core Issue. Only four (4) of jurisdictions addressed the subject in their AI. Altoona noted that 0.4% of the total housing stock lacked complete plumbing facilities. Johnstown identified that the housing stock in the City is older than in surrounding communities and is more likely to lack complete plumbing facilities; households in Johnstown were twice as likely to lack complete plumbing facilities as the households in the County (Cambria) outside of the City. Sharon did not mention this issue in their narrative, but did provide, in their appendix, the data regarding the number and percentage of units that were lacking complete plumbing and kitchen facilities as well as lacking telephone service. State College in their FHAU provided extensive information regarding the number of units lacking complete plumbing and kitchen facilities, including historical data and census tract data. Despite the extensive discussion, they failed to identify an impediment regarding this issue. An examination of the 2007-2011 ACS data provides us with a clearer
picture as to the deficiencies of the housing in the nine (9) entitlement jurisdictions. (See Table 4 for 2007-2011 housing deficiency figures).

Johnstown identified as an impediment that “The City’s supply of housing that is affordable to households up to 80% of median household income and members of the protected classes is increasingly inadequate, in particular within the rental market,” and proposed incentives to rehabilitate existing buildings, and improve existing housing stock through better code enforcement. These efforts would certainly aid Johnstown in addressing the, previously identified, inadequate housing that plagues the City.

Sharon identified as an impediment “There is a lack of accessible affordable housing that is decent, safe, and sound, which limits housing choice for handicapped persons and makes it a fair housing concern,” and proposed to provide targeted rehabilitation assistance and seek funding to develop housing for persons who are physically challenged or elderly. These efforts would likely aid Sharon in ensuring that their disabled residents are afforded decent, safe, and sound housing.

Every jurisdiction could readily identify Census or American Community Survey data on the characteristics of the housing stock in their jurisdiction, such as the numbers of homes lacking complete plumbing, kitchen facilities, or telephone service. Additionally, Counties such as Beaver, Washington, and Westmoreland, in particular, might be expected to have significant numbers of older homes built prior to 1939, which would be expected to be prime candidates for lacking complete facilities. Counties are also likely to have existing redevelopment authorities, which might include housing rehabilitation among their functions, leading to proposed actions to be matched with these corresponding impediments. Both Johnstown and Sharon advanced increasing housing rehabilitation activities as part of their action plans.

Core Issue #5 – Housing and Transportation

HUD, as well as housing counselors, banks, lenders, and other financial personnel, has noted that a family’s ability to afford a house or apartment is most often measured by calculating
the percentage of household income devoted to housing costs, the single biggest expense for most households. Counselors realize that a complete consideration of housing costs includes utilities, renter/homeowners insurance, and property taxes, in addition to the rent or mortgage payment.

However, transportation costs are an additional factor, often one not considered, and a factor that households may not fully account for when making decisions about where to live and work. Transportation factors have becoming increasingly important, as the rise in gasoline prices have led to higher costs in maintaining and operating a vehicle as well as increased fares for public transportation.

HUD has initiated a Housing and Transportation Affordability Initiative, seeking to enhance the understanding of the relationship between housing and transportation costs, in order to be more effective in advancing housing affordability for both individuals and communities. It will provide a “Location Affordability Index,” seeking to accurately identify the housing and transportation cost burden at the neighborhood level; providing a transportation cost calculator to allow families to create customized transportation cost estimates based on their location and household characteristics; and analyzing the potential for integrating transportation costs into HUD programs and policies.

In its FHEA, HUD will require grantees to consider existing transportation [e.g. displacement, affordability, lack of access to public transit, rail funding prioritized over buses, impact on transit development communities, impacts of federal, state and local investments] and its impact on access to opportunity, and to identify future transportation investments scheduled for the region.

The Commission’s Report considered the Core Issue of housing and transportation. Professor John Powell testified, “Neighborhoods powerfully shape residents’ access to social, political, and economic opportunities and resources. A number of studies have linked segregation to an increased likelihood of perpetrating and being victimized by violence and crime. The level of stress experienced in high-poverty, isolated neighborhoods contributes
substantially to this risk. When people face a high level of stress, child abuse, neglect, and family breakups are more likely…. In addition, a voluminous literature has examined the ‘spatial mismatch’ between predominantly African American, older urban neighborhoods and the employment opportunities in the suburbs.”

None of the jurisdictions directly addressed this Core Issue in their AI or identified an impediment(s) addressing this issue. Some jurisdictions did reference the topic, such as Westmoreland stating, “Households without a vehicle, which in most cases are primarily low-moderate income households, are at a disadvantage in accessing jobs and services, particularly in rural areas.” Beaver, Erie, Johnstown, Millcreek, State College, Washington, and Westmoreland provided information about the public transportation options available to their residents, but did not associate any cost information regarding transportation. The AI for Altoona and Sharon are completely deficient in regards to this Core Issue, as both jurisdictions were silent to any transportation matters.

Most, if not all, of the jurisdictions could have identified a lack of wide reaching public transportation, and the high cost of gasoline as significantly impacting the transportation cost burden on the LMI residents, as the basis for an impediment. The difficulty would be in identifying positive action that could be taken, other than increasing new job location citing throughout the jurisdiction, which would serve to address this Core Issue.

**Core Issue #6 – Economic Competitiveness**

For AFFH purposes, HUD is looking at more than just the physical composition and location of the housing itself. Promoting inclusive, diverse communities, and examining health, transportation and other issues suggests a more comprehensive, holistic approach to housing. Just as individuals in their housing location should have access to education and transportation, they should have access to good jobs, which will further raise the individual and communities’ quality of life.

---

49 Commissions Report at pg. 19.
NCRC noted, “By taking steps to integrate housing, transportation and economic activity and reduce spatial and regulatory barriers to economic development, communities can boost economic activity and redirect wasted time and resources to more economically productive uses. This can be accomplished by ensuring that workers have reliable access to employment centers and educational opportunities, and that businesses have access to markets.”50

The Commission has identified the goal of inclusive, diverse communities. One characteristic of such communities is that they “success[fully] resist sprawl and its negative social and environmental impacts by consolidating growth for a mixed income, diverse population along efficient transportation corridors and by bringing workers closer to regional job centers.”51 The Commission quotes Bruce Katz, and his 2004 Report, Neighborhoods of Choice and Connection 2, in saying that “segregation has a detrimental impact on the competitiveness of metropolitan areas in our increasingly global economy. A true rebirth of distressed areas (and the cities in which they are located) will only occur if we make these places ‘neighborhoods of connection that are fully linked to metropolitan opportunities’ for individuals and families with a broad range of incomes.”52

In its FHEA, HUD asks grantees to consider economic development, as well as transportation, housing, and community development, in their impact on access to opportunity. Grantees are to develop potential strategies to address inequitable investment, and to develop equity criteria for funding allocations and investment for public and private projects in concert with community groups.

Washington and Westmoreland addressed economic competitiveness in their AI. They both noted that the disparity in mortgage application denial rates between White and African American applicants is a cause for concern as it indicates sharp differences in access to credit across racial and ethnic groups, translating to relatively fewer housing options for African American residents.

50 Manual at pg. 31.
52 Id at 16.
Five (5) jurisdictions did identify impediments addressing this Core Issue. Beaver identified that “Black households have far fewer options than White households when purchasing a home or renting a unit. Black households have a greater degree of difficulty in securing mortgage application approval.” To address this impediment they proposed to increase and enhance fair housing education and outreach, as well as to continue the Affordable Housing Program and Projects in Beaver. It is not clear which of the planned initiatives identified for those strategies will be utilized in order to address this impediment, without that information it is impossible to determine if their efforts will be successful.

Erie identified that “Minority households have a greater difficulty becoming home owners in Erie because of lower incomes.” They proposed to continue to support the efforts of local fair housing advocates and certified housing counselors to increase homeownership among minorities and LMI residents and to map the locations of all new CDBG/HOME-assisted housing projects to determine the breakdown of projects in impacted areas versus projects in non-impacted areas. It is not clear how these efforts will address their goal of higher homeownership rates among minorities, or how it will address the Core Issue of economic competitiveness.

Sharon found “There is a lack of economic opportunities and jobs which prevent low-income households from improving their income and impact their ability to move outside of low-income areas, which reduces fair housing choice.” To address this impediment they proposed to increase job opportunities to increase family income and allow for more housing choice by promoting activities that produce new job opportunities for low and moderate-income persons, and supporting and enhancing workforce development and job training to improve job skills for the unemployed and under-employed. These efforts, if successfully implemented, would certainly have a positive impact on the economic competitiveness of Sharon.

Washington found that “Black households earn significantly less than White households, thus severely limiting housing choice, including location,” and proposed to provide incentives for employment training and apprenticeships aimed at residents of racially impacted neighborhoods, by establishing a new Section 3 policy linking clients at CareerLink with
contractors of County-funded housing and community development projects. These efforts would certainly increase the economic competitiveness of Washington and its minority residents.

Westmoreland also identified that “Black Households earn significantly less than White Households, thus severely limiting housing choice, including location,” and proposed to form a collaborative group of employment training agencies and housing providers, and provide incentives for employment training and apprenticeships aimed at residents of racially impacted neighborhoods. Much like in Washington, these efforts would serve to increase the economic competitiveness of Westmoreland and its minority residents.

While every jurisdiction looked at homeownership data along with the median household income data, only Erie and Westmoreland identified the discrepancies as impediments. All jurisdictions that identified an impediment to this issue proposed education and/or improving job training efforts, but little in the way of establishing higher-paying jobs targeted to minority residents. (See Table 5 for reported median household income and unemployment rates).

Core Issue # 7 – Lending Discrimination

The Commission noted, “a central historical cause of racial inequality in housing has been government and private redlining of neighborhoods that left individuals living in minority neighborhoods without access to mainstream mortgage lending.”

In 1992, the Department of Justice (“DOJ”) filed *U.S. v. Decatur Federal Savings and Loan Association*\(^\text{54}\), the first case in which DOJ charged a pattern of racial discrimination in lending through marketing and underwriting practices as well as through the failure to market products to minority neighborhoods. This case led to a period of vigorous fair lending enforcement beginning in 1999 and continuing today.

\(^{53}\) *Id* at 44.
The recent economic downturn and subsequent mortgage foreclosure crisis has exacerbated predatory lending and other discriminatory lending practices. The Commission recommended a number of actions to incorporate fair housing principals into foreclosure relief:\textsuperscript{55}

1) Any federal, state, or local government with responsibility for foreclosure rescue plans, such as loan modification or relief for neighborhoods damaged by foreclosure, must adopt and announce publicly the specific steps it will take, and requirements it will impose, to affirmatively further fair housing and avoid segregation.

2) The President’s Fair Housing Council should coordinate fair lending enforcement by fostering better coordination between HUD, the Department of Justice, the bank regulatory agencies, and private fair housing groups. This should include prioritizing fair housing and fair lending litigation, including cases challenging the disparate impact of practices and policies, such as discretionary pricing policies that have had a discriminatory impact on minority borrowers.

3) The President’s Fair Housing Council should review the implementation of homeownership preservation, foreclosure prevention, and loss mitigation efforts to ensure that these programs are being implemented in a manner that affirmatively furthers fair housing.

4) HUD and the Department of Treasury should develop and apply appropriate sanctions, with due process protections, for any entity seeking foreclosure relief funds that is found to have engaged in violations of the Fair Housing Act.

5) HUD should implement a special fair lending initiative in cooperation with private fair housing groups to fund the investigation and redress of discriminatory practices in the lending sector. This initiative must include an evaluation of programs designed to return foreclosed properties to active use so they do not destabilize the surrounding neighborhoods.

Fair Lending has continued to be a major issue for HUD, including their increased funding for Education and Outreach (“EOI”) efforts in Fair Lending in FY 2012.

\textsuperscript{55} Commissions Report at pg. 49.
Eight (8) of the nine (9) jurisdictions addressed Fair Lending in their AI by analyzing the data made available from the Home Mortgage Disclosure Act (“HMDA”), however only two (2) jurisdictions identified an impediment regarding this issue. The HMDA data allows a jurisdiction to analyze the number of homeowner mortgage applications received by lenders for home purchase throughout the jurisdiction. The data typically includes information on loan applications that were denied, withdrawn, or incomplete. This data can be sorted by race, sex, and income of the applicant. Additionally, the data can be sorted by geographic area, such as by County, City, or Census Tract.

Altoona’s AI is deficient as it relates to this Core Issue. Altoona failed to address or mention lending at all in their AI. They provided no data, information, or analysis regarding the mortgage lending practices currently taking place in their City, despite the readily available HMDA data. Clearly, it would be in their best interest to obtain, analyze, and report on the HMDA data to determine whether an impediment exists or not.

Beaver provided a statistical breakdown of the denial of applications by race and ethnicity, sex, loan type, reason for denial, denials by financial institution, and denials by census tract. The AI concluded that there were no discernable patterns of denials by financial institution or by census tract location. The AI also stated that the County had been hit hard by the subprime lending debacle. Beaver did identified that “Black households have far fewer options than White households when purchasing a home or renting a unit. Black households have a greater degree of difficulty in securing mortgage application approval.” To address this impediment they proposed to increase and enhance fair housing education and outreach, as well as to continue the Affordable Housing Program and Projects in Beaver. However, as previously stated it is not clear which of the planned initiatives identified for those strategies will be utilized in order to address this impediment, without further information it is impossible to determine if their efforts will be successful.

Erie provided a statistical breakdown of the applications filed as well as the denial rates by loan type, reason for denial, race and ethnicity, income, and census tract. The AI did not speak to any discernable patterns of denials that were observed. The AI also provided an
extensive discussion regarding high-cost lending practices and observed “Minority households are disproportionately represented among recipients of high-cost home purchase loans.”

Between 2007 and 2009, 23% of all African Americans with mortgages had a high-cost loan, compared to 9% of Whites. The AI states, “This trend places the homes of minority households at greater risk for eviction, foreclosure, and bankruptcy.” In response to this observation, they identified two (2) impediments. The first impediment being “Mortgage loan denials and high-cost lending disproportionately affect minority applicants;” to address this impediment they state that they will encourage certified housing counselors to target credit repair education and to encourage the CDBG subrecipient agencies involved in credit and budget counseling to market home ownership opportunities to all minorities. The second impediment was “Foreclosures appear to disproportionately affect minority households in Erie;” to address this they state that they will continue working with local agencies to mitigate the impacts of foreclosure by supporting increased buyer education and counseling. Since this is an area where the jurisdiction has very little control over the entities responsible for the impediments, primarily the lending institutions, the strategies identified are likely the best options available for the jurisdiction to address this Core Issue.

Johnstown provided an identical statistical breakdown of the applications received and the denials and found no discernable patterns indicating the presence of lending discrimination. They also provided a discussion on high-cost lending practices and found that lower-income households and minorities were more likely to have high-cost mortgages.

Millcreek provided a statistical breakdown of the denial of applications by race and ethnicity, sex, loan type, reason for denial, denials by financial institution by census tract. The only observation made in the AI was “No single financial institution had a disproportionate number of denials relative to the total number of applications.”

Sharon only provided data on the various types of home purchase loans obtained in the jurisdiction. However, they did provide printouts of the HMDA data in their Appendix. They also stated in the AI “The Data that was available does not indicate any discriminatory lending patterns.”
State College was unable to provide data specific to the Borough and therefore reported on the available data for the County and the metropolitan statistical area (“MSA”). The FHAU did not identify any patterns that would suggest the presence of discriminatory lending. They did state, “According to the data, race does not seem to be a factor in whether a loan application is originated or denied.” The FHAU also identified two (2) recommendations made in the 1991 AI regarding lending practices as well as an updated status on the recommendations. The first being “Banks and thrifts serving the Centre Region are urged to increase market research and analysis and intensify outreach efforts to community groups and organizations in order to better determine community credit needs.” The second was “Local lenders should increase special programs for low and moderate income and handicapped people (e.g. CRA mortgage programs, low cost checking accounts, participation in federal, Fannie Mae and local assisted multi-family developments).

Washington reviewed lending practices and provided statistical breakdown of the denial of applications by reason for denial, race, income level and race, census tract, and by financial institution. The several observations made in the AI all concluded that there were no discernable patterns regarding the denials, nor were there any disparities in the mortgage lending practices based on race or income level. Washington also included a discussion on high-cost lending practices and stated that there is “no relationship between rates of minorities and high-cost lending.”

Westmoreland also reviewed lending practices and provided statistical breakdown of the denial of applications by reason for denial, race, income level and race, census tract, and by financial institution. After reviewing all of the available data, they found that there were no discernable patterns regarding the denials or disparities in the mortgage lending practices. In their discussion on high-cost lending practices, they stated, “a strong relationship exists in Westmoreland County between rates of minority residents and high-cost lending. Census tracts with higher percentages of minority residents are statistically more likely to have higher rates of high-cost lending, based on 2007 HMDA data.” Despite, this conclusion, Westmoreland did not identify an impediment to this Core Issue.
With many of the nine (9) jurisdictions reporting high unemployment figures and low median household incomes for minorities, the issue of lending discrimination will remain a relevant and important issue as the jurisdictions enter into new planning periods. The readily available HMDA data should ensure that this issue is discussed and analyzed in the AI for years to come.

**Core Issue #8 – Creation of a Positive Fair Housing Environment**

A vital step to reducing housing discrimination is to create a positive fair housing environment, especially in areas that have seen little prior efforts due to lack of resources and initiative. This can result from education and outreach as well as working with state and local governments to promote their taking positive steps to reduce discrimination.

NCRC has noted, “In some cases, failure to develop and enact a local fair housing ordinance that is substantially equivalent to current federal fair housing law and provides an effective enforcement mechanism to which local resources are committed can serve as a barrier to reducing segregation. Without such an ordinance it is important to financially support any local private fair housing enforcement organizations serving the jurisdiction. State and Local entitlement jurisdictions must be fully aware of the existence, nature, extent and causes of all fair housing problems and the resources available to solve them. Without this information, and effective complaint referral and investigative mechanisms, the Fair Housing Plan will fall short of measurable results.”

Throughout the nine (9) entitlement jurisdictions there are only two (2) local ordinances in place that address fair housing. Erie County adopted Ordinance 39 in 2007, which established the EHRC. Both the City of Erie and Millcreek are covered by this ordinance. The ordinance extends protections to more protected classes than the Federal Fair Housing Act, and is more similar to the Pennsylvania Human Relations Act; however, it does extend protection based on sexual orientation. The Borough of State College enacted their Fair Housing Ordinance in 1993.

---

56 Manual at pg. 41.
Similar to Erie County, this ordinance extends protections beyond both the federal and state Acts, to cover sexual orientation, marital status, pregnancy, birth of a child, place of birth, and source of income. (See Table 5 for comparison of protected classes).

In its FHEA, HUD requires grantees to identify whether the fair housing enforcement and education in the region is effective, and if not, what barriers exist, and to identify actions to be taken.

Every jurisdiction except Millcreek identified at least one (1) impediment addressing the creation of a positive fair housing environment, and 24 impediments were set forth.

Altoona identified a total of four (4) impediments, all of which dealt with this particular Core Issue. The first impediment was “Public Awareness and Education,” to which they proposed to expand educational activities on advertising policies and practices. The second impediment was “Improve Knowledge to Homeowners, Homebuyers and Renters,” their plan to address this was targeting members of protected classes and informing them of their rights under the Fair Housing Act. The third impediment was “Homebuyer Education & Fair Housing Laws,” their plan to address this was, by conducting homebuyer training to low-moderate income persons and tenants who may be potential homeowners. The fourth and final impediment was “Fair Housing Workshops for Housing Professionals, Tenants, and Landlords,” they proposed to address this by conducting a workshop for housing professionals. With all of Altoona’s efforts focused on creating a positive fair housing environment, they have ensured that this Core Issue will be addressed throughout the duration of their planning cycle. However, while these actions and activities are certainly worthwhile endeavors, they are not truly impediments to fair housing choice, rather they are goals and activities for the Fair Housing Office and their staff to accomplish.

Beaver identified three (3) impediments addressing the creation of a positive fair housing environment. The first impediment was “Lower income minority households have fewer affordable housing options.” To address this impediment they proposed to increase and enhance fair housing education and outreach as well as to continue the Affordable Housing Program and
Projects in Beaver County. The second impediment was “Persons with disabilities are denied affordable housing options when landlords do not agree to make reasonable accommodations as required by federal fair housing law.” To address this impediment they proposed to increase and enhance fair housing education and outreach. The third impediment was “Housing options for members of the protected classes who could potentially reside in group homes are severely limited by municipalities that overly restrict the permitting process for group homes in violation of federal fair housing law.” To address this impediment they once again, proposed to increase and enhance fair housing education and outreach. It is not immediately clear these strategies will address these impediments, but they certainly have the opportunity to make progress towards the creation of a positive fair housing environment in Beaver.

Erie identified five (5) impediments addressing the creation of a positive fair housing environment. The first impediment was “There exists a continuing need for quality fair housing education, outreach and training, as well as real estate testing.” Their plan to address this was to support the efforts of local and regional fair housing advocacy organizations, effectuate a fair housing outreach, continue to provide funding to St. Martin’s Center, and to create a fair housing guide. The second impediment was “Members of the protected classes could be more fully represented on boards and commissions dealing with housing issues.” Their plan to address this was to conduct a survey of each of the appointed citizens who are currently members of public boards or commissions to identify members of the protected classes. The third impediment was “The City’s zoning ordinance should be amended to allow for a wider definition of families, in particular for permanent group homes.” To address this they planned to initiate discussions with the solicitor regarding amending the zoning ordinance. The fourth identified impediment was “The real estate advertising practices of The Erie Times-News do not meet fair housing standards.” Their plan to address this was to encourage The Erie Times-News to consistently include the equal housing logo and a commitment to not knowingly accepting advertisements that violate the Fair Housing Act and to provide clarifying language exempting companion and service animals from a “no pets” restriction. The fifth and final impediment was “The City’s process for allocating and reporting CDBG, HOME and NSP funds could be improved from a fair housing perspective.” To address this impediment they proposed to make sure that the Site and Neighborhood Selection requirements are incorporated for all applicable HOME-assisted
projects and to map the address of all new affordable housing as part of the CAPER process. All of these proposed efforts certainly will make meaningful progress toward the creation of a positive fair housing environment in Erie.

Johnstown identified two (2) impediments to this Core Issue. The first impediment was “The City’s fair housing programs are limited to periodic outreach and education efforts. Its fair housing efforts could be improved by expanding its programs and improving its documentation of activities.” To address this impediment they proposed to provide fair housing training to local organization staff and clients, and partner with Southwestern Pennsylvania Legal Services to implement a fair housing testing program. The other impediment was “The real estate advertising practices of The Tribune-Democrat do not meet fair housing standards.” To address this impediment they would recommend to the local newspapers that they commit to not knowingly accepting advertisements that are in violation of the Fair Housing Act. Both proposed strategies to address their identified impediments will further Johnstown’s effort in creating a positive fair housing environment.

Sharon identified as an impediment “There is a lack of awareness of rights and responsibilities under the Fair Housing Act and a need to continually monitor and enforce the Fair Housing Act.” To address this they proposed to continue to fund and support the following; educational programs concerning the rights and responsibilities covered by the Fair Housing Act, the Shenango Valley Urban League, the delivery of financial literacy and counseling to low income and minority households, and the delivery of fair housing services to at-risk groups and victims of housing discrimination. While support given to educational programs furthers Sharon’s efforts to create a positive fair housing environment, they may not effectively address the monitoring and enforcement component of their identified impediment.

State College identified “Lack of local fair housing enforcement, focus, and support” and “Zoning barriers to affordable housing” as impediments, but did not provide any information regarding goals or strategies to achieve their goal as it relates to this issue. Without any further information, it is impossible to determine what efforts are being made towards this impediment and whether they will lead towards the creation of a positive fair housing environment.
Washington identified four (4) impediments to this Core Issue. The first impediment was “Real estate ads in the local paper prohibiting pets may discourage persons with service animals from considering these units.” Their plan to address this was by encouraging the local newspaper to include an exception statement for service animals in all real estate ads that refer to pets. The second impediment was “both landlords and many elected officials and zoning board members lack a comprehensive understanding of fair housing law, including reasonable accommodation requirements.” To address this they proposed hosting a fair housing seminar workshop for area elected officials, municipal planners, zoning board members, planning commission members, other relevant municipal staff, and area landlords/property management companies. The third impediment was “many members of the protected classes are unaware of their fair housing rights and the existing affordable rental and for sale housing opportunities that exist throughout the County.” To address this they proposed conducting an annual fair housing workshop open to County residents. The final impediment was “Several municipal zoning ordinances are outdated, lack certain terms, definitions, and/or regulations, or are in violation of Federal fair housing law.” To address this impediment they proposed performing a review of all County municipal zoning ordinances to evaluate compliance with federal fair housing laws, and facilitate fair housing training for planners, zoning board officers, planning commission members and other municipal officials. All of the proposed efforts are positive steps toward the creation of a positive fair housing environment in Washington.

Westmoreland similarly, identified four (4) impediments to this Core Issue. The first such impediment was “Real estate ads in the local paper prohibiting pets may discourage persons with service animals from considering these units.” Their strategy to address this was by encouraging the local newspaper to include an exception statement for service animals in all real estate ads that refer to pets. The second impediment was “both landlords and many elected officials and zoning board members lack a comprehensive understanding of fair housing law, including reasonable accommodation requirements.” Their plan to address this was by hosting a fair housing seminar workshop for area elected officials, municipal planners, zoning board members, planning commission members, other relevant municipal staff, and area landlords/property management companies. The third impediment was “many members of the
protected classes are unaware of their fair housing rights and the existing affordable rental and for sale housing opportunities that exist throughout the County.” They proposed conducting an annual fair housing workshop open to County residents to address this impediment. The final impediment identified was “Several municipal zoning ordinances are outdated, lack certain terms, definitions, and/or regulations, or are in violation of Federal fair housing law.” The County to address this proposed performing a review of all County municipal zoning ordinances to evaluate compliance with federal fair housing laws, and facilitate fair housing training for planners, zoning board officers, planning commission members and other municipal officials. These proposed efforts are also positive steps towards the creation of a positive fair housing environment in Westmoreland.

A review of the range of identified impediments shows several common issues that were raised by multiple jurisdictions.

Eight (8) of the nine (9) jurisdictions identified 13 impediments identifying a lack of knowledge and education concerning Fair Housing rights and responsibilities, including:

1. Altoona: “Improve Knowledge to Homeowners, Homebuyers and Renters”
2. Altoona: “Homebuyer Education and Fair Housing Laws”
3. Altoona: “Workshops for Housing Professionals, Tenants, and Landlords”
4. Beaver: “Lower income minority households have fewer affordable housing options.”
5. Beaver: “Persons with disabilities are denied affordable housing options when landlords do not agree to make reasonable accommodations as required by federal fair housing law.”
6. Erie: “There exists a continuing need for quality fair housing education, outreach and training, as well as real estate testing.”
7. Johnstown: “The City’s fair housing programs are limited to periodic outreach and education efforts. Its fair housing efforts could be improved by expanding its programs and improving its documentation of activities.”
8. Sharon: “There is a lack of awareness of rights and responsibilities under the Fair Housing Act and a need to continually monitor and enforce the Fair Housing Act.”
9. State College: “Lack of local fair housing enforcement, focus, and support”
10. Washington: “Both landlords and many elected officials and zoning board members lack a comprehensive understanding of fair housing law, including reasonable accommodation requirements.”
11. Washington: “Many members of the protected classes are unaware of their fair housing rights and the existing affordable rental and for sale opportunities that exist throughout the County.”
12. Westmoreland: “Both landlords and many elected officials and zoning board members lack a comprehensive understanding of fair housing law, including reasonable accommodation requirements.”
13. Westmoreland: “Many members of the protected classes are unaware of their fair housing rights and the existing affordable rental and for sale opportunities that exist throughout the County.”

Every jurisdiction except for Millcreek, which probably should have included this topic, identified a lack of education and knowledge of Fair Housing rights and responsibilities as an existing impediment to fair housing choice to be addressed. The common proposed action was to conduct fair housing training: Johnstown proposed collaborating with Southwestern Pennsylvania Legal Services to implement a fair housing testing program, while State College did not identify any proposed action.

Five (5) jurisdictions identified newspaper-advertising practices as an impediment to Fair Housing, including:

1. Altoona: “Fair Housing Public Awareness and Education” [targeting advertising policies and practices]
2. Erie: “The real estate advertising practices of The Erie Times-News do not meet fair housing standards.”
4. Washington: “Real estate ads in the local paper prohibiting pets may discourage persons with service animals from considering these units.”

5. Westmoreland: “Real estate ads in the local paper prohibiting pets may discourage persons with service animals from considering these units.”

The jurisdictions varied in their approaches to address these impediments. Altoona’s efforts focused on the dissemination of fair housing information to housing providers as well as the public. Erie and Johnstown proposed to encourage their local newspapers to consistently include the equal housing log and to not knowing accept advertisements that were in violation of the Fair Housing Act. Finally, Washington and Westmoreland planned to send a letter to the local newspaper to alert them of the need to include exception clause for service animals in rental ads that prohibit “pets.” This particular action would provide increased notice of the rights and obligations present in fair housing laws to the landlords that place such ads, and the protected class community that reads the ads.

Five (5) jurisdictions identified zoning practices as an impediment to Fair Housing, including:

1. Beaver: “Housing options for members of the protected classes who could potentially reside in group homes are severely limited by municipalities that overly restrict the permitting process for group homes in violation of federal fair housing law.”

2. Erie: “The City’s zoning ordinances should be amended to allow for a wider definition of families, in particular for permanent group homes.”

3. State College: “Zoning barriers to affordable housing.”

4. Washington: “Several municipal zoning ordinances are outdated, lack certain terms, definition and/or regulations, or are in violation of Federal fair housing law.”

5. Westmoreland: “Several municipal zoning ordinances are outdated, lack certain terms, definition and/or regulations, or are in violation of Federal fair housing law.”

The jurisdictions suggested a combination of review and modification of existing ordinances, and education to current zoning and planning officials. Such a combined action plan
might certainly target and redress this problem, and would be recommended to the four (4) jurisdictions that did not identify this issue as an impediment.

Additionally, Erie identified two (2) further impediments whose removal could assist in creating a positive fair housing environment: “Members of the protected classes could be more fully represented on boards and commissions dealing with housing issues,” and “The City’s process for allocating and reporting CDBG, HOME and NSP funds could be improved from a fair housing perspective.”

**Core Issue # 9 – Review of Past Fair Housing Complaints**

A final Core Issue is to review past fair housing complaints. One of HUD’s criticisms in their review and rejecting of the Houston, Texas AI was that it “does not identify any funding directed by the City toward fair housing enforcement or enforcement-related activities such as testing…nor is such funding proposed for subsequent years although high levels of discrimination were identified as an impediment to fair housing in the AI.”

In its FHEA, HUD directs grantees to list the number of individual discrimination cases in the region and the bases of alleged discrimination. Similarly, grantees completing a Regional AI are to identify recent or current allegations of systemic discrimination against private or public entities, including civil rights lawsuits, pending fair housing enforcement actions, settlements, or consent decrees that signal the presence or resolution of key fair housing and civil rights concerns.

All nine (9) jurisdictions addressed prior discrimination complaints filed within their jurisdictions in their AI. The level of detail provided varied from jurisdiction to jurisdiction, with only Millcreek providing no detailed information. (See Table 6 for breakdown of complaints filed).

---

57 See fn. 33
Altoona reported eight (8) discrimination complaints filed with PHRC. Beaver reported 59 complaints dually filed with HUD and PHRC. Erie reported 70 complaints filed with HUD or the EHRC. Johnstown reported five (5) discrimination complaints filed with HUD and four (4) filed with PHRC. Sharon reported six (6) complaints filed with HUD and 10 with PHRC. State College reported 14 complaints filed with HUD from Centre County and 10 complaints filed with the Borough. Washington reported 17 complaints filed with HUD and 55 complaints filed with PHRC. Westmoreland reported 46 complaints filed with HUD and 153 complaints filed with PHRC.

Four (4) jurisdictions identified impediments addressing past complaints. Millcreek identified as an impediment “There appears to be little focus on fair housing by the Township. There is no formal tracking system for fair housing complaints in the Township.” They proposed several action to address this impediment, from partnering with local service providers to adopting a proposed zoning ordinance. Conversely, State College reported as an impediment, “Non-specific acts of discrimination,” but failed to offer any proposed actions to address this “impediment.” Without any further information, it is impossible to determine if their efforts will fully address this Core Issue.

Washington stated as an impediment “Fair Housing complaints alleging discrimination based on race and disability comprised the majority of PHRC complaints. Acts of harm related to the rental of housing and/or commercial property represented a large majority of the complaints filed with HUD,” and proposed to increase and enhance fair housing outreach and education efforts by redistributing the Washington County Fair Housing Guide.

Westmoreland also found that “Fair Housing complaints alleging discrimination based on race and disability comprised the majority of HUD complaints. Acts of harm related to the rental of housing and/or commercial property represented a large majority of the complaints filed with PHRC,” and proposed to increase and enhance fair housing outreach and education by creating and distributing a County Fair Housing Guide.

58 The 10 complaints filed with PHRC originated from Mercer County.
59 See fn. 23
The existence of current and/or recent fair housing complaints filed with HUD, PHRC, and/or EHRC would certainly seem to be worthy of inclusion as an impediment to fair housing choice in a jurisdiction’s AI. Publishing and distributing a Fair Housing Guide, as proposed by Washington and Westmoreland, appears to be a minimal response, and must be supplemented by a specific program of education outreach, specifically targeting those protected classes that had been the subject of recent complaints. Without such additional measures, their strategies will not fully address this Core Issue.
Conclusions and Recommendations

In this final section of the report, the strengths and weakness of each jurisdiction’s AI will be discussed. Additionally, the format of the AI will be examined, with the HUD “suggested format” as the guide. Finally, we will offer our recommendations to the jurisdictions as many of them prepare to enter into a new planning cycle.

Altoona (2010)

The AI for Altoona was prepared and drafted by the Altoona Department of Planning & Community Development. Altoona was the only jurisdiction who created their own AI, which may have contributed to its many shortcomings. The AI itself is rather short, coming in at only 20 pages. While an AI does not necessarily have to be lengthy to be effective, it is almost impossible to address the elements contained in the HUD suggested format in a mere 20 pages. The AI fails to address or mention a majority of the Core Issues discussed earlier in this report. Unfortunately, reading the AI leaves one with more questions than answers. The AI fails to utilize and expand upon the voluminous demographic data and information that is available to the jurisdictions. A review of the methodology indicates that there was a heavy reliance on the results of surveys created by the Planning Department to develop their assessment of the needs and/or impediments to fair housing choice. They appeared to rely quite heavily on the results of these surveys, despite the relatively low number that were completed and returned. A better understanding behind the methodology of the AI was gained during discussions with the jurisdiction. When asked why the AI lacked data or information that was found in other AIs, it was explained by the jurisdiction that the Department of Planning and Development did not want information and data that was in their Consolidated Plan duplicated in their AI. Additionally, the jurisdiction stated that they only identified “impediments” that could be addressed by their Fair Housing Office. These “impediment” are truly impediments to fair housing choice, rather they are goals for the Fair Housing Office and staff to achieve. These rationales are very flawed, as the final report produced is not a document that can stand on its own as an effective tool in the
fair housing planning process, nor does the final report fully represent the City and their present housing situation.

**Weaknesses**

- The AI failed to address the following Core Issues:
  - Segregation
  - Racially and Ethnically Concentrated Areas
  - Access to Opportunity
  - Housing and Transportation
  - Economic Competitiveness
  - Lending Discrimination
- Several elements, as provided for in HUD’s suggested format, were missing from the AI entirely or only vaguely touched upon; a partial list of these elements includes:
  - Demographic Data
  - Housing Profile
  - Zoning and Site Selection
  - Lending Policies and Practices
  - Conclusions and Recommendations
- The AI failed to identify any impediments to fair housing choice, instead choosing to identify four (4) goals and corresponding activities to be addressed by the Fair Housing Staff.
- The AI failed to provide any information regarding benchmarks, expected completion date, or proposed investment from the City in regards to the completion of their identified goals.

**Strengths**

- The activities identified in order to achieve their identified goals are effective strategies.

**Recommendations**

It is imperative that Altoona prepare a proper AI for the start of their next planning cycle in 2014. The AI that is currently in place is extremely deficient when analyzed against the Core
Issues and the HUD suggested format. If Altoona decides to keep the preparation of a new AI in-house, it is crucial that the department assigned this task review the AIs of other jurisdictions, both locally and nationally, in order to gain a better understanding of the information and data necessary to improve the effectiveness of the AI as fair housing planning tool. While procuring the services of an outside consulting group does not guarantee a flaw free AI, it could help to curtail any biases that may be present internally that negatively influence the final report. Additionally, Altoona must identify in the AI all impediments to fair housing choice, not just those that can be addressed by the Fair Housing staff.

**Beaver (2008)**

The AI for Beaver was prepared by Mullin & Lonergan Associates, Inc. (“Mullin & Lonergan”), a Pennsylvania based consulting group. Beaver’s AI was completed in December 2008 making it one of the oldest among the nine (9) jurisdictions. The AI is a mostly complete document in that it addressed a majority of the elements found in the HUD suggested format as well as the Core Issues. However, it does appear that the AI is out of date since it was not updated in 2010 when Beaver completed their five (5) year Consolidated Plan. In preparing this report there was some confusion concerning the identified impediments to fair housing choice. A review of the AI indicates five (5) identified impediments; however, while reviewing the CAPER and Action Plan, it appears that there are only two (2) identified impediments. The existence of these two (2) impediments was confirmed when speaking with the jurisdiction. The two (2) existing impediments have previously been identified in this report as Impediment #1 and #3 in the Beaver County summary. When discussing the AI with the jurisdiction, they had expressed some displeasure in the data relied upon when drafting the AI. The feeling was that the data was too general and broad, with the end product not being a true representation of the County. They also expressed that they felt slightly detached from the preparation of the AI, and that they hoped to be more involved with the preparation of future AIs. Lastly, they had expressed a desire for more assistance and guidance from HUD regarding the AI.

**Weaknesses**
- The AI failed to address the following previously identified Core Issues:
Health and Housing
- Housing and Transportation
- Economic Competitiveness (did identify an impediment regarding this issue)

- The AI failed to utilize maps as a medium for presenting the data and information included in the AI.
- Some of the “planned initiatives” identified for their two (2) strategies might not be effective in addressing the identified impediment to fair housing choice.
- The AI is outdated per HUD guidance that an AI be updated every three (3) to five (5) years in accordance with the jurisdiction’s planning cycle.

**Strengths**
- The AI addressed a majority of the elements provided by the HUD suggested format.

**Recommendations**

Beaver needs to prepare a new AI, utilizing 2010 Census and 2007-2011 American Community Survey data. This point is further reinforced by the fact that in the existing AI, they had identified five (5) impediments, but in the most recent CPD documents, they only identify two (2) impediments. When preparing their new AI Beaver should pay particular attention to the nine (9) Core Issues previously discussed as potential sources for impediments to fair housing choice. Lastly, when establishing a goal to address an identified impediment they need to make certain that the strategies implemented will be able to achieve their goal if successfully completed.

**Erie (2011)**

The AI for Erie was also produced by Mullin & Lonergan in July 2011. By many measures, this AI is the most complete and thorough of the nine (9) entitlement jurisdictions that were analyzed for this report. Almost all of the elements provided by HUD’s suggested format were present in the AI, as well as a majority of the Core Issues. The AI utilized maps more so than any other jurisdiction to provide a visual representation of the data provided. These maps certainly made the presentation of the demographic data much more impactful. Erie also
identified more impediments, 14, than any other of the nine (9) jurisdictions. When the number of impediments was discussed with the jurisdiction, there was a general feeling of resentment regarding the large number of impediments identified. Specifically, there was some consternation regarding some of the impediments that were identified, as City had either already addressed the identified impediment or the strategies identified to achieve the established goal were already in place. These impediments and strategies were identified in the final draft of the AI despite the fact that staff members had informed Mullin & Lonergan of their irrelevance in prior drafts of the AI. There also appeared to be some feelings of detachment regarding the production and drafting of the AI.

**Weaknesses**

- The AI failed to address the following Core Issues:
  - Health and Housing
  - Housing and Transportation
- Some of the established goals to address the impediments identified are likely unattainable such as:
  - “Higher home ownership rates among minority households.”
  - “Elimination of mortgage discrimination.”

**Strengths**

- A majority of the elements provided in HUD’s suggested format were present in the AI.
- Excellent use of maps to provide a visual representation of the demographic data discussed.
- The most complete and thorough AI of the nine (9) jurisdictions examined for this report.

**Recommendation**

As previously mentioned this AI is the most complete and thorough of the nine (9) jurisdictions examined for this report. Based upon the discussions with the jurisdiction regarding their identified impediments, we would recommend that during the next planning cycle that impediments that had already been addressed not be identified as existing impediments. By doing so the City will be able to reallocate the time and resources unnecessarily spent towards
these “impediments” to more pressing needs and actual impediments. This could also be achieved by engaging and involving the jurisdiction’s staff in the planning, preparation, and production of future AIs.

**Johnstown (2011)**

The AI for Johnstown was also prepared by Mullin & Lonergan in September 2011; this is the most recent AI of all nine (9) jurisdictions. The AI is similar to Erie’s in that it is among the more complete AIs, in that it addresses a majority of the Core Issues as well as the elements from the HUD suggested format. When discussing the AI with the jurisdiction they had stated that some of the five (5) impediments that were identified might have been carried over from the previous AI. They had also expressed that they felt detached from the process of producing the AI, and would like to see more guidance and direction from HUD regarding the AI.

**Weaknesses**

- The AI failed to address the following Core Issues:
  - Housing and Transportation
  - Economic Competitiveness
- The AI failed to utilize maps as a medium for presenting the data and information included in the AI.
- The goal to have “Increased home ownership rates among minority household,” is likely unattainable since there too many factors involved that are beyond the control of the City.

**Strengths**

- A majority of the elements provided in HUD’s suggested format were present in the AI.
- All five (5) identified impediments related to a Core Issue.
- The strategies identified to achieve the goals of the identified impediments are sound. If they are completed significant, progress should be made towards eliminating the impediment.
**Recommendations**

As previously mentioned this AI is one of the more complete AIs examined for the report. In their next planning cycle, Johnstown should look to address all the Core Issues in order to determine whether there are unidentified impediments to fair housing choice within them. They should also pay specific attention when establishing their goals to address any identified impediments, to ensure that they can be achieved through the strategies and activities they plan to undertake.

**Millcreek (2008)**

The AI for Millcreek was also prepared by Mullin & Lonergan in November 2008; this is the oldest AI of the nine (9) jurisdictions. The format and design of the AI is quite similar to Beaver’s AI. The AI is somewhat complete when analyzed against the Core Issues. The AI either addressed or identified an impediment to fair housing choice to five (5) of the nine (9) Core Issues. The AI did also address a majority of the elements of the HUD suggested format. When discussing the AI with the jurisdiction they stated that Mullin & Lonergan was currently working on a new AI for Erie County, as a required condition of their receipt of a HUD Sustainability Grant. This County AI would also encompass Millcreek. At the time of the writing of this report, it was not yet known whether any additional impediments to fair housing choice had been identified for Millcreek.

**Weaknesses**

- The AI failed to address the following Core Issues:
  - Health and Housing
  - Housing and Transportation
  - Economic Competitiveness
  - Creation of a Positive Fair Housing Environment
- The AI failed to utilize maps as a medium for presenting the data and information included in the AI.

---

60 Beaver’s AI was completed one (1) month after Millcreek’s.
• The AI failed to provide any data regarding housing discrimination complaints filed with HUD or PHRC.
• The AI failed to provide any goals for the identified impediments.
• The identified impediment “Continue to create and expand affordable housing activities for LMI persons and households in the Township,” is not an impediment, rather it is a goal.
• The strategy to “Continue the Township’s single family owner-owned housing rehab program, rental housing rehab program, and weatherization activities,” likely would not address the “impediment” to “Continue to create and expand affordable housing activities for LMI persons and households in the Township.”

Strengths
• A majority of the elements provided in HUD’s suggested format were present in the AI.
• All three (3) of the identified impediments related to a Core Issue.

Recommendations
Millcreek’s AI is the oldest AI of all nine (9) reviewed in the report, and needs to be updated. According to the jurisdiction, this process is currently in development as part of a new AI drafted for the County of Erie. Hopefully, the new AI will address all of the Core Issues to determine whether or not additional impediments to fair housing choice exists. Without seeing their new AI, no further recommendations can be given.

Sharon (2009)

The AI for Sharon was produced by Urban Design Ventures, a consultant company based in Homestead, Pennsylvania. Sharon’s AI was completed in November 2009, as an update to the 1996 Analysis of Impediments to Fair Housing Choice; however, the document appears to be a wholly new created AI. The AI is deficient when analyzing it against the Core Issues and the elements of the HUD suggested format. The AI only addressed in its narrative four (4) of the nine (9) Core Issues; it should be noted that they did identify five (5) impediments related to the Core Issues, including one (1) that was not addressed in the narrative. The AI also was missing several of the elements of the HUD suggested format. Sharon was the only jurisdiction of the
nine (9) that did not discuss their AI or AFFH efforts with us, despite our numerous attempts to reach out to them. Additionally, they were the only entitlement jurisdiction that did not provide copies of all of their HUD required CPD documents.

**Weaknesses**

- The AI failed to address the following Core Issues:
  - Segregation
  - Access to Opportunity
  - Health and Housing (did provide some statistical data in their Appendix)
  - Housing and Transportation
  - Economic Competitiveness (did identify an impediment regarding this issue)
- Several elements, as provided for in HUD’s suggested format, were missing from the AI entirely or only vaguely touched upon, a partial list of these elements is as follows:
  - Zoning and Site Selection
  - Planning and Zoning Boards
  - Fair Housing Enforcement

**Strengths**

- Four (4) of the six (6) identified impediments were related to the Core Issues.
- The strategies identified to achieve the goals of the identified impediments are sound. If they are completed significant, progress should be made towards eliminating the impediment.
- The demographical and statistical information provided in the Appendices.

**Recommendations**

Sharon’s AI is older, but in terms of their planning cycle, it is not outdated. In preparing for their next planning cycle a new AI, focusing on the Core Issues and the elements in the HUD suggested format, should be produced. By expanding the coverage of the AI, the City will be able to identify and plan for any newly identified impediments.
State College (2009)

The AI for State College is not technically an AI; it is a Fair Housing Analysis Update ("FHAU"). This FHAU was prepared by Lisa Beede on behalf of The Department of Planning and Community Development for State College. Despite not being an AI, the FHAU was fairly complete in that it addressed a majority of the Core Issues and the elements of the HUD suggested format. In discussing this FHAU with the jurisdiction, they stated that the original AI was produced in 1991, with updates in 2003, and 2009. They also stated that the Borough had not identified any additional or new impediments since the original AI in 1991. State College is unique among the nine (9) entitlement jurisdictions because of the presence of Penn State and their very large student population. Student housing dominates the housing stock and severely limits affordable housing opportunities. Additionally, because of their small geographic size there is a lack of vacant land upon which affordable housing could be created thus further limiting the creation of new affordable housing opportunities.

Weaknesses

- The FHAU failed to address the following Core Issues:
  - Segregation
  - Housing and Transportation
  - Economic Competitiveness
- The FHAU failed to utilize maps as a medium for presenting the data and information included in the FHAU.
- The FHAU failed to identify any impediments to fair housing choice, instead choosing to rely on the five (5) impediments that were identified in the 1991 AI.
- The FHAU failed to provide any information regarding the Borough’s goals and strategies they planned to implement to address the impediments.

Strengths

- A majority of the elements provided in HUD’s suggested format were present in the FHAU.
- Three (3) of the five (5) previously identified impediments related to the Core Issues.
**Recommendations**

It is imperative that State College produce a new AI. It is impossible to comprehend that what was identified in 1991 still exists as an impediment today, equally as impossible to comprehend is that no new impediments had been identified in the 18 years between the production of the original AI and the most recent FHAU. The new AI should address all of the Core Issues to determine if the impediments identified in 1991, still exist and what new impediments are present. If the impediments identified in 1991 are still present, the Borough needs to analyze what efforts and measures have been undertaken over the last 22 years and why they have failed to eliminate these impediments.

**Washington (2011)**

Washington’s AI was produced by Mullin & Lonergan in March 2011; it is one of the most recent AIs of the nine (9) analyzed for this report. It is also among the more complete AIs, in that it addressed seven (7) of the nine (9) Core Issues, as well as the majority of the elements in the HUD suggested format. In discussing the AI with the jurisdiction, they stated that they try to focus on addressing needs and areas that they can have control over, such as first-time homebuyer and housing rehabilitation programs. They also stated that they would benefit from more guidance from HUD regarding the AI. They feel that they have to use a consultant to produce the AI, as they would be unable to devote the time, internally, to complete such a task. During the meeting and discussion with the jurisdiction, they were informed that their identified impediments to fair housing choice are identical to those of Westmoreland County, whose AI was produced by Mullin & Lonergan in August 2010, less than one (1) year prior to the completion of Washington’s AI. The jurisdiction stated that they were completely unaware that the two jurisdictions had identical impediments. It should be noted that the entire AI is almost identical to Westmoreland’s AI.

**Weaknesses**

- The Update failed to address the following Core Issues:
  - Health and Housing
Housing and Transportation

- The AI failed to utilize maps as a medium for presenting the data and information included in the AI.
- The eight (8) identified impediments are identical to those identified seven (7) months earlier in Westmoreland’s AI.
- The goal to “Increase and enhance fair housing outreach and educational efforts,” does not appear to address the impediment “Several municipal zoning ordinances are outdated, lack certain terms, definitions, and/or regulations, or are in violation of Federal fair housing law.”

Strengths

- A majority of the elements provided in HUD’s suggested format were present in the AI.
- Five (5) of the eight (8) identified impediments related to the Core Issues.
- A majority of the strategies identified to achieve the goals of the identified impediments are sound. If they are completed significant, progress should be made towards eliminating the impediment.

Recommendations

The fact that this AI is almost identical to Westmoreland’s raises some serious doubts regarding whether either AI is a true representation of their Counties. While it is not uncommon for jurisdictions to have similarly worded impediments or impediments that address the same issue, it is almost impossible for two different jurisdictions to have identical impediments. While the best suggestion may be for Washington to produce a new AI, using a different consulting group, the fact that they are still in the early years of their planning cycle, and the prohibitive costs associated with the production of a new AI, make it very unlikely that they will do so. When they begin the planning for their next planning cycle they may want to consider other consulting groups, or work more closely with Mullin & Lonergan to ensure that the AI is completely representative of Washington County.
Westmoreland (2010)

Westmoreland’s AI was also produced by Mullin & Lonergan in August 2010. Their AI is among the more complete AIs, in that it addressed seven (7) of the nine (9) Core Issues, as well as the majority of the elements in the HUD suggested format. In discussing with the jurisdiction their AFFH efforts, they stated with recent cuts in funding across a multitude of programs they are trying to focus on projects and endeavors that will provide the most “bang for the buck.” They also indicated that they are in the process of developing a 10 year Countywide Comprehensive Plan. During this process, they have acquired and begun analyzing a significant amount of very specific and detailed demographic and geographic data. They indicated that they fully intend to utilize this data and their findings when preparing and developing their CPD planning documents, including the AI, when their current planning cycle concludes. The issues regarding the extreme similarities with Washington’s AI were not discussed with the jurisdiction, since theoretically their AI was produced in advance of Washington’s.

Weaknesses

- The Update failed to address the following Core Issues:
  - Health and Housing
  - Housing and Transportation
- The AI failed to utilize maps as a medium for presenting the data and information included in the AI.
- The eight (8) identified impediments are identical to those identified seven (7) months later in Washington’s AI.
- The goal to “Increase and enhance fair housing outreach and educational efforts,” does not appear to address the impediment “Several municipal zoning ordinances are outdated, lack certain terms, definitions, and/or regulations, or are in violation of Federal fair housing law.”

Strengths

- A majority of the elements provided in HUD’s suggested format were present in the AI.
- Five (5) of the eight (8) identified impediments related to the Core Issues.
• A majority of the strategies identified to achieve the goals of the identified impediments are sound. If they are completed significant, progress should be made towards eliminating the impediment.

**Recommendations**

The fact that this AI is almost identical to Washington’s raises some serious doubts regarding whether either AI is a true representation of their Counties. It is encouraging to hear that the jurisdiction in developing their Countywide 10 year Plan is utilizing some very specific and detailed data that they intend to use for future CPD planning activities, such as the production of a new AI when the current planning cycle concludes. Much like with Washington it will be critical for Westmoreland to take a much more proactive position in the production of the next AI, assuming that they continue to utilize services of Mullin & Lonergan. By doing so they can ensure that, the final product is a true representation of their County and its residents.

**General Recommendations**

*The United States Department of Housing and Urban Development*

In our discussions with the jurisdictions, there was a consistent request for more guidance, direction, and assistance from HUD regarding the AI. As previously stated, there are no formal regulations from HUD that mandate when an AI is to be updated or what substantive information should be included in the AI. The jurisdictions are, in a way, left to their own devices resulting in a lack of consistency in the AI from jurisdiction to jurisdiction. The lack of formal guidelines and regulations make it incredibly difficult for the jurisdictions to produce their own AI, as many do with the Consolidated Plan, Annual Action Plan, and CAPER reports. The formal guidelines and regulations that govern these documents allow them to be produced by the jurisdiction, instead of having to rely on an outside group for their production. With the majority of the jurisdictions utilizing the services of consulting groups, the structure and format created by these groups essentially becomes the standard format for the AI, which in large part, is fairly consistent with the HUD suggested format, but does not necessarily address the Core Issues. The proposed rule that would change the requirement to produce an AI and replace it
with a fair housing assessment and planning process, hopefully will address these concerns, providing the jurisdictions with the guidance and direction that the currently are lacking.

**Consulting Groups**

Since the majority of the jurisdictions utilize the services of a consulting group for the production of their AI, it is important to recognize the strengths and shortcomings of the documents they produce. As the report has shown, a majority of the consultant produced AIs are fairly complete in their addressing of the Core Issues as well as the elements found in the HUD suggested format. However, in reviewing all of the documents numerous typographical errors were found; while for the most part they were innocuous, a number resulted in incorrect numbers reported in charts, tables, or in the narrative. These types of errors can raise suspicion as to whether the data that is being relied upon to identify potential impediments is being manipulated either to identify an impediment that does not actually exist or to conceal one that does. It is also important for the consultant groups to work more closely with the planning and development groups within the jurisdictions. Many of the jurisdictions stated in our discussions that they felt detached from the entire process and that the final report was not truly representative of their jurisdiction as they knew it. It is also important for the consultants to start the AI process with a blank slate. While it is important that they reference the information, findings, and progress made since the last AI for the jurisdiction was produced, each AI should be a wholly new created document. By following these measures, a situation like the Washington/Westmoreland mirror image AI could be avoided.
## Glossary of Terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affirmative Fair Housing Marketing Plan:</td>
<td>A marketing strategy designed to attract buyers and renters of all majority and minority groups, regardless of sex, disability, and familial status to assisted and insured rental projects and sales dwellings, which are being marketed by an applicant.</td>
</tr>
<tr>
<td>Affirmatively Furthering Fair Housing: (AFFH)</td>
<td>The obligation of AFFH has never been defined statutorily, however, HUD defines it as requiring a grantee to: 1) Conduct an analysis to identify impediment to fair housing choice within the jurisdiction; 2) Take appropriate actions to overcome the effects of any impediments through the analysis; and 3) Maintain records reflecting the analysis and actions taken in this regard.</td>
</tr>
<tr>
<td>Affordable Housing:</td>
<td>Decent, safe, quality housing that costs no more than 30 percent of a household’s gross monthly income for utility and rent or mortgage payments.</td>
</tr>
<tr>
<td>American Community Survey: (ACS)</td>
<td>A nationwide survey designed to provide communities with a fresh look at how they are changing. It is a critical element in the Census Bureau’s reengineered 2010 census plan. The ACS collects information such as age, race, income, commute time to work, home value, veteran status, and other important data from U.S. households.</td>
</tr>
<tr>
<td>Analysis of Impediments Fair Housing Choice: (AI)</td>
<td>A comprehensive review of potential impediments and barriers to the right to be treated fairly when seeking housing. The AI is expected to cover public and private policies, practices, and procedures affecting housing choice and assess how they all affect the location, availability, and accessibility of housing. Grantees are also to develop strategies and actions to overcome these barriers based on history, circumstances, and experiences. The AI is a tool that is intended to serve as the basis for fair housing planning; provide essential information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates; and assist in building public support for fair housing efforts.</td>
</tr>
<tr>
<td>Area of Concentration:</td>
<td>A geographic area where the percentage of a specific group of individuals (i.e. racial and ethnic minority or low to moderate-income persons) is 10 percentage points higher than that of the overall jurisdiction.</td>
</tr>
<tr>
<td>Definition</td>
<td>Description</td>
</tr>
<tr>
<td>-----------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Census Block:</td>
<td>An area bounded on all sides by visible features, such as streets, roads, streams, and railroad tracks, and by invisible boundaries, such as city, town, township, and county limits, property lines, and short imaginary extensions of streets and roads. Census blocks are generally small in area.</td>
</tr>
<tr>
<td>Census Block Group:</td>
<td>A cluster of census blocks having the same first digit of their four-digit identifying numbers within a census tract.</td>
</tr>
<tr>
<td>Census Tract:</td>
<td>Small relatively permanent statistical subdivisions of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographical staff of a regional census center in accordance with Census Bureau guidelines. Census tracts generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.</td>
</tr>
<tr>
<td>Community Development Block Grant Program:</td>
<td>This program provides grant funds to local and state governments to develop viable urban communities by providing decent housing with a suitable living environment and expanding economic opportunities to assist low- and moderate-income residents.</td>
</tr>
<tr>
<td>Community Planning and Development: (CPD)</td>
<td>HUD’s Office of Community Planning and Development seeks to develop viable communities by promoting integrated approaches that promote decent housing, a suitable living environment, and expand economic opportunities for low- and moderate-income persons.</td>
</tr>
<tr>
<td>Consolidated Plan:</td>
<td>A document written by a state or local government describing the housing needs of the low- and moderate-income residents, outlining strategies to meet these needs, and listing all resources available to implement the strategies. This document is required in order to receive HUD Community Planning and Development funds.</td>
</tr>
<tr>
<td>Dissimilarity Index:</td>
<td>An analytical tool that measures the relative separation or integration of groups across all neighborhoods of a city or metropolitan area. The index score can be interpreted as the percentage of one of the two groups included in the calculation that would have to move to different geographical areas in order to achieve full integration. The index score is rated on a scale from zero (0) to 100, in which a score of zero (0) corresponds to perfect integration and a score of 100 represents total segregation.</td>
</tr>
</tbody>
</table>
scores less than 30 indicate a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

Emergency Solutions Grant Program: A federal CPD program grant designed to assist individuals and families quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.

Fair Housing and Equity Assessment: The goal of the FHEA is to undertake a regional scale analysis across five components, to gain a full picture of regional equity and access to opportunity. The five components are identification and assessment of: 1) Segregated Areas and Areas of Increasing Diversity and/or Racial/Ethnic Integration; 2) Racially Concentrated Areas of Poverty; 3) Access to Existing Areas of High Opportunity; 4) Major Public Investment; and 5) Fair Housing Issues, Services, and Activities.

Fair Housing Choice: The ability of persons, regardless of race, color, religion, national origin, disability, sex, or familial status, of similar income levels to have the same housing choices.

Home Investment Partnerships Program: Provides formula grants to states and localities that communities use – often in partnership with local nonprofit groups – to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership, or to provide direct rental assistance to low-income people.

Housing Stock: The number of existing housing units based on data compiled by the United States Bureau of the Census and referable to the same point or period in time.

Impediments to Fair Housing: Any actions, omissions, or decisions based upon race, color, religion, national origin, disability, sex, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice.

Low Income: A household whose income does not exceed 80 percent of the median income for the area, as determined by HUD, with adjustments for smaller or larger families.

Low- and Moderate-Income Household/Person: A household and/or a person having an income equal to or less than the Section 8 low-income limit established by HUD and adjusted for family size.
<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moderate Income:</td>
<td>A household whose income is between 81 percent and 95 percent of the median income for the area, as determined by HUD, with adjustments for smaller or larger families.</td>
</tr>
<tr>
<td>Multi-family Housing:</td>
<td>A building with more than four residential units.</td>
</tr>
<tr>
<td>Single Family Property:</td>
<td>A single-unit family residence detached or attached to other housing structures.</td>
</tr>
<tr>
<td>Site and Neighborhood Standards:</td>
<td>Standards that address the site location requirements for both rehabilitated and newly constructed rental units financed with HOME funds.</td>
</tr>
<tr>
<td>(24 CFR 983.6)</td>
<td></td>
</tr>
</tbody>
</table>
Index of Tables

Table 1  HUD Suggested Format for the Analysis of Impediments
Table 2  Borough of State College Population by Census Tract
Table 3  Pennsylvania Municipalities Dissimilarity Index Rankings
Table 4  2007-2011 ACS Housing Deficiency Figures
Table 5  Reported Median Household Incomes and Unemployment Rates
Table 6  Comparison of the Protected Classes
Table 7  Housing Discrimination Complaints Filed
Table 8  2010 Census Population Figures
Table 9  2007-2011 ACS Housing Stock Figures
Table 1 – HUD Suggested Format for the Analysis of Impediments

I. Introduction and Executive Summary of the Analysis
   A. Who Conducted
   B. Participants
   C. Methodology Used
   D. How Funded
   E. Conclusions
      1. Impediments Found
      2. Action To Address Impediments

II. Jurisdictional Background Data
    A. Demographic Data
    B. Income Data
    C. Employment Data
    D. Housing Profile
    E. Maps
    F. Other Relevant Data

III. Evaluation of Jurisdiction’s Current Fair Housing Legal Status
    A. Fair housing complaints or compliance reviews where the Secretary has issued a charge of or made a finding of discrimination
    B. Fair housing discrimination suit filed by the Department of Justice or private plaintiffs
    C. Reasons for any trends or patterns
    D. Discussion of other fair housing concerns or problems

IV. Identification of Impediments to Fair Housing Choice
    A. Public Sector
       1. Zoning and Site Selection
       2. Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage
       3. PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders
4. Sale of Subsidized Housing and Possible Displacement
5. Property Tax Policies
6. Planning and Zoning Boards
7. Building Codes (Accessibility)

B. Private Sector
   1. Lending Policies and Practices

C. Public and Private Sector
   1. Fair Housing Enforcement
   2. Informational Programs
   3. Visitability in Housing

D. Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD under Title VI of the Civil Rights Act of 1964 or Section 504 of the Rehabilitation Act of 1973, or where the Secretary has issued a charge under the Fair Housing Act regarding assisted housing within a recipient’s jurisdiction, an analysis of the actions which could be taken by the recipient to help remedy the discriminatory condition, including actions involving the expenditure of funds by the jurisdiction.

V. Assessment of Current Public and Private Fair Housing Programs And Activities on the Jurisdiction

VI. Conclusions and Recommendations

VII. Signature Page
Table 2 – Borough of State College Population by Census Tract

Census 2000

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>5,501</td>
<td>90.3%</td>
<td>4,814</td>
<td>75.5%</td>
<td>4,490</td>
<td>83.0%</td>
<td>1,685</td>
<td>92.5%</td>
<td>3,611</td>
<td>84.2%</td>
<td>2,780</td>
<td>85.8%</td>
<td>2,524</td>
<td>92.9%</td>
<td>3,802</td>
</tr>
<tr>
<td>African American</td>
<td>129</td>
<td>2.1%</td>
<td>496</td>
<td>7.8%</td>
<td>276</td>
<td>5.1%</td>
<td>39</td>
<td>2.1%</td>
<td>83</td>
<td>1.9%</td>
<td>48</td>
<td>1.4%</td>
<td>56</td>
<td>1.7%</td>
<td>68</td>
</tr>
<tr>
<td>American Indian</td>
<td>4</td>
<td>0.1%</td>
<td>11</td>
<td>0.2%</td>
<td>13</td>
<td>0.2%</td>
<td>2</td>
<td>0.1%</td>
<td>5</td>
<td>0.1%</td>
<td>4</td>
<td>0.1%</td>
<td>4</td>
<td>0.1%</td>
<td>5</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>312</td>
<td>5.1%</td>
<td>777</td>
<td>12.2%</td>
<td>395</td>
<td>7.3%</td>
<td>51</td>
<td>2.8%</td>
<td>489</td>
<td>11.4%</td>
<td>224</td>
<td>6.3%</td>
<td>311</td>
<td>15.9%</td>
<td>1,417</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>58</td>
<td>1.0%</td>
<td>136</td>
<td>2.1%</td>
<td>150</td>
<td>2.8%</td>
<td>12</td>
<td>0.7%</td>
<td>42</td>
<td>1.1%</td>
<td>49</td>
<td>1.4%</td>
<td>48</td>
<td>1.4%</td>
<td>35</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>86</td>
<td>1.4%</td>
<td>144</td>
<td>2.3%</td>
<td>88</td>
<td>1.6%</td>
<td>33</td>
<td>1.8%</td>
<td>57</td>
<td>1.3%</td>
<td>38</td>
<td>1.1%</td>
<td>65</td>
<td>2.0%</td>
<td>35</td>
</tr>
<tr>
<td>Total</td>
<td>6,090</td>
<td>6,378</td>
<td>5,412</td>
<td>1,822</td>
<td>4,287</td>
<td>3,548</td>
<td>3,240</td>
<td>2,716</td>
<td>4,927</td>
<td>38,420</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Minority Percentage | 9.7% | 24.5% | 17.0% | 7.5% | 15.8% | 10.2% | 14.2% | 7.1% | 22.8% | 15.7% |

Census 2010

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>#</th>
<th>%</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>6,198</td>
<td>89.6%</td>
<td>5,401</td>
<td>78.2%</td>
<td>4,975</td>
<td>80.5%</td>
<td>1,666</td>
<td>90.6%</td>
<td>3,895</td>
<td>81.5%</td>
<td>3,906</td>
<td>88.4%</td>
<td>3,072</td>
<td>88.9%</td>
<td>2,371</td>
</tr>
<tr>
<td>African American</td>
<td>141</td>
<td>2.0%</td>
<td>546</td>
<td>7.9%</td>
<td>337</td>
<td>5.5%</td>
<td>37</td>
<td>2.0%</td>
<td>87</td>
<td>1.8%</td>
<td>85</td>
<td>1.9%</td>
<td>88</td>
<td>2.5%</td>
<td>88</td>
</tr>
<tr>
<td>American Indian</td>
<td>5</td>
<td>0.1%</td>
<td>12</td>
<td>0.2%</td>
<td>8</td>
<td>0.1%</td>
<td>3</td>
<td>0.2%</td>
<td>12</td>
<td>0.3%</td>
<td>3</td>
<td>0.1%</td>
<td>5</td>
<td>0.1%</td>
<td>2</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>430</td>
<td>6.2%</td>
<td>676</td>
<td>9.8%</td>
<td>606</td>
<td>9.8%</td>
<td>85</td>
<td>4.6%</td>
<td>659</td>
<td>13.8%</td>
<td>327</td>
<td>7.4%</td>
<td>185</td>
<td>5.4%</td>
<td>126</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>38</td>
<td>0.5%</td>
<td>80</td>
<td>1.2%</td>
<td>116</td>
<td>1.9%</td>
<td>19</td>
<td>1.0%</td>
<td>43</td>
<td>0.9%</td>
<td>29</td>
<td>0.7%</td>
<td>31</td>
<td>0.9%</td>
<td>16</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>105</td>
<td>1.5%</td>
<td>193</td>
<td>2.8%</td>
<td>138</td>
<td>2.2%</td>
<td>29</td>
<td>1.6%</td>
<td>83</td>
<td>1.7%</td>
<td>67</td>
<td>1.5%</td>
<td>73</td>
<td>2.1%</td>
<td>51</td>
</tr>
<tr>
<td>Total</td>
<td>6,917</td>
<td>6,908</td>
<td>6,180</td>
<td>1,839</td>
<td>4,779</td>
<td>4,417</td>
<td>3,454</td>
<td>2,654</td>
<td>4,886</td>
<td>42,034</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Minority Percentage | 10.4% | 21.8% | 19.5% | 9.4% | 18.5% | 11.6% | 11.1% | 10.7% | 28.9% | 16.8% |

Source: U.S. Census Bureau
Table 3 – Pennsylvania Municipalities Dissimilarity Index Rankings

Pennsylvania Municipalities Dissimilarity Index Rankings (2000)

<table>
<thead>
<tr>
<th>Rank</th>
<th>City</th>
<th>African American Population</th>
<th>White Population</th>
<th>Total Population</th>
<th>Dissimilarity Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Philadelphia city</td>
<td>646,123</td>
<td>644,395</td>
<td>1,517,550</td>
<td>80.6</td>
</tr>
<tr>
<td>2</td>
<td>Pittsburgh city</td>
<td>90,183</td>
<td>223,982</td>
<td>334,563</td>
<td>71.3</td>
</tr>
<tr>
<td>3</td>
<td>Scranton city</td>
<td>2,200</td>
<td>70,512</td>
<td>76,415</td>
<td>57.7</td>
</tr>
<tr>
<td>4</td>
<td>New Castle city</td>
<td>2,820</td>
<td>22,729</td>
<td>26,309</td>
<td>53.1</td>
</tr>
<tr>
<td>5</td>
<td>Erie city</td>
<td>14,420</td>
<td>81,605</td>
<td>103,717</td>
<td>51.6</td>
</tr>
<tr>
<td>6</td>
<td>Chester city</td>
<td>27,500</td>
<td>6,582</td>
<td>36,854</td>
<td>47.8</td>
</tr>
<tr>
<td>7</td>
<td>Johnstown city</td>
<td>2,628</td>
<td>20,567</td>
<td>23,906</td>
<td>46.0</td>
</tr>
<tr>
<td>8</td>
<td>Harrisburg city</td>
<td>26,292</td>
<td>13,988</td>
<td>48,950</td>
<td>45.7</td>
</tr>
<tr>
<td>9</td>
<td>Altoona city</td>
<td>1,202</td>
<td>47,342</td>
<td>49,523</td>
<td>45.3</td>
</tr>
<tr>
<td>10</td>
<td>Bethel Park borough</td>
<td>340</td>
<td>32,463</td>
<td>33,556</td>
<td>44.0</td>
</tr>
<tr>
<td>11</td>
<td>Williamsport city</td>
<td>3,873</td>
<td>25,666</td>
<td>30,706</td>
<td>42.7</td>
</tr>
<tr>
<td>12</td>
<td>Lancaster city</td>
<td>7,067</td>
<td>29,196</td>
<td>56,348</td>
<td>42.6</td>
</tr>
<tr>
<td>13</td>
<td>Bethlehem city</td>
<td>2,244</td>
<td>53,408</td>
<td>55,651</td>
<td>42.2</td>
</tr>
<tr>
<td>14</td>
<td>Monroeville borough</td>
<td>2,425</td>
<td>24,971</td>
<td>29,396</td>
<td>42.1</td>
</tr>
<tr>
<td>15</td>
<td>Norristown borough</td>
<td>10,738</td>
<td>15,440</td>
<td>31,282</td>
<td>41.5</td>
</tr>
<tr>
<td>16</td>
<td>Wilkes-Barre city</td>
<td>2,129</td>
<td>39,433</td>
<td>41,562</td>
<td>39.5</td>
</tr>
<tr>
<td>17</td>
<td>Reading city</td>
<td>8,799</td>
<td>39,038</td>
<td>47,837</td>
<td>39.5</td>
</tr>
<tr>
<td>18</td>
<td>Allentown city</td>
<td>7,284</td>
<td>68,621</td>
<td>106,905</td>
<td>38.5</td>
</tr>
<tr>
<td>19</td>
<td>Plum borough</td>
<td>740</td>
<td>25,617</td>
<td>26,357</td>
<td>38.1</td>
</tr>
<tr>
<td>20</td>
<td>York city</td>
<td>9,798</td>
<td>22,142</td>
<td>40,938</td>
<td>36.3</td>
</tr>
<tr>
<td>21</td>
<td>State College borough</td>
<td>1,371</td>
<td>31,862</td>
<td>33,233</td>
<td>31.8</td>
</tr>
<tr>
<td>22</td>
<td>Easton city</td>
<td>3,221</td>
<td>19,302</td>
<td>22,523</td>
<td>30.3</td>
</tr>
</tbody>
</table>

Source: CensusScope
Table 4 – 2007-2011 ACS Housing Deficiency Figures

<table>
<thead>
<tr>
<th></th>
<th>Altoona</th>
<th>Beaver</th>
<th>Erie</th>
<th>Johnstown</th>
<th>Millcreek</th>
<th>Sharon</th>
<th>State College</th>
<th>Washington</th>
<th>Westmoreland</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
</tr>
<tr>
<td>Occupied Housing Units</td>
<td>19,275</td>
<td>70,198</td>
<td>40,377</td>
<td>10,075</td>
<td>22,178</td>
<td>6,047</td>
<td>12,289</td>
<td>83,806</td>
<td>152,819</td>
</tr>
<tr>
<td>Lacking Complete Plumbing Facilities</td>
<td>115</td>
<td>0.6%</td>
<td>270</td>
<td>0.4%</td>
<td>296</td>
<td>0.7%</td>
<td>18</td>
<td>0.2%</td>
<td>65</td>
</tr>
<tr>
<td>Lacking Complete Kitchen Facilities</td>
<td>270</td>
<td>1.4%</td>
<td>680</td>
<td>1.0%</td>
<td>340</td>
<td>0.8%</td>
<td>130</td>
<td>1.3%</td>
<td>192</td>
</tr>
<tr>
<td>No Telephone Service Available</td>
<td>442</td>
<td>2.3%</td>
<td>995</td>
<td>1.4%</td>
<td>895</td>
<td>2.2%</td>
<td>369</td>
<td>3.7%</td>
<td>457</td>
</tr>
</tbody>
</table>

Source: 2007-2011 American Community Survey
Table 5 – Reported Median Household Incomes

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>n/a</td>
<td>$38,100</td>
<td>$35,013</td>
<td>$24,193</td>
<td>$45,019</td>
<td>n/a</td>
<td>n/a</td>
<td>$38,104</td>
<td>$37,250</td>
</tr>
<tr>
<td>African American</td>
<td>n/a</td>
<td>$22,166</td>
<td>$22,023</td>
<td>$25,938</td>
<td>$50,195</td>
<td>n/a</td>
<td>n/a</td>
<td>$25,985</td>
<td>$24,724</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>$47,083</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>n/a</td>
<td>$48,068</td>
<td>$16,495</td>
<td>n/a</td>
<td>$65,385</td>
<td>n/a</td>
<td>n/a</td>
<td>$51,667</td>
<td>$127,242</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>n/a</td>
<td>$45,313</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>$24,737</td>
<td>n/a</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>$25,595</td>
<td>n/a</td>
</tr>
<tr>
<td>Hispanic</td>
<td>n/a</td>
<td>$43,906</td>
<td>$21,414</td>
<td>$11,406</td>
<td>$45,990</td>
<td>n/a</td>
<td>n/a</td>
<td>$36,100</td>
<td>$44,779</td>
</tr>
</tbody>
</table>

Reported Unemployment Rates

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Civilan Labor Force</td>
<td>n/a</td>
<td>5.4%</td>
<td>11.0%</td>
<td>9.6%</td>
<td>3.6%</td>
<td>n/a</td>
<td>n/a</td>
<td>5.3%</td>
<td>5.4%</td>
</tr>
<tr>
<td>Male CLF</td>
<td>n/a</td>
<td>5.6%</td>
<td>12.0%</td>
<td>9.3%</td>
<td>3.6%</td>
<td>n/a</td>
<td>n/a</td>
<td>5.7%</td>
<td>5.3%</td>
</tr>
<tr>
<td>Female CLF</td>
<td>n/a</td>
<td>5.1%</td>
<td>9.9%</td>
<td>9.9%</td>
<td>3.5%</td>
<td>n/a</td>
<td>n/a</td>
<td>4.7%</td>
<td>5.0%</td>
</tr>
<tr>
<td>White CLF</td>
<td>n/a</td>
<td>4.8%</td>
<td>9.1%</td>
<td>9.5%</td>
<td>3.5%</td>
<td>n/a</td>
<td>n/a</td>
<td>4.7%</td>
<td>5.0%</td>
</tr>
<tr>
<td>African American CLF</td>
<td>n/a</td>
<td>14.3%</td>
<td>24.6%</td>
<td>10.3%</td>
<td>2.6%</td>
<td>n/a</td>
<td>n/a</td>
<td>13.4%</td>
<td>13.5%</td>
</tr>
<tr>
<td>Asian CLF</td>
<td>n/a</td>
<td>5.0%</td>
<td>n/a</td>
<td>n/a</td>
<td>2.1%</td>
<td>n/a</td>
<td>n/a</td>
<td>6.8%</td>
<td>n/a</td>
</tr>
<tr>
<td>Other Races CLF</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>13.5%</td>
<td>n/a</td>
</tr>
<tr>
<td>Two or More Races CLF</td>
<td>n/a</td>
<td>13.0%</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>10.6%</td>
<td>n/a</td>
</tr>
<tr>
<td>Hispanic CLF</td>
<td>n/a</td>
<td>6.4%</td>
<td>n/a</td>
<td>24.3%</td>
<td>16.1%</td>
<td>n/a</td>
<td>n/a</td>
<td>12.5%</td>
<td>2.5%</td>
</tr>
</tbody>
</table>
## Table 6 – Comparison of Protected Classes

<table>
<thead>
<tr>
<th>Protected Class</th>
<th>Federal Fair Housing Act</th>
<th>Pennsylvania Human Relations Act</th>
<th>Erie County Ordinance 39</th>
<th>State College Fair Housing Ordinance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Color</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>National Origin</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Religion</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Sex</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Familial Status</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Disability</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Ancestry</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Age (40 and older)</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Use of Guide/Support Animal</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Association/Relationship with an individual with a Disability</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Pregnancy</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Marital Status</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Birth of a Child</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Place of Birth</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Source of Income</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>
Table 7 – Housing Discrimination Complaints Filed

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>n/a</td>
<td>21</td>
<td>28</td>
<td>3</td>
<td>n/a</td>
<td>4</td>
<td>n/a</td>
<td>7</td>
<td>18</td>
<td>81</td>
</tr>
<tr>
<td>Color</td>
<td>n/a</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>n/a</td>
<td>0</td>
<td>n/a</td>
<td>0</td>
<td>20</td>
<td>20</td>
</tr>
<tr>
<td>National Origin</td>
<td>n/a</td>
<td>0</td>
<td>8</td>
<td>0</td>
<td>n/a</td>
<td>0</td>
<td>n/a</td>
<td>1</td>
<td>3</td>
<td>12</td>
</tr>
<tr>
<td>Religion</td>
<td>n/a</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>n/a</td>
<td>0</td>
<td>n/a</td>
<td>1</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Sex</td>
<td>n/a</td>
<td>0</td>
<td>25</td>
<td>0</td>
<td>n/a</td>
<td>0</td>
<td>n/a</td>
<td>2</td>
<td>5</td>
<td>32</td>
</tr>
<tr>
<td>Familial Status</td>
<td>n/a</td>
<td>6</td>
<td>13</td>
<td>0</td>
<td>n/a</td>
<td>1</td>
<td>n/a</td>
<td>1</td>
<td>6</td>
<td>27</td>
</tr>
<tr>
<td>Disability</td>
<td>n/a</td>
<td>32</td>
<td>17</td>
<td>2</td>
<td>n/a</td>
<td>2</td>
<td>n/a</td>
<td>6</td>
<td>18</td>
<td>77</td>
</tr>
<tr>
<td>Harassment</td>
<td>n/a</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>n/a</td>
<td>0</td>
<td>n/a</td>
<td>0</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Retaliation</td>
<td>n/a</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>n/a</td>
<td>1</td>
<td>n/a</td>
<td>1</td>
<td>4</td>
<td>6</td>
</tr>
<tr>
<td>Total Complaints Filed</td>
<td>n/a</td>
<td>59</td>
<td>70</td>
<td>5</td>
<td>n/a</td>
<td>6</td>
<td>14</td>
<td>17</td>
<td>46</td>
<td>217</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>n/a</td>
<td>21</td>
<td>28</td>
<td>3</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>52</td>
</tr>
<tr>
<td>Color</td>
<td>n/a</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>0</td>
</tr>
<tr>
<td>National Origin</td>
<td>n/a</td>
<td>0</td>
<td>8</td>
<td>0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>8</td>
</tr>
<tr>
<td>Religion</td>
<td>n/a</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>0</td>
</tr>
<tr>
<td>Sex</td>
<td>n/a</td>
<td>0</td>
<td>25</td>
<td>1</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>26</td>
</tr>
<tr>
<td>Familial Status</td>
<td>n/a</td>
<td>6</td>
<td>13</td>
<td>0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>19</td>
</tr>
<tr>
<td>Disability</td>
<td>n/a</td>
<td>32</td>
<td>17</td>
<td>1</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>50</td>
</tr>
<tr>
<td>Harassment</td>
<td>n/a</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>3</td>
<td>4</td>
<td>7</td>
</tr>
<tr>
<td>Retaliation</td>
<td>n/a</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>n/a</td>
<td>n/a</td>
<td>1</td>
<td>4</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>Rental of Housing or Commercial Property</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>24</td>
<td>64</td>
<td>88</td>
<td></td>
</tr>
<tr>
<td>Failure to make Reasonable Accommodations/Modifications</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>4</td>
<td>16</td>
<td>20</td>
</tr>
<tr>
<td>Publication</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>3</td>
<td>13</td>
<td>16</td>
</tr>
<tr>
<td>Sale of Housing</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>4</td>
<td>10</td>
<td>14</td>
<td></td>
</tr>
<tr>
<td>Misrepresentation of Available Housing</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>0</td>
<td>3</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Operating Non-Accessible Housing</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>1</td>
<td>3</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Threats to Compel or Coerce Discrimination in the Furnishing of Facilities, Services, or Privileges</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>0</td>
<td>2</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Total Complaints Filed</td>
<td>8</td>
<td>59</td>
<td>70</td>
<td>4</td>
<td>n/a</td>
<td>10</td>
<td>5</td>
<td>55</td>
<td>153</td>
<td>364</td>
</tr>
</tbody>
</table>
### Table 8 – 2010 Census Population Figures

#### 2010 Population by Race

<table>
<thead>
<tr>
<th>Race</th>
<th>Altoona</th>
<th>Beaver</th>
<th>Erie</th>
<th>Johnstown</th>
<th>Millcreek</th>
<th>Sharon</th>
<th>State College</th>
<th>Washington</th>
<th>Westmoreland</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>43,435</td>
<td>155,561</td>
<td>76,327</td>
<td>16,776</td>
<td>50,677</td>
<td>11,285</td>
<td>34,959</td>
<td>195,657</td>
<td>348,182</td>
<td>932,859</td>
</tr>
<tr>
<td>African American</td>
<td>1,540</td>
<td>10,676</td>
<td>17,141</td>
<td>3,068</td>
<td>793</td>
<td>2,048</td>
<td>1,602</td>
<td>6,757</td>
<td>8,562</td>
<td>52,187</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>63</td>
<td>181</td>
<td>291</td>
<td>35</td>
<td>67</td>
<td>35</td>
<td>64</td>
<td>251</td>
<td>351</td>
<td>1,338</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>211</td>
<td>764</td>
<td>1,568</td>
<td>56</td>
<td>986</td>
<td>79</td>
<td>4,138</td>
<td>1,358</td>
<td>2,766</td>
<td>11,926</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>155</td>
<td>403</td>
<td>2,498</td>
<td>145</td>
<td>284</td>
<td>69</td>
<td>418</td>
<td>630</td>
<td>833</td>
<td>5,435</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>916</td>
<td>2,954</td>
<td>3,961</td>
<td>898</td>
<td>708</td>
<td>525</td>
<td>853</td>
<td>3,167</td>
<td>4,475</td>
<td>18,457</td>
</tr>
<tr>
<td>Hispanic</td>
<td>606</td>
<td>1,998</td>
<td>7,005</td>
<td>664</td>
<td>983</td>
<td>252</td>
<td>1,629</td>
<td>2,366</td>
<td>3,179</td>
<td>18,682</td>
</tr>
</tbody>
</table>

Total                      | 46,320  | 170,539| 101,786  | 20,978    | 53,515    | 14,038 | 42,034        | 207,820    | 365,169      | 1,022,199|

*Source: U.S. Census Bureau*
<table>
<thead>
<tr>
<th>Type of Structure</th>
<th>Altoona</th>
<th>Beaver</th>
<th>Erie</th>
<th>Johnstown</th>
<th>Millcreek</th>
<th>Sharon</th>
<th>State College</th>
<th>Washington</th>
<th>Westmoreland</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family (attached and detached)</td>
<td>16,109</td>
<td>60,887</td>
<td>27,223</td>
<td>8,130</td>
<td>17,178</td>
<td>5,372</td>
<td>4,116</td>
<td>74,043</td>
<td>133,472</td>
<td>346,530</td>
</tr>
<tr>
<td>2 Units</td>
<td>1,471</td>
<td>3,118</td>
<td>7,967</td>
<td>1,330</td>
<td>624</td>
<td>312</td>
<td>494</td>
<td>2,850</td>
<td>5,890</td>
<td>24,056</td>
</tr>
<tr>
<td>3 or 4 Units</td>
<td>1,018</td>
<td>3,543</td>
<td>3,909</td>
<td>600</td>
<td>980</td>
<td>390</td>
<td>555</td>
<td>2,888</td>
<td>5,394</td>
<td>19,277</td>
</tr>
<tr>
<td>5 to 9 Units</td>
<td>773</td>
<td>3,050</td>
<td>2,128</td>
<td>887</td>
<td>1,203</td>
<td>369</td>
<td>1,705</td>
<td>2,523</td>
<td>3,996</td>
<td>16,634</td>
</tr>
<tr>
<td>10 to 19 Units</td>
<td>630</td>
<td>1,397</td>
<td>937</td>
<td>389</td>
<td>1,063</td>
<td>70</td>
<td>1,427</td>
<td>1,622</td>
<td>2,873</td>
<td>10,408</td>
</tr>
<tr>
<td>20 or More Units</td>
<td>1,037</td>
<td>2,307</td>
<td>3,050</td>
<td>1,033</td>
<td>1,369</td>
<td>599</td>
<td>5,390</td>
<td>3,050</td>
<td>5,701</td>
<td>23,536</td>
</tr>
<tr>
<td>Mobile Home</td>
<td>207</td>
<td>3,986</td>
<td>279</td>
<td>83</td>
<td>1,331</td>
<td>89</td>
<td>24</td>
<td>5,818</td>
<td>10,654</td>
<td>22,471</td>
</tr>
<tr>
<td>Boat, RV, Van, etc.</td>
<td>0</td>
<td>6</td>
<td>0</td>
<td>10</td>
<td>0</td>
<td>11</td>
<td>19</td>
<td>11</td>
<td>57</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>21,245</td>
<td>78,294</td>
<td>45,493</td>
<td>12,462</td>
<td>23,748</td>
<td>7,201</td>
<td>13,722</td>
<td>92,813</td>
<td>167,991</td>
<td>462,969</td>
</tr>
</tbody>
</table>

Source: 2007-2011 American Community Survey