

ALLEGHENY COUNTY

PENNSYLVANIA

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

For Submission to HUD

December 2007





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Executive Summary

Allegheny County is an entitlement jurisdiction under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement jurisdiction must "affirmatively further fair housing." In order to "affirmatively further fair housing" each entitlement jurisdiction must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice.

Allegheny County prepared an Analysis of Impediments to Fair Housing Choice in December 1999. In the fall of 2006, Allegheny County, the City of Pittsburgh, and the Municipality of Penn Hills joined together to prepare an update to their Analysis of Impediments to Fair Housing Choice. The other remaining entitlement community, the City of McKeesport, previously prepared its own updated to its Analysis of Impediments to Fair Housing Choice. The City of Pittsburgh and Penn Hills have an update Analysis of Impediments to Fair Housing Choice and their information is also included as a part of the overall Analysis of Impediments to Fair Housing for Allegheny County. As a part of its Five-Year Consolidated Plan, the County has prepared this 2007 Update to the Analysis of Impediments to Fair Housing Choice. The analysis focused on the status and interaction of six (6) fundamental conditions within the County:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financing assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**
 - A sample review of municipal zoning and land use regulations and policies within the County was undertaken



- Demographic data for the County was analyzed from the U.S. Census and U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data and tables
- A review of the real estate and mortgage practices was undertaken
- **Interviews & Meetings**
 - Meetings and/or interviews were conducted with the Allegheny County Housing Authority, community and social service/advocacy agencies, and the local board of realtors and real estate firms
- **Analysis of Data**
 - Low/Mod income areas were identified
 - Concentrations of minority populations were identified
 - Fair housing awareness in the community was evaluated
- **Potential Impediments**
 - Public sector policies that may be viewed as impediments were identified
 - Private sector policies that may be viewed as impediments were identified

The County's 2007 Update to the Analysis of Impediments to Fair Housing Choice identified the following impediments and mitigation recommendations:

- **IMPEDIMENT No. 1:**

HOUSING AFFORDABILITY – There is a lack of affordable housing within the County that is decent, safe, and sound, which impacts neighborhoods and reduces fair housing choice.

GOAL – Coordinate county-wide housing programs to maximize the effectiveness of increasing the supply of decent, safe, and sound housing that is affordable to lower income households, both renters and owner occupants.

The Strategies to meet the goal are:

- **1-A** – Reduce the number of Low/Moderate Income (LMI) households waiting for public housing and rental assistance by increasing the supply of Section 8 Housing Choice Vouchers.
- **1-B** – Increase the supply of available decent, safe, and affordable housing through rehabilitation assistance, financing, new construction, and the removal and redevelopment of slums and blighting conditions.
- **1-C** – Increase homeownership opportunities for Low/Moderate Income (LMI) households by providing housing and credit counseling, financing, closing cost and downpayment assistance, transfer of vacant properties to new and responsible owners, and new construction or renovation of for-sale units.



- **1-D** – Maintain effective property maintenance inspection and enforcement programming and services.

- **IMPEDIMENT No. 2:**

HOUSING ACCESSIBILITY – There is an increasing need for housing opportunities and housing that is accessible to older populations and persons with disabilities.

GOAL – Increase the supply of homeless and transitional housing opportunities and housing that meets the accessibility, visitability, and quality of life needs of older populations and persons with disabilities.

The Strategies to meet the goal are:

- **2-A** – Provide support for housing rehabilitation to allow persons with disabilities to remain in their homes.
- **2-B** – Increase the supply of housing that is accessible to persons with disabilities and the elderly by providing targeted rehabilitation assistance and ensuring that new County-subsidized multi-family construction meets accessibility provisions of the Fair Housing Act.
- **2-C** – Support education and training programming concerning reasonable accommodations for persons with disabilities and the elderly.
- **2-D** – Support grant funds for homeless services and shelter providers to improve the accessibility of emergency shelters and transitional housing locations.

- **IMPEDIMENT No. 3:**

FAIR HOUSING EDUCATION, ADVOCACY, MONITORING, AND ENFORCEMENT – 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.

GOAL – Increase the knowledge and awareness of the rights of individuals and the responsibilities of public and private housing providers and policy makers in regard to the Fair Housing Act through education advocacy, monitoring, and encouragement to reduce discrimination in housing and provide fair housing choices for all individuals and families.

The Strategies to meet the goal are:

- **3-A** – Support the delivery of education and targeted training and programs by public, non-profit, and private housing providers concerning the rights and responsibilities ensured by the Fair Housing Act.



- **3-B** – Support efficient and effective fair housing monitoring, investigation, enforcement strategies, comprehensive planning and local land use and building code policies that further fair housing choice.
- **3-C** – Support the delivery of financial literacy counseling for Low/Moderate Income (LMI) and minority households to combat predatory and subprime lending practices.
- **3-D** – Support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination.

- **IMPEDIMENT No. 4:**

CONCENTRATION OF LOW-INCOME AND MINORITY GROUPS – There are concentrations of low-income persons, minorities, and female headed households that lack decent, safe and sound housing that is affordable, which impacts neighborhoods and reduces fair housing choice.

GOAL – Improve the housing conditions within the County and promote new affordable housing choices outside impacted areas in pursuit of diversified and culturally rich neighborhoods.

The Strategies to meet the goal are:

- **4-A** – Increase access to affordable housing opportunities in more affluent and less racially segregated areas through homeownership and rent assistance, new construction, renovation of existing housing stock and encourage among municipalities alternate land use policies.
- **4-B** – Encourage and support strategies to close the minority homeownership gap.
- **4-C** – Encourage and support targeted neighborhood development strategies to promote a range of quality housing for Low/Moderate Income (LMI) and minority households.
- **4-D** – Encourage that protected classes communities and economically diverse groups are well-represented on advisory bodies that oversee housing policies.
- **4-E** – Encourage and support the development of market rate housing and mixed income housing in areas that traditionally have a high concentration of Low/Moderate Income (LMI) and minority households.

- **IMPEDIMENT No. 5:**

ACCESSIBILITY TO ECONOMIC OPPORTUNITIES – There is a lack of economic opportunities which prevents low-income households from improving their income and their ability to live outside low-income areas, which reduces fair housing choice.



GOAL – Support sustainable economic growth that will provide an increase in job opportunities and improved household income in order to increase fair housing choice.

The Strategies to meet the goal are:

- **5-A** – Strengthen partnerships and program delivery that enhances the County’s business base, expand its tax base, and create a more sustainable economy for residents and businesses.
- **5-B** – Support workforce development and skills training that result in livable wage job opportunities.
- **5-C** – Support programming that enhances entrepreneurship and small business development, expansion, and retention within traditionally Low/Moderate Income (LMI) and minority neighborhoods.
- **5-D** – Develop strategies and fund initiatives that redevelop brownfield sites that are disproportionately located in municipalities with higher concentrations of minority and poverty level populations.



I. Introduction

Allegheny County is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to "affirmatively further fair housing" the community must conduct a Fair Housing Analysis (A.I.) which identifies any impediments to fair housing choice.

"Fair housing choice" is defined as:

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices."

The Fair Housing Analysis consists of the following six conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financing assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

Allegheny County prepared an Analysis of Impediments to Fair Housing Choice in December 1999. In the fall of 2006, Allegheny County, the City of Pittsburgh, and the Municipality of Penn Hills joined together to prepare an update to their Analysis of Impediments to Fair Housing Choice. The other remaining entitlement community, the City of McKeesport, previously prepared its own update to its A.I. The City of Pittsburgh and Penn Hills have an update A.I. and their information is also included as a part of the overall A.I. for Allegheny County. As a part of the County's Five Year Consolidated Plan, Allegheny County has prepared this 2007 Update to the Analysis of Impediments to Fair Housing Choice.



II. Background Data

In order to perform an analysis on fair housing in Allegheny County, the demographic and socio-economic characteristics of the County need to be evaluated as a basis for determining and identifying the impediments to fair housing choice.

Most of this data and information has been found in the statistical information from the U.S. Census Bureau's 2000 Decennial Census of Housing and Population and other databases to evaluate these and other conditions affecting fair housing choice in Allegheny County. The Analysis of Impediments document prepared in 1999 utilized 1990 Census data. Appendix A of this report contains extensive demographic data from the 2000 Census that is summarized and/or illustrated in the following sections.

A. Population and Race

The total population for Allegheny County estimated by the U.S. Census Bureau for 2005 was 1,195,503¹. This is down from the decennial count for 2000 by 6.7% (1,281,666). The County experienced a loss in population from 1980 to 1990 of -7.8% and from 1990 to 2000 of -4.1%.

According to the Pennsylvania State Data Center, there are only two counties within the Southwestern Pennsylvania region² that are estimated to have increased in population between April 1, 2000 and July 1, 2006 – Butler and Washington Counties. The remaining eight counties are estimated to have declined in population between -0.1% and -5.0%

Table II-1 below illustrates that in 2000 “White alone” (84.3%) was the largest race cohort and “Black or African American alone” (12.4%) was the largest minority cohort.

Table II-1 – Race Statistics For All of Allegheny County

Items	No. of Persons	Percentage
Total	1,281,666	-
One race	1,267,901	98.9%
White alone	1,080,800	84.3%
Black or African American alone	159,058	12.4%
American Indian and Alaska Native alone	1,593	0.1%
Asian alone	21,716	1.7%
Native Hawaiian and Other Pacific Islander alone	335	0%
Some other race alone	4,399	0.3%
Two or more races	13,765	1.1%

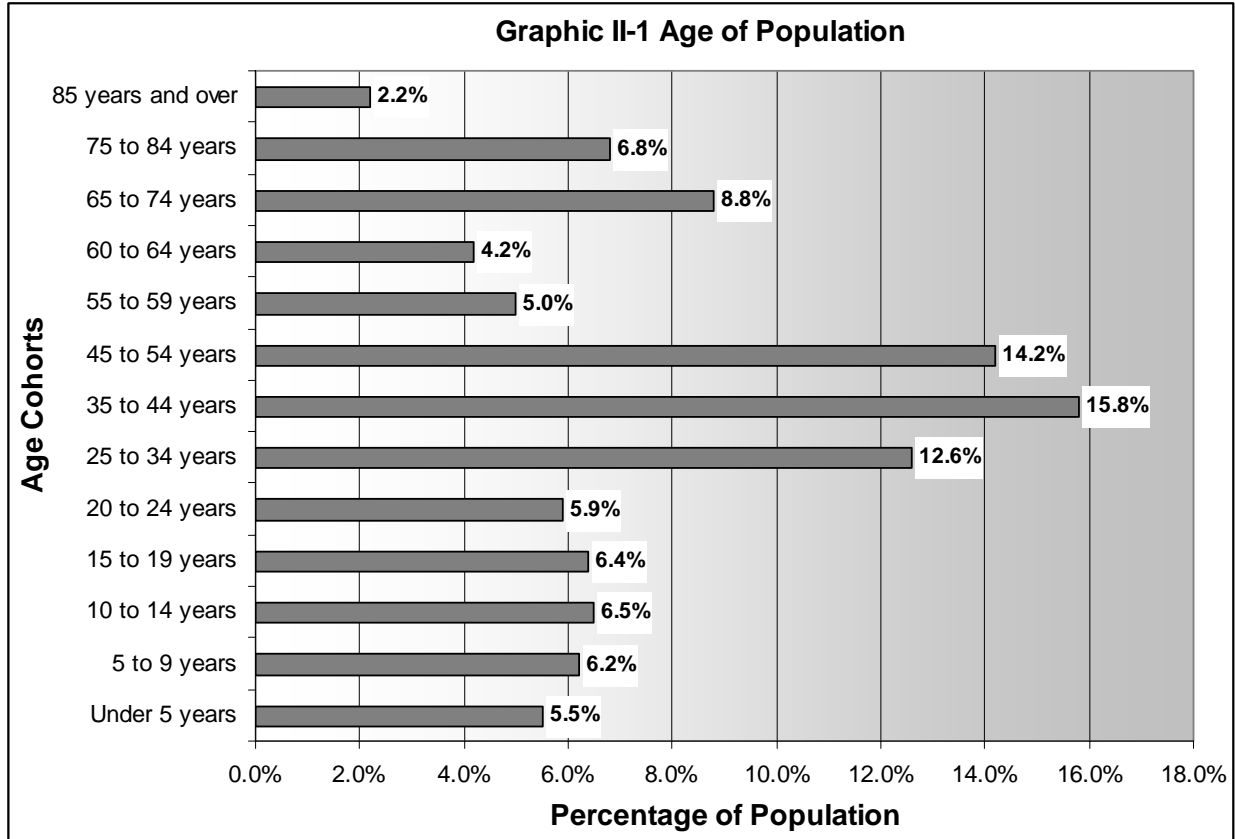
Source: 2000 U.S. Census Data

¹ Excludes the population living in institutions, college dormitories, and other group quarters

² Lawrence, Butler, Armstrong, Indiana, Beaver, Allegheny, Westmoreland, Washington, Fayette, and Greene



Graphic II-1 below illustrates age distribution within the entire County for 2000. Children under five years of age represented 5.5% of the population; 24.6% were under 20 years of age; and, 17.8% were 65 years of age or older.



Source: 2000 U.S. Census Data

B. Households

According to the U.S. Census for 2000, there were 537,150 households in the entire County. Of these households, 67% were considered owners and 33% were considered renters.

The average family size of owner households was 2.51 and 1.91 for renter households. Table II-2 illustrates household size characteristics for owner and renter households.

Table II-3 illustrates household tenure, either owner or renter, by race cohort.

Table II-2 – Household Size by Tenure

Owner-occupied housing units	
1-person household	24.1%
2-person household	35.9%
3-person household	17.0%
4-person household	14.7%
5-or-more-person household	8.4%
Renter-occupied housing units	
1-person household	50.2%
2-person household	26.6%
3-person household	11.8%
4-person household	6.8%
5-or-more-person household	4.5%

Source: 2000 U.S. Census Data



Table II-3 – Household Tenure by Race

Cohort	Owner (67%)	Renter (33%)
Householder who is White alone	91.8%	73.9%
Householder who is Black or African American alone	6.8%	21.3%
Householder who is American Indian and Alaska Native alone	0.1%	0.2%
Householder who is Asian alone	0.8%	2.9%
Householder who is Native Hawaiian and Other Pacific Islander alone	0%	0%
Householder who is Some other race alone	0.1%	3.9%
Householder who is Two or more races	0.4%	1.3%

Source: 2000 U.S. Census Data

Families comprised 61.9% of households in the entire County; 45.6% of which included children less than 18 years of age. Twenty percent (20%) of families were female-headed households. Table II-4 illustrates characteristics of female-headed households.

Table II-4 – Female-headed Households

Cohort	No. of Female-headed Households	Percentage
Female householder, no husband present	66,541	-
With related children under 18 years	39,502	59.4%
With own children under 18 years	34,534	51.9%
Under 6 years only	7,026	10.6%
Under 6 and 6 to 17 years	5,777	8.7%
6 to 17 years only	21,731	32.7%

Source: 2000 U.S. Census Data

C. Income and Poverty

The 2000 Census reported that the per capita income for all of Allegheny County was \$22,491. The median household income for Allegheny County was \$28,588 compared to \$40,106 for the Commonwealth of Pennsylvania.

The U.S. Department of Housing and Urban Development estimated that the 2006 Area Median Income for Allegheny County in 2006 was \$57,400. Household income for the Allegheny County rose by 8.4% compared to 11% for Pennsylvania.



Table II-5 illustrates household income trends for 1999.

Table II-5 – Household Income in 1999

Items	Number of Households	Percentage
Total Households	537,405	-
Less than \$10,000	57,641	10.7%
\$10,000 to \$14,999	39,913	7.4%
\$15,000 to \$24,999	79,179	14.7%
\$25,000 to \$34,999	69,879	13.0%
\$35,000 to \$49,999	87,433	16.3%
\$50,000 to \$74,999	97,907	18.2%
\$75,000 to \$99,999	48,950	9.1%
\$100,000 to \$149,999	34,349	6.4%
\$150,000 to \$199,999	9,662	1.8%
\$200,000 or more	12,492	2.3%
Median household income	\$28,588	

Source: 2000 U.S. Census Data

Thirty-nine percent (39.1%) of Allegheny County households were considered low- to moderate-income. Appendix B of this report identifies the 350 County Block Groups considered to have a concentration of low- to moderate-income population.

The percentage of County residents living below the poverty level increased from 11.2% in 2000 to 12.4% in 2005. In 2005, 11.9% of residents in the Commonwealth of Pennsylvania lived below the poverty level.

The County's poverty statistics for families with children show that:

- 13.1% of families with related children under the age of 18
- 16.6% of families with related children under the age of 5
- 37.2% of female-headed families with related children under the age of 18
- 52.0% of female-headed families with related children under the age of 5



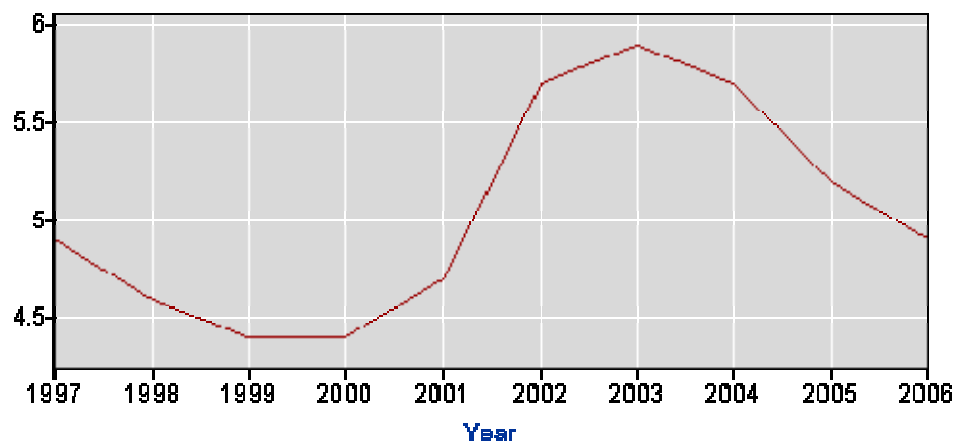
D. Employment

In 2000, 61.1% of the Allegheny County’s residents 16 years of age and over were considered a part of the labor force. “Management, professional, and related occupations” represented the largest occupational cohort (37.8%) followed by “sales and office occupations” (28.7%). “Educational, health and social services” represented the largest industry cohort (24.4%) followed by “retail trade” (11.9%) and “professional, scientific, management, administrative, and waste management services” (11.2%).

According to the U.S. Labor Department, the unemployment rate for the Pittsburgh Metropolitan Statistical Area for February 2007 was 4.7%, which was the same for the Commonwealth of Pennsylvania.

Graphic II-2 illustrates the annual seasonally adjusted unemployment rate trends for the Pittsburgh MSA from 1997 to 2006.

Graphic II-2 – Unemployment Rate



Source: 2000 U.S. Census Data

E. Housing Profile

The County’s housing stock is considered older, since 64.5% was constructed prior to 1960; and 32.2% was constructed prior to 1940. Only 11.8% of the County’s housing stock was constructed from 1980 to 2000. An older housing stock presents higher maintenance, weatherization, and heating costs, which can be a burden particularly for low- and moderate-income households.

In 2000, the County’s housing stock was primarily single-family detached (62.0%) followed by single-family attached (8.9%) and then multi-family units (8.2%) with twenty or more units within a structure. The median value of single-family owner-occupied homes in 2000 was \$84,200 for Allegheny County.



Forty-one percent (47.4%) of householders have resided in their home for more than ten years and 31.6% have resided in their home for more than twenty years.

Table II-6 – Homeownership Rate by Race

Race	Percentage
White Households	71.8%
Black/African American Households	39.1%
Asian, Hawaiian and Pacific Islander Households	33.8%
American Indian/Alaska Native Households	52.0%
Hispanic Households	43.0%

Sources: <http://www.dataplace.org>

F. Financing

The median mortgage expense in the County for 2000 was \$971. Table II-7 illustrates mortgage status and selected monthly owner costs.

Table II-7 – Mortgage Status and Selected Monthly Owner Costs

Items	Number of Housing Units	Percentage
Homes with a mortgage	201,917	60.9%
Less than \$300	920	0.3%
\$300 to \$499	13,080	3.9%
\$500 to \$699	33,209	10.0%
\$700 to \$999	59,119	17.8%
\$1,000 to \$1,499	57,339	17.3%
\$1,500 to \$1,999	21,847	6.6%
\$2,000 or more	16,403	4.9%
Median	\$971	-
Houses without a mortgage	129,519	39.1%
Median	\$342	-

Source: 2000 U.S. Census Data

Monthly housing costs of 20.3% of owner-occupied households exceeded 30% of their monthly income, indicating a high percentage of owners whose housing is not considered affordable. Table II-7 illustrates housing costs for owner-households.



Table II-8 – Selected Monthly Owner Costs as a Percentage of Household Income (1999)

Items	Number of Housing Units	Percentage
Less than 15 percent	127,506	38.5%
15 to 19 percent	59,929	18.1%
20 to 24 percent	44,025	13.3%
25 to 29 percent	29,744	9.0%
30 to 34 percent	17,543	5.3%
35 percent or more	49,640	15.0%
Not computed	3,049	0.9%

Source: 2000 U.S. Census Data

The median rent in 2000 was \$516. Table II-9 illustrates rental rates within the County.

Table II-9 – Gross Monthly Rent

Items	Number of Housing Units	Percentage
Less than \$200	13,638	7.7%
\$200 to \$299	12,051	6.8%
\$300 to \$499	53,378	30.2%
\$500 to \$749	62,405	35.3%
\$750 to \$999	18,929	10.7%
\$1,000 to \$1,499	6,620	3.7%
\$1,500 or more	1,773	1.0%
No cash rent	7,743	4.4%
Median	\$516	-

Source: 2000 U.S. Census Data

The monthly housing costs for 36.8% of all renter-occupied households exceeded 30% of monthly income, indicating an even higher percentage of renters whose housing is not considered affordable. Table II-10 illustrates the housing cost for renter-households.



**Table II-10 – Gross Rent as a Percentage
of Household Income (1999)**

Items	Number of Housing Units	Percentage
Less than 15 percent	34,053	19.3%
15 to 19 percent	24,889	14.1%
20 to 24 percent	21,329	12.1%
25 to 29 percent	19,015	10.8%
30 to 34 percent	12,264	6.9%
35 percent or more	52,859	29.9%
Not computed	12,128	6.9%

Source: 2000 U.S. Census Data

Note:

See Appendix “B” for a listing of all the Low/Mod Income Census Tracts/Block Groups in Allegheny County.

G. Household Types

Based on the HUD-Comprehensive Housing Affordability Strategy (CHAS) data found in Appendix F, the following statistics were found based on Low/Mod Income housing types:

- Total renter households with incomes less than 30% of median family income is 43,633.
 - 29.3% are elderly (1 & 2 persons)
 - 25.5% are small families (2 to 4 persons)
 - 4.8% are large families (5 or more persons)
 - 40.4% are other renter households
- Total renter households with incomes greater than 30% but less than 50% of median family income is 30,187.
 - 37.1% are elderly (1 & 2 persons)
 - 26.9% are small families (2 to 4 persons)
 - 4.0% are large families (5 or more persons)
 - 32% are other renter households



- Total renter households with incomes greater than 50% but less than 80% of median family income is 36,597.
 - 22.8% are elderly (1 & 2 persons)
 - 29.7% are small families (2 to 4 persons)
 - 5.3% are large families (5 or more persons)
 - 42.2% are other renter households

- Total owner households with incomes less than 30% of median family income is 22,316.
 - 54.6% are elderly (1 & 2 persons)
 - 21.3% are small families (2 to 4 persons)
 - 3.7% are large families (5 or more persons)
 - 20.4% are other renter households

- Total owner households with incomes greater than 30% but less than 50% of median family income is 31,465.
 - 65.3% are elderly (1 & 2 persons)
 - 18.7% are small families (2 to 4 persons)
 - 5.3% are large families (5 or more persons)
 - 10.7% are other renter households

- Total owner households with incomes greater than 50% but less than 80% of median family income is 57,043.
 - 50.9% are elderly (1 & 2 persons)
 - 29.3% are small families (2 to 4 persons)
 - 7.0% are large families (5 or more persons)
 - 12.8% are other renter households

Note:

Overall, the largest percentage of households by type which is Low/Mod Income (LMI) is the elderly (not including “other” households). This appears to be a need in Allegheny County for housing financial support.

H. Cost Overburden

Based on the HUD – CHAS data found in Appendix F the following statistics were found for LMI households that are cost overburdened:



- Total percentage of all renter households with incomes less than 30% of median family income that are cost overburdened by greater than 30% of income is 68.1%.
 - 61.2% of all elderly households in this income category are cost overburdened by 30% or more.
 - 70.0% of all small families (2 to 4 persons) in this income category are cost overburdened by 30% or more.
 - 73.5% of all large families (5 or more persons) in this income category are cost overburdened by 30% or more.
 - 71.3% of all other renter households in this income category are cost overburdened by 30% or more.

- Total percentage of all renter households with incomes less than 30% of median family income that are cost overburdened by greater than 50% of income is 53.5%.
 - 42.4% of all elderly households in this income category are cost overburdened by 50% or more
 - 56.0% of all small families in this income category are cost overburdened by 50% or more
 - 54.8% are large families in this income category are cost overburdened by 50% or more
 - 59.8% are other renter households in this income category are cost overburdened by 50% or more

- Total percentage of all renter households with incomes greater than 30% but less than 50% of median family income that are cost overburdened by greater than 30% is 63.1%.
 - 55.1% of all elderly households in this income category are cost overburdened by 30% or more
 - 62.1% of all small families in this income category are cost overburdened by 30% or more
 - 51.6% are large families in this income category are cost overburdened by 30% or more
 - 74.6% are other renter households in this income category are cost overburdened by 30% or more

- Total percentage of all renter households with incomes greater than 30% but less than 50% of median family income that are cost overburdened by greater than 50% is 19.9%.



- 21.9% of all elderly households in this income category are cost overburdened by 50% or more
- 15.7% of all small families in this income category are cost overburdened by 50% or more
- 9.4% are large families in this income category are cost overburdened by 50% or more
- 22.5% are other renter households in this income category are cost overburdened by 50% or more
- Total percentage of all owner households with incomes less than 30% of median family income that are cost overburdened by greater than 30% of income is 75.2%.
 - 74.3% are elderly (1 & 2 persons)
 - 78.8% are small families (2 to 4 persons)
 - 82.3% are large families (5 or more persons)
 - 72.6% are other owner households
- Total percentage of all owner households with incomes greater than 30% but less than 50% of income is 54.4%.
 - 46.0% of all elderly households in this income category are cost overburdened by 50% or more
 - 66.9% of all small families in this income category are cost overburdened by 30% or more
 - 65.9% are large families in this income category are cost overburdened by 30% or more
 - 61.7% are other owner households in this income category are cost overburdened by 50% or more
- Total percentage of all owner households with incomes greater than 30% but less than 50% of median family income that are cost overburdened by greater than 30% is 51.1%.
 - 42.0% of all elderly households in this income category are cost overburdened by 30% or more
 - 70.2% of all small families in this income category are cost overburdened by 30% or more
 - 66.5% are large families in this income category are cost overburdened by 30% or more
 - 65.5% are other owner households in this income category are cost overburdened by 30% or more



- Total percentage of all owner households with incomes greater than 30% but less than 50% of median family income that are cost overburdened by greater than 50% of income is 22.8%.
 - 14.9% of all elderly households in this income category are cost overburdened by 50% or more
 - 37.7% of all small families in this income category are cost overburdened by 50% or more
 - 29.0% are large families in this income category are cost overburdened by 50% or more
 - 41.9% are other owner households in this income category are cost overburdened by 50% or more

Note:

There is a large percentage of renters in all housing categories in the income levels of less than 50% of median family income that are cost overburdened. This varies from 42.4% to 76.6%, which indicates a need for financial assistance for rental units.

I. Housing Problems

Based on the HUD-Comprehensive Housing Affordability Strategy (CHAS) data found in Appendix F, the following statistics were found based on Low/Mod Income housing types:

- Total percentage of renter households with incomes less than 30% of median family income that have a housing problem is 69.5%.
 - 61.9% are elderly (1 & 2 persons)
 - 71.7% are small families (2 to 4 persons)
 - 81.3% are large families (5 or more persons)
 - 72.3% are other renter households
- Total percentage of renter households with incomes greater than 30% but less than 50% of median family income that have a housing problem is 64.9%.
 - 55.8% are elderly (1 & 2 persons)
 - 63.7% are small families (2 to 4 persons)
 - 70.9% are large families (5 or more persons)
 - 75.5% are other renter households
- Total percentage of renter households with incomes greater than 50% but less than 80% of median family income that have a housing problem is 32.1%.
 - 39.7% are elderly (1 & 2 persons)



- 27.7% are small families (2 to 4 persons)
- 37.9% are large families (5 or more persons)
- 30.3% are other renter households
- Total percentage of owner households with incomes less than 30% of median family income that have a housing problem is 75.7%.
 - 74.4% are elderly (1 & 2 persons)
 - 79.1% are small families (2 to 4 persons)
 - 88.4% are large families (5 or more persons)
 - 73.3% are other owner households
- Total percentage of owner households with incomes greater than 30% but less than 50% of median family income that have a housing problem is 51.7%.
 - 42.4% are elderly (1 & 2 persons)
 - 70.6% are small families (2 to 4 persons)
 - 70.1% are large families (5 or more persons)
 - 66.5% are other renter households
- Total percentage of owner households with incomes greater than 50% but less than 80% of median family income that have a housing problem is 31.3%.
 - 18.6% are elderly (1 & 2 persons)
 - 43.0% are small families (2 to 4 persons)
 - 47.5% are large families (5 or more persons)
 - 46.2% are other renter households

Note:

The largest percentage of households, both renter and owner occupied in the income category of less than 50% of the median family income, have a housing problem. This ranges from 42.4% for the elderly owners in the 30% to 50% median family income category, to 88.4% for large family owners in the less than 30% median family income category. This demonstrates a need in Allegheny County for housing financial support for both owners and renters.

J. Disabled Households

Attached in Appendix G is the updated 2005 Census Data, which shows the number of disabled individuals by Census Tract in Allegheny County, with the exception of the City of Pittsburgh. The total population is 838,251 and the disabled population is 124,232 which is 14.82%. This is an indicator of the need for housing for the disabled which



traditionally are mainly Low/Mod Income and lack housing resources that are accessible and/or affordable.

K. Maps

Attached are the following maps which illustrate demographic characteristics for Allegheny County.

- Census Tracts
- Percentage of Low- and Moderate-Income by Census Tracts
- Total Population
- Percentage of White Population
- Percentage of African American Population
- Percentage of Asian Population
- Percentage of American Indian Population
- Percentage of Native Hawaiian Population
- Percentage of Other Population
- Percentage of Two or More Races Population
- Percentage of Population Ages 65 and Over
- Total Housing Units
- Percentage of Owner-Occupied Housing Units
- Percentage of Renter-Occupied Housing Units

-- Maps get inserted here --



III. Review of Prior Plan

The previous “Analysis of Impediments To Fair Housing Choice” was prepared in December 1999 for Allegheny County. The following paragraphs restate each identified impediment within that document.

A. Summary of Impediments 1999:

The Analysis of Impediments to Fair Housing Choice Impediments is based on the following:

- Environmental sites
- Public and assisted housing
- Zoning
- Inter-agency fair housing cooperation
- Home lending policies and practices
- Real estate policies and practices
- The media
- The fair housing environment
- Fair housing laws
- Fair housing law enforcement
- Fair housing services and education and outreach
- Housing data
- Neighborhood Amenities: Transportation Access, Employment, Housing, Education Quality and Services

Environmental Sites:

1. Nearly two-thirds (2/3) of the County’s hazardous waste sites are located in municipalities with higher than average percentages of families living in poverty and minority residents.

Plan: The active sites in these municipalities should receive priority for expedited cleanup. HUD and Allegheny County should proactively work for priority cleanup with the Environmental Protection Agency and the Pennsylvania Department of Environmental Protection.



□ Public and Assisted Housing:

2. Public housing is segregated, and located in the County's poorer and more segregated municipalities.

Plan: Implement the consent decree to desegregate public and assisted housing.

3. The rental market may not be able absorb the new Section 8 certificates if the new fair market rent exception rents are too high or source of income discrimination occurs. Data is needed to measure Section 8 market absorption.

Plan: The reasonableness of the new fair market rent exception rents should be assessed after the following procedures: (1.) New Section 8 participants should be tracked to determine how well they penetrate the market, and where they have difficulty doing so. (2.) Test-based audits of the private rental market, focus groups, and surveys of participants and landlords, should be an integral part of measuring the Section 8 market and the probability of success of its home-seekers. (3.) HUB should take the lead in retaining a private fair housing specialist group such as FHP to conduct this research.

4. Discrimination against Section 8 holders has been reported, but little data is available to measure source of income discrimination.

Plan: Inclusion of source of income as a protected class is necessary in Allegheny County. This process should include at least two components: (1.) Develop a database to measure the extent of discrimination based on source of income. Empirical data can be derived from focus groups and surveys of Section 8 and public assistance home-seekers. It can also be derived from a thorough test-based fair housing audit for source of income discrimination. (2.) Using the findings of this research - and presuming that discrimination is indicated in the data - the Allegheny County government should proactively coordinate a broad-based effort to amend the Pennsylvania Human Relations Act to include source of income as a protected class.

5. The leases of Section 8 landlords are not reviewed by ACHA for compliance with fair housing laws.

Plan: ACHA should audit the leases of every current Section 8 landlord for compliance with fair housing laws. All future leases should be reviewed. HUD should provide technical assistance during this audit and for subsequent reviews.

6. Section 8 clients are not briefed by ACHA about protected class protections under Federal and Pennsylvania law.

Plan: ACHA should incorporate routine instruction about protected class in its client briefings. Technical assistance should be provided by an enforcement agency such as FHP.



7. No fair housing specialists have been hired by ACHA despite its close association with Section 8 clients and landlords, and its central position in the effort to desegregate public and assisted housing in Allegheny County.

Plan: An in-house fair housing specialist should be hired by ACHA.

□ Zoning:

8. Many municipalities have no group housing terms enacted in their municipal codes, and thus have no provisions for housing people with disabilities, and no guidelines for potential placement of group homes.

Plan: These municipalities should proactively enact ordinances that comply with Fair Housing Act and the Pennsylvania Human Relations Act, and which clearly define the services that are provided and other occupancy or distance provisions. The Allegheny County government should retain private fair housing specialists, or train its staff so that it can provide technical assistance to municipal officials. HUD should provide an oversight role in this process.

9. Few communities in the County have enacted permitted-use ordinances that allow people with disabilities and others to reside in group housing arrangements in single family zones as a matter of right.

Plan: Allegheny municipalities should enact permitted-use ordinances to allow group housing for people with disabilities in single family zones. The Allegheny County government should retain private fair housing specialists, or train its staff so that it can provide technical assistance to municipal officials. HUD should provide an oversight role in this process.

10. Nearly half of Allegheny County's municipalities have enacted special-exception or conditional-use procedures for group housing. Violations of fair housing law could arise if official decisions rejecting or restricting applications have the effect of keeping out group housing arrangements.

Plan: Zoning hearing board officials should be well-briefed - through fair housing education & outreach services - about the legality of zoning decisions that have a disparate impact on group living arrangements for people with disabilities. The Allegheny County government should retain private fair housing specialists, or train its staff, so that it can provide technical assistance to municipal officials to reduce their legal exposure. HUD should provide an oversight role in this process.

11. Few municipalities explicitly permit the occupation of group housing by people with disabilities.

Plan: All County municipalities should proactively enact ordinances in compliance with Fair Housing Act and the Pennsylvania Human Relations Act that clearly



address the occupation of group housing by people with disabilities. The Allegheny County government should retain private fair housing specialists, or train its staff, so that it can provide technical assistance to municipal officials. HUD should provide an oversight role in this process.

12. Some municipalities have enacted distance requirements, or family definitions, that would likely be construed as having the effect of illegally restricting group housing in violation of the Fair Housing Act and Pennsylvania Human Relations Act. Other municipalities have no family definitions.

Plan: These ordinances should be amended to eliminate these restrictions. The Allegheny County government should retain private fair housing specialists, or train its staff so that it can provide technical assistance to municipal officials to reduce their legal exposure. HUD should provide an oversight role in this process.

13. Very few municipalities have demonstrated in their zoning ordinances that they are aware of Fair Housing Act requirements, and no municipalities have demonstrated in their ordinances an awareness of the requirements of the Pennsylvania Human Relations Act.

Plan: All municipalities should incorporate references to the requirements of, and a commitment to comply with, the Fair Housing Act and the Pennsylvania Human Relations Act. The Allegheny County government should retain private fair housing specialists, or train its staff so that it can provide technical assistance to municipal officials. HUD should provide an oversight role in this process.

❑ Inter-Agency Fair Housing Cooperation:

14. Not enough coordination or information-sharing exists between private agencies on fair housing issues.

Plan: Regular meetings to discuss fair housing issues and share information would benefit all of these agencies. Quarterly meetings led by a nonprofit agency should be held. An annual update about national and local trends should be considered. The Fair Housing Partnership (FHP) would be the logical agency to manage these meetings because it is the only private fair housing agency in Western Pennsylvania.

15. More coordination and cooperation is needed between public and private agencies on fair housing issues.

Plan: HUD, Allegheny County, PHRC, FHP, and constituent-focused agencies should hold regular fair housing meetings, perhaps quarterly, and perhaps culminating in an annual fair housing conference during Fair Housing Month in April.



□ Home Lending Policies and Practices:

16. The denial rates for home loan applications for members of minority groups are much higher than the denial rates for whites in Allegheny County.

Plan: Research should be conducted to elicit the reasons for these disparities. This would require that lending institutions build and report databases indicating the reasons for denials across demographic groups. Data derived from the research would help clarify the reasons for the HMDA data.

17. HMDA data do not reveal the underlying reasons for loan rejections.

Plan: Lending institutions should build and report databases indicating the reasons for denials across demographic groups, and should initiate self-testing programs.

18. In-house test-based audits are not conducted by the lending institutions. As a consequence, no data exist about fair housing and fair lending practices at different stages of the lending process.

Plan: Lending institutions should self-test with “mystery shoppers” at each stage of the lending process to confirm compliance with fair housing and fair lending laws.

19. No Countywide fair housing education & outreach or counseling services are provided by lending institutions.

Plan: Lending institutions should initiate, or participate in, fair housing and fair lending talks or seminars jointly with constituent-focused agencies.

□ Real Estate Policies and Practices:

20. Real estate agencies do not provide fair housing education & outreach or counseling services.

Plan: Real estate agencies should initiate, or participate in, fair housing and fair lending talks or seminars jointly with constituent-focused agencies.

21. Fair housing guidelines are not distributed by real estate agencies.

Plan: Real estate agents should distribute guidelines to buyers and sellers so that they are aware about their protections and what can or cannot be done during sales transactions. This might also protect agents from allegations that they are engaging in discriminatory conduct during the sales process.

22. Real estate agencies do not conduct in-house test-based self-audits. No industry data exist about possible discriminatory practices by agents.



Plan: Real estate agencies should self-test every aspect of the sales process to assure compliance with the fair housing laws. These data could help reduce agency exposure to allegations of discrimination.

23. Realtors seem to be defensive about fair housing enforcement and activism.

Plan: Empirically rigorous surveys and focus groups comprised of real estate agents and managers should be conducted to identify the underlying causes of this apparent apprehension. HUD and the PHRC should then lead education and outreach workshops to reduce this apprehension in cooperation with the Realtors Association of Metropolitan Pittsburgh (RAMP).

☐ The Media:

24. Local media either do not understand, or have misrepresented, the concept of fair housing. The media subsume fair housing reporting under negative coverage of the consent decree to desegregate public and assisted housing.

Plan: (1.) Media understanding of fair housing should be improved by conducting education & outreach workshops for editors and reporters. These workshops should be managed by a national agency such as the National Fair Housing Alliance. (2.) The biased coverage of fair housing issues can be reversed only through changes in editorial decisions about how to report fair housing issues outside of the consent decree to desegregate public and assisted housing. This change would require proactive outreach to the media on non-desegregation fair housing issues from HUD, Allegheny County government, faith leaders, and constituent-focused agencies.

☐ The Fair Housing Environment:

25. The fair housing environment in Allegheny County is poor and has been caused by a historical culture of ethnic and racial exclusion.

Plan: A concerted effort should be undertaken to educate Allegheny County residents about diversity, multiculturalism, and inclusive community. This effort would of necessity be longitudinal, and would require proactive leadership from the new Allegheny County Executive and Council, influential faith leaders such as the Catholic and Episcopal bishops, and municipal elected leaders.

26. Many Allegheny County municipalities present an unwelcoming fair housing environment. No municipality proactively supports fair housing.

Plan: Municipal-level education & outreach is required for local public and private officials. This outreach should focus on educating municipal elected officials, municipal government workers, private rental agencies, landlords, and others. The Allegheny County government should coordinate this effort. It should retain



private fair housing specialists, or train its staff, so that it can provide technical assistance to participants.

27. The residents of Allegheny County generally do not understand the concept of fair housing. They mistake it for other issues.

Plan: Improving grass-roots understanding of fair housing should include at least two components: Empirical data to thoroughly probe the characteristics of this misunderstanding, and a significant effort to raise the profile of fair housing in Allegheny County. (1.) Empirically rigorous focus groups and surveys would elicit data about how residents perceive fair housing. (2.) The profile of fair housing should be enhanced through publicized events during Fair Housing Month, fair housing recognition awards to private agencies, fair housing “best practices” awards, and media-focused outreach such as op-ed articles. Both of these components require a proactive publicity campaign.

28. The consent decree to desegregate public and assisted housing in Allegheny County has, in part, negatively influenced the fair housing environment.

Plan: Reversing the consent decree’s negative impact on fair housing should include at least two components: (1.) Long-term education & outreach that places the decree within the broader context of fair housing. (2.) Develop a community-tensions task force that would operate independently of the “Sanders” task force to explore how to achieve a long-term reduction in the significant tension currently existing in the desegregation process. Both of these components require the accumulation of data to more thoroughly probe the linkage between the desegregation effort and the fair housing environment. Empirically rigorous surveys and focus groups would elicit these data.

29. Existing fair housing laws have not been adequately enforced in Allegheny County.

Plan: Data should be collected to determine where fair housing problems are concentrated - i.e., by industry, stage of the home-seeking process, and neighborhood. This should be accomplished by conducting targeted fair housing audits. Once these data have been assessed, extensive testing should be conducted, and violators brought to justice. This enforcement process requires: An aggressive and high-profile HUD; proactive leadership from Allegheny County government; proactive enforcement of the law against egregious violators by PHRC; and a strong testing and auditing program centered at FHP.

30. The fair housing environment is generally not good, or only fair, for clients served by constituent-focused agencies.

Plan: Constituent-focused agencies require a detailed assessment of the fair housing environment experienced by their constituents. This can be accomplished by conducting empirically rigorous surveys and focus groups of



their constituents, as well as fair housing audits on behalf of these constituents. Thus, coordination and cooperation on fair housing issues among the constituent-focused agencies is essential. FHP should facilitate this process, manage the data research, and conduct the audits.

□ Fair Housing Laws:

31. Some landlords in Allegheny County allegedly discriminate against home-seekers based on source of income. Little data is available to measure source of income discrimination.

Plan: Inclusion of source of income as a protected class is necessary in Allegheny County. This process should include at least two components: (1.) Develop a database to measure the extent of discrimination based on source of income. Empirical data can be derived from focus groups and surveys of Section 8 and public assistance home-seekers. It can also be derived from a thorough test-based fair housing audit for source of income discrimination. (2.) Using the findings of this research - and presuming that discrimination is indicated in the data - the Allegheny County government should proactively coordinate a broad-based effort to amend the Pennsylvania Human Relations Act to include source of income as a protected class.

□ Fair Housing Law Enforcement:

32. Existing fair housing laws have not been adequately enforced in Allegheny County.

Plan: Data should be collected to understand where fair housing problems are concentrated - i.e., by agency, industry, stage of the home-seeking process, protected class, and neighborhood. This should be accomplished by conducting targeted fair housing audits, including test-based audits. Once these data have been assessed, enforcement testing should be initiated and violators brought to justice. This enforcement process requires: An aggressive and high-profile HUD; proactive leadership from Allegheny County government; proactive enforcement of the law against egregious violators by PHRC; and a strong testing and auditing program centered at FHP.

33. Adequate data do not exist to determine the status of each protected class in the Allegheny County housing market.

Plan: Research should be conducted to study the status of specific protected classes in the housing market. This research should include empirically rigorous focus groups and surveys, as well as test-based audits.

34. HUD does not proactively monitor new construction for compliance with the accessibility requirements of the Fair Housing Act, at 42 U.S.C. 3604Q)(3)(C).



Plan: HUD should conduct an audit of new construction compliance with the advice and assistance of disability constituent-focused agencies. The purpose of this audit should be to identify non-compliant construction, and to proactively enforce compliance.

35. The leases of Section 8 landlords are not reviewed by ACHA for compliance with fair housing laws.

Plan: ACHA should audit the leases of every current Section 8 landlord for compliance with fair housing laws. All future leases should be reviewed. HUD should provide technical assistance during this audit and for subsequent reviews.

36. Although some data are available to indicate the existence of “futile gesture” behavior among constituent groups, these data are anecdotal and not systematically collected or reported.

Plan: Constituent-focused, government, and fair housing enforcement agencies should adopt routine procedures to survey their clients about their housing decisions and experiences.

❑ Fair Housing Services and Education and Outreach:

37. Few constituent-focused agencies provide fair housing education & outreach or counseling services.

Plan: Constituent-focused agencies should include fair housing instruction in as many group settings as possible. FHP should provide technical assistance to help these agencies develop the expertise for this instruction. HUD and PHRC should produce fair housing materials focusing on the special fair housing issues of specific constituent-focused agencies.

38. In-house fair housing training is irregularly provided in most constituent-focused agencies.

Plan: Constituent-focused agencies should train staff regularly about fair housing laws and issues. PHRC or FHP should be retained to provide this training and technical assistance.

39. Allegheny County has not hired fair housing specialists, nor trained existing staff about fair housing issues.

Plan: Allegheny County should train key staff about fair housing laws and issues. Because of the County’s central position in funding fair housing activities and the consent decree to desegregate public and assisted housing, at least one fair housing specialist should be hired.



40. Section 8 clients are not briefed by ACHA about protected class protections under Federal and Pennsylvania law.

Plan: ACHA should incorporate routine instruction about protected classed in its client briefings. Technical assistance should be provided by an enforcement agency such as FHP.

41. No fair housing specialists have been hired by ACHA despite its close association with Section 8 clients and landlords, and its central position in the effort to desegregate public and assisted housing in Allegheny County.

Plan: An in-house fair housing specialist should be hired by ACHA.

42. No Countywide fair housing education & outreach or counseling services are provided by lending institutions.

Plan: Lending institutions should cooperate with each other to establish relationships with constituent-based agencies and participate in regular workshops to explain fair housing and fair lending issues to clients.

43. Real estate agencies do not provide fair housing education & outreach or counseling services.

Plan: Real estate agencies should cooperate with each other to establish relationships with constituent-based agencies and participate in regular workshops to explain real estate sales issues to clients.

☐ Housing Data:

44. There is a lack of easily accessible data on rental and owner-occupied housing markets in Allegheny County.

Plan: (1.) The Allegheny County government should establish ties with Experian and RealStats, two of the larger suppliers of housing data, to make home sales data available to its staff and researchers on a free or reduced-cost basis. (2.) Allegheny County should initiate a survey of landlords to estimate market conditions (vacancies, asking rents, turnover) for rental housing.

☐ Neighborhood Amenities - Transportation Access, Employment, Housing, Education Quality and Services:

45. Limitations of public transit in linking residents of low-income, racially concentrated communities with communities with greater employment opportunities prevent these individuals from evaluating other neighborhood amenities that might induce them to move to these communities.



Plan: (1.) A rigorously designed study similar to the Bridges to Work experiment (conducted by Public/Private Ventures of Philadelphia) would enable local providers to evaluate the efficacy of alternative reverse commuting/job linkage strategies. Such strategies should include subsidized purchase of automobiles by low-income individuals, ridesharing between individuals in low-income communities and more affluent nearby communities as well as new bus routes and use of smaller vans. (2.) PAT should better advertise its new service linking low-income communities with high job-growth regions, perhaps through churches and public service announcements.

46. Racially isolated communities do not have adequate information about levels of specific amenities in potential destination communities. Many housing counselors, do not have the resources to synthesize publicly accessible data on desirable destination communities and to present it to clients in such a way that questions regarding potential destinations result in a new awareness among clients of relocation opportunities.

Plan: Improved training and technology resources (for example Geographical Information Systems-based software) for use by counselors to assist clients in visualizing relocation opportunities - and more highly publicize information on community amenities - would increase awareness of residential options among members of protected classes.

47. Impediment: Well-documented opposition to fair housing voiced by residents of the more desirable communities, and the general perception among individuals in protected classes that these communities are not welcoming, constitutes a barrier to fair housing.

Plan: (1.) The Federal Moving to Opportunity mobility demonstration showed that it is possible to deliver comprehensive housing counseling to low-income families that enables them to successfully lease rental housing in non-poverty areas without incurring significant local opposition. It is possible that such housing mobility programs could be implemented locally, both for families who receive and do not receive housing subsidies. (2.) New mobility programs, administered in an unobtrusive manner by well-known local organizations, could be combined with public discussions of fair housing issues by a comprehensive set of stakeholders: Representatives of desirable destination communities; family advocates; representatives of the faith community; researchers; and administrators. (3.) This combination of increased support for both housing mobility and more tolerant attitudes among those who are opposed to housing mobility could enable individuals in protected classes to believe that relocation to desirable communities will be both feasible and beneficial, despite the significant distance between origin and destination communities.



IV. Impediments to Fair Housing – 2007 Update

Based on the background information presented in this Analysis of Impediments, as a result of research, interviews, and meetings, certain impediments to fair housing choice are still present in Allegheny County.

A. Fair Housing Complaints

1. Pennsylvania Human Relations Commission

The PA Human Relations Commission (PHRC) is charged with enforcing state laws that prohibit discrimination. Fair housing complaints and charges may be filed by any person or group that feels they are a victim of discrimination in housing. The PHRC is comprised of three (3) regions, with the Pittsburgh Regional Office serving all of Western Pennsylvania.

PHRC Regional Office
11th Floor State Office Building
300 Liberty Avenue
Pittsburgh, PA 15222-1210
412.565.5395 (VOICE)
412.565.5711 (TTY)

The PHRC publishes an annual summary of docketed cases filed during the State’s fiscal year (July 1st thru June 30th). This information is published on a County by County basis. Table III-1 “PHRC Complaints” illustrates complaint trends for the period of July 1, 2002 thru June 30, 2006 in Allegheny County:

Table III-1 – PHRC Complaints

Year	Employment	Housing	Commercial Property	Public Accommodation	Education	Total
2005-2006	434	59	5	29	5	532
2004-2005	449	75	1	43	5	573
2003-2004	383	58	1	35	4	481
2002-2003	486	46	0	37	4	573



2. Fair Housing & Equal Opportunity (HUD)

The U.S. Department of HUD's Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. There were 414 fair housing complaints filed with HUD-FHEO within Allegheny County from January 1, 2000 through July 26, 2006.

Pittsburgh HUD Field Office
339 Sixth Avenue
Sixth Floor
Pittsburgh, PA 15222-2515
(412) 644-6428

Appendix C of this report contains the HUD-FHEO Complaints for the last reporting period of January 1, 2005 through December 31, 2005.

3. Fair Housing Partnership of Greater Pittsburgh, Inc.

The Fair Housing Partnership is a private, non-profit organization established in 1984 to create, promote, and support equal housing choice and opportunity in the Greater Pittsburgh area. FHP remains a key partner in furthering fair housing through education, training, and outreach within the metropolitan area. The agency also provides housing counseling services to homebuyers and homeowners seeking to find or maintain suitable housing.

Fair Housing Partnership
2840 Liberty Avenue
Suite 2005
Pittsburgh, PA 15222
(412) 391-2535

FHP investigates complaints and pursues enforcement action throughout Allegheny County. The agency also conducts sales and rental testing across all protected classes. In a recent test-group sampling by the FHP, one-third (1/3) of all those client cases that were reviewed led to enforcement action.

B. Public Sector

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and its impact on fair housing choice. Local government controls land use and development through the comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the County's policies to determine if there is a commitment to affirmatively further fair housing.



1. CDBG Program

Allegheny County receives CDBG funds from HUD as an entitlement jurisdiction under the program. The County allocates funding to, among other programming, homeownership assistance, neighborhood facilities, economic development, housing and human services, parks and recreation facilities, public facility improvements, and the prevention and elimination of slums and blight. Approximately 75.25% of the County's CDBG funds directly benefits low- and moderate-income persons.

In 2006, Allegheny County's CDBG allocation was cut by 9.8% or \$1,798,592 which was the largest reduction in its 32 year history. The total reduction in CDBG funds is over \$3.2 Million from FY 2000 to FY 2006. Table III-2 illustrates CDBG funding trends from 2000 to 2006.

Year	Funding Year	Grant Amount \$18,996,000	Percentage Increase/ (Decrease)	Amount Increase/ (Decrease)	Total CDBG Funds Lost
Year 27	2001	\$19,779,000	4.12%	\$783,000	
Year 28	2002	\$19,490,000	(1.46%)	(\$289,000)	
Year 29	2003	\$19,447,000	(0.22%)	(\$43,000)	
Year 30	2004	\$19,327,000	(0.62%)	(\$120,000)	
Year 31	2005	\$18,357,147	(5.02%)	(\$969,853)	
Year 32	2006	\$18,357,147	0%	\$0	
Year 33	2007	\$16,716,641	(8.94%)	(\$1,640,506)	(\$3,062,359)

In FY 2007, the County distributed CDBG funding within the following program areas:

Municipal Development Program Areas \$4.4 million

Public improvements, water and sewer improvements, elimination of slums and blight, handicap accessibility, parks and recreation, street reconstruction, engineering, code enforcement, streetscape improvements

Economic Development Program Areas..... \$4.6 million

Business development, job retention programming, brownfield renewal, technical assistance, infrastructure improvements, environmental mitigation



Housing & Human Services Program Areas \$3.6 million

Housing counseling, anti-predatory lending counseling, fair housing, housing rehabilitation, affordable housing construction, senior services, youth services, employment and training services, library services, housing accessibility, day care services, technical assistance, rape education and outreach, court appointed counsel for indigent clientele, hunger and nutrition programming, lead-based paint abatement

2. Other Funds

In addition to the CDBG funds, Allegheny County received the following federal funding for FY 2007:

- HOME Investment Partnerships Program (HOME) \$3,946,128
- Emergency Shelter Grants (ESG) \$ 714,105
- American Dream Downpayment Assistance (ADDI)..... \$ 71,925

HOME, ESG, and ADDI allocations were also substantially reduced in 2006.

Allegheny County supports the efforts of Community Development Corporations (CDCs) and Community Housing Development Organizations (CHDOs) such as:

- Mon Valley Initiative (MVI)
- AHI, Inc.
- McKeesport Housing Corporation (MHC)
- Community & Economic Development Corporation of Clairton (CEDCC)
- Swissvale Economic Development Corporation (SEDCO)
- Braddock Economic Development Corporation (BEDCO)
- East Pittsburgh Economic Development Corporation
- Homestead Economic Revitalization Corporation (HERC)
- North Braddock CARES
- Turtle Creek Development Corporation
- McKees Rocks CDC
- Duquesne Business Advisory Corporation
- The Rankin Partnership

These agencies have been able to obtain additional financing through sources including the Federal Home Loan Bank, PA Housing Finance Agency, and other financing mechanisms to construct new affordable housing and to rehabilitate existing buildings into affordable dwelling units.



Multi-family and Section 8 Project Based Assisted Housing Facilities

Multi-family assisted units with active contracts status	13,893
Percentage of Multi-family assisted units with contracts that expired prior to 2004	36.8%
Percentage of Multi-family assisted units with contracts expiring in 2004	5.6%
Percentage of Multi-family assisted units with contracts expiring in 2005	23.8%
Percentage of Multi-family assisted units with contracts expiring in 2006	8%
Percentage of Multi-family assisted units with contracts expiring in 2007	4.4%
Percentage of Multi-family assisted units with contracts expiring in 2008	4.3%
Percentage of Multi-family assisted units with contracts expiring in 2009-2013	17.1%

Source: www.dataplace.org

The number of HUD funded multi-family Section 8 Project based assisted housing in Allegheny County is 13,893 which is 2.4% of the total housing units in the County. The number of families living at or below the poverty level in the County is 26,527. Therefore, there are less than half of the federally subsidized units needed for poverty level households in Allegheny County.

3. Planning & Zoning

The Planning Division for the Allegheny County Department of Economic Development acts as the County’s official planning agency and administers duties assigned under the Pennsylvania Municipalities Planning Code.

The Division oversees land development approvals for 29 municipalities and provides technical assistance to the remaining 100 municipalities. Technical assistance includes reviews of land developments, ordinances, and land use planning initiatives. The Division reviews and approves all subdivisions in the County outside the City of Pittsburgh. The Division also assists in the planning, programming, funding, and coordination of highway transportation infrastructure throughout the County.

In reviewing a sampling of the municipal planning and zoning ordinances, the following land use policies pertaining to group housing arrangements were identified as barriers to fair housing:

- Several ordinances do not recognize, define, and/or include provisions for group living arrangements or housing for persons with disabilities.
- Only a few communities appear to have incorporated group housing arrangements as a by-right, permitted-use in single-family zoning districts.



- There appears to be a significant portion of municipalities that require special-exception or conditional use approval for group housing to obtain.
- Distance requirements intended to separate or not permit concentrations of groups housing appear to illegally restrict fair housing choice and opportunity.
- Several definitions of “family” appear to illegally restrict group housing arrangements.

The Planning Division is currently spearheading the County’s first Comprehensive Land Use Plan. One primary objective of this initiative is to identify and implement land use policies that are regional in scope. Planning and zoning compliance with fair housing serves to improve the quality of life and freedom of housing choice for all residents, irregardless of municipal residency.

The comprehensive planning process should include a coordinated review by the ACDED Planning Division of fair housing compliance for each municipality. Specific zoning text amendments recommendations that achieve fair housing compliance should be provided as technical support. Local zoning ordinance barriers were identified as an impediment in the County’s 1999 AI. As such, the Comprehensive Plan should include an implementation strategy to ensure that all municipal zoning ordinances are in compliance within a short timeframe. The County may need to consider requiring fair housing compliance of municipal planning and zoning policies as a condition of CDBG funding.

In addition to fair housing compliance, local planning and zoning regulations can provide opportunities to increase affordable housing opportunities for underserved markets and improve quality of life. The Planning Division should provide leadership, education, and technical assistance to municipalities in studying the feasibility of implementing alternate land use strategies, including:

- Planned Unit Developments that offer mixed-uses, densities, and building envelopes not generally provided in underlying zoning regulations
- Planned Residential Developments that offer various housing types, mixed-incomes, densities, and building envelopes not generally provided in underlying zoning regulations
- Density bonuses provided for developments that reserve a certain percentage of affordable housing, accessible housing, and/or age-restricted housing in neighborhoods outside of historically concentrated minority and low income areas
- Incorporating mixed-use development opportunities within existing zoning districts or through overlay districts that allow affordable housing opportunities that are within close proximity of employment and essential goods and services
- Transit-oriented development (TOD) that can lessen living costs by reducing auto-dependency and increasing access to employment and essential goods and services



- The promotion of public health by rewarding or even requiring the development of active open spaces, recreational facilities, urban groceries, bike routes, safe streetscapes, sidewalk systems, etc.

Environmental hazardous waste sites and brownfield sites are disproportionately located in communities with concentrations of minority, low income, and poverty populations. The Comprehensive Plan should include the incorporation of existing inventories of site locations and hazardous contaminants. The Plan’s implementation strategies should include mitigation and remediation tasks, redevelopment, and reuse planning.

4. Taxes

Real estate property taxes also impact housing affordability. Though it may not be an impediment to fair housing choice, it does impact the affordability of housing.

Allegheny County maintains control over property assessments for the entire county and its municipalities. The millage rate for the County in 2007 was 4.69.

Table III-3 illustrates the municipal and school district millage trends within the County.

Table III-3 – Municipal & School District Millage Trends

Taxing Authority	Millage Rate
Municipalities (2007)	
Median municipal millage rate	5.5
<i>Three lowest municipal millage rates</i>	
Pine Township	1.2
City of Clairton	1.22 *
Franklin Park Borough	1.283
<i>Four highest municipal millage rates</i>	
McDonald Borough	38.75
Trafford Borough	23
Dormont Borough	14
Wilkinsburg Borough	14
School Districts (2007)	
Median school district millage rate	21.36
<i>Three lowest school district millage rates</i>	
Clairton	7.5
Pittsburgh	13.92
McKeesport	17.71



<i>Three highest municipal millage rates</i>	
Wilkinsburg	35
Brentwood	28.27
East Allegheny	26.54

Note:

The City of Clairton millage rate is 1.22 for building plus an additional 28 for land. Penn-Trafford (118.5) and Fort Cherry (71.25) were not included in the chart above for the highest municipal millage rates because only a small portion of the school districts are in Allegheny County.

C. Private Sector

The private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental or advertising of dwellings, in the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act prohibits such practices as the failure to give the same terms, privileges, or information, charging different fees, steering prospective buyers or renters toward a certain area or neighborhood, or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status or national origin.

1. Real Estate Practices

The Realtors Association of the Metropolitan Pittsburgh (RAMP) is the local organization of real estate brokers operating within Allegheny County. RAMP has an open membership policy and does not discriminate. Members are bound by the Code of Ethics of the National Association of Realtors (NAR).



This Code of Ethics obligates its members to maintain professional standards including efforts to affirmatively further fair housing. The NAR enforces its Code of Ethics through a disciplinary commission consisting of NAR members. The NAR refers cases involving fair housing complaints to the PA Human Relations Commission. The NAR has an Affirmative Fair Housing Marketing Plan. In order for realtors to maintain their license in Pennsylvania they must annually complete continuing education courses which includes fair housing education. Neither HUD nor the PA Human Relations Commission has reported any fair housing complaints against local area realtors in recent years.

2. Newspaper Advertising

Under Federal Law, no advertising with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color,



religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.

Real estate advertisements were reviewed for *The Pittsburgh Post-Gazette*, *The Tribune Review* and the *Pittsburgh HOMES – Guide by Realtors* published by the Realtors Association of Metropolitan Pittsburgh. The newspapers publish the Fair Housing logo and there were no ads that contained language that prohibited occupancy by any group. The *Pittsburgh HOMES* contained the Fair Housing logo and included a statement that all real estate advertised was subject to the Fair Housing Act. *Pittsburgh HOMES* also included the telephone number for HUD to call for more information on Fair Housing Choice.

3. Private Financing

The Financial Institutions Reform, Recovery and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The HMDA data was obtained and is included as Appendix D of this report. The data that was available does not indicate any discriminatory lending patterns. However, interviews with housing providers raised concerns for subprime and predatory lending activities within LMI and minority communities.

The local branch banks in Allegheny County have been cooperating with the area's non-profit housing development corporations by making loans to them for housing development and rehabilitation. These banks have sponsored Federal Home Loan Bank applications and have made grants available to assist these housing agencies with their administrative and pre-development costs. There is a cooperative attitude between the local banks, Federal Home Loan Bank, Allegheny County, and the local housing providers.

In addition to working directly with non-profit housing providers, the following lending institutions participate in the County's First-time Homebuyers Program and Targeted Areas Homebuyer Program:

- Allegheny Mortgage Corp.
- Allstate Financial
- American Home Mortgage
- Countrywide Home Loans, Inc.
- Dollar Bank
- Howard Hanna Financial Services
- National City Bank of Pennsylvania
- OMEGA Financial
- West Penn Financial



D. Potential Impediments and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist Allegheny County to affirmatively further fair housing in the community. Updated impediments to Fair Housing Choice are presented in chart format on the following pages.



<p>IMPEDIMENT No. 1.</p>	<p>HOUSING AFFORDABILITY – There is a lack of affordable housing within the County that is decent, safe, and sound, which impacts neighborhoods and reduces fair housing choice. GOAL – Coordinate county-wide housing programs to maximize the effectiveness of Increasing the supply of decent, safe, and sound housing that is affordable to lower income households, both renters and owner occupants.</p>				
<p>Strategies To Meet the Goal</p>	<p>Responsible Entities</p>	<p>Benchmark</p>	<p>Proposed Investment</p>	<p>Proposed Year to be Completed</p>	<p>Date Completed</p>
<p>1-A – Reduce the number of LMI households waiting for public housing and rental assistance by increasing the supply of Section 8 Housing Choice Vouchers</p>	<ul style="list-style-type: none"> – ACHA 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>1-B – Increase the supply of available decent, safe, and affordable housing through rehabilitation assistance, subsidy financing, new construction, and the removal and redevelopment of slums and blighting conditions</p>	<ul style="list-style-type: none"> – ACED – ACHA – RAAC – PA DCED – PHFA – Non-Profit Developers – Private Developers 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>1-C – Increase homeownership opportunities for LMI households by providing housing and credit counseling, financing, closing cost and downpayment assistance, transfer of vacant properties to new and responsible owners, and new construction or renovation of for-sale units</p>	<ul style="list-style-type: none"> – ACED – ACHA – ACRFA – RAAC – ULP – FHP – Non-Profit Developers – Private Developers 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>1-D – Maintain effective property maintenance inspection and enforcement programming and services</p>	<ul style="list-style-type: none"> – Municipalities – ACHA – ACED 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	



IMPEDIMENT No. 2.	HOUSING ACCESSIBILITY – There is an increasing need for housing opportunities for homeless persons and for housing that is accessible to older populations and persons with disabilities. GOAL – Increase the supply of homeless and transitional housing opportunities and housing that meets the accessibility, visitability, and quality of life needs of older populations and persons with disabilities.				
Strategies To Meet the Goal	Responsible Entities	Benchmark	Proposed Investment	Proposed Year to be Completed	Date Completed
2-A – Provide support for housing rehabilitation to allow persons with disabilities to remain in their homes	<ul style="list-style-type: none"> – RAAC – ACTION-Housing, Inc. – PA DCED 	On-going	Determined annually	FY 2012	
2-B – Increase the supply of housing that is accessible to persons with disabilities and the elderly by providing targeted rehabilitation assistance and ensuring that new County-subsidized multi-family construction meets accessibility provisions of the Fair Housing Act	<ul style="list-style-type: none"> – PHFA – PA DCED – ACED – RAAC – ACTION-Housing, Inc. – Municipalities – Non-Profit Developers 	On-going	Determined annually	FY 2012	
2-C – Support education and training programming concerning reasonable accommodations for persons with disabilities and the elderly	<ul style="list-style-type: none"> – ULP – FHP 	On-going	Determined annually	FY 2012	
2-D – Support grant funds for homeless services and shelter providers to improve the accessibility of emergency shelters and transitional housing locations	<ul style="list-style-type: none"> – ACED – AC DHS – PA DCED – Housing Providers – Shelter Providers 	On-going	Determined annually	FY 2012	



<p>IMPEDIMENT No. 3.</p>	<p>FAIR HOUSING EDUCATION, ADVOCACY, MONITORING, AND ENFORCEMENT – 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.</p> <p>GOAL – Increase the knowledge and awareness of the rights of individuals and the responsibilities of public and private housing providers and policy makers in regard to the Fair Housing Act through education advocacy, monitoring, and encouragement to reduce discrimination in housing and providing fair housing choices for all individuals and families.</p>				
<p>Strategies To Meet the Goal</p>	<p>Responsible Entities</p>	<p>Benchmark</p>	<p>Proposed Investment</p>	<p>Proposed Year to be Completed</p>	<p>Date Completed</p>
<p>3-A – Support the delivery of education and targeted training and programs by public, non-profit, and private housing providers concerning the rights and responsibilities ensured by the Fair Housing Act</p>	<ul style="list-style-type: none"> – FHP – ULP – ACHA – ACED 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>3-B – Support efficient and effective fair housing monitoring, investigation, enforcement strategies, comprehensive planning, and local land use and building code policies that further fair housing choice</p>	<ul style="list-style-type: none"> – FHP – ULP – ACHA – ACED – Municipalities – ACRFA 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>3-C – Support the delivery of financial literacy counseling for LMI and minority households to combat predatory and sub prime lending practices</p>	<ul style="list-style-type: none"> – FHP – ULP – ACED – ACHA – ACRFA 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>3-D – Support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination</p>	<ul style="list-style-type: none"> – FHP – ULP – ACHA – ACED 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	



<p>IMPEDIMENT No. 4.</p>	<p>CONCENTRATION OF LOW-INCOME AND MINORITY GROUPS – There are concentrations of low-income persons, minorities, and female headed households that lack decent, safe and sound housing that is affordable, which impacts neighborhoods and reduces fair housing choice.</p> <p>GOAL – Improve the housing conditions within the County and promote new affordable housing choices outside impacted areas in pursuit of diversified and culturally rich neighborhoods.</p>				
<p>Strategies To Meet the Goal</p>	<p>Responsible Entities</p>	<p>Benchmark</p>	<p>Proposed Investment</p>	<p>Proposed Year to be Completed</p>	<p>Date Completed</p>
<p>4-A – Increase access to affordable housing opportunities in more affluent and less racially segregated areas through homeownership and rent assistance, new construction, renovation of existing housing stock, and encourage among municipalities alternate land use policies</p>	<ul style="list-style-type: none"> – ACED – ACRFA – ACHA – RAAC – Municipalities 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>4-B – Encourage and support strategies to close the minority homeownership gap</p>	<ul style="list-style-type: none"> – ACHA – ACED – ACRFA 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>4-C – Encourage and support targeted neighborhood development strategies to promote a range of quality housing for LMI and minority households</p>	<ul style="list-style-type: none"> – ACED – RAAC – CDC's – Non-Profit Developers – Neighborhood Groups 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>4-D – Encourage and support protected class communities' and economically diverse groups' representation on advisory bodies that oversee housing policies</p>	<ul style="list-style-type: none"> – ACHA – ACED – Non-Profit Developers 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>4-E – Encourage and support the development of market rate housing and mixed income housing in areas that traditionally have a high concentration of LMI and minority households</p>	<ul style="list-style-type: none"> – ACED – RAAC – CDC's – Non-Profit Developers – Neighborhood Groups – Private Developers 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	



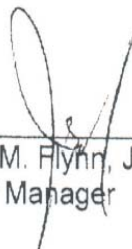
<p>IMPEDIMENT No. 5.</p>	<p>ECONOMIC OPPORTUNITIES – There is a lack of economic opportunities which prevents low-income households from improving their income and their ability to live outside low-income areas, which reduces fair housing choice.</p> <p>GOAL – Support sustainable economic growth that will provide an increase in job opportunities and improved household income, in order to increase fair housing choice.</p>				
<p>Strategies To Meet the Goal</p>	<p>Responsible Entities</p>	<p>Benchmark</p>	<p>Proposed Investment</p>	<p>Proposed Year to be Completed</p>	<p>Date Completed</p>
<p>5-A – Strengthen partnerships and program delivery that enhances the County’s business base, expands its tax base, and creates a more sustainable economy for residents and businesses</p>	<ul style="list-style-type: none"> – ACED – CDC’s – Non-Profit Developers – RAAC 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>5-B – Support and enhance workforce development and skills training that results in livable wage job opportunities</p>	<ul style="list-style-type: none"> – ACED – CDC’s – Non-Profit Developers 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>5-C – Support programming that enhances entrepreneurship and small business development, expansion, and retention within traditionally LMI and minority neighborhoods</p>	<ul style="list-style-type: none"> – ACED – CDC’s – Non-Profit Developers 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	
<p>5-D – Develop strategies and fund initiatives that redevelop Brownfield sites that are disproportionately located in municipalities with higher concentrations of minority and poverty level populations</p>	<ul style="list-style-type: none"> – Allegheny County – EPA – PA DEP 	<p>On-going</p>	<p>Determined annually</p>	<p>FY 2012</p>	



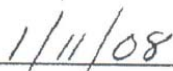
V. Certification

Signature Page:

I hereby certify that this *Fair Housing Analysis Update – 2007* is in compliance with the intent and directives of the Community Development Block Grant Program regulations.



James M. Flynn, Jr.
County Manager



Date