

## Counter Proposal to Conciliation Proposal

1. HUD will conduct a study on a census tract basis to determine the correlation between the geographic concentration of Section 8 Voucher holders and the mortality rate within Lancaster and the Antelope Valley. Such a study would include a comparison of mortality rates in census tracts in which holders of Section 8 Vouchers reside in Lancaster to mortality rates in census tracts throughout Los Angeles County.
2. HUD will conduct a study on a census tract basis to determine the correlation between the geographic concentration of Section 8 Vouchers and the availability of healthcare services in Lancaster and in other areas of the County. Such a study would include a comparison of the availability of healthcare services in census tracts in which holders of Section 8 Vouchers reside in Lancaster to the availability of healthcare services in census tracts throughout Los Angeles County.
3. HUD will conduct a study on census tract basis to determine the correlation between the geographic concentration of Section 8 Voucher holders and the violent crime and property related crime rates within Lancaster and the Antelope Valley. Such a study would include a comparison of the violent crime and property related crime rates in census tracts in which holders of Section 8 Vouchers reside in Lancaster to the violent crime and property related crime rates in census tracts throughout Los Angeles County.
4. HUD will conduct a complete review and audit of the expenditures by the County for health and other services provided to low income persons within Lancaster and the Antelope Valley and other sub areas of the County of Los Angeles to determine if adequate expenditures for such services are being made to support the needs of all low income persons and families in Lancaster and the Antelope Valley.
5. HUD will conduct a complete review and audit of HACoLA's administrative expenditures, excluding any amounts contributed by the Cities of Lancaster and Palmdale and the 5<sup>th</sup> District Supervisors office, and staffing to determine the amount spent on enforcement actions and how such expenditures are applied within Lancaster and the Antelope Valley and other sub areas of the County of Los Angeles. The audit will include a determination of the number of vouchers per staff member involved in inspection and enforcement efforts.
6. If the audit conducted in accordance with 5 demonstrates that HACoLA has spent less than the national average on enforcement activities or has more vouchers per staff member than the national average, HUD will require HACoLA, and HACoLA will agree, to expend not less than 125% of the national average amount spent by other Housing Authorities on enforcing Section 8 program requirements for the next 5 years. Thereafter HACoLA agrees that it will spend not less than the national average on enforcement actions and shall employ a sufficient number of staff to maintain the ratio of vouchers per staff member at or below the national average. HUD will agree to provide HACoLA with additional funds sufficient to accomplish this purpose. Such expenditures shall be made on a proportional basis based on the number of Section 8 Voucher holders living in a particular area of the County.
7. HUD and HACoLA will work with the Los Angeles County Sheriff, any other law enforcement agency operating in Lancaster and the Los Angeles County Superior Courts to develop a

line of communication to alert HACoLA of the arrest and/or conviction of any Section 8 voucher holders for any disqualifying crimes.

8. HUD will work to stop the segregation of Lancaster neighborhoods by developing a plan, regulations and policies to avoid an geographic concentration of Section 8 Voucher holders in any neighborhood and to achieve geographic dispersion throughout Los Angeles County. HUD will adopt regulations or amendments to regulations to accomplish this purpose. If necessary, HUD will work with Congress to adopt necessary legislation to support this effort.

9. If any of the studies conducted pursuant to 1, 2 or 3 above show a correlation between the geographic concentration of Section 8 voucher holders and any of the factors considered, HUD and HACoLA will work to limit the number of Section 8 Voucher holders or agreements with Landlords in the City of Lancaster and the Antelope Valley until adequate services can be provided to reduce the occurrence of such factors in the City of Lancaster or the Antelope Valley.

10. HACoLA will work within the federal law and regulations to establish a separate market rental rate within the City of Lancaster and the Antelope Valley.

11. HACoLA will adopt policies as needed to insure that it makes Section 8 Vouchers available to all minority groups on an equal basis.

12. City will continue to publicize and provide a mechanism for receiving and processing fair housing discrimination complaints and other discrimination complaints through its contract with the Housing Rights Center.

13. City staff members involved in code enforcement, LANCAP and housing programs will continue to undergo fair housing training on a periodic basis as required by federal regulations or as otherwise determined by the city consistent with budgetary considerations.

14. City will continue to sponsor two community fair housing training programs per year. The training programs will be open to the public and will be conducted by the Housing Rights Center or other group approved by the City.

15. City will continue to provide public information on its website and in public buildings to promote fair housing within the community.

16. City will complete a new Analysis of Impediments to Fair Housing that meets the requirements of the Fair Housing Planning guide and receives HUD and City Council approval. Consistent with federal regulations, the Analysis will be updated periodically at least every 5 years.

17. Complainants will agree to undergo fair housing training on a periodic basis.

18. Complainants will dismiss the lawsuit filed by them against the City and will pay all of the City's attorney's fees and legal costs related to this complaint and the lawsuit.