



2016 Analysis of Impediments to Fair Housing Choice



Sponsored by the City of Grants Pass
Public Input Meeting

Public Input Presentation

1

September 19, 2016



Today's Presentation




- Review of Fair Housing Policy
 - ✓ Upcoming changes
- Review of Data
 - ✓ Demographic, economic, housing
 - ✓ Home lending
 - ✓ Housing complaints
 - ✓ Fair housing survey
- Impediments/Recommended Actions


Public Input Presentation

2

September 19, 2016




**2016 City of Grants Pass
Analysis of Impediments (AI)**




Federal grantees must:
**Certify that they are Affirmatively
Furthering Fair Housing (AFFH)
to receive community planning
and development (CPD) funds
from HUD**

Public Input Presentation 3 September 19, 2016




**2016 City of Grants Pass
Analysis of Impediments (AI)**



Certification means three things:


- 1. Conduct an AI**
- 2. Take action on impediments, if
impediments were found**
- 3. Maintain records of actions**

Public Input Presentation 4 September 19, 2016




Content of an AI

- **Private sector transactions: rental market (applications, interviews, etc.) and sales markets (lending, steering, blockbusting, foreclosure burden, etc.)**
- **Public sector influences: land use codes, zoning, public policy practices, neighborhood resistance, etc.**
- **Assessing barriers to housing choice**



Public Input Presentation 5 September 19, 2016



Definition of Impediments to Fair Housing Choice:

**Actions, omissions, or decisions
which restrict housing choice
because of protected class
status**



Public Input Presentation 6 September 19, 2016



Who is protected?

Everyone.

Protections under federal and state law:
Race, color, religion, national origin, sex, disability, familial status, legal sources of income, domestic violence survivors, marital status, sexual orientation, and gender identity



Public Input Presentation 7 September 19, 2016



Fair Housing Choice

- **Not the same as affordable housing!**
- **Fair housing choice relates to the ability to choose your residence.**
- **Choice can be affected by:**
 - ✓ **Discriminatory Actions**
 - ✓ **Organizations Actions**
 - ✓ **Structural Issues – Segregated housing patterns, zoning**



Public Input Presentation 8 September 19, 2016




Changes to AFFH Policy

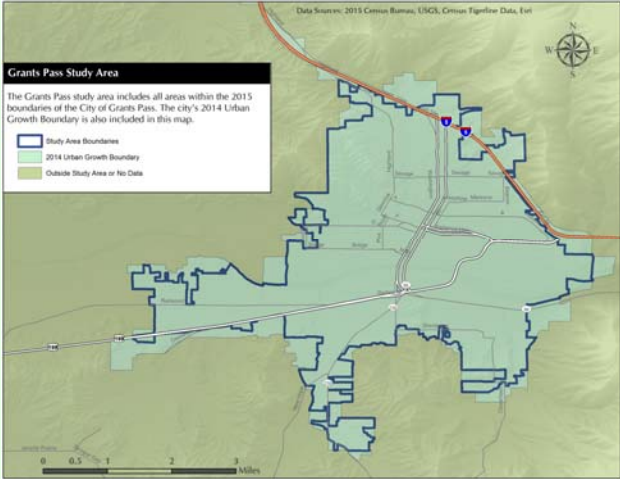
- 2010 GAO Report Criticizing AI Process
- HUD Rule: July 8, 2015
- New format, new requirements
 - ✓ The AFH must be submitted/approved in advance of the Consolidated Plan
 - ✓ Nationally standard data/assessment tool
- In 2019, the City will submit an assessment of fair housing (AFH)


 EQUAL HOUSING OPPORTUNITY

Public Input Presentation 9 September 19, 2016




2016 AI Study Area




 EQUAL HOUSING OPPORTUNITY

Public Input Presentation 10 September 19, 2016



Grants Pass Study Area Demographics




Population by Race and Ethnicity


Grants Pass Study Area
2000 & 2010 Census SF1 Data

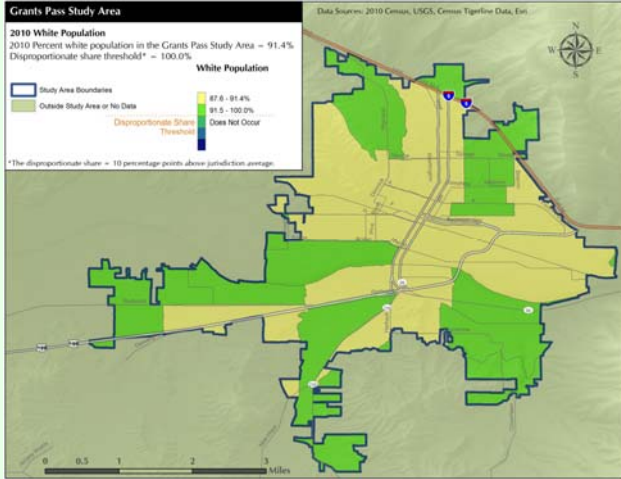
Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
White	28,237	93.4%	32,576	91.4%	15.4%
Black	93	0.3%	178	0.5%	91.3%
American Indian	330	1.1%	444	1.2%	34.7%
Asian	240	0.8%	342	1.0%	42.4%
Native Hawaiian/ Pacific Islander	21	0.1%	86	0.2%	309.3%
Other	460	1.5%	736	2.1%	60.1%
Two or More Races	837	2.8%	1,262	3.5%	50.8%
Total	30,218	100.0%	35,625	100.0%	17.9%
Non-Hispanic	28,666	94.9%	32,795	92.1%	14.4%
Hispanic	1,552	5.1%	2,830	7.9%	82.3%

Public Input Presentation 11 September 19, 2016



White Population: 2010





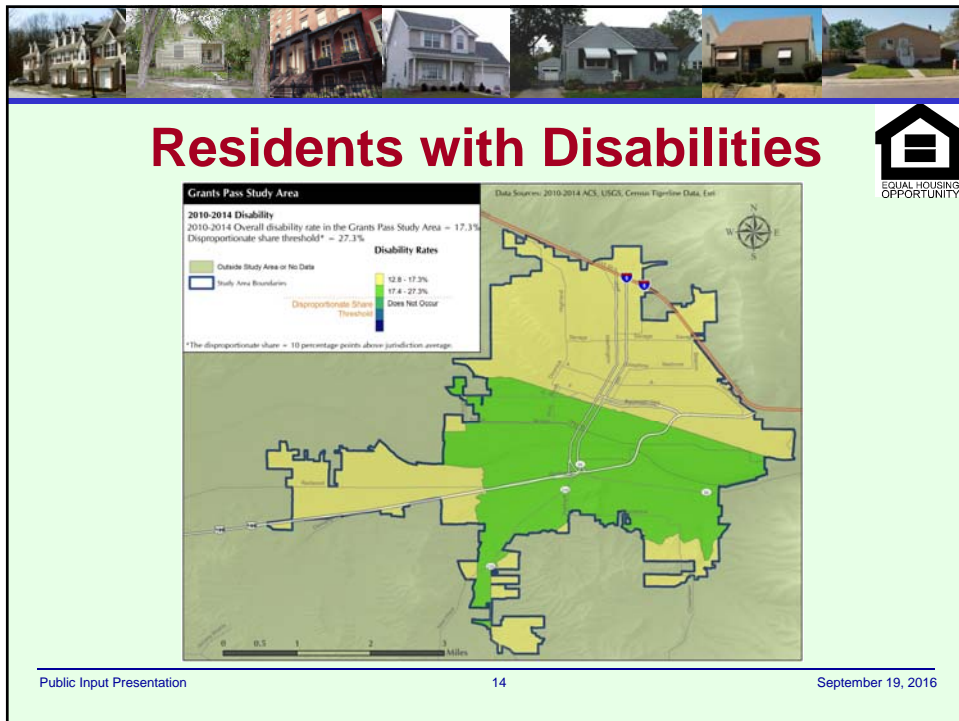
Grants Pass Study Area
2010 White Population
2010 Percent white population in the Grants Pass Study Area = 91.4%
Disproportionate share threshold* = 100.0%


White Population

- 87.6 - 91.4%
- 91.5 - 100.0%
- Disproportionate Share Threshold
- Does Not Occur


*The disproportionate share = 10 percentage points above jurisdiction average.

Public Input Presentation 12 September 19, 2016






Grants Pass Study Area Economics: Poverty in the Grants Pass Study Area




Poverty by Age
Grants Pass Study Area
2000 Census SF3 & 2014 Five-Year ACS Data

Age	2000 Census		2014 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	640	14.6%	1,083	13.6%
6 to 17	977	22.2%	1,561	19.6%
18 to 64	2,363	53.7%	4,509	56.7%
65 or Older	418	9.5%	797	10.0%
Total	4,398	100.0%	7,950	100.0%
Poverty Rate	14.9%		22.5%	

Public Input Presentation 15 September 19, 2016



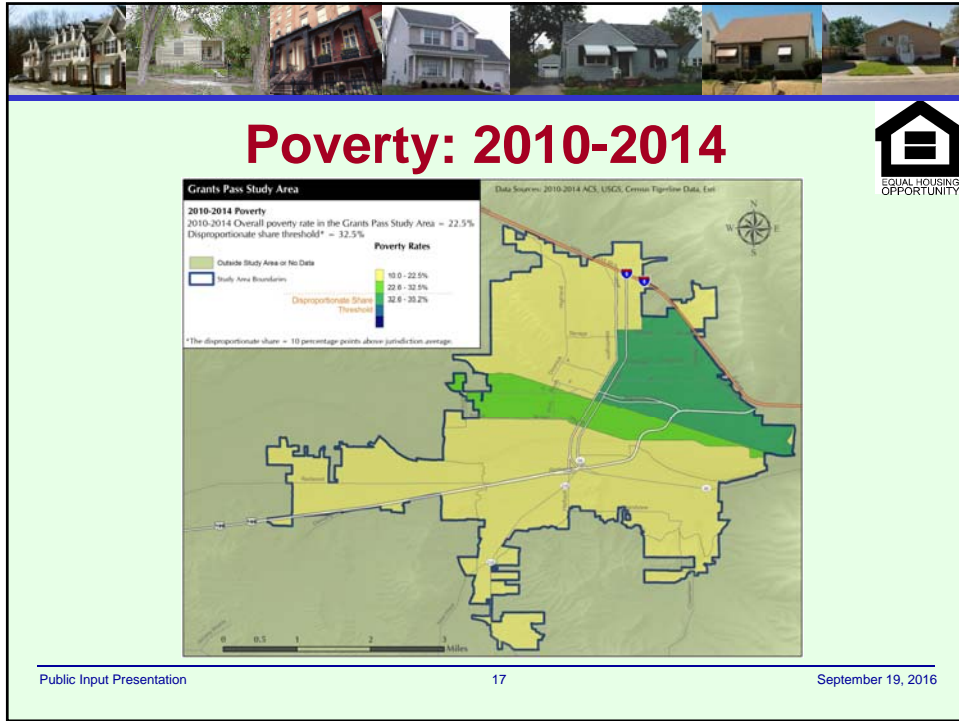
Grants Pass Study Area Economics: Poverty in the Grants Pass Study Area

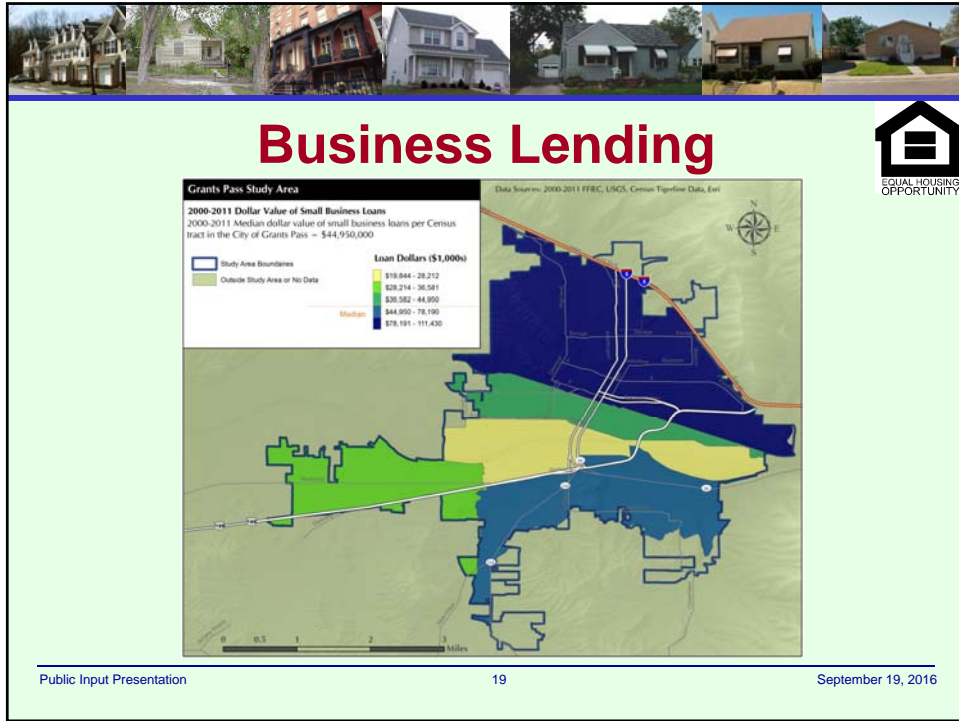


2015 Poverty Threshold by Household Size
2015 U.S. Census Bureau

Size of family unit	Related children under 18 years								
	0	1	2	3	4	5	6	7	>=8
One person (unrelated individual)									
Under 65 years.....	12,331								
65 years and over.....	11,367								
Two people.....									
Householder under 65 years.....	15,871	16,337							
Householder 65 years and over.....	14,326	16,275							
Three people.....			19,096						
Householder.....	18,540	19,078	19,096						
Four people.....				24,120					
Householder.....	24,447	24,847	24,036	24,120					
Five people.....					27,853				
Householder.....	29,482	29,911	28,995	28,286	27,853				
Six people.....						31,078			
Householder.....	33,909	34,044	33,342	32,670	31,670	31,078			
Seven people.....							34,077		
Householder.....	39,017	39,260	38,421	37,835	36,745	35,473	34,077		
Eight people.....								38,668	
Householder.....	43,637	44,023	43,230	42,536	41,551	40,300	38,999	38,668	
Nine people or more.....									45,822
Householder.....	52,493	52,747	52,046	51,457	50,490	49,159	47,956	47,658	45,822

Public Input Presentation 16 September 19, 2016





Grants Pass Study Area Housing

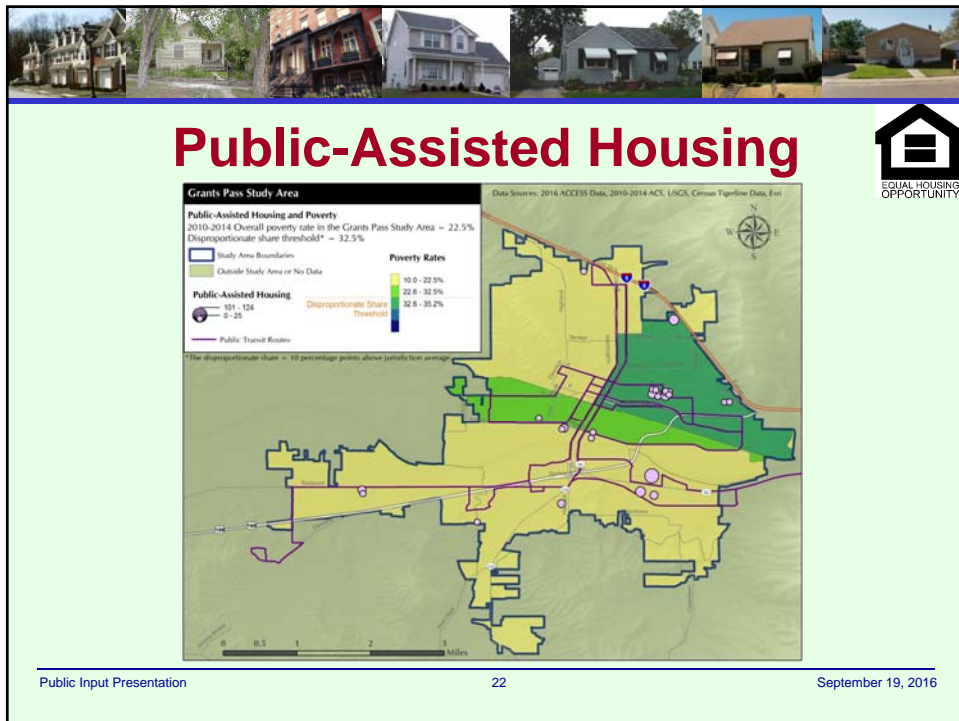
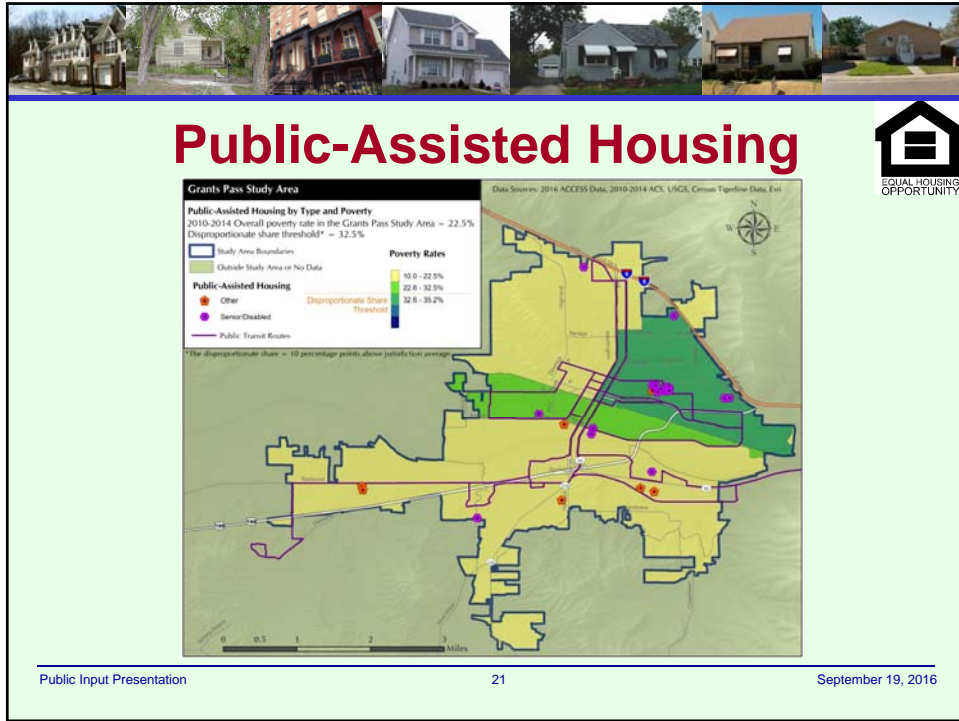
Housing Units by Tenure
 Grants Pass Study Area
 2000 & 2010 Census SF1 Data

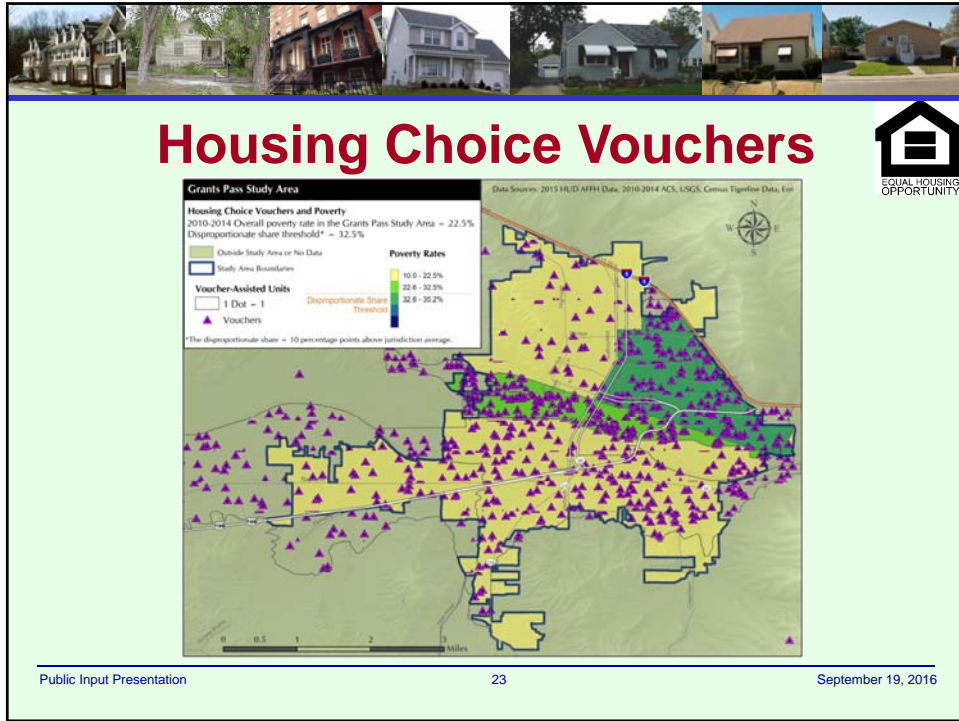
Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	12,476	94.6%	14,925	91.9%	19.6%
Owner-Occupied	7,310	58.6%	8,050	53.9%	10.1%
Renter-Occupied	5,166	41.4%	6,875	46.1%	33.1%
Vacant Housing Units	714	5.4%	1,308	8.1%	83.1%
Total Housing Units	13,190	100.0%	16,233	100.0%	23.1%

Housing Units by Tenure
 Grants Pass Study Area
 2010 Census & 2014 Five-Year ACS Data

Tenure	2010 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	14,925	91.9%	14,618	92.2%
Owner-Occupied	8,050	53.9%	7,748	53.0%
Renter-Occupied	6,875	46.1%	6,870	47.0%
Vacant Housing Units	1,308	8.1%	1,233	7.8%
Total Housing Units	16,233	100.0%	15,851	100.0%

Public Input Presentation 20 September 19, 2016





Home Lending


Purpose of Loan by Year
Grants Pass Study Area
2008-2014 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	Total
Home Purchase	670	669	545	546	720	688	740	4,578
Home Improvement	111	65	38	43	81	68	53	459
Refinancing	1,045	1,365	976	804	1,388	1,105	541	7,224
Total	1,826	2,099	1,559	1,393	2,189	1,861	1,334	12,261


Occupancy Status for Home Purchase Loan Applications
Grants Pass Study Area
2008-2014 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	Total
Owner-Occupied	541	596	461	452	618	576	629	3,873
Not Owner-Occupied	117	66	77	91	99	107	109	666
Not Applicable	12	7	7	3	3	5	2	39
Total	670	669	545	546	720	688	740	4,578

Public Input Presentation 24 September 19, 2016



Home Lending



Denial Rates by Gender of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	20.6%	25.6%	36.4%	0.0%	22.5%
2009	19.7%	23.8%	12.9%	0.0%	20.1%
2010	7.1%	19.5%	28.6%	0.0%	11.7%
2011	14.9%	16.3%	36.4%	0.0%	16.3%
2012	12.5%	9.4%	30.0%	0.0%	12.0%
2013	12.9%	22.8%	16.7%	0.0%	16.0%
2014	17.0%	13.4%	21.1%	0.0%	16.0%
Average	15.3%	18.0%	22.8%	0.0%	16.4%

Public Input Presentation 25 September 19, 2016



Fair Housing Complaints



- **Overview of Complaint Process (HUD)**
 - ✓ **Complaint is filed within one year of alleged discriminatory act.**
 - ✓ **Notification/Investigation**
 - ❖ **During investigation, HUD will encourage parties to conciliate.**
 - ✓ **If conciliation fails, HUD will issue a charge within 100 days.**

Public Input Presentation 26 September 19, 2016



Fair Housing Complaints



- ✓ If HUD finds reasonable cause to believe discrimination has occurred, it will issue a charge of discrimination.
 - ❖ If not, HUD will close the complaint.
 - ❖ Complainant may still sue.
- ✓ If HUD finds cause, the issue may proceed to an administrative hearing or a civil court.

Public Input Presentation 27 September 19, 2016




Fair Housing Complaints




- ✓ Potential consequences:
 - ❖ Compensate for actual damages
 - ❖ Injunctive Relief (Non-Discrimination Policy, etc.)
 - ❖ Pay a civil penalty (\$10,000 for first offense; \$50,000 for repeat offenses)
 - ❖ Pay reasonable attorney's fees

Public Input Presentation 28 September 19, 2016



HUD Complaints




Fair Housing Complaints by Basis of Complaint


2008-2016 HUD Data

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Disability	1	1	2	1				1		6
Sex			1							1
Total Basis	1	1	3	1				1		7
Total Complaints	1	1	3	1				1		7

Public Input Presentation 29 September 19, 2016



HUD Complaints




Fair Housing Complaints by Issue of Complaint


2008-2016 HUD Data

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Failure to Make Reasonable Accommodation		1	1	1	1					4
Discriminatory Advertising, Statements, and Notices				1	1					2
Discriminatory terms, conditions, privileges, or services and facilities				1				1		2
Discriminatory refusal to rent and negotiate for rental				1	1					2
Discrimination in the selling of residential real property								1		1
Discriminatory refusal to sell				1						1
Total Issues	1	1	5	3				2		12
Total Complaints	1	1	3	1				1		7

Public Input Presentation 30 September 19, 2016




HUD Complaints




Fair Housing Complaints by Closure Status
2008-2016 HUD Data

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Complainant failed to cooperate			1	1						2
No cause determination	1		1							2
Complaint withdrawn by complainant after resolution		1								1
Conciliation/settlement successful								1		1
Unable to locate complainant				1						1
Total Complaints	1	1	3	1				1		7

Public Input Presentation 31 September 19, 2016




Grants Pass Study Area 2016 Fair Housing Survey




Barriers to Fair Housing in the Private Sector
City of Grants Pass
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	18	25	30	28	101
The real estate industry?	5	26	42	28	101
The mortgage and home lending industry?	2	26	45	28	101
The housing construction or accessible housing design fields?	7	26	40	28	101
The home insurance industry?	1	28	43	29	101
The home appraisal industry?	1	25	47	28	101
Any other housing services?	7	22	43	29	101

Public Input Presentation 32 September 19, 2016



Grants Pass Study Area 2016 Fair Housing Survey



Barriers to Fair Housing in the Public Sector

City of Grants Pass
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	9	27	30	35	101
Zoning laws?	7	22	37	35	101
Occupancy standards or health and safety codes?	6	28	31	36	101
Property tax policies?	3	23	39	36	101
Permitting process?	4	22	38	37	101
Housing construction standards?	1	25	39	36	101
Neighborhood or community development policies?	5	26	34	36	101
Limited access to government services, such as employment services?	17	31	17	36	101
Public administrative actions or regulations?	5	20	41	35	101

Public Input Presentation 33 September 19, 2016




Fair Housing Survey



➤ Comments Expressed:

- ✓ Lack of affordable housing
- ✓ Discrimination in rental housing
- ✓ Tight rental market
- ✓ Difficulty in siting affordable housing


Public Input Presentation 34 September 19, 2016



2016 Analysis of Impediments

- **Private Sector Impediments/Actions**
 - ✓ **Refusal to make reasonable accommodation or modifications as required by law.**
 - ❖ **Outreach and education**


Public Input Presentation 35 September 19, 2016



2016 Analysis of Impediments

- **Private Sector Impediments/Actions**
 - ✓ **Discriminatory actions in the rental housing market**
 - ❖ **Outreach and education**
 - ❖ **Partner with Fair Housing Council**


Public Input Presentation 36 September 19, 2016



2016 Analysis of Impediments

- **Private Sector Impediments/Actions**
 - ✓ **Challenges in home lending**
 - ❖ **Conduct or promote home mortgage credit education, focusing on techniques to build and maintain good credit**

Public Input Presentation 37 September 19, 2016



2016 Analysis of Impediments

- **Public Sector Impediments/Actions**
 - ✓ **Difficulty siting affordable housing developments**
 - ❖ **Continue efforts to maintain the supply and condition of existing units**
 - ❖ **Explore rehab/redevelopment options**
 - ❖ **Outreach/education on affordable housing programs**


Public Input Presentation 38 September 19, 2016



2016 Analysis of Impediments

- **Public Sector Impediments/Actions**
 - ✓ **Need for ongoing outreach and education on fair housing law**
 - ❖ Identify candidate gov't agencies to take on FH outreach and education
 - ❖ Encourage participation in FHIP
 - ❖ Update City's fair housing page
 - ❖ **Open dialogue with FH Council**

Public Input Presentation 39 September 19, 2016




2016 Analysis of Impediments

- **Public Sector Impediments/Actions**
 - ✓ **Inconsistency in land-use definitions between terms relating to "family"**
 - ❖ Review land-use provisions to ensure consistency across definitions relating to family
 - ❖ Update land-use codes to resolve inconsistencies

Public Input Presentation 40 September 19, 2016




2016 AI Project Schedule




➤ **Coming up:**

- ✓ **This presentation marks the beginning of the public review period (30 Days)**
- ✓ **Read the Report and Provide Comments**
- ✓ **Survey Will Remain Open Through Public Review Period**
- ✓ **Final Presentation (Oct. 19)**
- ✓ **Final Report Submitted (Oct. 31)**

Public Input Presentation 41 September 19, 2016



Grants Pass Study Area 2016 Fair Housing Survey



Please take the
2016 Grants Pass Fair Housing Survey:

<https://www.research.net/r/2016GrantsPassFairHousingSurvey>

Public Input Presentation 42 September 19, 2016




Grants Pass AI Draft for Public Review




Review the draft Analysis of Impediments at:
www.grantspassoregon.gov

Public Input Presentation 43 September 19, 2016



Conclusion



Contact Information:

Mr. Tom Schauer, AICP
Senior Planner
City of Grants Pass
101 NW 'A' Street
Grants Pass, Oregon 97526
tschauer@grantspassoregon.gov

Public Input Presentation 44 September 19, 2016