City of Casa Grande

Analysis of Impediments to Fair Housing Choice
Program Year 2015

Prepared by:

CITY OF CASA GRANDE, ARIZONA

Community Development and Housing Division

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Introduction

Purpose of the Report

It is the intent of the City of Casa Grande, as a new Community Development Block Grant (CDBG) entitlement community to comply with the Federal Fair Housing Act by affirmatively furthering fair housing. This Analysis of Impediments to Fair Housing Choice (AI) will provide essential, specific, and detailed information and data to city officials and staff, housing developers, lenders, fair housing advocates, realtors, and stakeholders. The AI helps build public support for fair housing efforts. This report represents the City's efforts in making an objective assessment of the nature and extent of fair housing concerns in the City, and the potential impediments to making fair housing choice available to its residents.

This is the City's first Analysis of Impediments to Fair Housing Choice. This AI will review current information and data available from a number of sources, identify current impediments to fair housing in the community, develop a new Plan of Action to address current impediments, and maintain records related to Fair Housing. It will evaluate the effects of population growth, the increasingly diverse population, looks at economic change with regard to jobs and the housing market, and creates awareness about fair housing. Through this process, Casa Grande promotes fair housing choices for all persons, including protected classes, as well as providing opportunities for racially and ethnically inclusive patterns of housing occupancy, identifying structural and systemic barriers to fair housing choice, and promotes housing that is physically accessible and usable by persons with disabilities.

This AI will also serve as a supporting document to the 2015 - 2019 City of Casa Grande 5-year Consolidated Plan and should be reviewed and evaluated within the context of that plan.

Definitions

Impediments to Fair Housing Choice

HUD defines "I**mpediments to Fair Housing Choice"** as follows:

- *Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or*

- *Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, and sexual orientation.*

Affirmatively Further Fair Housing

HUD defines "**Affirmatively Further Fair Housing Choice (AFFH)"** per the 1968 Fair Housing Act as *"An obligation of jurisdiction to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status."*

Fair Housing is defined as *"a condition in which individuals of similar income levels in the same housing market having a like range of housing choice available to them regardless of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor."*

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

Protected Classes is defined as individuals who are protected from *housing discrimination based on the following:*

1. *race,*
2. *color,*
3. *national origin or ancestry,*
4. *sex,*
5. *religion,*
6. *familial status, and*
7. *mental and physical disability.*

Affordable

HUD defines *Affordable* if housing cost meets these parameters:

- *Housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.*
- *For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners' association fees.*
- *Housing affordable to a low-income family of two (income up to 30% of the area median income) residing in the area would carry a total monthly income of $2,450 as reported by the National Low Income Housing Coalition's 2014 Out of Reach data*[1]*.*

Data Sources Used in this Analysis

The following are key data sources used to complete this AI:

- 2010 U.S. Census, 2011-2013 and 2009-2013 American Community Survey
- The City's Consolidated Plan, 2014-2019
- The City's 2020 General Plan
- Comprehensive Housing Affordability Strategy (CHAS) Data from HUD
- Home Mortgage Disclosure Act (HMDA) Data
- National Low Income Housing Coalition, Out of Reach 2014
- Trulia Housing Sales and Foreclosure Data
- Pinal County Housing Authority

[1] http://nlihc.org/oor/2014/AZ

- U.S. Department of Housing and Urban Development (HUD), Fair Housing and Equal Opportunity Complaint Data
- Housing Element of the Casa Grande 2020 General Plan
- Office of the State Attorney General
- Southwest Fair Housing Council
- Against Abuse, Inc.
-

Sources of specific information are identified in the text, tables and figures.

City of Casa Grande Fair Housing Goals

The City's goals in developing this AI and implementing the Plan of Action are consistent with HUD objectives in requiring CDBG jurisdictions to affirmatively further fair housing (AFFH). The goals include the following:

- *Increase community awareness and promote equal housing opportunity and fair housing choices citywide.*
- *Actively promote fair housing choice for all persons in the City.*
- *Provide housing opportunities regardless of race, color, religion, sex, familial status, disability and national origin.*
- *Actively promote housing that is structurally accessible to, and usable by all persons, particularly persons with disabilities within the City.*
- *Foster compliance with the nondiscrimination provisions of the Fair Housing Act.*
- *Increase cooperation between public and private agencies in promoting public awareness of fair housing issues.*

Methodology

The City of Casa Grande prepared this AI. Information and data used for this report are from the following sources:

- *Reports and studies conducted and provided on a local, state and national level.*
- *City of Casa Grande's first 5-Year Consolidated Plan for 2015-2019.*
- *An online survey of approximately 483 members of the public.*
- *Newspaper articles and other publications.*
- *Data from public and private agencies including HUD, the State Attorney General's Office, Civil Rights Division (AG), Arizona Department of Housing (ADOH) and Southwest Fair Housing Center (SWFHC), Pinal County Housing Authority, Community Action Human Resource Agency (CAHRA), Bureau of Census.*
- *Discussions with other housing and social services providers by City staff.*

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JURISDICTIONAL BACKGROUND DATA

This is the City's first report of analyzing the impediments to fair housing choice. It is imperative to know it geographical location, the composition of people that lives in the area, the types of income and jobs available, and the practices of fair housing choice for its residents, in order to identify and recognize the City of Grande's current fair housing status. Acknowledging and understanding these dynamics places fair housing issues in perspective and helps to create appropriate recommendations and effective plan of actions.

Geography Quick Facts	Casa Grande	Arizona	United States
Land area in square miles	110	113,594	3,531,905
Persons per square mile, 2013	455.5	56.3	87.4

Geography and History

Casa Grande is located in Pinal County, Arizona, mid-way between the Phoenix and Tucson Metropolitan Areas. The City is located at the nexus of two key Interstates, I-8 and I-10. The City is bordered by the Tohono O'odham Nation to the south, the Gila River Indian Community to the north, the City of Maricopa to the west, and the Cities of Coolidge and Eloy to the east.

Interstate 8 provides through access to the west to San Diego, California and bypasses the Phoenix and Tucson metropolitan areas. Interstate 10 provides through access to Los Angeles, California. While I-8 terminates in Casa Grande at its intersection with I-10, I-10 continues east to provide regional connections to Tucson and Mexico via I-19, and continues east towards Texas, the Gulf-States and ultimately Jacksonville, Florida. In addition to national and international roadway connections, the Union Pacific Railroad passes through the City and is an active line that connects the major ports and freight transfer points in Los Angeles and El Paso, Texas.

Casa Grande was founded in 1879 during the Arizona mining boom, specifically due to the presence of the Southern Pacific Railroad. In January 1880, the community of Terminus, meaning "end-of-the-line," was established despite consisting of just five residents and three buildings. In September 1880, railroad executives renamed the settlement Casa Grande, after the Hohokam ruins at the nearby Casa Grande Ruins National Monument. Casa Grande grew slowly, and suffered several setbacks both in 1886 and 1893, when fires ravaged the town, destroying all wooden housing structures within it. When the mining boom slowed in the 1890s, the town was nearly abandoned, but with the advent of agriculture, the town remained alive and well, and was eventually incorporated in 1915.

One of the founding fathers of Casa Grande was Thompson Rodney Peart. Peart Road, Peart Park, and the Peart Center, all of which are notable fixtures of Casa Grande, are named after him.

Casa Grande is home to Francisco Grande Hotel & Golf Resort, former spring training location for the San Francisco Giants. Then owner, Horace Stoneham, began developing the property in 1959. The first exhibition game was played in Casa Grande in 1961, with Willie Mays hitting a 375-foot (114 m) home run. The San Francisco Giants no longer play at Francisco Grande, but the pool remains in a baseball bat and ball shape in memory of the past ballgames.[2]

When incorporated in 1915, the City of Casa Grande included 2,000 acres (about three square miles). After 1960, annexations increased substantially and continued at a rapid pace. In 2010, the City of Casa Grande

[2] http://en.wikipedia.org/wiki/Casa_Grande,_Arizona#History

is the most populous community in Pinal County with 48,571 residents. In 2013, Census estimated the City's population to be 50,111.

The City limits of Casa Grande currently encompass approximately 110 square miles of developed and undeveloped land (2014). The City's Planning Area includes 274 square miles. The vast majority of land within the City limits and its Planning Area is vacant or in agricultural use. Other key land uses include manufacturing, residential and commercial.

Casa Grande is the economic hub of Pinal County. The City has historically posted Pinal County's strongest jobs-to-population ratio. Export-based industries in the area include agricultural production, manufacturing, and transportation-related businesses. The City accounts for more than 50 percent of Pinal County employment in utilities, manufacturing, wholesale trade, retail trade, transportation and warehousing, information, management of companies and businesses, educational services, and health care and social services. The City has strong fundamental characteristics that position it well to be the commercial, industrial and employment center of Pinal County. It is served by the Casa Grande Municipal Airport (regional airport).

Casa Grande has a substantial employment base because of various industries in the City. In addition, the City has a Regional Shopping Mall located along the Interstate 10. Because Casa Grande is strategically located along two interstates, it has become home to major industries and a hub for distribution industries, such as Walmart and Tractor Supply Company. Central Arizona College provides higher education to the area.

Population

The population of the City is now estimated to be 50,111 persons according to the 2013 Census estimates, American Community Survey (ACS). Today, Casa Grande has grown by 99% from the 2000 Census (25,224), and 3% more from the 2010 Census (48,571). Casa Grande is the largest city in Pinal County, Arizona. The City's racial makeup consist of 77.9% white; 5.9% Black or African American; 2.6% American Indian and Alaskan Native; 3.0% Asian; 0% Native Hawaiian and Other Pacific Islander; 7.7% from other races; 2.9% from two or more races; and 39% were Hispanic or Latino of any race. Of those residents that classified themselves as Hispanic or Latino, 38.9% of all residents categorize their Hispanic or Latino heritage as Mexican.

Table 1: Population Totals

Demographic Profile Highlights , 2000 and 2010 Census		
	2000	**2010**
Total Population	25,224	48,571
Male	12,429	23,536
Female	12,795	25,035
One Race	24,326	46,079
White	16,371	32,687
Black or African American	1,077	2,245
American Indian and Alaskan Islander	1,238	2,232
Asian	294	875
Native Hawaiian and Other Pacific Islanders	25	87
Other Race	5,321	7,953
Two or More Races	898	2,492
Hispanic or Latino (of any race)	9,871	18,932

Source: Table DP-1. Profile of General Demographic Characteristics: 2000; Bureau of Census, 2010

Race

The table below compares the racial composition of Casa Grande with that of Arizona and the United States, demonstrating racial diversity in the City. As can be seen, Casa Grande has a higher percentage of White persons than the nation but slightly lower than the State, and while the percentage of African-Americans is much lower than that of the Nation and slightly higher than the State. There are no Native Hawaiian and Other Pacific Islander in the City while it tops both the State and the Nation for "some other race."

Table 2: Racial Composition

Racial Composition			
RACE	**United States, %**	**Arizona, %**	**Casa Grande, %**
White	74.0	79.2	77.9
Black or African American	12.6	4.2	5.9
American Indian and Alaska Native	0.8	4.4	2.6
Asian	4.9	2.8	3.0
Native Hawaiian and Other Pacific Islander	0.2	0.2	0.0
Some other race	4.7	6.2	7.7
Two or more races	2.8	3.0	2.9

Source: 2009-2013 ACS

Hispanic or Latino Population

According to the 2009-2013 ACS table below, the Hispanic population in Casa Grande constitutes 35.4 percent of the City's population, a decrease by 3.7% and 3.6% from the Census 2000 (39.1%) and Census 2010 (38.9%) respectively. The current percentage is above the national figure of 16.6 percent, also higher than the State percentage of 29.9.

Table 3: Hispanic or Latino Composition

HISPANIC OR LATINO AND RACE	United States		Arizona		Casa Grande	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Total population	311,536,594	311,536,594	6,479,703	6,479,703	48,908	48,908
Hispanic or Latino (of any race)	51,786,591	16.6%	1,935,948	29.9%	17,319	35.4%
Mexican	33,392,414	10.7%	1,749,835	27.0%	15,974	32.7%
Puerto Rican	4,886,378	1.6%	35,765	0.6%	202	0.4%
Cuban	1,897,690	0.6%	10,733	0.2%	51	0.1%
Other Hispanic or Latino	11,610,109	3.7%	139,615	2.2%	1,092	2.2%

Source: 2009-2013 ACS

There are no Census Tracts in which a minority population constitutes over 50 percent of the population of that Tract.

Places of Birth

The percentage of foreign-born persons in Casa Grande is 11.8 percent, which is below both the State figure of 13.4 percent, and the national percentage, 12.9. The percentage of persons born in United States is 87.4, which is higher than both the State (85.4%), and the nation (85.7%). Almost half of the population in Casa Grande was born in different state compared to the nation. The percentage of native in Casa

Grande is 88.2 percent, which is slightly higher than the State figure of 86.6%, and the national percentage, 87.1.

Table 4: Hispanic or Latino Composition

Subject	United States		Arizona		Casa Grande	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
PLACE OF BIRTH						
Total population	311,536,594	311,536,594	6,479,703	6,479,703	48,908	48,908
Native	271,194,696	87.1%	5,609,835	86.6%	43,125	88.2%
Born in United States	266,837,150	85.7%	5,532,500	85.4%	42,749	87.4%
State of residence	183,005,710	58.7%	2,466,137	38.1%	19,950	40.8%
Different state	83,831,440	26.9%	3,066,363	47.3%	22,799	46.6%
Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)	4,357,546	1.4%	77,335	1.2%	376	0.8%
Foreign born	40,341,898	12.9%	869,868	13.4%	5,783	11.8%

Source: 2009-2013 ACS

Age

As shown on the Population by Age Table below, Casa Grande has a slightly older population than the State and the Nation. The median age according to the American Community Survey was 38.6 years, compared to 36.3 for the State and 37.3 for the Nation. In Casa Grande, 17.2 percent of the population is over 65, while in Arizona, the percentage is 14.4, and the United State percentage is 13.4. The high median age is affected by the presence of a higher percentage of older adults 60 years and over, and lower median age over 21 years old adults in the age cohorts between 20 and 59. The table below compares Casa Grande's population with those of the State and the nation by age cohort, showing the larger percentage of persons in the City 60 and over. Casa Grande has slightly higher percentage than the Nation and the State of ages 9 years and younger. The City is also higher than the US or State of age 15 to 19 years by 0.7%.

Table 5: Age Distribution

Population by Age			
Age Cohort	**United States, %**	**Arizona, %**	**Casa Grande, %**
Under 5 years	6.4	6.9	7.6
5 to 9 years	6.6	7.0	7.3
10 to 14 years	6.6	7.0	6.6
15 to 19 years	7.0	7.0	7.7
20 to 24 years	7.1	7.1	6.1
25 to 35 years	13.4	13.4	10.2
35 to 44 years	13.1	12.8	12.2
45 to 54 years	14.3	13.0	13.3
55 to 59 years	6.5	5.9	5.1
60 to 64 years	5.6	5.6	6.7
65 to 74 years	7.4	8.2	9.9
75 to 84 years	4.2	4.5	5.9
85 years and over	1.8	1.7	1.4
Median age (years)	37.3	36.3	38.6

Source: 2009-2013 ACS

Demographics

General Social Characteristics	Casa Grande	Percentages
Total households	17,279	100.0%
With own children under 18 years	5,241	30.3%
Husband-wife family	8,975	51.9%
Male householder, no wife present	1,214	7.0%
Female householder, no husband present	2,216	12.8%
Nonfamily households [7]	4,874	28.2%
Male	23,711	48.5%
Female	25,197	51.5%
Households with individuals under 18 years	5,989	34.7%
Average household size	2.82	

Source: 2009-2013 ACS

- Family households make up 71.8% of the total population in Casa Grande.
- The average household size is 2.8, and the average family size is 3.32.

The average household size in Casa Grande, 2.82 persons, is above both the US figure (2.63), and the Arizona's figure of 2.67 persons. The table below shows the percentage of Family Households in Casa Grande is 71.8 percent, above the US average of 66.4 percent, and the State figure (65.9%). The percentage of families with children under 18 is 30.3 percent, which is 1.3% higher than the State. It should be noted that the percentage of Female Headed Households (12.8%) is 0.2% higher than the State figure and 0.2% below the national percentage. However, the percentage of those households with children under 18 (7.2%) is slightly below both State and National percentages.

Though there are 4,874 nonfamily residents living in Casa Grande (28.2% of the households), the number of households with persons 65 or older living alone is 1,750, which is 10.1 percent of the households, a figure above both state and national norms.

Thus, the City has a significant percentage of family households (71.8), non-family households (28.2%), a relatively high percentage of family with children under 18 (30.3%), a relatively lower percentage than the state and nation of householders living alone (23.8%), and a slightly higher % than the state and nation of 65 years and over.

Table 6: Household Characteristics

Average Household, Family Size, and Other Households Characteristics			
HOUSEHOLDS BY TYPE	United States, %	Arizona, %	Casa Grande, %
Total households	115,610,216	2,370,289	17,279
Family households (families)	66.4%	65.9%	71.8%
With own children under 18 years	29.6%	29.0%	30.3%
Married-couple family	48.7%	48.1%	51.9%
With own children under 18 years	20.0%	18.8%	18.1%
Male householder, no wife present, family	4.7%	5.3%	7.0%
With own children under 18 years	2.3%	2.8%	5.1%
Female householder, no husband present, family	13.0%	12.6%	12.8%
With own children under 18 years	7.3%	7.4%	7.2%
Nonfamily households	33.6%	34.1%	28.2%
Householder living alone	27.5%	27.1%	23.8%
65 years and over	9.8%	9.4%	10.1%

Source: 2009-2013 ACS

Income Characteristics

The following table compares key income and poverty figures for the city, the state, and the nation.

Selected Income and Poverty Statistics

Casa Grande's Median household Income is 85 percent of the national figure and 88 percent of the State figure. Casa Grande's Per Capita Income 86 percent of the State Per Capita Income (PCI), and 77 percent of the national figure. Casa Grande's percentage of persons in poverty is about 2% higher than the State, and 3.49% higher than the nation.

Table 7: Selected Income and Poverty Statistics			
	United States	Arizona	Casa Grande
Median HH Income ($)	$52,762	$50,752	$45,009
Per Capita Income ($)	$28,155	$25,358	$21,874
Persons in Poverty (%)	13.94	15.84	17.43

Source: 2009-2013 ACS

Selected Economic Data

The City does have a higher percentage of households with retirement income than the nation (21.1% vs. 17.7%) and a higher percentage of households with Social Security income (36.6% vs. 28.9%). At the same time, the percentage of persons with Supplemental Security Income is 5.1 percent compared to the national figure of 4.9 percent. The percentage of persons receiving Food Stamp/SNAP benefits is 12.5 percent, almost the same as the national percentage, 12.4.

Table 8: Selected Economic Data	United States	%	Arizona	%	Casa Grande	%
With retirement income	20,504,523	17.7	460,506	19.4	3,653	21.1
Mean retirement income (dollars)	23,589	(X)	24,632	(X)	21,398	(X)
With Social Security	33,386,448	28.9	725,945	30.6	6,321	36.6
Mean Social Security income (dollars)	17,189	(X)	18,179	(X)	18,309	(X)
With Supplemental Security Income	5,716,592	4.9	92,787	3.9	875	5.1
Mean Supplemental Security Income (dollars)	9,152	(X)	9,431	(X)	10,782	(X)
With cash public assistance income	3,255,213	2.8	60,518	2.6	580	3.4
Mean cash public assistance income (dollars)	3,808	(X)	3,544	(X)	4,378	(X)
With Food Stamp/SNAP benefits in the past 12 months	14,339,330	12.4	312,330	13.2	2,156	12.5

Source: 2009-2013 ACS

Household Income

The table below shows the number and percentage of households at various income levels.

Table 9: Household Income Distribution

Household Incomes	Casa Grande # of Household	Casa Grande, %	Arizona, %	United States, %
Less than $10,000	467	3.8	5.5	4.7
$10,000 to $14,999	346	2.8	3.4	3.2
$15,000 to $24,999	1,131	9.1	8.7	8.1
$25,000 to $34,999	1,637	13.2	10.2	9.0
$35,000 to $49,999	2,572	20.7	14.3	13.1
$50,000 to $74,999	2,510	20.2	19.9	19.0
$75,000 to $99,999	1,751	14.1	13.9	14.3
$100,000 to $149,999	1,191	9.6	14.6	16.0
$150,000 to $199,999	550	4.4	5.0	6.3
$200,000 or more	250	2.0	4.5	6.2

Source: 2009-2013 ACS

The City has a fewer number of households with an income of less than $15,000 than the nation and state; indeed, only 6.6 percent of households, some 813 households, are below this figure. The percentage of households with incomes of less the $15,000 is below the national figure, so is the percentage of households with incomes of over $150,000 (6.4% in Casa Grande and 12.5% nationally). Casa Grande has slightly higher percentages in the income brackets between $35,000 and $49,000 and $50,000 to $74,999 than the State and Nation.

HUD has provided detailed data as part of its Comprehensive Housing Affordability Strategy materials to assist in preparing the Consolidated Plan and implementing HUD programs. HUD established five income categories for its analysis of incomes. The five income ranges are:

Extremely Low (0-30% of the median income),
Very Low-income (31-50% of the median income),
Low-income (51-80% of the median),
Moderate-income (81-100% of the median), and
Upper-income (100% and above of the median).

City of Casa Grande Income Limits

Table 10: 2015 Casa Grande Income Limits

Income Limits Category	Median HH Income, $64,000	Approximate # of HH	Approximate % of HH
<30% AMI	$ 19,200	1875	11.0
31-50% AMI	$ 32,000	2245	13.0
51-80% AMI	$ 51,200	3190	19.0
81-100% AMI	$ 64,000	2345	14.0
>101% AMI	$ 64,640	7210	43.0

SOURCE: HUD, Income Limit Documentation System

The table above shows the income distribution of households in the City. The 2015 Median Income figure for a family of four in Casa Grande, calculated by HUD, is $64,000.

By HUD's definitions, 7,310 (43%) of Casa Grande households are in the low income categories.

Table 11: Selected Income and Poverty Statistics			
	United States	Arizona	Casa Grande
Median HH Income ($)	$52,762	$50,752	$45,009
Per Capita Income ($)	$28,155	$25,358	$21,874

Source: 2009-2013 ACS

The percentage of Casa Grande's median household income is lower than the State by 12.75%, and the Nation by 17.22%.

Poverty is an issue in Casa Grande as 17.43 percent of the population had an income in the preceding twelve months that was above the established poverty level. It is 3.49% higher than the nation (13.94%). 14.94 percent of the elderly and 29.19 percent of persons under 18 are in this group, slightly higher than the nation (24.15%).

Table 12: Housing Issues and General Housing Characteristics

Housing Issues		Casa Grande	Arizona	United States
Substandard		1.24%	1.21%	1.27%
Overcrowded		4.46%	4.28%	3.17%
Household Pay >30%		36.26%	37.24%	36.14%
Demographics and General Housing Characteristics				
Poverty Rate (persons in poverty)	Slightly Higher	17.43%	15.84%	13.94%
<80% HAFMI		44.36%	37.17%	41.13%
Pop 65+		**14.94%**	13.59%	12.92%
Pop <18	Slightly Higher	**29.19%**	25.61%	24.15%
Renter Rate		34.05%	33.43%	33.87%
Median Owner Value		82.38%	106.02%	100.00%
Median Contract Rent	Lower	89.47%	102.77%	100.00%

Source: CDP Map

NOTE: HAFMI means HUD Area Family Median Income

Employment and Economic Data

Educational Attainment

Casa Grande's population has a high percentage of persons who graduated from high school, "with some college" categories, and "no degree". It also has a relatively higher percent of population with an Associate's degree (9.6%) than the State (8.3%) and Nation (7.8%), and a low percentage of persons with Bachelor's degree (11.8%) than the State (17%) and the Nation (18%). The percentage of persons with a Graduate or professional degree is almost a half less than State and the National percentage.

Table 13: Educational Attainment

EDUCATIONAL ATTAINMENT, (Population 25 and over)			
EDUCATIONAL ATTAINMENT	**United States, %**	**Arizona, %**	**Casa Grande, %**
Population 25 years and over	206,587,852	4,211,194	31,627
Less than 9th grade	5.9	6.4	6.5
9th to 12th grade, no diploma	8.0	7.9	7.9
High school graduate (includes equivalency)	28.1	24.5	30.4
Some college, no degree	21.2	26.0	27.9
Associate's degree	7.8	8.3	9.6
Bachelor's degree	18.0	17.0	11.8
Graduate or professional degree	10.8	9.9	5.9

Source: 2009-2013 ACS

Labor Force and Employment

The percentage of civilian labor force (persons 16 years and over) in Casa Grande was 46.31%, lower than the Nation (50.66%) and the State (47.46%), based on One CPD Map figures below.

	Result	For Casa Grande (Place)	For Pinal County	For Arizona State	NATION
General Indicators					
Unemployment Rate		9.21%	9.91%	8.92%	8.68%
Civilian Labor Force as % of Total Population	Lower	46.31%	40.45%	47.46%	50.66%
Average Commute Time (minutes)	**n/a**	20.6	32.1	24.7	2.5
Population	**n/a**	43,050	351,709	6,337,373	306,603,772
Median Hh Income	Much Lower	85.31%	97.06%	96.19%	100.00%
Age and Education					
Population Age 18–24		9.15%	7.89%	9.89%	9.95%
Population Age 25–64	Much Lower	46.71%	51.88%	50.90%	52.98%
HS equivalent or less	Much Higher	48.99%	47.37%	41.16%	43.73%
Some college		33.55%	36.10%	35.05%	30.56%
BA/BS or more	Much Lower	17.46%	16.53%	23.79%	25.71%

Source: One CPD map

Workers by Industry

The table below compares the employment by industry of Casa Grande's workers with those at the state and national level.

Casa Grande has a very high percentage of workers in the Educational services and health care and social assistance, in Arts, entertainment and recreation and accommodation and food services, Manufacturing and retail trade, and the Public Administration sector. As a regional hub and commercial center, the percentages of workers in the Information, Wholesale trade, and Transportation sectors are low. Education and Health Care Services, a very large employer in the city, is slightly below both State and national figures. As a community that values Agriculture, Casa Grande is slightly higher in percentage than the State and the Nation. Casa Grande is a self-sufficient City and is home to a number of manufacturing industries. It stands relatively higher than the Nation and the State.

Percentage of Workers by Industry			
INDUSTRY	United States,%	Arizona, %	Casa Grande,%
Civilian employed population 16 years and over	142,888,751	2,745,112	18,493
Agriculture, forestry, fishing and hunting, and mining	2.0	1.6	2.3
Construction	6.1	6.5	4.7
Manufacturing	10.5	7.5	12.8
Wholesale trade	2.7	2.4	2.2
Retail trade	11.6	12.2	10.0
Transportation and warehousing, and utilities	4.9	4.8	4.6
Information	2.1	1.8	3.5
Finance and insurance, and real estate and rental and leasing	6.6	8.0	5.7
Professional, scientific, and management, and administrative and waste management services	10.9	11.8	5.0
Educational services, and health care and social assistance	23.2	22.1	20.6
Arts, entertainment, and recreation, and accommodation and food services	9.5	10.7	13.9
Other services, except public administration	5.0	5.0	5.9
Public administration	4.9	5.7	8.9

Source: 2009-2013 ACS

The largest employers in Casa Grande, according to the City's Economic Development Website, are:

- Abbott Laboratories/ Ross Products Division
- ACO Polymer Products, Inc.
- Banner Casa Grande Medical Center
- Bull Moose Tube of Casa Grande (Metal tube manufacturer)
- Casa Grande Unified School District
- Casa Grande Dispatch
- City of Casa Grande
- Central Arizona College
- Erhmann/Commonwealth Dairy
- Daisy Brand (Dairy Products manufacturer)
- Diamond Plastics (Plastic tube manufacturer)
- Franklin Foods
- Frito Lay Inc.
- Hexcel
- Price Industries (Metal Fabricator)
- National Vitamin Company
- Sam's Club and Wal-Mart Distribution Center (Food distribution/warehousing)

Unemployment

The unemployment rate in Casa Grande (10.7%) is currently higher than both the State and National figures of 9.9 and 9.3 percent respectively.

UNEMPLOYMENT	United States	Arizona	Casa Grande
	2011-2013 Estimate	2011-2013 Estimate	2011-2013 Estimate
Percent Unemployed	9.3%	9.9%	10.7%

Source: 2011-2013 ACS

Housing

Housing Stock and Condition

Casa Grande has 21,576 housing units as of the 2009-2013 ACS figures. However, 4,297 units, 19.9 percent, are vacant according to the ACS figures. This figure is higher than the US 12.5 percent and the State's 17.1 percent. The Casa Grande homeowner vacancy rate (3.1%) is below both the state but slightly above the national and the rental vacancy rate (15.5%) is 5.5 percent higher than that of the State (10.0%) and significantly higher than the nation (7.3%). Please note that these are Census Bureau figures, not current data from local sources.

Housing Units by Type				
Housing Information Indicator	**Casa Grande Number**	**Casa Grande %**	**Arizona %**	**United States %**
Total Housing Units	21,576	100		
1-unit, detached	14624	67.8	63.3	61.7
1-unit, attached	542	2.5	5	5.8
2 units	134	0.6	1.4	3.8
3 or 4 units	634	2.9	3.4	4.4
5 to 9 units	672	3.1	4.4	4.8
10 to 19 units	1054	4.9	5.1	4.5
20 or more units	662	3.1	6.4	8.5
Mobile home	3116	14.4	10.7	6.5
Boat, RV, Van, etc.	138	0.6	0.4	0.1

Source: 2009-2013 ACS

Housing in Casa Grande is similar to the national norm in terms of the types of structures. Nationally, 61.7 percent of structures are one-unit structures and the percentage of multi-unit structures is around 26.0 percent. In Casa Grande 67.8 percent of structures are one-unit detached and about 14.6 percent are multi-unit structures. The City has fewer duplex and two through nine unit structures compared to the State and Nation. The table above shows the number and percent of each type of unit in Casa Grande and compares this to State and national percentages. The City has a slightly higher percenter of mobile homes (14.4 percent) than the State (10.7%) and the Nation (6.5%).

Number of Units by Room Size						
ROOMS	**United States**		**Arizona**		**Casa Grande**	
	Estimate	**%**	**Estimate**	**%**	**Estimate**	**%**
Total housing units	132,057,804	132,057,804	2,859,768	2,859,768	21,576	21,576
1 room	2,553,564	1.9	62,052	2.2	41	0.2
2 rooms	3,201,898	2.4	99,643	3.5	477	2.2
3 rooms	11,969,458	9.1	283,355	9.9	2,061	9.6
4 rooms	21,898,345	16.6	508,981	17.8	3,509	16.3
5 rooms	26,953,670	20.4	643,768	22.5	5,114	23.7
6 rooms	23,982,342	18.2	534,597	18.7	5,114	23.7
7 rooms	16,285,507	12.3	338,720	11.8	2,700	12.5
8 rooms	11,276,514	8.5	197,305	6.9	1,092	5.1
9 rooms or more	13,936,506	10.6	191,347	6.7	1,468	6.8
Median rooms	5.5	(X)	5.2	(X)	5.4	(X)

Source: 2009-2013 ACS

The table above shows the numbers of units by room size. Casa Grande shows that 47.4 percent of units are 5 to 6-bedrooms (10,228), the highest percent of the City's room sizes, but that there are only 41 small units (one bedroom) – 0.2 percent of housing units, which compares to 1.9 percent for the Nation is still lower. The percent of the 3-bedrooms units are almost similar with the State and Nation. Casa Grande is

slightly lower in percent of 4-bedrooms units than the State and Nation. There are 2,700 units of seven bedrooms (12.5% of the total) for large households, compared to 12.3% nationally. This indicates that it is cheaper to build larger houses in Casa Grande compared to the nation.

Thus, there would appear to be some balance between household size and availability of appropriately sized units. ACS figures show 735 housing units with overcrowding issues. Casa Grande at 4.46 percent is slightly higher than the national figure of 3.17 percent.

Result	Casa Grande, 735 units	Arizona	Nation
Issue = Overcrowding			
Overcrowded	4.46%	4.28%	3.17%

Source: CPD Map

The housing stock in Casa Grande is young. The table below shows the number of units built by decade in the City.

# of Units Built by Decade	United States		Arizona		Casa Grande	
	Estimate	%	Estimate	%	Estimate	%
YEAR STRUCTURE BUILT						
Total housing units	132,057,804	132,057,804	2,859,768	2,859,768	21,576	21,576
Built 2010 or later	771,765	0.6%	15,579	0.5%	216	1.0%
Built 2000 to 2009	19,385,497	14.7%	732,809	25.6%	10,764	49.9%
Built 1990 to 1999	18,390,124	13.9%	588,742	20.6%	3,070	14.2%
Built 1980 to 1989	18,345,244	13.9%	538,061	18.8%	2,454	11.4%
Built 1970 to 1979	21,042,566	15.9%	508,132	17.8%	2,046	9.5%
Built 1960 to 1969	14,634,125	11.1%	210,265	7.4%	1,254	5.8%
Built 1950 to 1959	14,464,282	11.0%	166,475	5.8%	1,173	5.4%
Built 1940 to 1949	7,231,811	5.5%	50,953	1.8%	328	1.5%
Built 1939 or earlier	17,792,390	13.5%	48,752	1.7%	271	1.3%

Source: ACS, 2009-2013

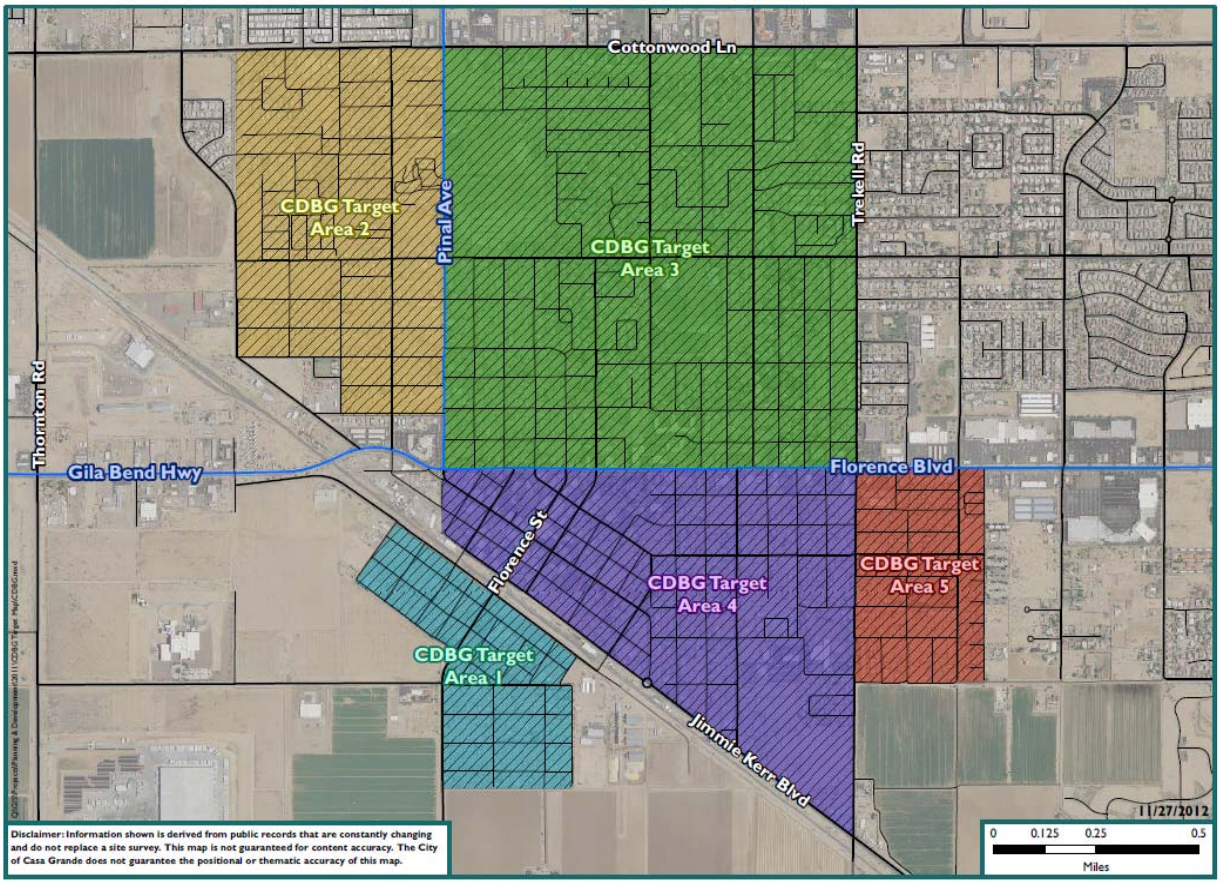
In the decade between 2000 or later over 10,980 housing units were built, 50.9 percent of the City's current total. In the decades between 1980 and 1999, 5,524 units (25.5% of the total) were constructed with an additional 4473 units (20.7% of the total) constructed in the 1950s and 1970s. Because of this surge in growth, the median construction date for housing units in Casa Grande is approximately 2000.

Thus, even though the housing stock is young overall, a significant number of units are over thirty years old (5,070 units or23.5%), and the need for maintenance and rehabilitation is increasing.

The condition of the housing stock in Casa Grande is considered to be fair for the most part. As noted, over one-half of the housing stock was built after 2000. Though housing problems are scattered throughout the City, the oldest part of the City noted as CDBG Target Areas 1 through 5 on the map below, still requires attention.

CDBG Target Area

Source: City of Casa Grande, GIS



Subject	United States		Arizona		Casa Grande	
SELECTED CHARACTERISTICS	Estimate	Percent	Estimate	Percent	Estimate	Percent
Occupied housing units	115,610,216	115,610,216	2,370,289	2,370,289	17,279	17,279
Lacking complete plumbing facilities	572,007	0.5%	17,932	0.8%	76	0.4%
Lacking complete kitchen facilities	1,025,964	0.9%	21,433	0.9%	77	0.4%
No telephone service available	2,825,796	2.4%	70,086	3.0%	424	2.5%

The table above shows that there are 153 units in the City that lack a complete kitchen and complete plumbing. These units represent 0.8 percent of the City's occupied housing units. The City's percentage of housing units lacking complete plumbing and kitchen facilities is slightly below that of the State and Nation.

Tenure

The tenure pattern in Casa Grande varies from the national norm. In Casa Grande, owner-occupied units constitute 69.3 percent of units while renter-occupied units comprise 30.7 percent of housing. Across the nation, the percentages are 64.9 percent owner-occupied and 35.1 percent renter-occupied. This may be due to a higher rate of retirees who consider Casa Grande as their home.

GROSS RENT	United States	%	Arizona	%	Casa Grande	%
Occupied units paying rent	**38,336,617**	**38,336,617**	**801,199**	**801,199**	**5,125**	**5,125**
Less than $200	*618,429*	*1.6*	*7,734*	*1.0*	*100*	*2.0*
$200 to $299	*1,248,924*	*3.3*	*12,938*	*1.6*	*204*	*4.0*
$300 to $499	*2,984,207*	*7.8*	*50,458*	*6.3*	*343*	*6.7*
$500 to $749	*8,358,370*	*21.8*	*195,072*	*24.3*	*1,256*	*24.5*
$750 to $999	*9,291,346*	*24.2*	*216,808*	*27.1*	*1,300*	*25.4*
$1,000 to $1,499	*10,067,165*	*26.3*	*233,816*	*29.2*	*1,588*	*31.0*
$1,500 or more	*5,768,176*	*15.0*	*84,373*	*10.5*	*334*	*6.5*
Median (dollars)	*904*	*(X)*	*896*	*(X)*	*857*	*(X)*
No rent paid	*2,197,899*	*(X)*	*41,615*	*(X)*	*184*	*(X)*
GROSS RENT as a % of HH Income (GRAPI)	**United States**	**%**	**Arizona**	**%**	**Casa Grande**	**%**
Occupied units paying rent (excluding units where GRAPI cannot be computed)	**37,452,651**	**37,452,651**	**777,532**	**777,532**	**5,118**	**5,118**
Less than 15.0 percent	4,355,942	11.6	90,208	11.6	360	7.0
15.0 to 19.9 percent	4,515,103	12.1	96,157	12.4	640	12.5
20.0 to 24.9 percent	4,671,489	12.5	102,436	13.2	704	13.8
25.0 to 29.9 percent	4,328,624	11.6	88,334	11.4	832	16.3
30.0 to 34.9 percent	3,403,489	9.1	69,876	9.0	479	9.4
35.0 percent or more	16,178,004	43.2	330,521	42.5	2,103	41.1

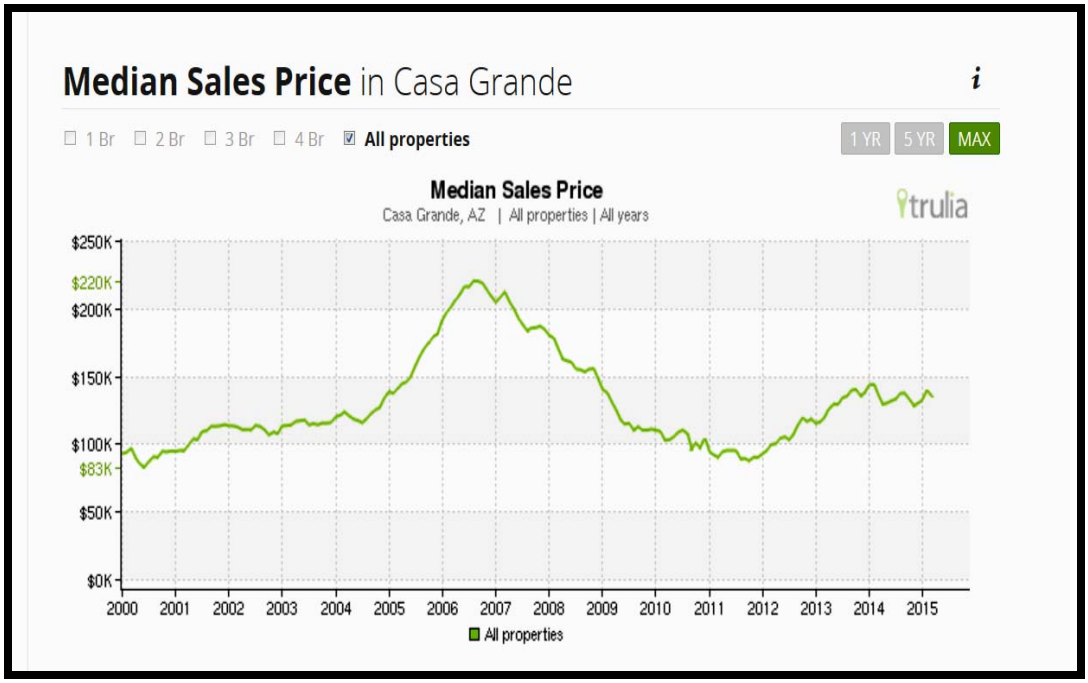
Source: ACS 2009-2013

Housing Cost, Cost Burden, and Affordability

According to the table above, the median rent in Casa Grande was $857 (ACS, 2009-2013), which was below the national median rent of $904. Despite the apparent equality of rents, the impact of this level of expense is that 41.1 percent of households spent 35.0 percent or more of their income for rent, a figure that places them in the "severely cost burdened" category. In addition, another 9.4 percent of households pay between 30 and 35 percent of income for housing, which places them in the "cost burdened" category.

Homeownership appears to offer a financial advantage in Casa Grande. ACS shows the median Casa Grande home was worth $113,400 in 2009-2013 compared to $176,700 for the United States, the median mortgage payment for a home in Casa Grande was $1,284 compared to $1,540 for the nation, per the ACS data. These figures imply that a Casa Grande homeowner is making a lower mortgage payment than the national figure for a home valued at about $63,300 less. 28.2 percent of Casa Grande homeowners were paying 35.0 percent or more for housing, compared to 27.1 percent nationally.

The demand for housing in Casa Grande followed the national trend and declined markedly after the housing "crash" in 2007, and only partial recovery, sale prices have continued a general decline.



Source: Trulia Market Trends, Casa Grande

Trulia Market Trends shows the median sales price for homes in Casa Grande AZ for December '14 to March '15 was $145,000 based on 191 homes sales. This represents an increase of 7.4%, or $10,050, compared to the prior quarter and an increase of 11.6% compared to the prior year. Sales prices have appreciated 38.1% over the last 5 years in Casa Grande. The average listing price for Casa Grande homes for sale on Trulia was $160,322 for the week ending March 25, 2015, which represents a decline of 4.3%, or $7,220, compared to the prior week and an increase of 1.6%, or $2,611, compared to the week ending March 4, 2015. There are currently 749 resale and new homes in Casa Grande on Trulia, including 305 homes in the pre-foreclosure, auction, or bank-owned stages of the foreclosure process. Average price per square foot for Casa Grande AZ was $110, a decrease of 2.7% compared to the same period last year.[3]

Using the rule of thumb that a house should cost no more than two and one-half times one's income, a family would need an income of $58,000 to afford a median priced home. The HUD median household income in Casa Grande is $45,009, meaning that a household at the median income level cannot afford the median priced home. An analysis of the income ranges presented above reveals that approximately 44 percent of households in Casa Grande have incomes below the $58,000 figure.

Household Incomes	Casa Grande # of Household	Casa Grande, %	Arizona, %	United States, %
Less than $10,000	467	3.8	5.5	4.7
$10,000 to $14,999	346	2.8	3.4	3.2
$15,000 to $24,999	1,131	9.1	8.7	8.1
$25,000 to $34,999	1,637	13.2	10.2	9.0
$35,000 to $49,999	2,572	20.7	14.3	13.1
$50,000 to $74,999	2,510	20.2	19.9	19.0
$75,000 to $99,999	1,751	14.1	13.9	14.3
$100,000 to $149,999	1,191	9.6	14.6	16.0
$150,000 to $199,999	550	4.4	5.0	6.3
$200,000 or more	250	2.0	4.5	6.2

Source: 2009-2013 ACS

[3] http://www.trulia.com/real_estate/Casa_Grande-Arizona/market-trends/

These income figures mean that it is more difficult for many households to meet monthly expenses, especially when housing costs more than 30% of their income, more difficult to save for a down payment for a home, and more difficult to qualify for a mortgage to purchase home, especially in light of the current tight lending market.

The National Low Income Housing Coalition (NLIHC) data shows that in Casa Grande, the Fair Market Rent (FMR) for a two-bedroom apartment is $957. In order to afford this level of rent and utilities – without paying more than 30% of income on housing – a household must earn $3,190 monthly or $38,280 annually. Assuming a 40-hour work week, 52 weeks per year, and this level of income translates into a Housing Wage of $18.40.[4]

According to the NLIHC, in Arizona, a minimum wage worker earns an hourly wage of $7.90. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner would have to work 93 hours per week, 52 weeks per year. Or a household must include 2.3 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable. In Casa Grande, it is reasonable to say that in order to afford or buy a house or rent a place at fair market rate, it requires at least two working individuals in a household or it will have to be subsidized based on income.

Public Housing

The City of Casa Grande does not have public housing program. This program is under the Pinal County Housing Authority. According to Pinal County Housing Authority, there are 203 families in the City utilizing the Section 8 program. Section 8 has a total of 730 families on the waiting list throughout Pinal County at the extremely low income level, and 72 at the very low income level. There are 24 public housing authority units located in the Casa Grande city limits. The increasing number of elderly and younger disabled persons creates additional need for accessible units.

Other Housing Facilities

According to Against Abuse, Inc., there are 32 beds in an emergency shelter for adults and women with children, 10 units (up to 23 people) of transitional housing for victims of violence, and 15-bed housing for displaced children who are wards of the State, in the City of Casa Grande. Against Abuse, Inc. manages these facilities. The Community Action Human Resources Agency (CAHRA) also manages the Emergency Shelter Services program that serves Pinal County. Families and individuals residing in Emergency Shelter Services program are followed up on a weekly basis in reference to their case plan activity; they must be actively working on a plan to obtain income and affordable housing and other barriers that they may encounter due to homelessness. Participants are required to follow the Emergency Shelter Services program responsibilities, and maintain compliance for continued assistance and case management services. Transportation is being provided to all available services and resources for employment activity search, and any other resources and service to meet objectives to reach goals.

[4] http://nlihc.org/sites/default/files/oor/2014-OOR-AZ_0.pdf

Fair Housing Legal Status

The U.S. Department of Housing and Urban Development (HUD) requires Community Development Block Grant (CDBG) entitlement grantees to submit each year a certification that they will affirmatively further fair housing (AFFH), and that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1964 and the Fair Housing Act of 1968. Title VIII of the Civil Rights Act of 1968, as amended, commonly known as the Fair Housing Act, prohibits discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability.

Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of HUD's housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act, which requires the Secretary of HUD to administer the Department's Housing and Urban Development Programs in a manner to affirmatively further fair housing[5].

Local entitlement communities meet this obligation by performing an "Analysis of Impediments to Fair Housing Choice (AI)" within their communities, developing strategies, and implementing actions to overcome these barriers based on their history, circumstances, and experiences. In other words, Casa Grande will define the problems, develop the solutions, and be held accountable for meeting its standards. This analysis identifies the impediments to fair housing choice in the jurisdiction, assesses current fair housing initiatives, and describes the actions the jurisdiction will take to overcome the identified impediments. Casa Grande as a new entitlement community is meeting its obligation to affirmatively further fair housing by:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Fair Housing Act prohibits any person, agencies, and local jurisdictions receiving Federal funds to:

- discriminate anyone in the nation,
- to be excluded from participation in,
- be denied the benefits of,

[5] U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13). March 1996.

- or be subject to discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability
- Or otherwise making unavailable or denying a dwelling to any person because of race, color, religion, sex, national origin, handicap, or familial status.

The City of Casa Grande incorporates Fair Housing in its Owner Occupied Housing Rehabilitation Program. Each year, the City Mayor at a regular City Council meeting, through a resolution, declares the month of April as a Fair Housing Month. The City provides the venue for the Fair Housing Training every month of April, and collaborates with Pinal County, Southwest Fair Housing Training Center, and other agencies dealing with housing-related activities, and/or funded with Community Development Block Grant (CDBG) monies. As an entitlement community, the City of Casa Grande will further the fair housing act in its implementation of the CDBG program.

Arizona Laws

It is the policy of the State of Arizona to provide, within constitutional limitations, fair housing throughout the state. The State of Arizona has a fair housing act (the Arizona Fair Housing Act) that carries the same protections as the Federal Fair Housing Act, and is designated as "substantially equivalent." The Civil Rights Division of the Arizona Attorney General's Office investigates and resolves housing discrimination complaints as well as providing education on fair housing. Additionally, the Arizona Department of Housing has an active role in the education and training of housing providers to ensure awareness of fair housing laws.

Under the Federal Fair Housing Assistance Program (FHAP), the U.S. Department of Housing and Urban Development (HUD) contracts with the Arizona Attorney General's Civil Rights Division to investigate and rule on fair housing cases. Nearly all complaints that are submitted to HUD and originate within Arizona, except for Phoenix, are processed by the Attorney General's office.

To initiate a complaint with the Arizona Attorney General a person must complete an intake complaint form, which is delivered to the Attorney General's office by mail, fax, or via the internet[6]. This form may be found on the Internet at: http://www.azag.gov/civil_rights/CivilRightsIntake.pdf.

Typically after receiving the complaint, the Attorney General will notify the alleged violator of the complaint, and that person must submit a response. The Attorney General will investigate the complaint and determine whether reasonable cause exists to believe that the Fair Housing Act has been violated.

If the Fair Housing Act has been violated, the Attorney General will try to reach a conciliation agreement with the respondent. If an agreement is reached, the Attorney General will take no further action on the complaint. If the Attorney General finds reasonable cause to believe that the discrimination occurred, and no conciliation is reached, the case will be heard in an administrative hearing within 120 days. The

[6] http://www.hud.gov/complaints/housediscrim.cfm.

case may be handled by the Department of Justice (DOJ) and heard in U.S. District Court if one of the parties so desires.

Individuals who believe they have been discriminated against in a housing transaction may also file a complaint with the HUD Enforcement Division in San Francisco. The first step in filing a complaint with HUD is to submit a Housing Discrimination Complaint form explaining the nature of the alleged violation. Housing discrimination complaint forms are available on the Internet at:
http://www.hud.gov/complaints/housediscrim.cfm.

A complaint form or additional information may also be obtained by calling the HUD Housing Discrimination Hotline at 1-800-669-9777, or by writing to the following address:

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity
Room 5204
451 Seventh St. S.W.
Washington, DC 20410-2000

A complaint may be resolved in a number of ways. First, HUD is required to try to reach an agreement between the two parties involved. A conciliation agreement must protect both the filer of the complaint and the public interest. If an agreement is approved, HUD will take no further action unless the agreement has been breached.

If HUD has determined that a state or local agency has the same housing powers ("substantial equivalency") as HUD, it may refer the complaint to that state or local agency and notify the complainant of the referral. The agency, called a Fair Housing Assistance Program Partner (FHAP), must begin work on the complaint within 30 days or HUD may take it back. As noted, the Arizona Attorney General's Civil Rights Division is the state agency FHAP in Arizona.

If, during the investigative, review and legal process, HUD finds that discrimination has occurred, the case will be heard in an administrative hearing within 120 days, unless either party prefers the case to be heard in Federal district court.

If HUD adjudicates the case, HUD lawyers will litigate the case for the complainant before an Administrative Law Judge (ALJ). If the ALJ decides that discrimination occurred, the respondent can be ordered:

- To compensate for actual damages, including humiliation, pain, and suffering.
- To provide injunctive or other equitable relief; for example, to make housing available.
- To pay the federal government a civil penalty to vindicate the public interest.
- To pay the maximum penalties of $10,000 for a first violation, $27,500 for a second offense, $50,000 for a third violation within seven years.
- To pay reasonable attorney's fees and costs.

There are two other laws that do not directly address fair housing, but which do deal with housing issues. The first is the Arizona Landlord and Tenant Act, which details the rights of both tenants and landlords

with respect to rental property, while the second, the Arizona Mobile Home Landlord & Tenant Act, deals specifically with mobile homes.

Three significant changes to the Fair Housing Act were made. These changes are described briefly as follows:

1. The Housing for Older People Act of 1995 (HOPA) made several changes to the 55 and older exemption. Since the 1988 Amendments, the Fair Housing Act has exempted from its familial status provisions properties that satisfy the Act's 55 and older housing condition. First, HOPA eliminated the requirement that 55 and older housing have "significant facilities and services" designed for the elderly. Second, HOPA establishes protection from damages for persons who in good faith believe that the 55 and older exemption applies to a particular property, if they do not actually know that the property is not eligible for the exemption and if the property has formally stated in writing that it qualifies for the exemption.

2. Changes were made in the Act to enhance law enforcement, including making amendments to criminal penalties in section 901 of the Civil Rights Act of 1968 for violating the Fair Housing Act.

3. Changes were made to provide incentives for self-testing by lenders for discrimination under the Fair Housing Act and the Equal Credit Opportunity Act. See Title II, subtitle D of the Omnibus Consolidated Appropriations Act, 1997, P.L. 104 - 208 (9/30/96)1. In addition, it is also illegal for anyone to threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right and advertise or make any statement that indicates a limitation or preference based on race, color, religion, national origin, familial status or handicap. Both intentional discrimination and unintentional actions or conditions that limit choice are also prohibited.

City of Casa Grande Ordinance

The City of Casa Grande unlike some cities in Arizona does not currently have a fair housing ordinance, however, the City declares the month of April as Fair Housing Month by adopting a resolution.

Casa Grande citizens, who felt discriminated against, may contact the following:

Southwest Fair Housing Council,
2030 E. Broadway Blvd. Suite 101,
Tucson, AZ 85719,
Phone: 520-798-1568; Toll Free: 1-888-624-4611, TTY: 520-670-0233.

Scope of Analysis

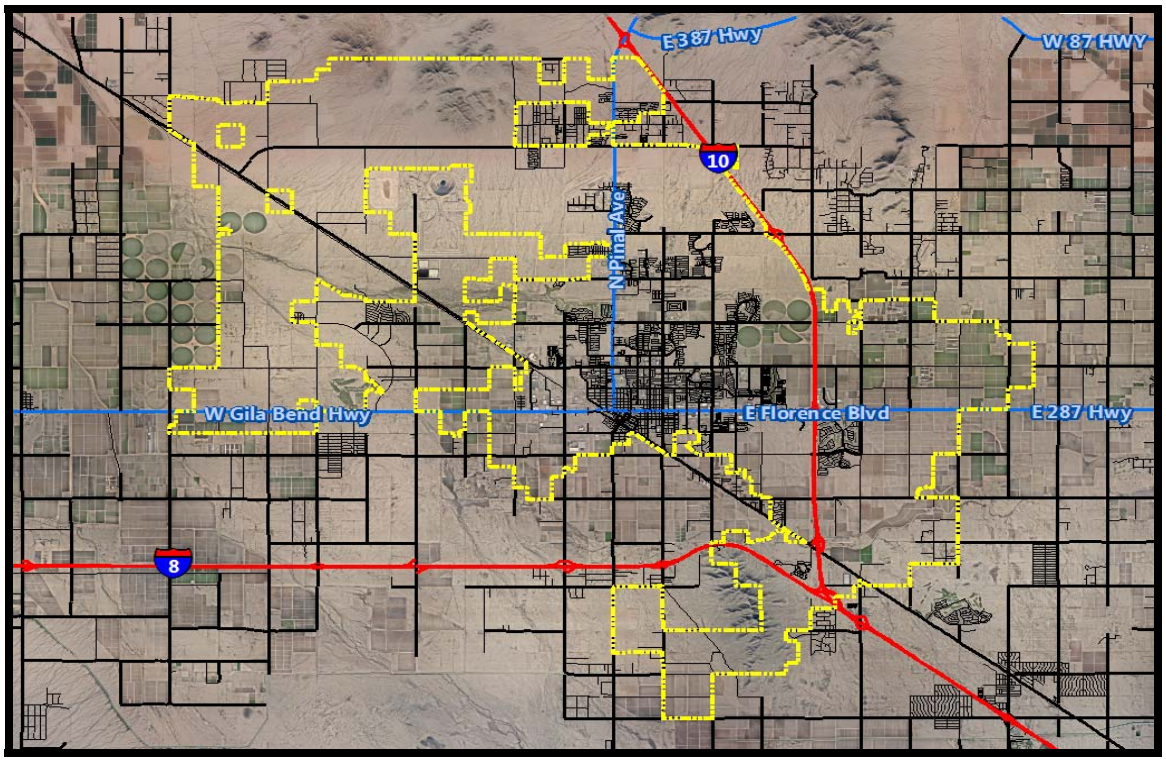
This Analysis of Impediments (AI) to Fair Housing Choice provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual's or a household's access to housing. The AI involves:

- A comprehensive review of the laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws, regulations, policies, procedures, and practices affect the location, availability, and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choice.

Geographic Area Covered

The geographic area covered with this AI is the city limits of Casa Grande.

The yellow line indicates the city lines of Casa Grande, approximately 110 sq. miles in area.



Source: City of Casa Grande, GIS

Discrimination against Families with Children and Persons with Disabilities are further defined:

<u>Discrimination against Families with Children</u>

The Fair Housing Act also prohibits discrimination against families with children (familial status), unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with:

- A parent
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.

Exemption: Housing for older persons is exempt from the prohibition against familial status discrimination under the following conditions:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a Federal, State or local government program or

- It is occupied solely by persons who are 62 or older or
- It houses at least one person who is 55 or older in at least 80 percent of the occupied units, and adheres to a policy that demonstrates intent to house persons who are 55 or older.

A transition period permits residents on or before September 13, 1988, to continue living in the housing, regardless of their age, without interfering with the exemption.

Discrimination against families with children manifests itself in many ways, the most common of which are in advertising (e.g. indications that rentals are for "no children" or "adults only"), restrictive occupancy standards that unreasonably limit the number of children who may occupy a given space, and steering of families with children to separate buildings or parts of buildings.

Provisions for People with Disabilities

Access to housing is crucial to our security and independence. Federal law prohibits any discrimination in housing - in sales, rental, financing and other housing related transactions – based on disability. It also mandates accessible housing for people with disabilities.

Nonetheless, people with disabilities often encounter barriers in finding accessible and affordable housing.

The Fair Housing Act defines a person with disability as someone who has the following:

- Physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities
- A record of such a disability or
- Is regarded as having such a disability

Impediments to Fair Housing Choice and Plan of Action

Fair Housing prohibits anyone to take any of the following actions based on disability:

In the Sale and Rental of Housing:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting)
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing
- Advertise or make any statement that indicates a limitation or preference based on disability
- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right

In Mortgage Lending:

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

In Accommodations:

- Refuse to allow tenants to make reasonable modifications to dwelling or common use areas, at the tenant's expense, if necessary for a disabled person to use the housing. (Where reasonable, the landlord may permit changes only if the tenant agrees to restore the property to its original condition upon leaving.)
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing[7].

[7] *Adapted from* **"Fair Housing--It's Your Right" from HUD**

Special Protections

In addition to providing people with disabilities all of the protections against housing discrimination that are provided to members of the other six protected classes, the following provisions of the Fair Housing Act provide important additional protection.

The prohibition against discriminating in the terms and conditions of sale or rental prohibits a landlord from asking any questions of a person with a disability that would not be asked of any other applicant. A landlord may not, for example, inquire about the nature or severity of a person's disability or ask whether that person is capable of living alone.

Reasonable Accommodations

It is unlawful to refuse to make such reasonable changes in rules, policies, practices and services, which may be necessary to afford a person with a disability an equal opportunity to enjoy and use a dwelling. These "reasonable accommodations" include such things as making an exception to a "no pets" policy for a person who needs a service animal and providing a reserved, designated parking place for a person with mobility impairment.

Reasonable Modifications

It is unlawful to refuse to permit a person with a disability to make, at his/her own expense, such reasonable changes in the premises as may be necessary to permit use and enjoyment of the premises. "Reasonable modifications" include such things as installing grab bars to facilitate use of bathroom facilities, cabinets lowered or the widening of a doorway to accommodate a wheelchair.

Full Accessibility of "New" Multi-family Housing

Multi-family housing constructed for first occupancy after March 13, 1991 (i.e. buildings consisting of 4 or more units) must be fully accessible to people with disabilities. If a building has an elevator, all units must be accessible; if there is no elevator, only "ground floor" units must be accessible. "Accessible" means:

1. There must be an accessible building entrance on an accessible route;
2. Public and common use areas must be readily accessible to and usable by people with disabilities;
3. All inside doors must be wide enough to accommodate a wheelchair;
4. There must be an accessible route into and through the dwelling;
5. Light switches, electrical outlets, thermostats and other environmental controls must be accessible;
6. Bathroom walls must be reinforced to allow later installation of grab bars; and
7. Kitchens and bathrooms must have enough space to permit maneuvering in a wheelchair.

OBSERVATIONS

Several key points relevant to potential impediments to fair housing emerge from the preceding discussion. While not definitive indicators of impediments to fair housing choice in and of themselves, they point to conditions or situations that may create impediments. These points are:

- Despite an improving economic base, 43% of the population is in the low-income categories as defined by HUD. Affordability is a problem for almost one half of the City's homebuyer population.

- 41.1% of the population who are renters are paying over 35% of their household income for housing cost, which is a "severely cost burdened" category. Affordability is also a problem for the City's renter population.

- Despite the abundance of single family detached, there is still a prevailing need for housing rehabilitation in the older neighborhoods and an increasing need for maintenance and rehabilitation of both rental and owner units as almost one-fourth of the properties (5,070 units) are now 30 years old or older.

- The City has a high percentage of senior persons living alone, thus a demand for smaller and accessible housing units, yet the supply of one to two rooms housing units is relatively low.

- A trend of grandparents that are responsible for their grandchildren is emerging; most of these grandparents have fixed incomes and female householders, thus a demand for more social services and programs to be available to them.

Lending and Complaint Data; Advertising

This section of the AI evaluates lending practices in Casa Grande, using information from banking oversight agencies, and complaint data from local, state, and federal organizations and agencies, as well as an assessment of advertising practices.

HOME LOAN ACTIVITY

Background

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. The State of Arizona in conjunction with their 2015 AI, partnered with the South West Fair Housing Council (SWFHC) to come up with an analysis of loan activities in the State outside the metropolitan areas. The analysis includes the rural areas and non-entitlement communities in the State. The results are difficult to apply to Pinal County or Casa Grande in particular. Although this analysis was not specific to Casa Grande, it is interesting to note how one race fair with another in terms of obtaining loans for the purchase or refinancing of their homes in the general rural areas of Arizona.

SWFHC commissioned the National Community Reinvestment Coalition (NCRC) to conduct a portfolio and market share analysis using 2013 Home Mortgage Disclosure Act (HMDA) data for the State of Arizona with the following specifications: all single family lending, loans to owner-occupant, and first lien loans. All single-family loans include loans for home purchase and refinances. The lending patterns were compared to the demographics of the metropolitan area to illustrate potential lending disparities. Key points from that analysis are provided below and shown in italics.

> *The Share Analysis of All Single Family Lending in Arizona shows that Hispanic or Latino borrowers applied for far fewer loans than their population size would suggest. While 21% of all households in Arizona consisted of Hispanics, this borrower group received just 12% of all applications and 11% of loans during 2013 and at 11.4% the number of sub-prime loans made to Latinos was nearly four times as high as the percentage of sub-prime loans made to whites, see Table 1b, Appendix A*
>
> *The Hispanic population of Arizona has a median age of just 25.4 years, while the non-Hispanic median age is 41.4 years old. This may explain the starkly different*

observations in our HMDA analysis for Hispanic households, as far fewer of them will be at a point where they are ready for homeownership[8].

African-American and Asian borrowers comprised just 4% and 2% of Arizona households, yet their numbers are sufficient to draw some information from. For example, the loans made to black households fall far below the size of their population suggest at just 0.51 times as often non-Hispanic whites. Asian householders are more likely to secure a mortgage loans than non-Hispanics whites. This trend is not unique for Arizona, but should be monitored for disparate impact nonetheless.

This analysis indicates that residents of high minority tracts are more likely to be denied or receive a sub-prime loan. This is consistent with other research on the topic, which found that tract level minority and income were highly correlated with the kinds of lending, regardless of the attributes of the borrower in terms of race or income[9].

The report also included the Denial Disparity Analysis of All Single Family Home Lending in Arizona whereby, Hispanic borrowers were 1.34 times as likely to be denied single-family loans, as were White borrowers. Furthermore, African-Americans were 1.39 times more likely to be denied a single-family loan than White applicants. About 18% of all Hispanics and African-American loan applications were denied in Arizona, while just 12% of non-Hispanic White applicants saw their applications declined, see Table 1c and Chart 1c located in Appendix B_.

Furthermore, the report implied that Low-Mod Income applicants were slightly more likely to be denied a single family loan than the Middle-and Upper-Income borrowers, see Table 2c and Chart 2c. This again reinforces the idea that borrower characteristics are of minimal importance. More study is indicated in this area.

This is a recent data, as noted, includes the entire rural areas and non-entitlement areas in Arizona. For these reasons, the findings should be viewed with some reservation.

Furthermore, HMDA data provides some insight into the lending patterns that exist in a community. However, HMDA data is only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices. HMDA data lacks the detailed information on loan terms or specific reasons for denial to make conclusive statements.

HOUSING DISCRIMINATION COMPLAINTS

As described earlier, there are a number of organizations and agencies with oversight in the area of fair housing and discrimination in housing. This section of the Analysis of Impediments will review and assess information about housing discrimination complaints and reports on housing opportunity in Casa Grande.

According to the Arizona Attorney General's Office, in the past seven years, there were eleven complaints received because of disability and only one because of race. The data cover the period January 2008 to September, 2014, and are the most recent and complete available. The table below shows those complaints by year and by basis for the complaint, see Table 4, Appendix _D.

[8] Annual Estimates of the Resident Population by Sex, Age, Race, and Hispanic Origin for the Nation and Arizona: April 1, 2010 to July 1, 2013 Source: U.S. Census Bureau, Population Division Release Date: June 2011

[9] Wyly, E., Hammel, D., & Atia, M. (2004). Capital is the Landlord: Class-Monopoly Rent and New Geographies of Subprime and Predatory Mortgage Lending. In 34th Annual Meeting of the Urban Affairs Association.

A complaint may be filed on multiple grounds, so the number of complaints often exceeds the number of cases filed. The number of cases filed peaked in 2011 with one-half of the total filings coming in that year. The previous years (2009-2010), however, there were no filings noted.

The largest number of filings was on the basis of Disability. The number of Disability Basis cases was even across the period, roughly one per year. There was one Race Basis case file. The City is not aware of any fair housing complaints in the past two years. Any complaints registered with the City would be forwarded to the Southwest Fair Housing Council for action.

The Arizona Attorney General's Office is responsible for the administration of fair housing complaints in Arizona. Since the Attorney General is the administrator for fair housing issues, the data below obtained from the Attorney General's Office is the accurate and current data.

The information above was derived from the Office of the State Attorney General, which included all of the complaints of violations of the Arizona Fair Housing Act that occurred in Casa Grande file with the Arizona Civil Rights Division (Division). The complaints are broken down by year and the basis for the complaint (i.e., the protected class cited by the complainant). The attached chart does not include fair housing complaints filed directly with HUD that were not referred to the Division for investigation.

These data do not capture the totality of fair housing conditions in Casa Grande. Not all fair housing problems are recorded or come to light as fair housing complaints.

REAL ESTATE ADVERTISING

This assessment of fair housing practices in Casa Grande included a review of a number of sources containing advertisements for housing, both for sale and rental. Overall, there does not appear to be any attempt to exclude or discriminate against any of the protected classes.

Four real estate publications were found outside restaurants and shopping areas. These were "Pinal Real Estate Buyer's Guide," "After 55.com", "A Senior Housing & Care Resource", "Dandy Dime Classifieds," and "The Real Estate Book". An examination of all four showed that the fair housing logo or fair housing language was present in each.

A review of the listings for Casa Grande in Casa Grande Dispatch, a local newspaper, showed a number of fair housing logos and "Equal Housing Opportunity" languages on the classified ads section of the paper.

It should be noted that upon going to the real estate broker's site (as opposed to the individual property listing) the fair housing logo was often present, usually at the bottom of the page. In reviewing ads for homes for sale and for apartments, the reviewer noted that few of the sites, such as Realtors.com or homes.com contained a fair housing logo or language. Some property management agencies in the City do not have a fair housing logo or language on their website. It was also noted by the reviewer that majority of the realtors websites provided a fairly small size fair housing logo located at the bottom of the page. However, among all the realtors' website visited by the reviewer, only Century 21 website has a section on the home page for Fair Housing Statement.

OBSERVATIONS

- The number of complaints for the period 2008-2014 under review was modest.
- There was no clear sign of discrimination in the language or illustrations of housing

advertising in the real estate both hard copies and online sites.

Public Policies and Practices

LAND USE – ZONING – BUILDING CODE

From a regulatory standpoint, local government measures to control land use through zoning often define the scope and density of housing resources available to residents, developers, and other organizations within certain areas. Examples of zoning provisions that most commonly result in impediments to fair housing choice include the following:

- Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, or that require large lot sizes that deter affordable housing development.
- Restrictive definitions of "family" that impede unrelated individuals from sharing a dwelling unit.
- Placing administrative and siting constraints on group homes for persons with disabilities.

The City of Casa Grande regulates land development activities within its jurisdiction through the Casa Grande Zoning Ordinance (Title 17 of the Code), the Building and Construction Code (Title 15), and the Subdivision Regulations (Title 16). The Zoning Ordinance was adopted under the authority granted by the State to local municipalities to regulate land use. (A.R.S. § 9-462.01.) The Zoning Code was last revised in the late 80s. Some parts of the zoning code needs updating to be in line with new planning common practices, new development trends, and other regulatory updates from the State and Federal level. The Zoning Code and other design standards should also be consistent with the City's General Plan as it is amended and updated. The City's General Plan was adopted by the citizens of Casa Grande in 2009. The General Plan has spatial form and design, density and intensity, and some land use designs that are not common in the 80s. This causes some difficulties in the implementation and achieving the type of developments that would benefit the low to moderate income population. After the late 1990s, most developments in Casa Grande are processed through the planned area development approach, whereby, the developer or landowner can create their own "zoning code" to meet their development needs.

Public policies established at the local level can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. Fair housing laws are designed to encourage an inclusive living environment and active community participation.

Arizona law requires municipalities to prepare General Plans, including a Housing Element. This element establishes a goal of ensuring that all residents have access to adequate and affordable housing. The General Plan may also include a housing opportunities objective to provide quality housing and a range of housing size, cost, and density that should be provided in each community, to make it possible for all who work in the community to also live in the community. In these Plans local governments evaluate the composition and quality of the community's housing stock, the age and condition of housing, the cost of housing, the needs of households that are cost burdened, the relationship of local housing costs and availability to the socioeconomic characteristics of these households and special housing needs in the community.

The City's 2020 General Plan, approved by the City Council in July of 2009, and voted on by the citizens of Casa Grande in November of 2009, contains a housing element. The housing element

contains visions of the City, to have a community of sufficient and appropriate housing mix to meet the needs of residents, and a community that invests in neighborhood revitalization. One of the goals in the General Plan is to provide a variety of housing choice for all income levels, generations, and household demographics. Another goal is the implementation of the CDBG program to maintain vitality of mature neighborhoods. The policy of the City is to continue the City's efforts to rehabilitate housing and replace substandard units using federal, state and local funds. It is the policy of the City is to meet housing needs of senior citizens, by encouraging different levels of residential care homes in accessible locations, close to demanded facilities and amenities.

The City also has a Building Code and a Zoning Code, which serve to protect the public interest and create safe and sanitary living conditions. However, both can affect fair housing choice. Inspection costs permit fees, and higher quality construction requirements tend to drive up the cost of housing. Requirements for various kinds of building permits also increase the cost of a housing unit. Similarly zoning requirements that define or exclude certain types of housing can reduce the opportunity to develop a range of housing choices for individuals across the community.

The fair housing equation is balanced on one end with equal access and on the other end with a range of housing choice. To ensure fair housing choice in a community, a zoning ordinance should provide for a range of housing types, including single-family, multi family, second dwelling units, mobile homes, licensed community care facilities, employee housing for seasonal or migrant workers, assisting living facilities, emergency shelters, and transitional housing. Single and multi-family housing types include detached and attached single-family homes, duplexes, townhomes, condominiums, and rental apartments, as well as accessory units.

The Building Code for the City is based upon the 2012 edition of the International Building Code, amended to meet the specific needs of the City. As such, it incorporates policies, procedures and standards that are widely accepted and do not adversely affect housing choice.

The City Code for Casa Grande permits this range of development and permits a range of housing in a range of areas within the City. Manufactured housing is permitted in certain areas, as are accessory units and group living arrangements. The standards do not restrict accessibility in particular. The current code does address a number of terms, such as "disabled" and "family," and in doing so avoids issues that could possibly impact housing choice. It should be noted that the Code does not mention universal design principles (UDP).

TRANSPORTATION

Transportation from housing to work, to services, and to shopping is an essential part of fair housing. Persons without automobiles, persons with disabilities, the elderly, and many others need access to reliable and convenient transportation.

VEHICLES AVAILABLE	Nation	Percent	Arizona	Percent	Casa Grande	Percent
Occupied housing units	**115,610,216**	**115,610,216**	**2,370,289**	**2,370,289**	**17,279**	**17,279**
No vehicles available	10,483,077	9.1%	162,993	6.9%	979	5.7%
1 vehicle available	39,051,590	33.8%	901,830	38.0%	7,238	41.9%
2 vehicles available	43,402,846	37.5%	905,700	38.2%	6,471	37.5%
3 or more vehicles available	22,672,703	19.6%	399,766	16.9%	2,591	15.0%

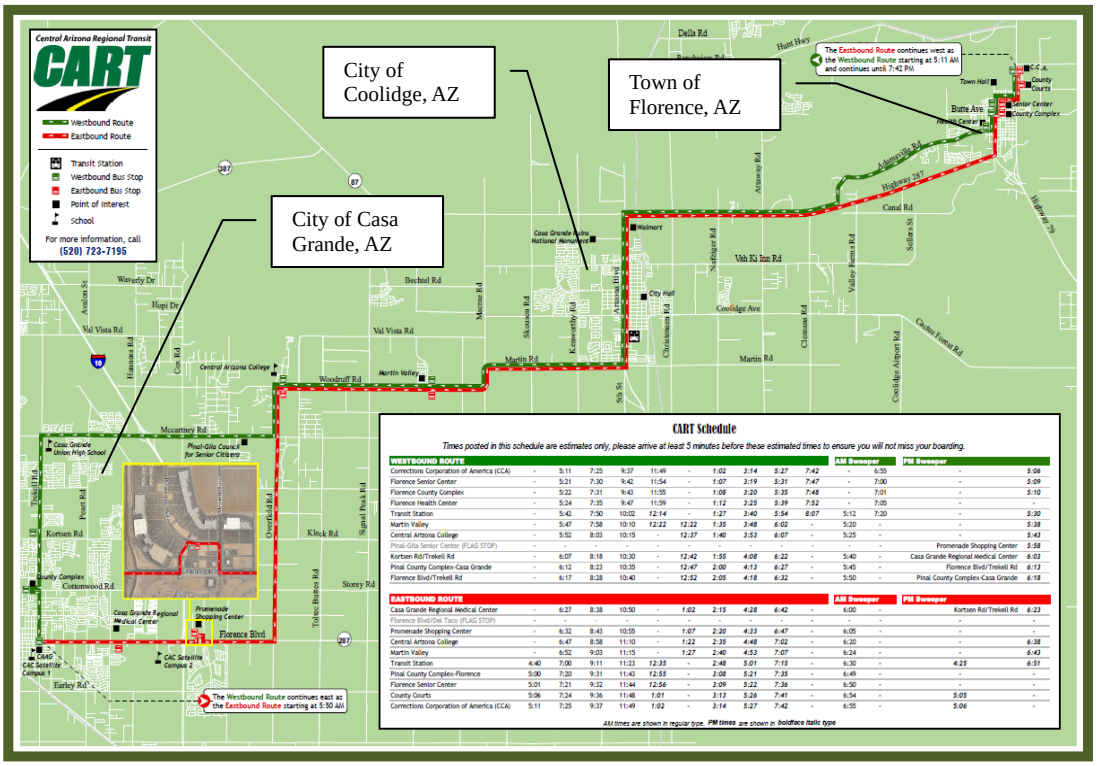
Source: 2009-2013 ACS

DRAFT

As shown on the table above, Casa Grande's percentage of no vehicle available is slightly lower (5.7%) than the Nation which is 9.1%, and the State at 6.9%. However, the City's percentage of 1 vehicle available is 8.1% higher than the Nation, and 3.9% higher than the State. In reviewing the percentage of housing units with 3 or more vehicles available, the City is 4.6% lower than the Nation and 1.9% lower than the State. A clear indication that the families in Casa Grande have transportation challenges.

Casa Grande has no public mass transit system. The closest transit system is operated and managed by the Town of Coolidge, called Cotton Express. Cotton Express serves the Town of Coolidge, Pinal County, Town of Florence and the City of Casa Grande on a limited defined route. It complies with Title VI of the Civil Rights Act of 1964 and service will be provided without regard to race, color, national origin, age, sex or disability. The service has routes that run from Monday through Friday, between 5:00 AM and 7:30PM, covering the central Pinal County area and connecting the County offices, Central Arizona College, the Promenade Regional Mall at Casa Grande, and the Banner Hospital, see route below.

The City of Coolidge has operated a public transit system for 25 years in the city limits of Coolidge. Rural Public Transit has been on the Arizona Department of Transportation's (ADOT) radar for many years now in Pinal County. The Arizona Department of Transportation (ADOT) has finally become able to make a move with the Cotton Express transit system to expand transit on a regional level across Pinal County, thus the route now includes Casa Grande and the Town of F



OBSERVATIONS

1. The City's General Plan emphasizes in its Goals and Visions, to have a community of sufficient and appropriate housing mix to meet the needs of residents, and a community that invests in neighborhood revitalization.

2. The City's Building and Development Codes do not limit fair housing.

3. The City's Zoning Code needs updating.

4. Planned Area Development Zoning districts required amenities for recreational purposes to encourage the residents to walk and have connectivity between neighborhoods and its amenities such as parks and open spaces.

5. The City has no public transit system addressing local public transportation needs; however, the City has Senior Meals Programs in collaboration with the Pinal-Gila Council for Senior Citizens – Area Agency on Aging, United Way of Pinal County, Administration on Aging, and ADOT. The Meals on Wheels program provides meals to homebound citizens in the community. The City also has a senior center provided with a mini-bus transportation to help transport individuals 50 years of age or older and for those 18 years of age or older with a disability. Rides are available to and from the Senior Center, doctor appointment, shopping trips, etc. For more information on receiving meals, contact Pinal-Gila Council for Senior Citizens at (520) 424-2800.

6. The City has numerous group homes, nursing homes, residential facilities that comply and meet city code for accessibility and safety.

7. The City does not have a policy or code that encourages segregation of people due to color, age, race, origin, and familial status.

Public Engagement

As with the development of the Consolidated Plan, this Analysis of Impediments to Fair Housing Choice (AI) results from a process of consultation and public participation, building upon existing participation mechanisms and venues. Citizens, not-for-profit organizations, and interested parties were afforded a variety of opportunities to:

- contribute during meetings, hearings and planning sessions,
- review and comment upon the participation plan, the Analysis of Impediments, and comments made about the Analysis,
- participate in public hearings,
- comment upon the plan and its amendments, and
- register complaints about the Analysis of Impediments and its amendments.

The City complied with the public participation requirements of the regulations by doing the following:

- Preparing, adopting, and following a Public Participation Plan (PPP);
- Publishing informational notices about the document;
- Holding public hearings in accessible places at convenient times after providing reasonable notice;
- Publishing a summary of the Analysis, describing its contents and purpose and a listing of locations where the entire document could be examined;

- Making the Analysis available for public examination and comment for a period of fifteen (15) days before submission to HUD;
- Providing citizens, public agencies, and other interested parties reasonable access to records regarding uses of assistance for affordable and supportive housing the City may have received during the preceding five years; and
- Considering the views and comments of public, and preparing a summary of those views for consideration with the submission.

The City considers the involvement of its low- and moderate-income residents to be essential to the development and implementation of its Five-Year Consolidated Plan and Annual Action Plans.

As noted in the PR-10 Consultation in the Consolidated Plan, publicized public hearings were held on two occasions. The first meeting was held on February 18, 2015 at the City's Len Colla Recreation Center and was shortly followed by the second meeting which was held on March 17, 2015 at the Seeds of Hope Community Center. Both public meetings were scheduled at 5:30pm. These sessions were part of a concerted effort to obtain as much public input as possible in the preparation of the Plan.

The City also conducted three focus group meetings on the 21st, 27th and 29th of January 2015. These were held at either the City Hall Council Chambers or the City's Parks and Recreation facility. Representatives from community social service organizations, housing developers, homeless advocates, realtors, educators and government departments were invited to attend. Active participation by attendees at the meeting provided insight into community needs.

The City also developed a Web-based community discussion regarding CDBG (available through the City's Qualtrix survey) in order to obtain additional public input. The survey was available on the City Website January 28 until March 12, 2015. The City received 438 responses which were used in determining goals and priorities, identifying and assessing needs.

The City ensures that all Public Hearings were held at times and locations convenient to potential and actual beneficiaries and with accommodations for persons with disabilities. Moreover, upon request, in advance of the meeting, the City made accommodations for those individuals in need of special assistance. The City also provided technical assistance workshops for any person, or persons, interested in the program.

Public Meetings/Hearings

The City staff held publicized public meetings on two occasions – on February 11, 2015 and March 17, 2015. Both were held at locations accessible to the low and moderate income neighborhoods. A public hearing was held at the time of a City Council meeting, May 4, 2015. These sessions were part of a concerted effort to obtain as much public input as possible in the preparation of the Consolidated Plan and the AI.

Focus Groups

A kick off meeting held on December 11, 2014 included 28 various stakeholders invited to the meeting. Three focus group meetings were also held in the two separate venues, the City Council Chambers on January 21, 2015, and at the Parks and Recreation Building on January 27 and 29, 2015. Representatives from community social service organizations, housing developers and advocates, and government departments were invited to attend. Active participation by attendees at the meeting provided insight into fair housing issues and concerns.

Consultation and Public Participation Schedule

Dates	Times	Meetings Proposed	Location and General Purpose
Monday, November 18, 2014		Sent Invitations to Focus Group	Send invitation to select Focus Group for the Kick Off meeting.
Thursday, December 11, 2014	2:00 p.m.	Kick-off Meeting Consultation and Public Participation	**Parks and Recreation Building,** Bobcat and Coyote Rooms, 404 East Florence Blvd., Casa Grande, AZ 85122 **Kick-off meeting and Introductions**. *Introducing the CDBG Entitlement Process*
Wednesday, January 21, 2015 Tuesday, January 27, 2015 Thursday, January 29, 2015	2:00 p.m. 2:00 p.m. 2:00 p.m.	Consultation with Focus Group: **SOCIAL SERVICES** Consultation with Focus Group: **HOUSING AND HOMELESS SERVICES** Consultation Focus Group: **COMMUNITY DEVELOPMENT**	**City Hall Council Chamber,** 510 E. Florence Blvd., Casa Grande *Job training, Meals, Education, Day Care, Mental Health, Medical Health, etc.* **Parks and Recreation Building, Bobcat Room,** 404 E Florence Blvd., Casa Grande, AZ 85122 *Homelessness, Permanent Housing (Renter and Owner)* **Parks and Recreation Building, Bobcat Room**, 404 East Florence Blvd., Casa Grande *Utility/Infrastructure, Streets/Sidewalks/Lights, Parks/Recs/Trails/Open Space, Economic Development)*
Tuesday, February 17, 2015	5:30 p.m.	Public Meeting #1	**Len Colla Recreation Center,** 1105 East Fourth Street, Casa Grande Summary of Comments /Background Issues.
Wednesday, March 11, 2015	5:30 p.m.	Public Meeting # 2	**Seeds of Hope Community Center at Albert Cruz Park,** 1491 N. Crane St., Casa Grande Summary of Comments /Background Issues.
Monday, April 20, 2015	5:00 p.m.	Council Work Session	**Council Chamber, City Hall,** 510 E. Florence Blvd., Casa Grande
March 16 – April 16, 2015			**30 day Public Review and Comment Period**
Monday, May 4, 2015	7:00 p.m.	Public Hearing	Approval of the Plan by City Council, **City Hall, 510 E. Florence Blvd., Casa Grande, AZ**
Thursday, May 14, 2015			Deadline to submit Consolidated Plan to HUD
July 1, 2015			HUD approves plan

Online Survey

Consolidated Plan also included a survey sent out to the focus groups, available on the City's Website, Facebook, and Twitter social media to allow a greater and convenient participation of the public. Public meetings or hearings are noticed in the local newspaper and are posted on public bulletin boards, and on the City website. Consultation with City Staff and elected officials were also part of the Public Participation Plan (PPP).

The City also developed a Web-based community discussion regarding CDBG (available through the City's Qualtrix survey) in order to obtain additional public input. The survey was available on the City Website January 28 through March 12, 2015. The City received 483 responses which were used in determining goals and priorities.

Focus Group Discussions

When asked about fair housing and housing discrimination in Casa Grande, the group did not identify any problems or issues. However, staff with the Housing Division of the City sometimes hears complaints from individuals regarding their rental units. Concerns from individuals about their rental units vary from not having sufficient cooling and heating system to plumbing and electrical issues, and holes on their floors. Some Tenants feel that they are being discriminated against due to the age or disability. Staff provides them with information and refers them to the Fair Housing number with the Arizona Department of Housing (602-771-1000), the Southwest Fair Housing Council (888-624-4611), or the AZ Attorney General's office (1800-352-4557), and the Southern Arizona Legal Aid, Inc. (520-316-8076 or 877-718-8086).

The most important point the group raised was that the public needed more education about and awareness of fair housing.

Some members of the group did not feel that fair housing or housing discrimination were issues in Casa Grande, though it was noted there should be more housing facilities for homeless veterans, or more housing assistance to the veterans who are struggling to keep their homes. Another concern was the presence of some homeless people who are regularly pan-handling and stands in medians of major roadways, which is a pedestrian safety issue.

The consensus among the participants in all sessions was that housing discrimination is not much of an issue.

OBSERVATIONS

- The key point that emerges from the preceding discussion is that the residents involved in these discussions do not see housing discrimination as a major issue in Casa Grande, though there is a need to enhance the awareness of the public on Fair Housing.

Fair Housing Practices

This section provides an overview of the institutional structure of the housing industry in governing the fair housing practices of its members. The oversight, sources of information, and fair housing services available to residents in Casa Grande are described and their roles explained.

OVERSIGHT ORGANIZATIONS & ENFORCEMENT PROCESSES

Residents of Casa Grande are protected from housing discrimination by federal and state laws. These laws are enforced by agencies at each level and persons have a number of alternatives for seeking assistance if they feel they have been discriminated against. At the federal level, the Department of Housing and Urban Development and the Department of Justice have enforcement authority. Reports and complaints are filed with these agencies, and the Department of Justice may take legal action in some cases. Typically fair housing service providers work in partnership with HUD and state agencies to resolve problems. However, in some cases where litigation is necessary, the case may be 1) resolved via administrative filing with HUD or the state 2) referred for consideration to the Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section; or 3) referred to a private attorney for possible litigation.

The Arizona Fair Housing Act (AFHA) of 1991 (ARS § 41.1491) provides the same protections as the Federal Fair Housing Act (FHA), but different procedures for administrative complaint processing. In addition, the AFHA brought the Arizona Landlord and Tenant Act into compliance with the State Fair Housing Statute.

The City of Casa Grande does not currently have a fair housing ordinance, but implements and furthers the fair housing act in the Owner Occupied Housing Rehabilitation Program.

As noted above, there are a number of avenues a Casa Grande resident can take to file a complaint. Under the Federal Fair Housing Assistance Program (FHAP), the U.S. Department of Housing and Urban Development (HUD) contracts with the Arizona Attorney General's Civil Rights Division to investigate and rule on fair housing cases. These types of complaints include alleged violations under the Fair Housing Act (Title VIII) and other HUD programs (Section 504 of the Rehabilitation Act of 1973, American with Disabilities Act of 1990, etc.). In addition, a citizen may contact the Southwest Fair Housing Council at (888-624-4611).

Local government officials, in agreeing to accept CDBG funds, certify that they will "affirmatively further fair housing". While the law does not specify what type of action recipients must take, it is clear that local government recipients are obligated to take some sort of action to affirmatively further the national goal of fair housing. The City keeps records that reflect all recipients take one or more actions to affirmatively further fair housing.

Coordination & Supervision in the Homeownership Market

Many agencies are involved in overseeing real estate industry practices and the practices of the agents involved. A portion of this oversight involves ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the lending market, the real estate market, and some of their policies, practices, and programs are described.

Federal Financial Institutions Examination Council (FFIEC)

The Federal Financial Institutions Examination Council (FFIEC) was established on March 10, 1979, pursuant to title X of the Financial Institutions Regulatory and Interest Rate Control Act of 1978 (FIRA), Public Law 95-630. In 1989, title XI of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA) established The Appraisal Subcommittee (ASC) within the Examination Council.

The Council is a formal interagency body empowered to prescribe uniform principles, standards, and

report forms for the federal examination of financial institutions by the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC), and the Consumer Financial Protection Bureau (CFPB) and to make recommendations to promote uniformity in the supervision of financial institutions. To encourage the application of uniform examination principles and standards by the state and federal supervisory authorities, the Council established, in accordance with the requirement of the statute, an advisory State Liaison Committee composed of five representatives of state supervisory agencies. In accordance with the Financial Services Regulatory Relief Act of 2006, a representative state regulator was added as a voting member of the Council in October 2006.

The Council is responsible for developing uniform reporting systems for federally supervised financial institutions, their holding companies, and the nonfinancial institution subsidiaries of those institutions and holding companies. It conducts schools for examiners employed by the five federal member agencies represented on the Council and makes those schools available to employees of state agencies that supervise financial institutions.

The Council was given additional statutory responsibilities by section 340 of the Housing and Community Development Act of 1980 to facilitate public access to data that depository institutions must disclose under the Home Mortgage Disclosure Act of 1975 (HMDA) and the aggregation of annual HMDA data, by census tract, for each metropolitan statistical area (MSA).

National Association of Realtors (NAR)

The National Association of Realtors (NAR) is America's largest trade association, involved in all aspects of the residential and commercial real estate industries. NAR membership is composed of residential and commercial REALTORS®, who are brokers, salespeople, property managers, appraisers, counselors and others engaged in all aspects of the real estate industry, which are pledged to a strict Code of Ethics and Standards of Practice which imposes obligations upon realtors regarding their active support for equal housing opportunity. Realtors work for property owners. They are trained and developed professionally in real estate industry.

Arizona Association of Realtors (AAR)

The Arizona Association of Realtors is a trade association of realtors statewide. As members of the Association, realtors follow a strict code of ethics. The Association provides fair housing information on its website, offers Fair Housing classes, education on ethics, professionalism, and professional standards, as well as the diversity course mentioned above. The Association also maintains a roster of instructors on key topics including fair housing and legal issues.

Arizona Department of Real Estate Commission

The Arizona Department of Real Estate is the licensing authority for real estate brokers and salespersons. The Department has adopted education requirements that include courses in ethics and fair housing. To renew a real estate license, each licensee is required to complete continuing education, including ethics and fair housing issues.

Coordination & Supervision in the Rental Market

A number of agencies are involved with the apartment rental process and related practices. This oversight includes ensuring that fair housing laws are understood. The following organizations have limited oversight within the rental housing market.

The National Apartment Association (NAA) serves the interests of multifamily housing owners, managers, developers and suppliers. As a federation of more than 170 state and local affiliates, NAA is comprised of over 63,000 members representing more than 7 million apartment homes throughout the United States and Canada. The organization offers a range of courses and information on fair housing issues, including domestic violence, housing design standards and the elderly. In addition, the organization provides a Fair Housing Library for its members.

The Arizona Apartment Association Inc. is a non-profit statewide trade association affiliated with the National Apartment Association and local associations. The group represents rental housing providers in legislative, legal and regulatory matters, and provides services, products, educational programs and networking opportunities to its members.

National Association of Residential Property Managers (NARPM) is an association of real estate professionals who are experienced in managing single-family and small residential properties. NARPM promotes the standards of property management, business ethics, professionalism, and fair housing practices within the residential property management field. NARPM certifies members in the standards and practices of the residential property management industry and promotes continuing professional education. NARPM offers designations to qualified property managers and management firms, and these certifications require educational courses in fair housing practices.

Other Entities

There are other organizations that are involved in fair housing activities, though not as supervisory organizations, but rather as advocacy organizations.

The Arizona Center for Disability Law is a federally-designated Protection and Advocacy System for the State of Arizona. Protection and Advocacy Systems (P&As) throughout the United States assure that the human and civil rights of persons with disabilities are protected. In creating Protection and Advocacy Systems, Congress gave them unique authorities and responsibilities, including the power to investigate reports of abuse and neglect and violations of the rights of persons with disabilities. The Center is authorized to pursue appropriate legal and administrative remedies on behalf of persons with disabilities to insure the enforcement of their constitutional and statutory rights, including fair housing issues.

The Arizona Fair Housing Center (AFHC) is a private not-for-profit civil rights advocacy organization whose mission is to eliminate housing discrimination. The Center engages in a range of outreach and education efforts on fair housing. The Center also investigates some complaints, makes referrals to attorneys and government agencies, and provides technical assistance to government agencies, housing providers, and social service agencies.

The Southwest Fair Housing Council (SWFHC), based in Tucson, Arizona, is a non-profit agency funded by memberships, donations, HUD, the Arizona Department of Housing and CDBG funding. The SWFHC also receives funding through HUD's Fair Housing Initiatives Program (FHIP) to assist people who believe they have been victims of housing discrimination. The SWFHC will use its FHIP grant to conduct an array of enforcement and education and outreach activities, and other fair housing assistance throughout the state. The SWFHC works to affirmatively further fair housing and overcome identified impediments to fair housing choice for protected classes throughout the state, and collaborates with two Fair Housing

Assistance Program (FHAP) agencies: the Arizona State Attorney General's Office and the City of Phoenix's Department of Equal Opportunity to address Arizona's fair housing needs.

SWFHC provides a variety of services directed toward education and enforcement of fair housing laws, including: investigating individual complaints of housing discrimination; obtaining evidence to support enforcement action by public agencies conducting legal or administrative actions; initiating complaints and litigation to serve fair housing goals; making presentations at community meetings and special events; conducting conferences, training programs, and seminars to inform housing professionals about housing laws; and providing information and referrals for persons and families with housing needs.

Arizona Fair Housing Partnership is a statewide coalition of government agencies, housing industry representatives, nonprofit organizations, social service agencies and housing advocates who support and promote equal fair housing opportunities.

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RECOMMENDATIONS AND PLAN OF ACTIONS

Background

This section summarizes the key findings of the AI document, and makes recommendations for actions to eliminate impediments to fair housing choice in Casa Grande. This information is as comprehensive as possible, and there likely remain a number of additional remedies to these and other problems faced by home seekers.

Housing discrimination continues to occur, and manifests itself in different ways among different segments of the population. Since it continues to be the goal of the City to eliminate any existing discrimination and prevent future housing discrimination and other impediments to equal housing opportunity, the recommendations provided below provide a guide to ensure fair access to housing for all City residents.

This 2015 AI analyzes recent data, identifies the private and public sector conditions that foster housing discrimination, and provides recommendations for dealing with the fair housing issues identified. Based upon research in statistical materials, a review of HMDA and complaint data, and focus group discussion, the following is a list of key potential impediments identified in Casa Grande. Each impediment below is followed by recommendations to address and eliminate that impediment.

It should be noted that in some instances, it is necessary to strike a balance among issues. Land use policies and requirements and development standards, although sometimes adding costs to construction or rehabilitation, are necessary for the safety and health of residents.

It should also be noted that Casa Grande appears to have a low incidence of housing discrimination. The issue brought only minimal response when raised at meetings, and also showed minimal incidence reported based on the report from the Office of the Attorney General.

IMPEDIMENT ONE – Need for Increased Awareness, Outreach and Education

Casa Grande has an active fair housing program. However, discussions indicate a lack of knowledge about fair housing law, policies, and practices. The need for on-going education, awareness, and outreach remains, especially among lower income households and minorities.

Recommendations:

1) Conduct City sponsor training sessions and information campaigns especially among rental property owners and managers, as well as apartment owner associations, and management companies in coordination with the South West Fair Housing Council and Pinal County Housing Authority.

2) Update Fair Housing information regularly and make it available to the citizens of Casa Grande.

3) Provide Fair Housing materials and educational programs in Spanish, especially in neighborhoods and communities with high percentages of Spanish-speaking persons.

IMPEDIMENT TWO – LIMITED SUPPLY OF AFFORDABLE HOUSING

As discussed earlier, affordability is an indirect aspect of housing discrimination and it is difficult to talk about addressing impediments to fair housing, and actions to eliminate discrimination in housing, without simultaneously talking about development of policies, plans, programs, and projects to increase the supply of affordable housing.

Earlier sections of this Analysis addressed the issue of affordability. Suffice to say that even moderate-income households face challenges in purchasing a home in Casa Grande, and low-income families face a significant cost burden for rental housing.

Recommendations:

Continue to use all available federal and state funding resources and programs to address high priority housing needs for rehabilitation, preservation, and development of affordable units.

1) Continue to work with community based organizations, affordable housing developers, and housing advocacy groups to increase the supply of accessible housing units, and leveraging resources to the extent possible.

2) Continue owner occupied housing rehabilitation program to maintain the City's base of affordable units and, if possible, expand housing rehabilitation programs to rental units.

3) Research other affordable housing programs for additional ideas and practices.

4) Continue to seek incentives to promote developers constructing a wide range of housing types at a number of price points, considering transportation, employment centers and the availability of services and shopping in their planning.

5) Housing for special needs populations and minorities should be scattered throughout the City, yet close to amenities.

IMPEDIMENT THREE – GOVERNMENT POLICIES

This impediment deals with issues relating to the development of land including housing that is available to a wide range of persons and income levels in disparate locations. This goal is affected by a wide range of factors, some of which are beyond the ability of the City to change. However, the City can address some issues, as noted below.

Recommendations:

1) Encourage the use of universal design principles[10] in new housing developments.

2) Ensure that local zoning ordinances and building codes properly address issues of concern with respect to higher density housing, persons with disabilities, and group homes/congregate living/community care.

3) Seek new or additional incentives, as noted in Impediment Two, to get developers to undertake affordable projects or to include affordable units in market rate projects.

[10] http://en.wikipedia.org/wiki/Universal_design#The_Principles_of_Universal_Design

4) Develop policies and regulations that encourage the provisions of affordable housing.

IMPEDIMENT FOUR – AWARENESS OF POTENTIAL DISCRIMINATION

The review of demographic information does not provide a clear indicator of housing discrimination among persons in the protected classes. However, statistical data can assist in identifying potential problems and topics of concern.

In the current economy and given the structure of the City's housing stock, the incidences of discrimination may focus on rental housing, and the focus of efforts in the immediate future should be upon aspects of discrimination in the rental market, and upon some groups within the protected classes.

In particular, potential discrimination affecting one protected class should be noted.

- Disabled persons may face discrimination or difficulties in finding appropriate units because of the small number of small units and the costs of building or adapting units.

Recommendation:

1) Increase housing choice alternatives for the disabled and families with children by encouraging the construction of affordable, and especially rental, housing.

IMPEDIMENT FIVE – LACK OF PUBLIC TRANSPORTATION WITHIN THE CITY

The development pattern of the City is not as compact as it should have been to encourage walking to job sites, medical appointments, and other amenities. The developed areas within the city limits (110 square miles) are difficult for an individual without a vehicle or a family of four with only one vehicle to find jobs which requires transportation.

Recommendations:

1) Continue to strongly support and implement the Growth Area Map within the City's General Plan 2020 to ensure an orderly development in the City which will help minimize development cost from infrastructure installation.

2) Consider a partnership among local government, state, federal and large employers to look for alternative funding sources to provide transportation to work.

3) Collaborate with the City of Coolidge to find ways to connect with their regional transit route and a future local transportation system.

IMPEDIMENT SIX – LACK OF ASSISTANCE FOR HOMEBUYERS

There is a percentage of the population who has less perfect credit scores or no credit history, who wanted to own a home. Going through the traditional lending process is much harder route for these individuals to obtain a housing loan due to more stringent lending regulations. These potential home buyers needed some assistance either for closing, down payment and/or slight repairs of the home.

Recommendations

1) Establish a homebuyer assistance program similar to the Neighborhood Stabilization Program designed to revitalize the neighborhoods.

2) Establish a Revitalization Program in older neighborhoods.

3) Acquire units that are foreclosed in older neighborhoods, and fix the unit to meet code.

4) Place a family that is income qualified through a direct loan or deferred loan process in order to assist the family in owning a unit.

5) Conduct an inventory and assessment of all City boarded-up houses and focus the Neighborhood Revitalization Program on those boarded homes.

6) City Staff directs or assists clients with not enough credit but has affordability to own a home.

7) Collaborate with other non-profit agencies.

Plan of Action

The City's Plan of Action for 2015 includes initiatives to further fair housing choices and increase access to housing and housing programs and services.

HUD requires that the City conduct an analysis of impediments to fair housing choice and to take appropriate actions to overcome the effects of any impediments identified through the analysis. This is the City's first Analysis of Impediments to Fair Housing Choice, and includes:

1) a demographic, income, housing, employment, education, and public transportation profile of the community,

2) an assessment of fair housing law, municipal policies, and complaint analysis,

3) results of focus group sessions and community engagement, and

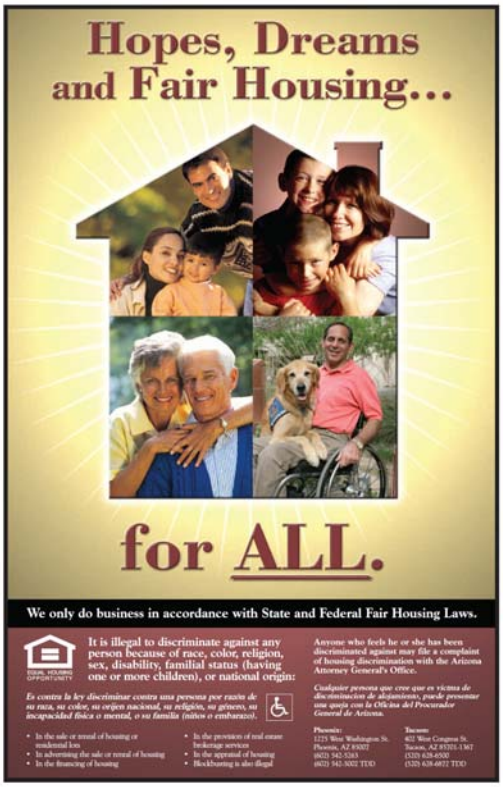
4) a review of home mortgage disclosure and fair housing complaint data.

In addition, the City will do the following:

1. display current posters, ad, and notices concerning fair housing at City Hall
2. provide literature about fair housing at reception areas in City Hall
3. declare April as a fair housing month and continue to partner with Pinal County Housing Authority and South West Fair Housing Council in conducting a Fair Housing Training
4. report any fair housing issues to the Arizona Attorney General's Office, and
5. include fair housing issues in its Comprehensive Annual Performance and Evaluation Reports, though the City has had nothing to report in recent years.

Conclusion

The City of Casa Grande Community Development and Housing Division has limited authority and capacity to enforce the Fair Housing Act. The State of Arizona Attorney General's Office has this responsibility. Therefore, the identification of impediments to fair housing choice and Plan of Action was limited to those areas that are within Casa Grande's jurisdiction. However, within the parameters that City will operate, it will have a significant impact in improving fair housing choice in the community. The key points in the Plan of Action include the following:



- The continuation of partnership among agencies such as Pinal County Housing Authority and the SWFHC to provide fair housing education and outreach to both housing providers and housing consumers in the Pinal Central area.

- The enhancement of awareness on Fair Housing through brochures and information available to citizens of Casa Grande.

- Requiring that all federally funded projects funded by CDBG include a strategy to affirmatively further fair housing and a plan for monitoring and enforcing this requirement.

- Requiring that all sub-grantees with CDBG funding through Casa Grande will coordinate with the City's Planning Division to obtain information on zoning and land use to ensure that the proposed project conforms to the City's General Plan and meets zoning and development requirements.

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APPENDICES

Appendix A

Table 1b. Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race							
White	136,437	7,065	143,502	95.1%	4.9%	1.00	1.00
White, Non Hispanic	115,010	4,645	119,655	96.1%	3.9%	1.01	0.79
Black or African American	2,950	241	3,191	92.4%	7.6%	0.97	1.53
Hispanic or Latino	17,467	2,255	19,722	88.6%	11.4%	0.93	2.32
Asian	4,760	131	4,891	97.3%	2.7%	1.02	0.54
Total**	219	43	262	83.6%	16.4%	0.88	3.33

Share Analysis of All Single Family Lending in Arizona

Source: SWFHC

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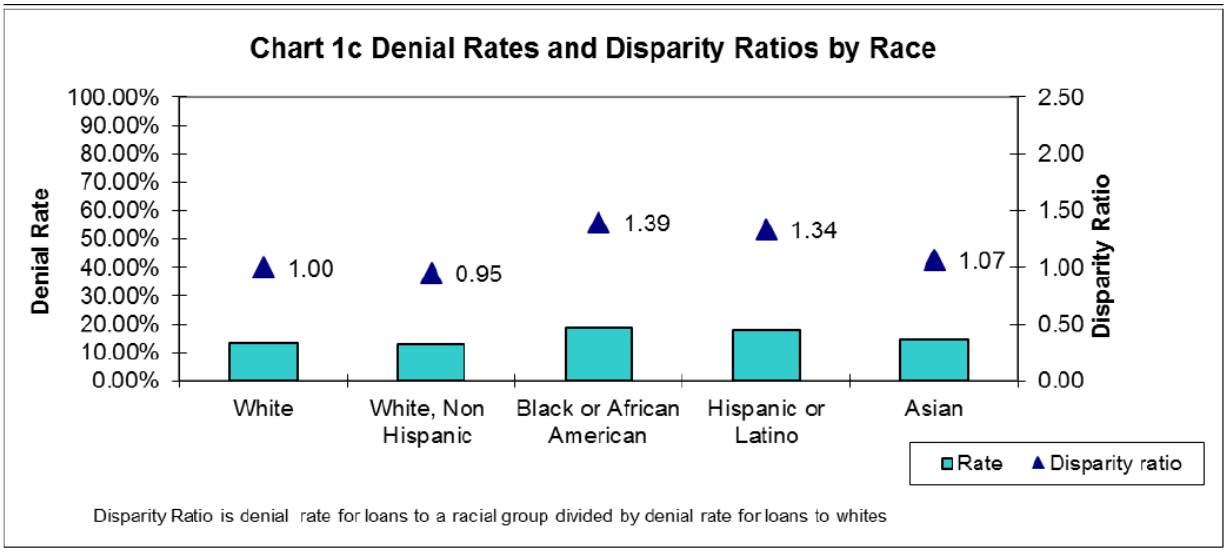
Appendix B

Table 1c. Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race				
White	210,387	28,308	13.46%	1.00
White, Non Hispanic	173,032	22,174	12.81%	0.95
Black or African American	5,286	992	18.77%	1.39
Hispanic or Latino	31,785	5,724	18.01%	1.34
Asian	7,492	1,080	14.42%	1.07
Total**	263,820	4,325	100.00%	

Notes

"Total" refers to total of all races, which includes races in addition to the four included in this analysis. Therefore, the "Total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and the number of households.



Source: SWFHC

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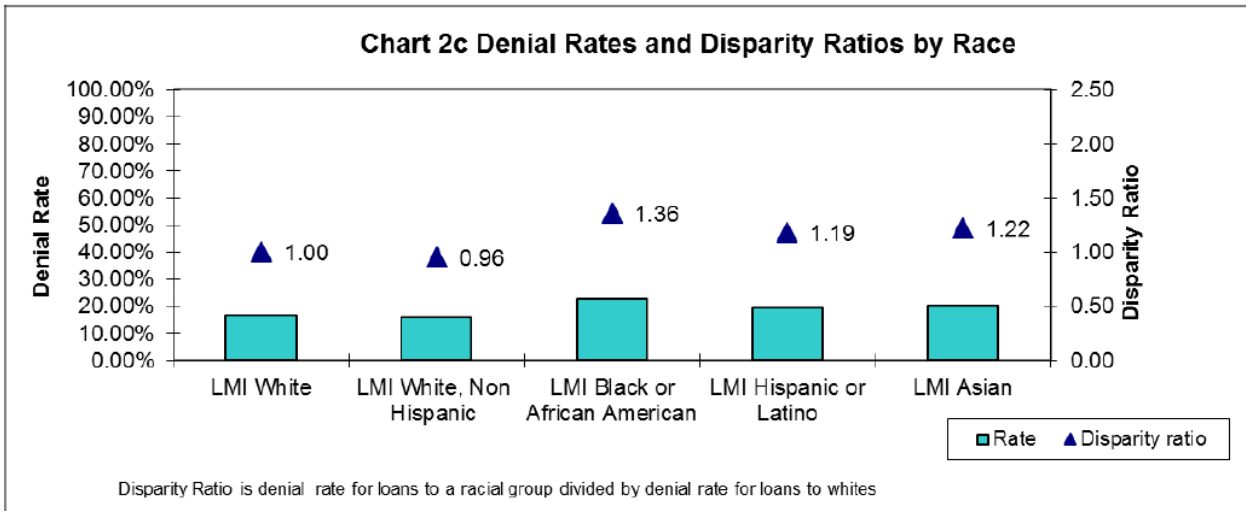
Appendix C

Table 2c. Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race & Income Level				
LMI White	55,813	9,240	16.56%	1.00
LMI White, Non Hispanic	41,222	6,527	15.83%	0.96
LMI Black or African American	1,514	342	22.59%	1.36
LMI Hispanic or Latino	14,549	2,857	19.64%	1.19
LMI Asian	1,781	360	20.21%	1.22
LMI Total[1]	67,997	11,929	17.54%	

Source: SWFHC



Source: SWFHC

Appendix D

Table 4: Fair Housing Complaints Files, Casa Grande, 2008-2014

File Date	Race	Color	National Origin	Disability	Familial Status	Sex	Religion	Retaliation
2008	0	0	0	1	0	0	0	0
2009	0	0	0	0	0	0	0	0
2010	0	0	0	0	0	0	0	0
2011	0	0	0	4	0	0	0	0
2012	1	0	0	2	0	0	0	0
2013	0	0	0	2	0	0	0	0
2014	0	0	0	1	0	0	0	0
Totals	**1**	**0**	**0**	**10**	**0**	**0**	**0**	**0**

Source: AZ Attorney General's office