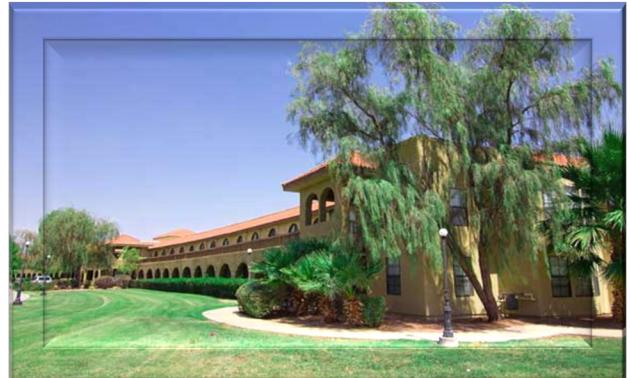


# City of Casa Grande

## Analysis of Impediments to Fair Housing Choice

### April 2025



# Introduction

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## **Executive Summary**

It is the intent of the City of Casa Grande, as a Community Development Block Grant (CDBG) entitlement community to comply with the Federal Fair Housing Act by affirmatively furthering fair housing. The Analysis of Impediments 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.

The Analysis of Impediments to Fair Housing Choice (AI) identifies barriers to equitable housing access and outlines strategies to overcome them. Achieving fair housing is a complex challenge due to housing affordability, market dynamics, and supply and demand.

This process involves identifying impediments, taking corrective action, and maintaining records to affirmatively further fair housing.

Fair Housing ensures all individuals regardless of race, color, religion/creed, sex, national origin, physical/mental disability, retaliation, or familial status, have equal opportunities to access housing without discrimination.

## **Fair Housing**

HUD requires Entitlement Community Development Block Grant communities certify they will affirmatively further fair housing with the Consolidated Plan submission. HUD "is committed to eliminating racial and ethnic discrimination, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing."

## **Impediments to Fair Housing Choice**

HUD defines "Impediments 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*

## **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** are 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 Housing**

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

- ❖ *Decent, safe housing costs no more than 30% of a household's total monthly gross income for utility and rent or mortgage payments.*

### **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 people 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 people, particularly people 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. The 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 5-Year Consolidated Plan for 2025-2029.*
- ❖ *An online survey of approximately 889 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.*

## **Data Sources Used in this Analysis**

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

- ❖ 2023 American Community Survey
- ❖ The City's Consolidated Plan, 2025-2029
- ❖ The City's 2030 General Plan
- ❖ Comprehensive Housing Affordability Strategy (CHAS) Data from HUD
- ❖ Pinal County Housing Authority
- ❖ Sources of specific information are identified in the text, tables and figures.

# **JURISDICTIONAL BACKGROUND DATA**

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This is the City's report analyzing the impediments to fair housing choice. It is imperative to know its geographical location, the composition of people that live in the area, the types of income and jobs available, and the practices of fair housing choice for its residents, 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 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.

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 is the most populous community in Pinal County with 48,571 residents. In 2013, the Census estimated the City's population to be 50,111. In 2023, ACS reports the population to be 63,737.

The city limits of Casa Grande currently encompass over 110 square miles of developed and undeveloped land. The City's Planning Area covers 274 square miles. Most of the 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 much 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. 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, and Lucid, electric car manufacturing. Central Arizona College provides higher education in the area.

## ***Population***

The population of the city is now estimated to be 63,737 persons according to the 2023 Census American Community Survey (ACS). Today, Casa Grande has grown by 152% from the 2000 Census (25,224). Casa Grande is one of the largest cities in Pinal County, Arizona.

## ***Race***

The City's racial makeup consists of 59.2% white; 4.7% Black or African American; 3.1% American Indian and Alaskan Native; 1.8% Asian; 20.8% from two or more races; and 43.1% were Hispanic or Latino of any race. Of those residents that classified themselves as Hispanic or Latino, 39% of all residents categorize their Hispanic or Latino heritage as Mexican.

## ***Age***

Casa Grande has a slightly younger population than the State. The median age according to the 2023 American Community Survey for Casa Grande was 37.8 years, compared to 38.8 for the State. In Casa Grande, 20.3% of the population is over 65.

## ***Housing Demographics***

There are approximately 20,816 occupied housing units in Casa Grande. There are approximately 6,246 nonfamily households, 6,776 households with related children under 18 years old, and 2,620 households 65 years and over living alone.

## **Income Characteristics**

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

### **Selected Income and Poverty Statistics**

Casa Grande's Median Household Income is \$74,341. Casa Grande's percentage of people in poverty is higher than the state's rate; 17.9% compared to state's rate of 14%.

### **Selected Economic Data**

The City does have a higher percentage of households with retirement income than the state; 6,515 (31.3%) compared to 26.2% for the state. The Mean Retirement Income is also higher in Casa Grande than the state; \$45,623 compared to \$31,625. There are 7,917 (38%) residents with Social Security compared to 33.7% state residents. Casa Grande has 1,297 (6.2%) people receiving Supplemental Security Income and the state has 4.2%. At the same time, the percentage of people with Supplemental Security Income is 6.6 percent compared to the state figure of 4.2 percent. The percentage of people receiving cash assistance benefits is 2 percent and 1.7 percent for the state.

Table: Selected Economic Data	Arizona	%	Casa Grande	%
With retirement income	761,520	26.2	6,515	31.33
Mean retirement income (dollars)	31,625	(X)	45,623	(X)
With Social Security	980,265	33.7	7,917	38
Mean Social Security income (dollars)	24,745	(X)	24,472	(X)
With Supplemental Security Income	123,459	4.2	1,297	6.2
Mean Supplemental Security Income (dollars)	11,481	(X)	11,825	(X)
With cash public assistance income	50,481	1.7	409	2
Mean cash public assistance income (dollars)	3,300	(X)	4,285	(X)

Source: 2023 ACS

## **Household Income**

The table below shows the number of households at various income levels. There are 7,555 households below the \$50,000 income bracket, 7,021 households between \$50,000 and \$99,999, and 6240 above the \$100,000 income.

HOUSEHOLD INCOMES	Households
	20,816
Less than \$10,000	1,330
\$10,000 to \$14,999	518
\$15,000 to \$19,000	509
\$20,000 to \$24,999	522
\$25,000 to \$34,999	1,847
\$35,000 to \$49,999	2,829
\$50,000 to \$74,999	4,208
\$75,000 to \$99,999	2,813
\$100,000 to \$149,000	3,591
\$150,000 or more	2649
Median household income (dollars)	\$66,354
Source: 2023 ACS	

## ***Household Issues and General Housing Characteristics***

HUD has identified four specific housing problems: (1) overcrowding, (2) lack of complete kitchen, (3) lack of complete plumbing, and (4) cost burden. The concept of “overcrowding” means that there is more than one person per room living in a housing unit. The lack of a complete kitchen and the lack of plumbing are straightforward concepts. The last problem, cost burden, is technically defined by HUD as when households spend over 30 percent of their income on shelter they are “cost burdened,” and when they spend over 50 percent of their income for shelter, they are “severely cost burdened.” Expenditures for shelter include rent or mortgage payments and utility costs.

According to the 2017-2021 Comprehensive Housing Affordability Strategy, there are 3,085 renter households with at least 1 of 4 housing problems and 2,785 owner households with at least 1 of 4 housing problems. There are 1,565 renter households and 1,750 owner households experiencing severe housing issues such as lacks kitchen, complete plumbing, and severe overcrowding.

An examination of the data presented shows that the “cost burden” category is also a housing problem in Casa Grande.

There are 755 extremely low-income renter households, 1,000 very low-income renter households, and 820 low-income renter households for a total of 2,575 renters facing a cost burden of greater than 30% of income. At the same time there are 815 extremely low-income owners, 835 very low-income owners, and 555 low-income owners for a total of 2,205 owner households facing a cost burden of greater than 30% AMI.

There are 600 extremely low-income renter households, 415 very low-income renter households, and 820 low-income renter households for a total of 2,575 renters facing a cost burden of greater than 30 to 50% of income. At the same time there are 725 extremely low-income owners, 240 very low-income owners, and 110 low-income owners for a total of 1,075 owner households facing a cost burden of greater than 30% AMI to 50%AMI.

## ***Employment and Economic Data***

### **Educational Attainment**

Casa Grande's population has a higher number of High School Graduates and bachelor's degree for the 45–65-year age group and the 65+ age group. Data indicates 25–34-year age range have a higher number of High School Graduate than the 25-year-old age group.

### **Educational Attainment by Age**

	Age				
	25 Years and Older	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
High School Graduate or Higher	2,710	7,487	5,960	10,323	10,531
Bachelor's Degree	288	1,267	1,276	2,540	3,028

Data Source: 2023 ACS

### ***Labor Force and Employment***

#### **Labor Force**

Total Population in the Civilian Labor Force	24,875
Civilian Employed Population 16 years and over	23,205
Unemployment Rate	6.71%
Unemployment Rate for Ages 16-24	17.21%
Unemployment Rate for Ages 25-65	4.22%

Data Source: 2016-2020 ACS

#### **Workers by Industry**

Occupations by Sector	Number of People
Management, business and financial	3,835
Farming, fisheries and forestry occupations	840
Service	2,910
Sales and office	5,450
Construction, extraction, maintenance and repair	1,980
Production, transportation and material moving	1,840

Data Source: 2016-2020 ACS

## Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	440	401	3	3	0
Arts, Entertainment, Accommodations	2,452	2,101	15	15	0
Construction	1,080	328	7	2	-5
Education and Health Care Services	3,195	2,485	19	18	-1
Finance, Insurance, and Real Estate	1,052	472	6	3	-3
Information	285	205	2	1	-1
Manufacturing	2,066	2,435	13	18	5
Other Services	567	431	3	3	0
Professional, Scientific, Management Services	1,048	791	6	6	0
Public Administration	0	0	0	0	0
Retail Trade	3,089	3,412	19	25	6
Transportation and Warehousing	625	188	4	1	-3
Wholesale Trade	620	504	4	4	0
Total	16,519	13,753	--	--	--

Data Source: 2016-2020 ACS

Based on the Business Activity table above, the major employment sectors in Casa Grande are:

- 1) Education and Healthcare Services,
- 2) Retail,
- 3) Arts, Entertainment, Accommodations,
- 4) Manufacturing,
- 5) Construction.

The largest employers in Casa Grande are:

Abbott Laboratories/ Ross Products Division  
 ACO Polymer Products, Inc.  
 Banner Casa Grande Medical Center  
 Casa Grande School Districts  
 City of Casa Grande  
 Central Arizona College  
 Daisy Brand (Dairy Products manufacturer)  
 Franklin Foods  
 Frito Lay Inc.  
 Hexcel  
 Kohler  
 Lucid

Price Industries (Metal Fabricator)  
 Tractor Supply  
 National Vitamin Company  
 Wal-Mart Distribution Center (Food distribution/warehousing and Store)  
 US Customs and Border Protection

## ***Housing***

### **Housing Stock and Condition**

Casa Grande has 20,816 housing units, however, 3,817 units (17.3 percent), are vacant according to the 2019-2023 ACS. The Casa Grande homeowner vacancy rate 1.9%, slightly lower than the state rate of 2.2%. The rental vacancy rate for Casa Grande is 8.2% compared to the state rate of 6.89%.

UNITS IN STRUCTURE	Casa Grande
<b>Total housing units</b>	20,816
1-unit, detached	14,736
1-unit, attached	570
2 Apartments	256
3 or 4 Apartments	342
5 to 9 Apartments	637
10 or more Apartments	1,696
Mobile home	2,579

Data source 2023 ACS

Casa Grande has 8,675 Owner-Occupied 3-bedroom units compared to 2,650 Renter 3-bedroom units. There are more No Bedroom and 2-Bedroom Rental units than Owner-Occupied No Bedroom and 2-Bedroom units.

	Owners		Renters	
	Number	%	Number	%
No bedroom	115	1%	240	4%
1 bedroom	714	6%	844	12%
2 bedrooms	2,750	22%	3,025	45%
3 or more bedrooms	8,675	71%	2,650	39%
<b>Total</b>	<b>12,254</b>	<b>100%</b>	<b>6,759</b>	<b>100%</b>

Data source: 2016-2020 ACS

YEAR STRUCTURE BUILT	
<b>Total housing units</b>	20,806
Built 2020 or later	716
Built 2010 to 2019	2,590
Built 2000 to 2009	8,589
Built 1980 to 1999	4,138
Built 1960 to 1979	3,608
Built 1940 to 1959	1,027
Built 1939 or earlier	148

Data source: 2023 ACS

Thus, even though the housing stock is young overall, a significant number of units (8,921) are over forty-five years old and most likely have the most need for maintenance and rehabilitation. The condition of the housing stock in Casa Grande is considered to be fair for the most part. As noted, much 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, still requires attention.

In the past couple of years, additional housing units have been built that will meet the various income levels. There have been three new Low Income Tax Credit apartment complexes; two that have opened and one under construction. There have been numerous build to rent campuses that have been built and some under construction and three new market rent apartment complexes expected to be completed in 2025.

Substandard means: The unit is in poor condition, and it is both structurally and financially feasible to rehabilitate.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,315	19%	2,790	41%
With two selected Conditions	215	2%	630	9%
With three selected Conditions	0	0%	30	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	9,730	79%	3,310	49%
<i>Total</i>	<i>12,260</i>	<i>99%</i>	<i>6,760</i>	<i>99%</i>

Data source: 2016-2020 ACS

## ***Housing Cost, Cost Burden, and Affordability***

Both owners and renters choose to occupy housing for a variety of reasons; location, availability, access to services, proximity to family, schools and employment, anticipated income increases, and housing quality are just some of the complex factors that impact housing choice. The value (cost) of housing drives whether households can afford to purchase and maintain ownership. Rents impact location choice, mobility, and the ability to save for home purchase.

Home prices and rent have increased significantly in the past few years. Based on the 2016-2020 ACS data, the median home value increased 44% from 2009 to 2020. This data does not reflect the current costs.

	<b>Base Year: 2009</b>	<b>Most Recent Year: 2020</b>	<b>% Change</b>
Median Home Value	112,500	162,000	44%
Median Contract Rent	712	808	13%

<b>Mortgage Paid</b>	<b>Number</b>	<b>%</b>
Less than \$499	107	1.3%
\$500 to \$999	1206	14.7%
\$1,000 to \$1,999	4962	60.5%
\$2,000 to \$2,999	1709	20.9%
\$3,000 or more	222	2.7%
Total	8,206	100.00%

Source 2023 ACS

<b>Rent Paid</b>	<b>Number</b>
Median Gross Rent	1,315
No Bedroom	1,136
1 Bedroom	1,023
2 Bedrooms	1,303
3 Bedrooms	1,529
4 Bedrooms	1,779
5 or More Bedrooms	2,011

According to the ACS 2023 data, the median gross rent in Casa Grande for a No-Bedroom is \$1,136, a 1-bedroom at \$1,023, a 2-bedroom at \$1,303, and 3-bedroom unit at \$1,529, and 5-bedroom unit is \$1,779. These rates appear to be within the Fair Market Rent amounts. The Fair Market Rents for Casa Grande are based on the Phoenix-Mesa-Scottsdale Metropolitan Statistical Area (see the chart below).

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,530	1,679	1,950	2,624	2,934
High HOME Rent	1,150	1,233	1,482	1,703	1,880
Low HOME Rent	900	963	1,157	1,336	1,491

The rental and purchase affordability are expected to stabilize. As supply increases, housing values and rents may stabilize, but low-and-moderate income households are expected to be an on-going problem. As mentioned before, additional housing products have recently been constructed and have not impacted on the data to date.

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 \$65,000 to afford a median-priced home of \$162,000. Per 2020 analysis of the income ranges reveals that approximately 52% of households in Casa Grande have incomes below the \$65,000 figure. 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

## Public Housing

The City of Casa Grande does not have a public housing program. This program is under the Pinal County Housing Authority (PCHA). According to PCHA, there are 268 Housing Choice Vouchers participants residing in Casa Grande. There are 12 VASH vouchers in use in Casa Grande. There are 52 public housing units in Casa Grande. There are 47 units occupied at this time. There are 23 2-bedroom units, 18 3-bedroom units, and 8 4-bedroom units located throughout Casa Grande. There are 4,368 applicants on the waiting list for Housing Choice Vouchers across the county.

## Other Housing Facilities

According to Against Abuse, Inc., there are 18 beds in an emergency shelter for adults and women with children, 5-10 units of transitional housing for victims of violence. The Community Action Human Resources Agency (CAHRA) also manages the emergency shelter services program that serves Pinal County. Families and individuals residing in the 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 with continued assistance and case management services.

There are several assisted living and group homes operating in Casa Grande for those needing a higher level of care or supervised setting. Such facilities provide care for the physically, intellectually, mentally disabled and senior populations.

## Fair Housing Legal Status

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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.

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 from:

- discriminate against anyone in the nation,
- to be excluded from participation in,
- be denied the benefits of,
- 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 Mayor through a Proclamation, declares the month of April as a Fair Housing Month. The City provides the venue for the Fair Housing Training every April (when possible) with Southwest Fair Housing Training Center, and other agencies dealing with housing-related activities, and/or funded with Community Development Block Grant (CDBG) monies. Management from local apartment complexes and realtors are invited to attend. 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.

Arizona law makes it an unlawful housing practice to discriminate in connection with housing because of race, color, religion/creed, sex, national origin, physical/mental disability, retaliation, or familial status.

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. To initiate a complaint with the Arizona Attorney General a person must file a complaint at: <https://www.azag.gov/civil-rights/fair-housing>.

Individuals who believe they have been discriminated against in a housing transaction may also file a complaint with the U.S Department of Housing and Urban Development online, by phone, or by mail. Information can be found at: <https://www.hud.gov/contactus/file-complaint>.

## ***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 Proclamation.

Casa Grande citizens, who felt discriminated against, are encouraged to contact the AZ Attorney General's office.

### ***Scope of Analysis***

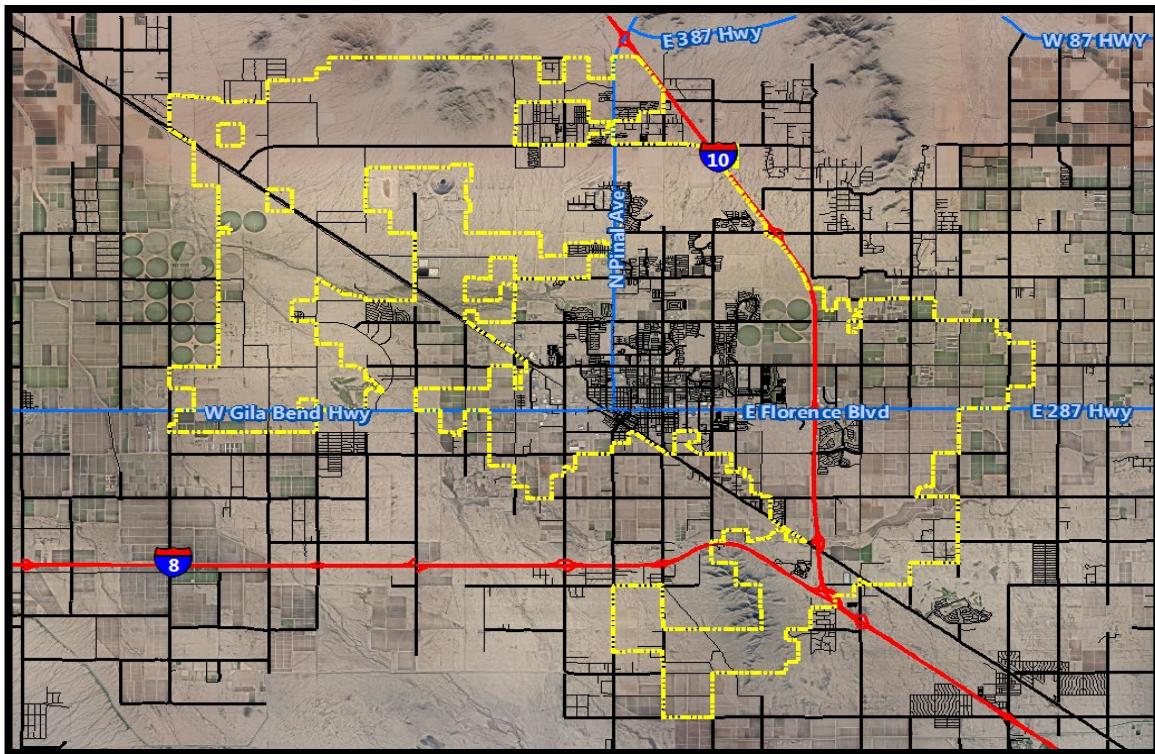
This Analysis of Impediments (AI) to Fair Housing Choice provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual's or a household's access to housing. The AI involves:

- 1) A comprehensive review of the laws, regulations, and administrative policies, procedures, and practices;
- 2) An assessment of how those laws, regulations, policies, procedures, and practices affect the location, availability, and accessibility of housing; and
- 3) 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

## Protected Class Analysis

Arizona law makes it an unlawful housing practice to discriminate in connection with housing because of race, color, religion, sex, national origin, familial status, disability or ancestry.

### Discrimination against Families with Children

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.

According to the 2023 ACS data, Casa Grande has 20,816 households. Of those households, 30% of them are nonfamily households. In addition, 29.1% of the households have individuals under the age of 18 years. The majority of households are Married Couple Family Households.

General Social Characteristics	Casa Grande
Total households	20,816
With own children under 18 years	6,057
Married Couple Family Household	10,331
Male householder, no spouse present	1258
Female householder, no spouse present	2,981
Nonfamily households	6,246
Average household size	3.12

## 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 a 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

The 2023 ACS figures for disability status indicate 18,877 persons have hearing or vision impairment, ambulatory limitations, cognitive limitation, self-care or independent living limitations. Those with these types of impairments may need additional assistance to live independently and have additional requirements for their housing, grab bars in the bathroom, and special types of kitchen and bathroom fixtures

There are numerous housing programs for the developmentally disabled within the city administered by non-profit organizations. There are an estimated 4,151 individuals with cognitive difficulty which may need additional assistance to live independently and have additional requirements for their housing, for example supervised staff.

The number of people under the age of 18 with disabilities is 950, while the number of people aged 18 to 64 with disabilities is 4,907. The number of people 65 and over with disabilities is 4,077. These figures, based upon the Census Bureau definition of disability, include a wide range of disabilities and a precise figure for people with physical disabilities is difficult to determine.

## **Race and Ethnicity**

Race refers to whether a person is White, Black/African American, Asian, American Indian or an Alaska Native, or is a Native Hawaiian or Pacific Islander, or some mixture of two or more of these groups. Under the Fair Housing Act, national origin refers to a person's birthplace or ancestry, such as someone who is Latino/a or Hispanic or from another country or region of the world.

It is illegal for housing providers – such as landlords, property manager, real estate agents, brokers, mortgage lenders, and insurance companies – to treat someone differently because of his or her actual race or perceived race, or because the person is multiracial or in a relationship with someone of a different race. A housing provider may also not discriminate against a current or prospective tenant because they associate with people of a particular race.

The City's racial makeup consists of 59.2% white; 4.7% Black or African American; 3.1% American Indian and Alaskan Native; 1.8% Asian; 20.8% from two or more races; and 43.1% were Hispanic or Latino of any race. Of those residents that classified themselves as Hispanic or Latino, 39% of all residents categorize their Hispanic or Latino heritage as Mexican.

## National Origin

According to the 2018 ACS data, 42% of the residents were born in Arizona while 44% were born out of state. There are 12% of the residents are foreign born.

Place of Birth	Casa Grande
Native, Born in Arizona	24,674
Native, Born in other state in the United States	25,367
Native, Born outside the United States	661
Foreign Born	6,888
Total	57,590

## Color

It is illegal for housing providers – such as landlords, property manager, real estate agents, brokers, mortgage lenders, and insurance companies – to treat someone differently because of the color of a person’s skin, regardless of whether that person has lighter or darker skin. Color discrimination can involve someone of a different race or the same race.

Color discrimination may be closely related to race discrimination (and sometimes national origin discrimination). In some instances, an act of discrimination against someone could be considered both race and color discrimination

## Sex

Discrimination based on gender roles or gender stereotyping is discrimination against you because you don’t fit the discriminator’s idea or stereotype of what a person of your biological sex can do or how you should behave. Casa Grande has 1,258 Male householders with no spouse present and 2,981 Female householders with no spouse present.

## Religion

Everyone has the right to practice their religion. It is illegal to discriminate in housing because of a person’s religion or religious practices.

People discriminate based on religion when they treat others differently or have different rules for them because of their religion. People also discriminate based on religion when they say negative things about a person or their religion or religious practices.

Discrimination against people based on their religion often looks like discrimination against people based on their national origin, race, or color. Some people discriminate against others in housing for more than one unlawful reason.

# Impediments to Fair Housing Choice and Plan of Action

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***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.

### **Special Protections**

In addition to providing people with disabilities with all 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 can live 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 to the premises as it 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, 14.1% 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.
- ❖ There are renters are paying over 30% 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-third of the properties (8,921 units) are now 45 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.

### **HOUSING DISCRIMINATION COMPLAINTS**

As described earlier, there are several organizations and agencies with an oversight into fair housing and discrimination in housing. According to Southwest Fair Housing Council, there were no complaints in Casa Grande about housing discrimination in the past year.

## ***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 people 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.)

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 2030 General Plan 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 the 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 the demanded facilities and amenities.

The City also has a Building Code and a Zoning Code, which serves 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 2019 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. 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).

The city updated the Zoning Code in 2024 to allow for accessory dwelling units, development of nonconforming lots in all residential zoning districts, and allow manufactured homes in certain R-1 zoning districts to facilitate affordable housing options.

## **TRANSPORTATION**

Transportation from housing to work, to services, and to shopping is an essential part of fair housing. People without automobiles, people with disabilities, the elderly, and many others need access to reliable and convenient transportation. The City of Casa Grande began a transit public transportation program in 2023. CG LINK provides an on-demand, curb-to-curb service. During the first year in operation, CG LINK transported over 34,000 passengers. CG LINK operates Monday through Saturday from 7:00 am to 7:00 pm. Passengers can book trips 24 hours in advance and all vehicles are wheelchair accessible and equipped with bike racks. GC LINK offers reduced fare for seniors, disabled persons, veterans, and youth.

VEHICLES AVAILABLE	Casa Grande
<b>Occupied housing units</b>	<b>20,816</b>
No vehicles available	750
1 vehicle available	7,650
2 vehicles available	7,634
3 or more vehicles available	4,782

Data Source: 2023 ACS

As shown on the table above, 3% of households have no vehicle available. However, 36% of households have 1 vehicle available, and 36% have 2 vehicles available.

## **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 to be updated on a continuing basis.
4. Planned Area Development Zoning districts require amenities for recreational purposes to encourage the residents to walk and have connectivity between neighborhoods and their amenities such as parks and open spaces.
5. The City's transit system will continue to be evaluated to meet the public's needs for transportation for employment, entertainment, shopping, medical appointments, etc.
6. The city has numerous group homes, nursing homes, residential facilities that comply and meet the 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 with 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 the 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.

The city ensures that all Public Hearings were held at times and locations convenient for potential and actual beneficiaries and with accommodations for people with disabilities. Moreover, upon request, in advance of the meeting, the City made accommodation 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 Participation**

When asked about fair housing and housing discrimination in Casa Grande with an on-line survey, out of 872 responses, 619 stated this is a medium to high priority.

If community members contact the City with complaints or concerns, staff will provide them with information and refer 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).

### ***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 protection 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 several 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 that 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 by 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 the 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 educational 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 141 state and local affiliates, NAA is comprised of over 95,000 members representing more than 12 million apartment homes globally. 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 Multifamily Housing 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 people with disabilities. The Center is authorized to pursue appropriate legal and administrative remedies on behalf of persons with disabilities to ensure 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.

## RECOMMENDATIONS AND PLAN OF ACTIONS

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### 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 are likely remaining several 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 2020 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.

### **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 SouthWest 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) Continuing 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) Conduct research on 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 several price points, considering transportation, employment centers and the availability of services and shopping in their planning.
- 5) Encourage housing developments for special needs populations and minorities 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<sup>1</sup> 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.
- 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 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 a 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 with closing, down payment and/or slight repairs of the home.

#### Recommendations

- 1) Establish a homebuyer assistance program like 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 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) Provide directions to clients with not enough credit but has affordability to own a home.
- 7) Collaborate with other non-profit agencies.

## ***Plan of Action***

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 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, ads, 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 Southwest 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.
6. Provide resources to the public for complaints.

# 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.

**Hopes, Dreams  
and Fair Housing...**

**for ALL.**

We only do business in accordance with State and Federal Fair Housing Laws.

**EQUAL HOUSING OPPORTUNITY**

*Es contra la ley discriminar contra una persona por razón de raza, color, religión, sexo, discapacidad, condición familiar (tener un o más hijos), o origen nacional.*

*Cualquier persona que cree que es víctima de discriminación de alquileres, puede presentar una queja al Oficina del Procurador General de Arizona.*

**Phoenix:**  
1175 West Washington St.  
Phoenix, AZ 85701-3167  
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(520) 618-8872 TDD

**Esperanzas, Sueños  
y Vivienda Justa...**

**para TODOS.**

**Hacemos solamente negocio de acuerdo con las Leyes Justas en la Vivienda del Estatal y Federal**

**Equal Housing Opportunity**  
Casa Grande, AZ  
Casa Grande Housing Authority

**Es contra la ley discriminar contra una persona por razón de su raza, su color, su origen nacional, su religión, su género, su edad, su condición de familia, o su condición de uno o más hijos.**

- En la venta o alquiler en la vivienda
- En la promoción de la venta o alquiler
- En el financiamiento de la vivienda
- En la ejecución de la vivienda
- En la administración de la vivienda

**It is illegal to discriminate against any person because of race, color, religion, gender, age, family status, or one or more children, or national origin:**

- In the sale or rental of housing
- In the promotion of the sale or rental of housing
- In the financing of housing
- In the sale or rental of housing
- In the administration of housing

**Anyone who feels he or she has been discriminated against may file a claim of housing discrimination with the Arizona Attorney General's Office.**

**Cualquier persona que cree que es víctima de discriminación en la vivienda debe presentar una queja con la Oficina del Procurador General de Arizona.**

**Arizona Attorney General's Office**  
Phoenix  
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- ❖ Requiring that all sub-grantees with CDBG funding through Casa Grande will coordinate with the City's Planning Division 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.