2016 City of Grants Pass Analysis of Impediments to Fair Housing Choice

Draft Report for Public Review
September 15, 2016

2016 City of Grants Pass
Analysis of Impediments to Fair Housing Choice:

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Parks and Community Development Department
of Grants Pass

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HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

If you feel you have experienced discrimination in the housing industry, please contact:

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EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG), entitlement jurisdictions must submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified, and
3. Maintain records reflecting the actions taken in response to the analysis.

In the *Fair Housing Planning Guide*, page 2-8, HUD provides a definition of impediments to fair housing choice as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.[1]

The list of protected characteristics included in the above definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. However, state and local governments may enact fair housing laws that extend protection to other groups. The State of Oregon extends additional protections based on legal sources of income, marital status, sexual orientation, and gender identity, as well as to survivors of domestic violence.[2]

The AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, and housing transactions. The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified impediments.

METHODOLOGY

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in the City of Grants Pass included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- Investment data gathered in accordance with the Community Reinvestment Act,

[1] U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide*. Vol. 1, p. 2-8. http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf
[2] O.R.S. Chapter 659A

- Home loan application data from the Home Mortgage Disclosure Act, and
- Housing complaint data from HUD.

Qualitative research included evaluation of relevant existing fair housing research and fair housing legal cases. Additionally, this research included the evaluation of information gathered from several public input opportunities conducted in relation to this AI, including the 2016 Fair Housing Survey, a fair housing forum presentation, public review and final presentations, city council work group presentations, and a thirty-day public review period of the draft analysis of impediments.

Geographic analyses of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of total population and then plotting the data on a geographic map of Census block groups or Census tracts in the Grants Pass Study Area. Block groups were used where available, as they provide for a more detailed analysis of geographic trends in the study area. However, some data are not available at the block group level, notably data concerning the distribution of households and residents by poverty and disability status. In such cases, geographic data are presented at the level of the Census tract. [3]

Ultimately, a list of potential impediments was drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Potential impediments to fair housing choice present within the city were identified; along with actions the city may consider in attempting to address them.

OVERVIEW OF FINDINGS

This AI includes a review of both public and private sector housing market contexts in the Grants Pass Study Area to identify practices or conditions that may operate to limit fair housing choice in the city. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected characteristics; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the city's residents.

The contextual analysis described above provides a foundation for a review of fair housing laws, cases, studies, complaints, and public involvement data. The structure provided by local, city, and federal fair housing laws shapes the complaint and advocacy processes available in the city, as do the services provided by local, city, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have a

[3] A Note on Geography: Demographic information in this report are based on estimates of the population living within the 2015 boundaries of the City of Grants Pass in 2000, 2010, and after. This area is referred to in this report as the "Grants Pass Study Area". Because the city's boundaries changed considerably between 2000 and the present, owing to a series of annexations, comparison of city-level population data across years would give an inflated impression of population growth without some effort to preserve a stable study area from one period to the next.

Because it was only possible to estimate population figures within the study area in 2000 and 2010, all population figures in the following narrative are presented as estimates rather than exact figures. The same is true of all economic, housing, lending, and other data included in this report, unless otherwise noted.

substantial influence on fair housing choice. In the public sector, policies and practices can also significantly affect housing choice.

Complaint data and AI public involvement feedback further help define problems and possible impediments to fair housing choice, and confirm suspected findings from the contextual and supporting data.

Socio-Economic Context

Socio-economic data provide an essential context for the analysis of impediments, characterizing the environment in which housing choices are made. In its 1996 *Fair Housing Planning Guide* and subsequent guidance, HUD recommends the inclusion and analysis of demographic, economic, and housing data as part of a thorough review of the local housing market and potential impediments to fair housing choice. Accordingly, this study provides a review of demographic and economic data provided by the Census Bureau along with economic and employment data gathered from the Bureau of Labor Statistics and Bureau of Economic Analysis. Data from the Census Bureau were primarily drawn from the 2000 and 2010 decennial Census counts, but were supplemented with data from the 2010-2014 American Community Survey.

The population within the Grants Pass study area grew by an estimated 18 percent between 2000 and 2010. As it did, racial and ethnic minority residents came to account for larger and larger percentages of the study area population. This was particularly true of the Hispanic population, which grew from an estimated 1,552 in 2000 (5.1 percent of the population) to 2,830 in 2010 (7.9 percent) and has continued to grow since 2010, accounting for 8.9 percent of the population in 2010-2014.

From a fair housing perspective, it is important to determine the degree to which residents are segregated by race or ethnicity. Some degree of segregation may be natural, and may not represent a fair housing challenge; however, where there are high concentrations of residents of one race or ethnicity, and where those concentrations exist in areas with high poverty and low access to opportunity, such conditions are a cause for concern. For the purposes of this report, residents of different demographic groups are considered to be disproportionately concentrated in Census tracts or block groups where they account for a share of the population that exceeds the overall study area average by ten percentage points. For example, if black residents account for 0.5 percent of the population throughout the study area, they will be considered "disproportionately" concentrated in any Census block group where they make up 10.5 percent of residents or more.[4]

In fact, there were no Census block groups in the study area with disproportionate shares of residents from any racial or ethnic group in 2000 or 2010. All groups were well below the ten-point disproportionate share threshold in all block groups throughout the city in 2000 and 2010. As noted previously, racial and ethnic minority residents have grown as a share of the study area population since 2000. At present, there are few indications that this growth has

[4] Note: Where possible, geographic data are presented at the block group level. This geographic unit is smaller than a Census tract, and therefore allows for a more detailed analysis of demographic, economic, and housing trends. However, data on some topics (specifically, disability and poverty) are not available at the Census tract level in recent American Community Survey estimates. These data are presented by Census tract.

been focused in a specific area. However, non-white and Hispanic residents have come to account for a larger share of the population to the northeast of the city center. This same area saw a dramatic increase in the percentage of residents living in poverty from 2000 to 2010-2014. These trends are discussed in more detail below.

Residents with disabilities accounted for 17.3 percent of the city population in 2010-2014. At that time, residents with disabilities accounted for 18 to 24 percent of the population of Census tracts in the south of the city. However, there were no areas in which these residents would be considered disproportionately concentrated based on the criteria described above.

Like much of the nation, the City of Grants Pass[5] experienced a marked decline in employment after 2007. At that time, there were around 14,500 workers in the city's labor force, 13,600 of whom were employed. Over the following three years, the number of workers in the labor force held steady while the number of employed declined. This contributed to a spike in the unemployment rate, which rose from 6.2 percent in 2007 to 13.3 percent by 2009. The unemployment rate has declined steadily since that time, dropping to 7.1 percent by 2015.

Prior to 1995, real average earnings in Josephine County exceeded those at the state level. However, due to rapid growth in earnings at the state level, the amount that the average worker in the county earned at his or her job fell behind statewide figures in that year, and has remained behind since. The average worker in the county earned $35,178 at his or her job in 2014, down from around $38,000 in 2003.

On the other hand, real per capita income (PCI), which is the inflation-adjusted average income of all residents in the county, has not declined in recent years. However, at $33,911, real PCI in the county in 2014 was considerably below the statewide average of $51,271 that same year.

The poverty rate has also risen considerably since 2000, from 14.9 percent to 22.5 percent in 2010-2014. Unlike in the distribution of residents by race and ethnicity, there did appear one Census tract in which households in poverty were disproportionately concentrated in 2010-2014. In that Census tract, which lay to the northeast of the city center, 35.2 percent of households were living in poverty in 2010-2014.[6]

As noted previously, this same Census tract saw an increase in the percentage of non-white residents from 2000 through 2010, from 6.4 to 9.2 percent. The Hispanic population more than doubled as a percentage of the population of that same Census tract over the same time period, accounting for 9.5 percent of the tract population in 2010. At present, these figures do not approach the demographic threshold that HUD uses to identify Census tracts as racially-ethnically concentrated areas of poverty (50 percent non-white), even if the poverty rate is close to the 40 percent threshold specified by HUD.

However, in future fair housing studies it will be important to continually reassess demographic and economic conditions in this and other parts of the study area. This will put the City in a

[5] These figures are based on data from the Bureau of Labor Statistics, which are reported at the city level. For that reason, it was not possible to estimate the trends in employment within the stable limits of the study area, and these figures are presented as occurring within the "City of Grants Pass."

[6] In 2010, a family of four with two children was considered to be living in poverty if the family income was less than $22,113 per year.

position of being able to anticipate and prevent the development of racially-ethnically concentrated areas of poverty, rather than having to address such areas that have already formed. This in turn will allow for greater flexibility in future planning efforts and ensure that area residents have equitable access to economic and housing opportunities.

Between 2000 and 2010, the estimated number of housing units in the study area grew faster than the number of households to fill those units: the result was an increase in the vacancy rate, which rose from 5.4 percent of the housing stock in 2000 to 8.1 percent in 2010. Since that time, vacant units have fallen to 7.8 percent of the housing stock.

Around a quarter of vacant units in 2000 were classified as "other vacant". Units may be classified as "other vacant" if the owner does not wish to sell the unit, is using it for storage, is elderly and living with relatives or in a nursing home, or the unit is foreclosed. These units are often more problematic than other types of housing units, as they are not available to the market place and may fall into dilapidation, contributing to blight in areas where they are grouped in close proximity.

Among occupied housing units, the study area saw a marked shift toward rental housing from 2000 through 2010 and continuing through 2010-2014. In 2000, an estimated 41.4 percent of occupied units were occupied by rental households. By 2010-2014, that figure had risen to 47 percent. Rental housing tended to account for a greater share of occupied housing units in central areas of the city in 2000 and 2010, while owner-occupied units represented a greater share of occupied units in peripheral parts of the study area.

Single-family units (attached and unattached) accounted for nearly 70 percent of the housing stock in 2000 and 2010-2014. Apartment units grew as a share of the housing stock, from 9.7 percent in 2000 to 11.9 percent by 2010-2014. Mobile homes declined as a share of the overall housing stock, from an estimated 10.3 to 7.7 percent.

Fewer than five percent of households in the study area were impacted by overcrowding, incomplete plumbing facilities, or incomplete kitchen facilities: three of four conditions that HUD categorizes as "housing problems." The fourth, cost burden, was considerably more common. Roughly a fifth of all households in the city were paying between 30 percent and half of their income toward housing costs in 2000 and 2010-2014. The share of households paying more than half of their income in housing costs grew from 13.9 percent in 2000 to nearly a quarter in 2010-2014. Renters were considerably more likely to be living under a cost burden than homeowners, even homeowners who were still paying on a mortgage.

Review of Fair Housing Laws, Studies, and Cases

The federal Fair Housing Act (FHA) is the foundation for a suite of laws at the national level designed to protect residents of the United States from discrimination in the housing market. As originally passed in 1968, the Act prohibited discrimination on the basis of race, color, religion, gender, and national origin. Subsequent amendments passed in 1988 added additional protections on the basis of disability and familial status, and strengthened the enforcement provisions of the Act. Amendments to the FHA passed from 1964 to the present have generally broadened the protections guaranteed under the FHA, applying stricter and

more comprehensive protections that apply to housing providers who benefit from federal funding.

In addition to the fair housing protections provided by federal law, Oregon residents are protected from discrimination in the state housing market by state-level anti-discrimination law (O.R.S. Chapter 659A). This law, which is enforced by the Bureau of Labor and Industry's Civil Rights Division (BOLI), prohibits discrimination on all of the bases included in the federal Fair Housing Act, as well as discrimination based on legal sources of income, status as a survivor of domestic violence, marital status, sexual orientation, and gender identity. HUD has recognized Oregon's anti-discrimination statutes as "substantially equivalent" to the Fair Housing Act, meaning that the rights, responsibilities, and remedies that Oregon law guarantees are at least as comprehensive as those provided under federal law (although as noted Oregon goes further by recognizing additional protected characteristics).

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened the Act's relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless "actually or predictably[7]" result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* The case originated in a lawsuit against the Texas Department of Housing and Community Affairs ("the Department") based on the claim that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies, whether or not those disparities were intentional. In doing so, the Court imposed restrictions on the application of disparate impact theory, ruling that under fair housing law the theory required the demonstration of a causal connection between a policy or practice and the alleged discriminatory effects of that policy.

Having affirmed the validity of disparate impact theory as a cause of action under fair housing law, the Supreme Court sent the case back to the lower courts to determine if the Department's policies amounted to a violation of the Fair Housing Act in light of the restrictions the Court imposed on the application of disparate impact theory. In a decision issued on August 26, 2016, the U.S. District Court for the Northern District of Texas ruled that the Inclusive Communities Project had failed to demonstrate that the Department's policies caused a statistically-significant disparity in the location of low-income housing, and dismissed the case.

[7] *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

Even though the Supreme Court case upholding disparate impact advanced at roughly same time that HUD was finalizing its new affirmatively furthering fair housing (AFFH) rule, the AFFH obligation arises from a different section of the federal Fair Housing Act than disparate impact liability. It is important to emphasize that disparate impact liability does not depend on entitlement status or the receipt of HUD funding: any individual, business, or local government agency may potentially be held liable for violating the Fair Housing Act by adopting policies that predictably cause disparate outcomes among residents with protected characteristics.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. For the City of Grants Pass, these changes will not take effect until the next Consolidated Planning cycle, which begins in 2019.

Fair Housing Structure

There are a variety of avenues available to Grants Pass residents who believe that they have experienced discrimination in the local housing market. The Department of Housing and Urban Development enforces the federal Fair Housing Act, and those who believe that they have suffered housing discrimination based on race, color, religion, sex, national origin, familial status, or disability, may file a complaint with the agency.

Because HUD has recognized Oregon anti-discrimination laws as "substantially equivalent" to the federal Fair Housing Act, the state agency enforcing those laws, the Bureau of Labor and Industries (BOLI), partners with HUD for state-level fair housing enforcement. Concretely, this means that fair housing complaints alleging discrimination in the private housing market[8] that are initially filed with HUD are typically referred to BOLI for investigation and enforcement. Because Oregon law prohibits discrimination on based on characteristics not included in federal law, complaints alleging discrimination on those bases are investigated and enforced by BOLI.

In addition, the Fair Housing Council of Oregon (FHCO) accepts complaints from state residents who believe that they have experienced discrimination in the state housing market, and conducts initial identification, investigation, and referral of fair housing violations to HUD for enforcement. The FHCO offers outreach, education, and training to residents, housing providers, and local officials on fair housing and related topics.

Finally, the Oregon Law Center (OLC) offers civil legal assistance to low-income Oregonians, providing services that include advice and representation on Fair Housing, and other housing matters.

Contact information for HUD, BOLI, the FHCO, and the OLC are included in **Section IV** of this report and following the report's title page.

[8] In the case of housing complaints alleging discrimination in federally funded programs, HUD will retain and investigate the complaint.

Fair Housing in the Private Sector

Fair housing choice may be influenced by factors in the private housing market, including patterns in home and small business lending and the decisions that rental housing providers to accept or reject potential tenants. To assess the degree to which these factors may influence fair housing choice in the City of Grants Pass, this report includes an analysis of home lending data collected under the Home Mortgage Disclosure Act (HMDA), small business lending data collected in accordance with the Community Reinvestment Act (CRA), fair housing complaints filed against local housing providers, and data summarizing the experience of stakeholders and residents in the local housing market gathered through the 2016 City of Grants Pass Fair Housing Survey.

Banks and other lending institutions handled 12,261 home loans and loan applications from 2008 through 2014. Around 37 percent (4,578) of these were home purchase loans, and approximately 85 percent of those home purchase loans were intended to finance the purchase of a home in which the buyer intended to live.

Based on the 1,905 loans that were originated in the city during that time period, and the 375 that were denied, owner-occupied home purchase loan applicants in the study area saw an overall denial rate of 16.4 percent. The most common reasons that these loans were denied included debt-to-income ratio and credit history. As one might expect, denial rates tended to fall as the income of the prospective applicant increased.[9]

One of the reasons that it is important to examine home lending data in the context of fair housing is to determine whether there are marked differences in the success of home loan applications by protected class status. Data gathered under the HMDA include information on the race or ethnicity of the buyer, as well as his or her gender, allowing for a comparison of denial rates between these groups.

However, home lenders working in the Grants Pass housing market received comparatively few home loan applications from non-white residents: an estimated 45 applicants over seven years, or roughly 6 applicants per year on average. Given such a small sample, it is difficult to comment definitively on whether there are significant differences in the ability of racial or ethnic minority applicants to secure a home loan in the city.

However, there were a substantial number of applications from both male and female applicants. The outcomes of those applications indicate that female applicants were more likely than male applicants to be denied a loan, though the overall difference between the two was not that great: an 18 percent denial rate in the case of female applicants compared to 15.3 percent for male applicants.

High-cost home purchase loans[10] were relatively uncommon in the period from 2008 through 2014. Twenty-six of these high-annual percentage rate loans, or HALs, were issued during that

[9] This was not universally the case: the denial rate for applicants with incomes of more than $75,000 per year was higher, at 14 percent, than the denial rate for those with incomes between $60,001 and $75,000 per year (13.2 percent).

[10] That is, loans with annual percentage rates rates that are three or more percentage points higher than treasury rates on comparable loans.

time, most of them in 2009 and 2010. No racial or ethnic minority group received more than one such loan during that time period.

There were also no substantial fair housing concerns revealed through an analysis of small business lending data gathered under the Community Reinvestment Act (CRA). Small business lending was fairly evenly distributed by income level. Lending was not notably absent from areas with above-average concentrations of protected class groups or households living in poverty.

City residents (or prospective residents) filed seven fair housing complaints against housing providers in the city from 2008 through 2016. All but one of those complaints cited perceived discrimination on the basis of disability, and failure to make reasonable accommodation was the most common discriminatory activity alleged in these complaints. Two of those complaints were resolved through an agreement between the complainant and housing provider; the rest were closed after the complainant failed to cooperate, investigators were unable to locate the complainant, or an investigation failed to produce sufficient evidence to warrant a charge of discrimination against the housing provider.

Respondents to the 2016 Fair Housing Survey weighed in on a range of industries and activities in the city's private housing sector:

- The rental housing market;
- The real estate industry;
- The mortgage and home lending industry;
- The housing construction or accessible design fields;
- The home insurance industry;
- The home appraisal industry; or
- Any other housing services.

For most private sector activities, fewer than ten percent of respondents were aware of any questionable practices or barriers to fair housing choice. However, around a quarter of respondents who answered the question maintained that they were aware of questionable practices in the rental housing market. When asked to elaborate on their response, respondents cited discriminatory actions based on religion, family size, disability, or race.

Fair Housing in the Public Sector

The ability of residents to choose where they will live is also impacted by laws, policies, and actions in the public sector. Factors influencing the supply and location of affordable housing units may expand or restrict housing choice for certain groups, and limitations in public transit or other government services may restrict access to employment or educational opportunities. To identify any potential areas of concern in public policy, this AI report reviews the location of publicly-funded affordable housing units; a variety of provisions in local land-use and planning codes and policies; and public input gathered through the 2016 Fair Housing Survey.

There were around 20 multifamily housing developments supported by funding from HUD or the U.S. Department of Agriculture's Rural Development programs, or subsidized through tax credits. All told these developments comprised some 713 affordable units. Though there were affordable developments in most parts of the city, there was some tendency toward concentration of these units in areas with above-average poverty rates. The Census tract with the highest poverty rate (35.2 percent in 2010-2014) held 45 percent of public-assisted affordable housing developments and 44 percent of units in those developments, while only containing around 16 percent of the city population.

Housing choice vouchers, housing subsidies which are not specific to a development but may be used anywhere they are accepted, were distributed more widely throughout the city. There was some tendency for these vouchers to be concentrated in areas with higher poverty, but not to the degree that fixed housing developments were concentrated in those areas (an estimated 22 percent of vouchers were located in the same Census tract discussed in the previous paragraph).

Review of local land-use and zoning provisions and feedback from city officials reveals that the city has procedures in place to promote mixed-use and affordable housing development, but that local opposition to affordable housing has at times served to restrict or limit the development of public-assisted affordable housing developments, whether single-family or multi-family.

According to the City's fair housing policy, Grants Pass is committed to promoting equal opportunity in housing, regardless of race, color, religion, sex, national origin, family status, or disability, within the resources available to the city.

Respondents to the 2016 Fair Housing Survey noted whether they were aware of barriers or impediments to fair housing choice in the following public policy areas:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

In most cases, few respondents were aware of barriers to fair housing choice in these areas. The exception was in the question concerning access to government services: more than a quarter of those who answered this question stated that they were aware of barriers to fair housing choice in this area. In specifying the types of barriers of which they were aware, most respondents noted limitations in the public transit network.

Public Involvement

Efforts to promote public involvement in the 2016 AI process included the 2016 Fair Housing Survey, a series of City Council workgroup sessions and presentations, a Fair Housing Forum presentation, a public input presentation, and a final presentation.

A total of 101 people responded to the Fair Housing Survey. Respondents were generally supportive of fair housing laws, and considered themselves at least somewhat familiar with those laws. Many respondents also felt that current levels of fair housing testing and outreach and education were insufficient to meet the city's fair housing needs. However, some respondents were less supportive, considering fair housing laws to go too far in protecting individuals in search of housing at the expense of the rights of housing providers.

A common concern among those who contributed written responses to survey questions was the current state of the rental housing market. These respondents perceive the current market to be tight, and the supply of decent affordable rental housing to be short.

This was also a concern raised during the Fair Housing Forum. However, the primary contribution of participants in the forum discussion was to underscore the need for fair housing education and outreach for residents, housing providers, and local officials and policy makers.

As of the submission of this draft, several public outreach events are yet to occur. A summary of these events will be included in future drafts.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

The following impediments to fair housing choice are based on a range of data examined during the 2016 AI process. In recognition of both the strengths and limitations of those data, the actions and measurable objectives below reflect and emphasis outreach and education, targeting residents, stakeholders, local government officials, and other interested parties. The topics to be addressed in outreach and education sessions range from reasonable accommodation/modification for residents with disabilities, fair housing laws and policies, home financing and methods for building credit, and other subjects related to housing.

Apart from outreach and education, the 2016 includes recommendations relating to the development of public-assisted affordable housing, by reiterating development goals included in the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan and recommending continuing exploration of rehabilitation and redevelopment as a means to shore up the supply of affordable housing units.

Finally, the 2016 AI proposes actions that entities in the public sector may take, including review of land-use ordinances for consistency across provisions relating to "family", and consideration of local government agencies to promote fair housing outreach and education (potentially with funding from HUD through the Fair Housing Initiatives Program).

Private Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Refusal to make reasonable accommodation or modification as required by law.** This impediment was identified through a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development and input from the public through the 2016 Fair Housing Survey.

Action 1.1: Conduct ongoing outreach and education to local landlords, property managers, and residents. These outreach and education sessions should highlight the rights and responsibilities provided for in the Americans with Disabilities Act and the Fair Housing Act regarding reasonable accommodation. However, it is also important to include a discussion of what the laws do *not* require, e.g., an obligation for private landlords to make expensive, irreversible modifications to a property at the owner's expense.

Measurable Objective 1.1: The number of outreach and education sessions conducted on a yearly basis, marketing materials relating to those efforts, and the number of participants.

***Impediment 2*: Discriminatory actions in the rental housing market.** This impediment was identified through a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development and input from the public through the 2016 Fair Housing Survey.

Action 2.1: Conduct ongoing fair housing outreach and education to local residents and housing providers, focusing on the rights and responsibilities provided for in federal and state fair housing laws.

Measurable Objective 2.1: The number of fair housing outreach and education sessions held on a yearly basis, marketing materials relating to those sessions, and the number of participants.

Action 2.2: Partner with the Fair Housing Council of Oregon to conduct fair housing outreach and education, and to assess the need for additional fair housing services.

Measurable Objective 2.2: Partnership with the Fair Housing Council and the number of outreach and education sessions conducted.

***Impediment 3*: Challenges in home lending.** This impediment was identified through a review of home mortgage lending data gathered under the Home Mortgage Disclosure Act (HMDA). Female applicants had a higher rate of loan denials than male applicants over all. In some years included in the study, the denial rate for female applicants exceeded that of male applicants by ten percentage points. There were also relatively few home purchase loan applications from racial/ethnic minority residents. For example, while Hispanic residents accounted for around 8 percent of the population in 2010, an estimated 3.4 percent of home loan purchase loan applications were from Hispanic applicants.

Action 3.1: Conduct or promote home mortgage credit education, focusing on techniques to build and maintain good credit.

Measurable Objective 3.1: The number of credit education classes held and the number of participants who are female, and are representative of the area's racial/ethnic minority residents.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Difficulty siting public-assisted affordable housing developments.** This impediment was identified through review of commentary submitted with the 2016 Fair Housing Survey, housing information gathered from the Census Bureau, and feedback provided during the public input process.

Action 1.1: Continue efforts to maintain the supply and condition of existing affordable housing units, in accordance with the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan.

Measurable Objective 1.1: Efforts undertaken to maintain the supply and condition of affordable housing in the city.

Action 1.2: Explore opportunities for redevelopment or rehabilitation of residential properties for the purposes of increasing the stock of affordable housing.

Measurable Objective 1.2.1: The number of properties identified as having a potential for rehabilitation or redevelopment for the purpose of providing affordable housing.

Measurable Objective 1.2.2: The number of properties rehabilitated or redeveloped as affordable housing units.

Action 2.1: In fair housing outreach and education sessions, include materials relating to affordable housing, including the benefits of affordable housing and an overview of affordable housing programs.

Measurable Objective 2.1: The number of outreach and education sessions including materials of affordable housing programs.

***Impediment 2*: Need for ongoing outreach and education on the subject of fair housing law and policy.** The identification of this impediment is based on feedback gathered through the public input process, including commentary submitted with responses to the 2016 Fair Housing Survey and during the City Council Workgroup and Fair Housing Forum presentations.

Action 2.1.1: Identify local government agencies as candidates to provide outreach and education relating to fair housing.

Action 2.1.2: Assess the eligibility of these agencies for funding under the Education and Outreach component of the Fair Housing Initiatives Program.

Action 2.1.2: Contingent on eligibility, encourage the agency chosen to provide fair housing outreach and education to submit an application for funding to promote outreach and education under the FHIP.

Measurable Objective 2.1.1: (1) Identification of candidate agencies to perform outreach and education, and (2) the schedule of outreach events.

Measurable Objective 2.1.2: Assessment of the eligibility for funding under the FHIP, in the form of correspondence with HUD, internal memoranda, or other documentation.

Measurable Objective 2.1.3: Application for fair housing outreach and education funding under the FHIP, and the results of that application.

Action 2.2: Update the City's Housing Resources page to include a discussion of groups protected from housing discrimination under state law.

Measurable Objective 2.2: Updates made to the City's Housing Resources page.

***Impediment 3*: Inconsistency in land-use code and definitions relating to "family".** This impediment was identified through review of public land-use and development policies and in consultation with local government.

Action 3.1.1: Review local land-use provisions to ensure consistency between definitions relating to family.

Action 3.1.2: Update local provisions where needed.

Measurable Objective 3.1: The results of the review of local land-use provisions and updates to the development code.

SECTION I. INTRODUCTION

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

WHY ASSESS FAIR HOUSING?

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)[11], and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, states and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. The AFFH certification process has three parts:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified through the analysis, and
3. Maintain records reflecting the analysis and actions taken.

However, the obligation to affirmatively further fair housing is not limited to those communities that apply directly to HUD for housing and community development funding. Non-entitlement communities that apply to the state for community development funding that

[11] The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

HUD has granted to the state must also certify that they will use those funds in a manner that will affirmatively further fair housing, in accordance with the fair housing goals and priorities that the state has identified in its analysis of impediments.

In the *Fair Housing Planning Guide*, page 2-8, HUD notes that impediments to fair housing choice are:

- "Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect."[12]

State and local governments may enact fair housing laws that extend protection to other groups as well. For example, Oregon Law provides additional protections based on legal sources of income, marital status, sexual orientation, and gender identity, as well as to survivors of domestic violence. A comparison of protected class designations by federal and city law is presented below in Table I.1.

Table I.1
Comparison of Fair Housing Laws
City of Grants Pass

Protected Group	Federal Fair Housing Act	O.R.S. Chapter 659A
Race	X	X
Sex	X	X
Religion	X	X
Familial Status	X	X
Disability	X	X
National Origin	X	X
Color	X	X
Legal Sources of Income		X
Survivors of Domestic Violence		X
Marital Status		X
Sexual Orientation		X
Gender Identity		X

Affordable Housing and Fair Housing Choice

While fair housing policy and affordable housing policy can be overlapping areas of concern, it is essential to distinguish between the two. Affordable housing policy is largely concerned with the supply of units available to residents of all income levels, while the emphasis in fair housing policy is on the ability of residents to choose where to live regardless of their protected class status. Lack of affordable housing can be a significant concern to policy makers; however, it is not on its own a fair housing problem. Where the issues of affordable housing and fair housing choice may overlap is when the supply of affordable housing is restricted in such a way as to limit housing choice for a specific group of residents.

[12] *Fair Housing Planning Guide.*

For example, if families with children have a greater need for affordable housing and affordable units are effectively blocked from a jurisdiction, this may represent an impediment to fair housing choice for those families. As another example, if racial minority residents account for a relatively large share of affordable housing residents in a jurisdiction, and affordable units are restricted to racial or ethnically concentrated areas of poverty within that jurisdiction, this concentration could serve to further segregate the population and isolate racial minority residents to areas with poor access to opportunity.

At present, there is no area in the city or county that meets the definition of a "racially/ethnically concentrated area of poverty" under HUD guidelines.[13] However, to the northeast of the city center, non-white residents have come to account for a larger percentage of the population since 2000 (9.2 percent as of 2010), even as the poverty rate in that area rose from 11.6 percent to 35.2 percent by 2010-2014. The same area, which included around 15.6 percent of study area residents in 2010, currently holds around 45 percent of public-assisted housing developments and 44 percent of public-assisted units. As the population continues to grow, it will be important to continually assess economic and demographic conditions in this and other parts of the study area to anticipate and potentially prevent the development of racially-ethnically concentrated areas of poverty, and concentrations of public-assisted units in those areas.

PURPOSE OF THIS RESEARCH

HUD interprets the broad objectives of affirmatively furthering fair housing to include:

- "Analyzing and working to eliminate housing discrimination in 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, and usable by, all persons, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act."[14]

The objective of the 2016 AI process was to research, analyze, and identify prospective impediments to fair housing choice throughout the city. The goal of the completed AI is to suggest actions that the sponsoring jurisdictions can consider when working toward eliminating or mitigating the identified impediments.

LEAD AGENCY

The agency that led the effort of preparing this report on behalf of the City of Grants Pass was the Grants Pass Parks and Community Development Department.

[13] A Census tract is identified as a racially/ethnically concentrated area of poverty if the following conditions are true: (1) the non-white (Hispanic or non-Hispanic) population exceeds 50 percent of the Census tract population, and (2) the poverty rate in that Census tract exceeds 40 percent or three times the jurisdiction average, whichever threshold is lower.
[14] *Fair Housing Planning Guide*, p.1-3.

Commitment to Fair Housing

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the city certifies that it will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice, and maintaining records that reflect the analysis and actions taken in this regard.

GEOGRAPHIC SCOPE OF THE ANALYSIS

The geographic area under consideration in this study corresponds to the 2015 city boundaries reported by the Census Bureau. In order to preserve stable boundaries across different vintages of Census data, it was necessary to construct a weighting procedure to estimate the sizes of various population groups within the study area in 2000 and 2010. For that reason, population figures included in the analysis of impediments are presented as estimates, except where otherwise noted. The Grants Pass Study Area is presented in Map I.1 on the following page, along with the extent of the city's 2014 Urban Growth Boundary.

Where possible, data provided by the Census Bureau are presented geographically by block group, which is a smaller geographic unit than the Census tract. This allows for greater precision in discussing the distribution of residents by race, ethnicity, etc. However, not all data are available at the block group level; those that are not will be presented by Census tract.

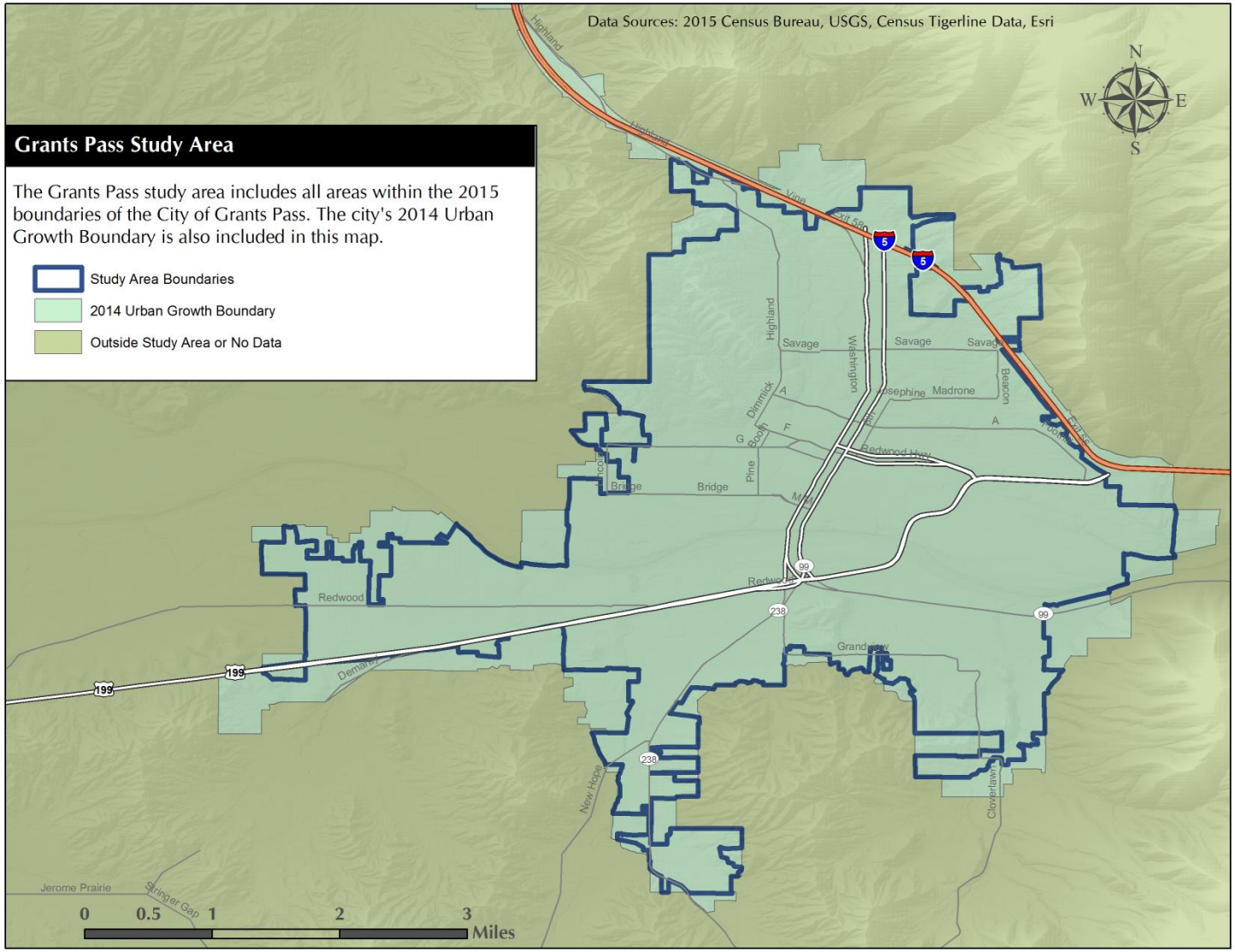
RESEARCH METHODOLOGY

The AI process involves a thorough examination of data related to housing. AI sources include Census data, employment and income information, home mortgage application data, business lending data, fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain. Relevant information was collected and evaluated via four general approaches:

1. *Primary Research*, or the collection and analysis of raw data that did not previously exist;
2. *Secondary Research*, or the review of existing data and studies;
3. *Quantitative Analysis*, or the evaluation of objective, measurable, and numerical data; and
4. *Qualitative Analysis*, or the evaluation and assessment of subjective data such as individuals' beliefs, feelings, attitudes, opinions, and experiences.

Some baseline secondary and quantitative data were drawn from the Census Bureau, including 2000 and 2010 Census counts, as well as American Community Survey data averages from 2010 through 2014. Data from these sources detail population, personal income, poverty, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Labor Statistics, the Bureau of Economic Analysis, and a variety of other sources. The following narrative offers a brief description of other key data sources employed for the 2016 AI for the City of Grants Pass.

Map I.1
City of Grants Pass Study Area
The Grants Pass Study Area
2015 Grants Pass AI Data



Home Mortgage Disclosure Act Data

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2008 through 2014 were analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Fair Housing Complaint Data

Housing complaint data were used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the city from 2008 through 2016. These data provide the following details for each complaint:

- The basis of the complaint: Generally, one or more protected characteristic (e.g., race, color, religion, disability, etc.), which was perceived to be the motivation for the discriminatory action cited in the complaint;
- The issue of the complaint: The discriminatory action cited in the complaint; and
- The closure status of the complaint: The outcome of the complaint.

Fair Housing Survey

The city elected to utilize a survey instrument as a means to encourage public input in the AI process. The survey targeted individuals involved in the housing arena, although anyone was allowed to complete the survey. The 2016 City of Grants Pass Fair Housing Survey, an internet-based instrument, has received 96 responses.

The survey was designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. If limited input on a particular topic was received, it was assumed that the entirety of stakeholders did not view the issue as one of high pervasiveness or impact. This does not mean that the issue was nonexistent in the city, but rather that there was no widespread perception of its prevalence, as gauged by survey participants. The following narrative summarizes key survey themes and data that were addressed in the survey instrument.

Federal, State, and Local Fair Housing Laws

The first section of the survey asked respondents to address a number of questions related to fair housing laws, including assessment of their familiarity with and understanding of these laws, knowledge of characteristics protected by these laws, the process for filing fair housing complaints, and an inquiry into whether or not fair housing laws should be changed.

Fair Housing Activities

The second section of the survey evaluated stakeholders' awareness of and participation in fair housing activities in the city, including outreach activities such as trainings and seminars, as well as monitoring and enforcement activities such as fair housing testing exercises.

Barriers to Fair Housing Choice in the Private Sector

This section addressed fair housing in the City of Grants Pass's private housing sector and offered a series of two-part questions. The first part asked respondents to indicate awareness of questionable practices or barriers to fair housing choice in a variety of private sector industries, and the second part requested a narrative description of these questionable practices or concerns if an affirmative response was received. The specific areas of the private sector that respondents were asked to examine included the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industries,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

The use of open-ended questions allowed respondents to address any number of concerns such as redlining, neighborhood issues, lease provisions, steering, substandard rental housing, occupancy rules, and other fair housing issues in the private housing sector of the city.

Fair Housing in the Public Sector

Just as in the section of the survey concerning private sector barriers, respondents were asked to offer insight into their awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public sector was provided, and respondents were asked first to specify their awareness of fair housing issues within each area. If they were aware of any fair housing issues, they were asked to further describe these issues in a narrative fashion. Respondents were asked to identify fair housing issues within the following public sector areas related to housing:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies, and
- Any other public administrative actions or regulations.

The questions in this section were used to identify fair housing issues in the city regarding zoning, building codes, accessibility compliance, subdivision regulations, displacement issues,

development practices, residency requirements, property tax policies, land use policies, and NIMBYism.[15]

Additional Questions

Finally, respondents were asked about their awareness of any local fair housing plans or specific geographic areas of the city with fair housing problems. Respondents were also asked to leave additional comments.

Research Conclusions

The final list of impediments to fair housing choice for the City of Grants Pass was drawn from all quantitative, qualitative, and public input sources, and was based on HUD's definition of an impediment to fair housing choice as any action, omission, or decision that affects housing choice because of protected class status. The determination of qualification as an impediment was derived from the frequency and severity of occurrences drawn from quantitative and qualitative data evaluation and findings.

PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the City of Grants Pass as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily indicate the existence of city-wide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis reinforce findings from other data sources concerning impediments to fair housing choice.

[15] "Not In My Backyard" mentality

SECTION II. SOCIO-ECONOMIC CONTEXT

This section presents demographic, economic, and housing information collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the City of Grants Pass.

To supplement 2000 and 2010 Census data, data for this analysis was also gathered from the Census Bureau's American Community Survey (ACS). The ACS data cover similar topics to the decennial counts but include data not appearing in the 2010 Census, such as household income and poverty. The key difference of these datasets is that ACS data represent a five-year average of annual data estimates as opposed to a point-in-time count. Numerical estimates gathered through the ACS are not directly comparable to decennial Census counts because they do not account for certain population groups such as the homeless and because they are based on samples rather than counts of the population. However, *percentage* distributions from the ACS data can be compared to percentages from the 2000 and 2010 Censuses.

Due to a series of annexations between 2000 and the present, the city boundaries of Grants Pass have changed considerably during that time. Analysis of trends based on data from within contemporary city boundaries in 2000, 2010, and the present would not accurately reflect the previous population, previous housing activities, or the level of population growth within the area encompassed by current city boundaries. Previous trends have shaped the housing market within the current city boundaries, even if housing activities occurred in areas that were formerly outside of those boundaries.

In order to examine trends within a stable area from 2000 through the present, a weighting procedure was developed to estimate the size and characteristics of the population in 2000 and 2010 within current city boundaries. For that reason, demographic, economic, and housing data in this section are presented as estimates, except where otherwise noted.

DEMOGRAPHICS

As part of the review of the background context of the City of Grants Pass housing markets, detailed population and demographic data are included to describe the city's residents. These data summarize characteristics of the total population for the entire study area, along with the outcome of housing location choices.

POPULATION BY AGE

In 2000, an estimated 30,218 people lived within the area encompassed by the 2015 city boundaries ("the Grants Pass study area"), as shown in Table II.1 on the following page. By 2010, the population in the study area had grown by around 18 percent, to an estimated 35,625 residents. The fastest-growing group during that time included residents aged 55 to 64, who accounted for 12.8 percent of the population in 2010, up from 9 percent in 2000.

However, residents aged 35 to 54 represented a larger share of the population, though that share declined from 26.1 percent in 2000 to 24.2 percent by 2010. Approximately one-fifth of the population was aged 5 to 19 in both years.

Table II.1
Population by Age
Grants Pass Study Area
2000 & 2010 Census SF1 Data: 2015 City Boundaries

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	1,947	6.4%	2,245	6.3%	15.3%
5 to 19	6,278	20.8%	6,856	19.2%	9.2%
20 to 24	1,534	5.1%	2,015	5.7%	31.4%
25 to 34	3,489	11.5%	4,152	11.7%	19.0%
35 to 54	7,880	26.1%	8,622	24.2%	9.4%
55 to 64	2,716	9.0%	4,577	12.8%	68.5%
65 or Older	6,373	21.1%	7,158	20.1%	12.3%
Total	**30,218**	**100.0%**	**35,625**	**100.0%**	**17.9%**

The elderly population, which includes residents aged 65 and older, grew modestly but declined by a percentage point as a share of the overall population between 2000 and 2010. Even so, around one fifth of the population was aged 65 or older in 2010. As shown in Table II.2 below, just over a fifth of the elderly cohort was aged 85 and older: an estimated 1,479 residents. This group grew considerably as a share of the overall elderly population between 2000 and 2010, as did residents aged 65 or 66.

Table II.2
Elderly Population by Age
Grants Pass Study Area
2000 & 2010 Census SF1 Data: 2015 City Boundaries

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	496	7.8%	767	10.7%	54.6%
67 to 69	752	11.8%	1,047	14.6%	39.3%
70 to 74	1,435	22.5%	1,424	19.9%	-.8%
75 to 79	1,546	24.3%	1,273	17.8%	-17.7%
80 to 84	1,086	17.0%	1,168	16.3%	7.5%
85 or Older	1,057	16.6%	1,479	20.7%	40.0%
Total	**6,373**	**100.0%**	**7,158**	**100.0%**	**12.3%**

POPULATION BY RACE AND ETHNICITY

White residents represented more than ninety percent of the study area population in 2000 and 2010, accounting for an estimated 32,576 residents in 2010. However, the population declined slightly as a share of the overall population, owing to a relatively modest rate of growth over the decade, as shown in Table II.3 on the following page. Those who considered themselves to be part of two or more racial groups constituted the next largest percentage of the population (3.5 percent in 2010), followed by those who classified their race as "other", who made up 2.1 percent of the population in 2010. Additional racial groups accounted for around one percent of the population or less in both years.[16] In terms of ethnicity, which is a

[16] Note: Numerical figures from the ACS are based on samples of the population rather than a count of each resident, and direct comparisons of numerical figures from the ACS and Census should be avoided. For that reason, comparisons of ACS and Census data presented in this section are limited to comparisons of percentages.

separate consideration from race[17], the Hispanic population grew relatively rapidly from 2000 to 2010. Hispanic residents accounted for 5.1 percent of the study area population in 2000; an estimated 1,552 people. By 2010, the Hispanic population had grown by 82.3 percent, to an estimated 2,830 residents, accounting for 7.9 percent of the population in that year.

Table II.3
Population by Race and Ethnicity
Grants Pass Study Area
2000 & 2010 Census SF1 Data: 2015 City Boundaries

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	28,237	93.4%	32,576	91.4%	15.4%
Black	93	.3%	178	.5%	91.3%
American Indian	330	1.1%	444	1.2%	34.7%
Asian	240	.8%	342	1.0%	42.4%
Native Hawaiian/ Pacific Islander	21	.1%	86	.2%	309.3%
Other	460	1.5%	736	2.1%	60.1%
Two or More Races	837	2.8%	1,262	3.5%	50.8%
Total	**30,218**	**100.0%**	**35,625**	**100.0%**	**17.9%**
Non-Hispanic	28,666	94.9%	32,795	92.1%	14.4%
Hispanic	1,552	5.1%	2,830	7.9%	82.3%

Since 2010, Hispanic residents have continued to grow as a percentage of the total population in the study area, to an estimated 8.9 percent in 2010-2014, as shown in Table II.4 below. Following a decade of below-average growth, the white population grew slightly as a percentage of the total population from 2000 through 2010-2014. More pronounced was the estimated growth of the American Indian population, which came to account for 2.2 percent of the study area population (an estimated 785 residents) after 2010, when the estimated 444 American Indian residents in the study area accounted for 1.2 percent of the population.

Table II.4
Population by Race and Ethnicity
Grants Pass Study Area
2010 Census & 2014 Five-Year ACS

Race	2010 Census		2014 Five-Year ACS	
	Population	Population	Population	% of Total
White	32,576	91.4%	33,023	91.7%
Black	178	.5%	94	.3%
American Indian	444	1.2%	785	2.2%
Asian	342	1.0%	219	.6%
Native Hawaiian/ Pacific Islander	86	.2%	34	.1%
Other	736	2.1%	574	1.6%
Two or More Races	1,262	3.5%	1,291	3.6%
Total	**35,625**	**100.0%**	**36,021**	**100.0%**
Non-Hispanic	32,795	92.1%	32,816	91.1%
Hispanic	2,830	7.9%	3,206	8.9%

Table II.5 on the following page compares the maximum percentage of each racial or ethnic group observed in any block group throughout the city in 2000 and 2010 to the overall average for each group in each year. As shown, there were no racial groups whose maximum observed share of a block group population was more than four percentage points higher than the overall average. Moreover, the highest observed percentage of Hispanic residents in 2000

[17] Respondents to the decennial Census and American Community Survey are asked about their race and ethnicity separately, meaning that those who identified themselves as "non-Hispanic" or "Hispanic" may also identify as any race.

was 6.3 percentage points above the citywide average. By 2010 that difference had fallen to 4.8 percentage points. For the purposes of this study, a group is considered to represent a "disproportionate share" of a block group or Census tract if that group accounts for a share of the population in those areas that is ten percentage points higher than the study area average or greater.

Table II.5
Population by Race and Ethnicity
Grants Pass Study Area
2000 & 2010 Census SF1 Data: 2015 City Boundaries

Race	2000 Census			2010 Census		
	% of Total	Max %	Difference (% Point)	% of Total	Max %	Difference (% Point)
White	93.4%	96.7%	3.3	91.4%	95.1%	3.7
Black	0.3%	0.8%	0.5	0.5%	1.1%	0.6
American Indian	1.1%	2.5%	1.4	1.2%	2.9%	1.7
Asian	0.8%	1.7%	0.9	1.0%	2.8%	1.8
Native Hawaiian/ Pacific Islander	0.1%	0.7%	0.6	0.2%	1.0%	0.8
Other	1.5%	4.6%	3.1	2.1%	5.4%	3.3
Two or More Races	2.8%	4.5%	1.7	3.5%	6.0%	2.5
Total	**100%**	**-**	**-**	**100.0%**	**-**	**-**
Non-Hispanic	94.9%	98.3%	3.4	92.1%	95.7%	3.6
Hispanic	5.1%	11.4%	6.3	7.9%	12.7%	4.8

As shown in Map II.1 on the following page, American Indian residents exceeded the study area average in block groups in the city center, to the west and northwest of the city center, and to the southeast of the city center. However, there were no block groups in which the population of American Indian residents represented 11.1 percent of the population or more; the disproportionate share threshold for American Indian residents in 2000.

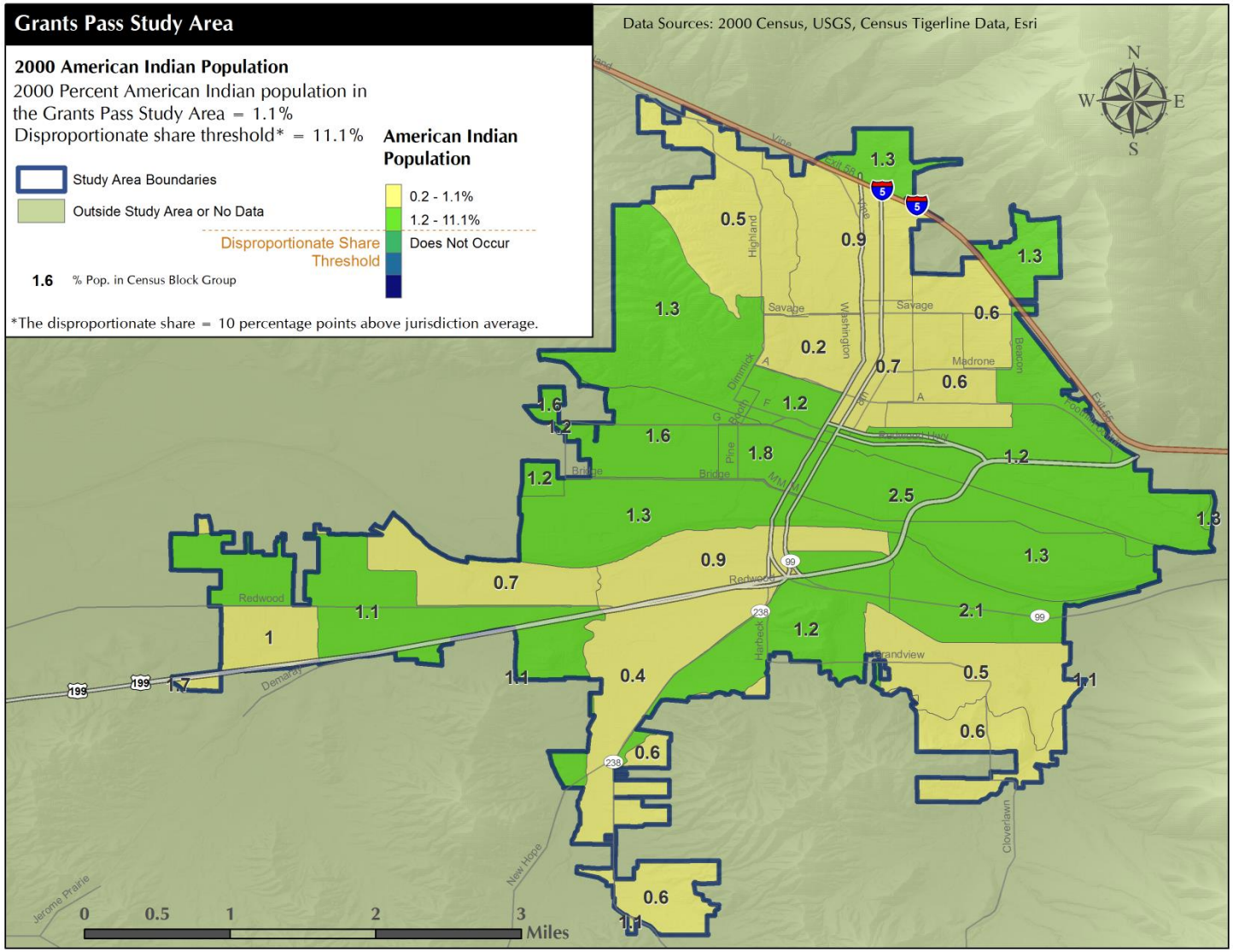
The same was true in 2010, as shown in Map II.2 on page 28. In that year, American Indian residents remained at above-average concentrations in roughly the same areas in which the population had been concentrated in 2000.

Asian residents accounted for above-average shares of the population (more than 0.9 percent) to the north of the city center in 2000, as shown in Map II.3 on page 29. However, as was the case with American Indian residents, there was nowhere in the study area in which Asian residents were observed to be disproportionately concentrated in that year. Above-average concentrations of Asian residents also appeared in block groups in the south of the study area.

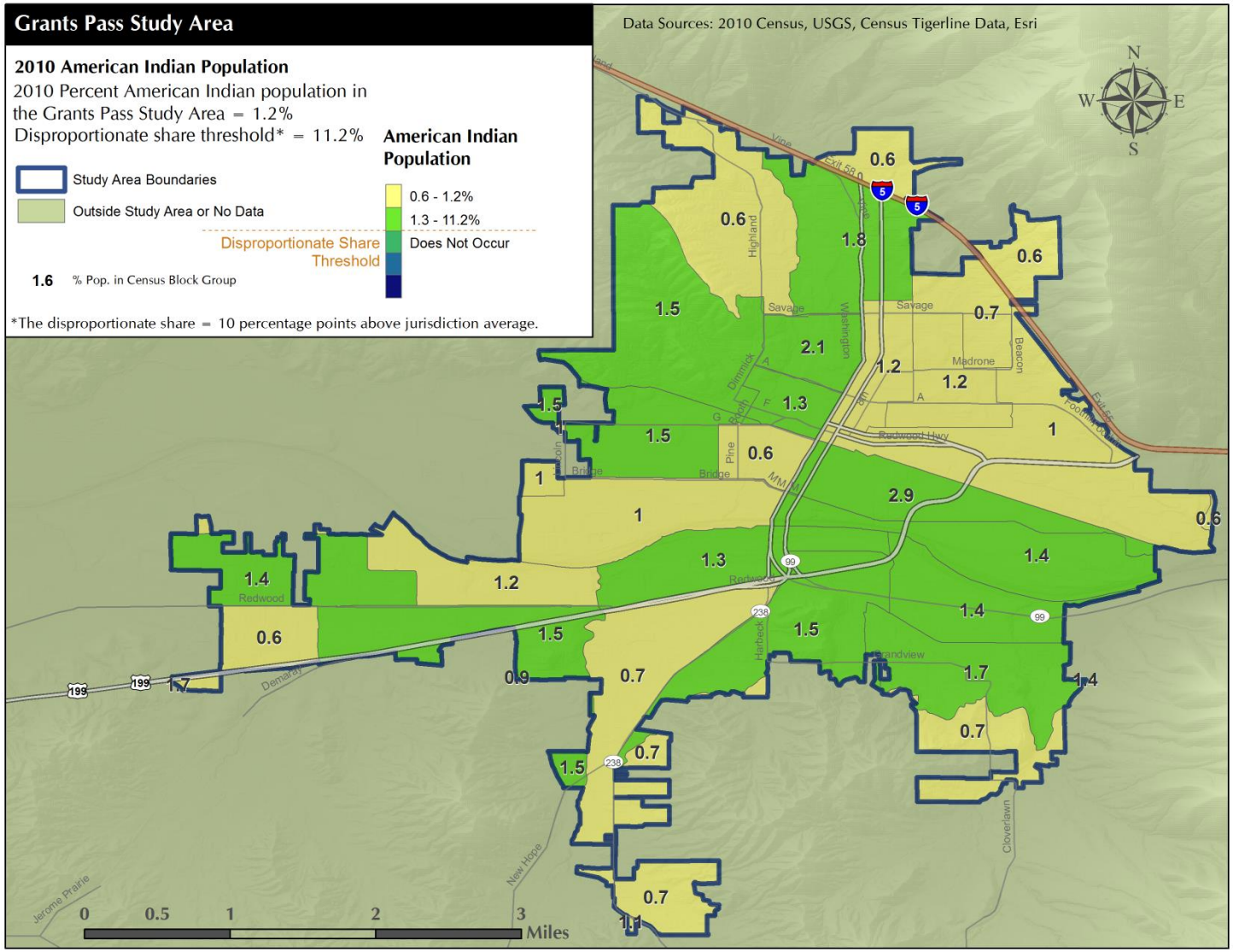
The distribution of the Asian population in 2010 is presented in Map II.4 on page 30. The areas in which Asian residents accounted for above-average percentages of the population (more than 1 percent in 2010) were largely the same as in 2000, though there was one block group in the northwest of the study area that came to have an above-average concentration of Asian residents after 2000.

The black population, which accounted for only 0.3 percent of the study area population in 2000, tended to be slightly concentrated in areas to the immediate north and south of the city center in that year, as shown in Map II.5 on page 31 (up to 0.8 percent of the population). There were also several block groups in the west of the study area in which black residents represented more than 0.3 percent of the population.

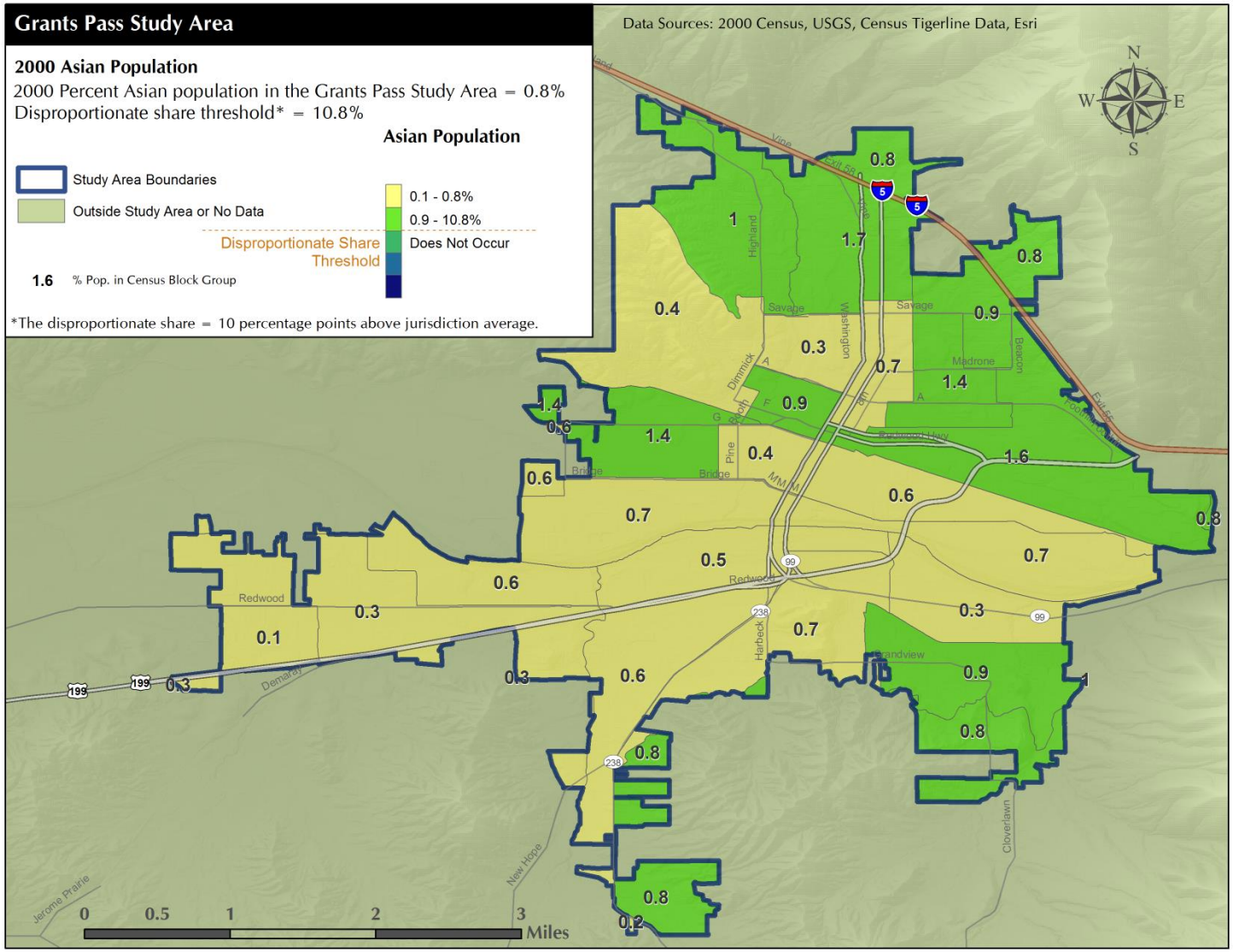
Map II.1
American Indian Population by Block Group, 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



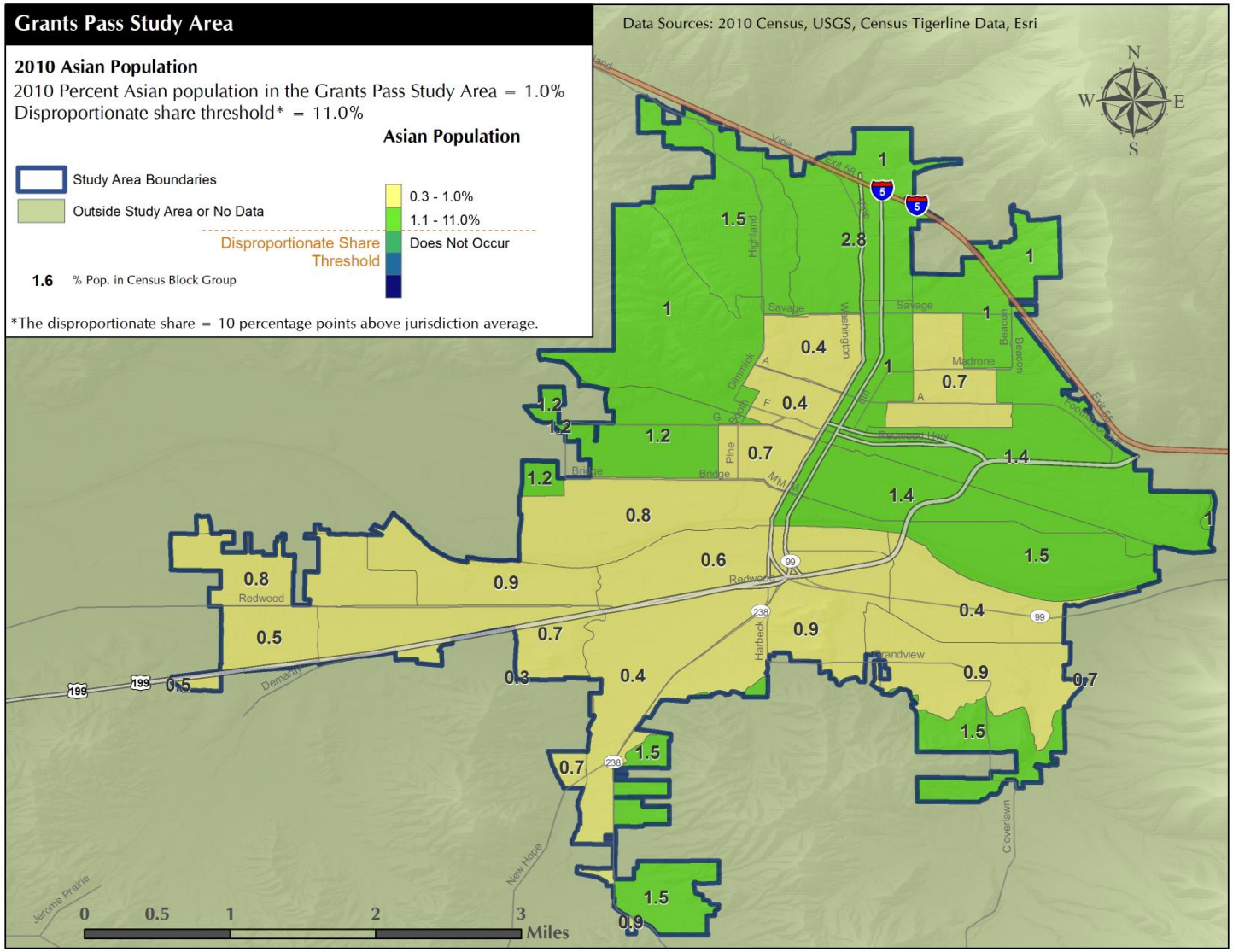
Map II.2
American Indian Population by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



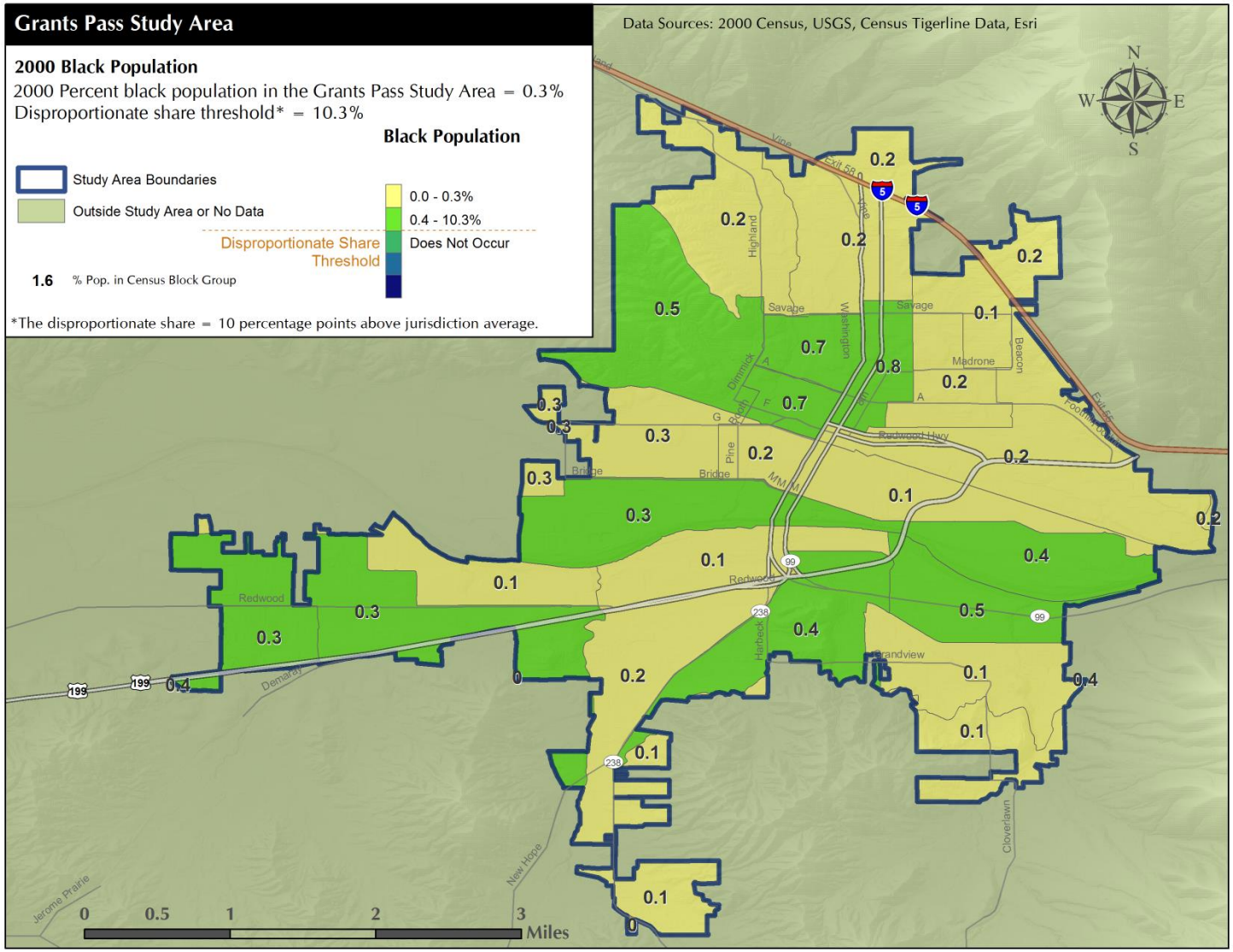
Map II.3
Asian Population by Block Group, 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



Map II.4
Asian Population by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



Map II.5
Black Population by Block Group, 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



As the black population grew from 2000 through 2010, black residents remained concentrated in many of the same areas that had above-average concentrations of black residents in 2000. However, as shown in Map II.6 on the following page, there were also several block groups, in the northwest of the study area and to the east of the city center, in which the percentage of black residents exceeded the overall study area average in 2010.

The Native Hawaiian and Pacific Islander population also accounted for a relatively small percentage of the study area population in 2000: just 0.1 percent. As shown in Map II.7 on page 34, above average concentrations of Native Hawaiian/Pacific Islander residents were largely limited to the center of the city in that year.[18]

In 2010, Native Hawaiian and Pacific Islander residents represented 0.2 percent of the population. As shown in Map II.8 on page 35, these residents came to account for larger shares of the population in the south and east of the study area after 2000.

Block groups with above average concentrations of white residents tended to be located closer to the periphery of the study area in 2000, as shown in Map II.9 on page 36. Nevertheless, there were several block groups to the south of the city center in which the white population ranged from 93.4 to 100 percent of the population. There were no block groups throughout the study area in which white residents accounted for any less than 89.7 percent of the population in that year; this also means that there were no block groups in which the non-white population accounted for any more than 10.3 percent of the population.

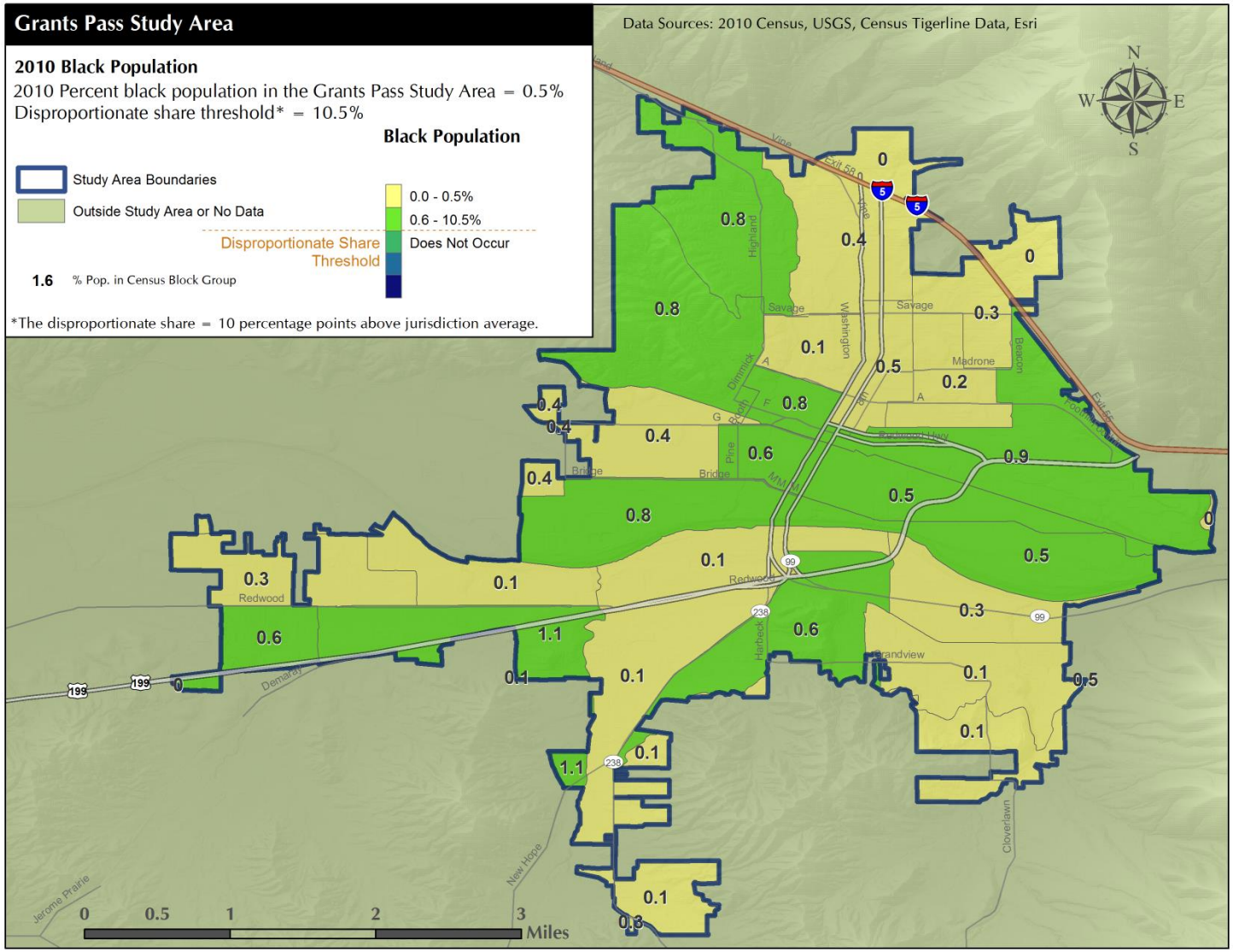
By 2010, the white population has declined slightly, representing 91.4 percent of the population. As shown in Map II.10 on page 37, it remained the case that the white population tended to account for larger shares of the population in block groups closer to the periphery of the study area. There were also areas in which the non-white population accounted for as much as 12.4 percent of the population, up more than two percentage points above the maximum non-white population share observed in 2000.

The Hispanic population tended to account for above-average shares of the population in block groups in the city center and in the south of the study area in 2000, as shown in Map II.11 on page 38, along with several block groups located along the Highway 99 corridor in the north of the study area.

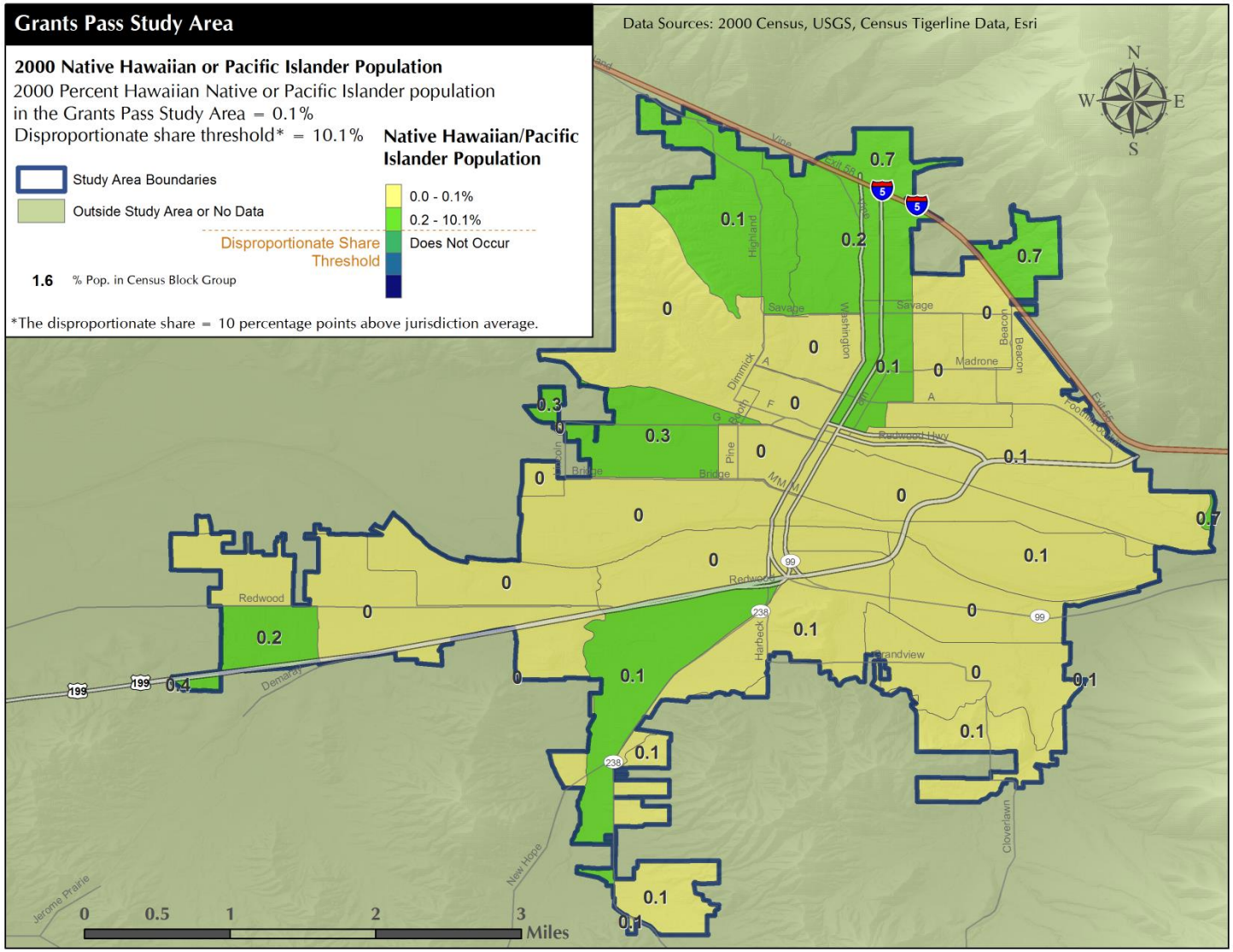
By 2010, Hispanic residents were accounting for larger percentages of the population in block groups to the north of the city center, as shown in Map II.12 on page 39. However, as has been the case with each of the racial groups discussed previously, there were no block groups in the study area in which Hispanic residents were observed to be disproportionately concentrated in 2010 (the same was true in 2000).

[18] The area in the northeast of the city with an above-average concentration of Native Hawaiian and Pacific Islander residents is part of a large block group, the majority of which lay outside of the study area in 2000.

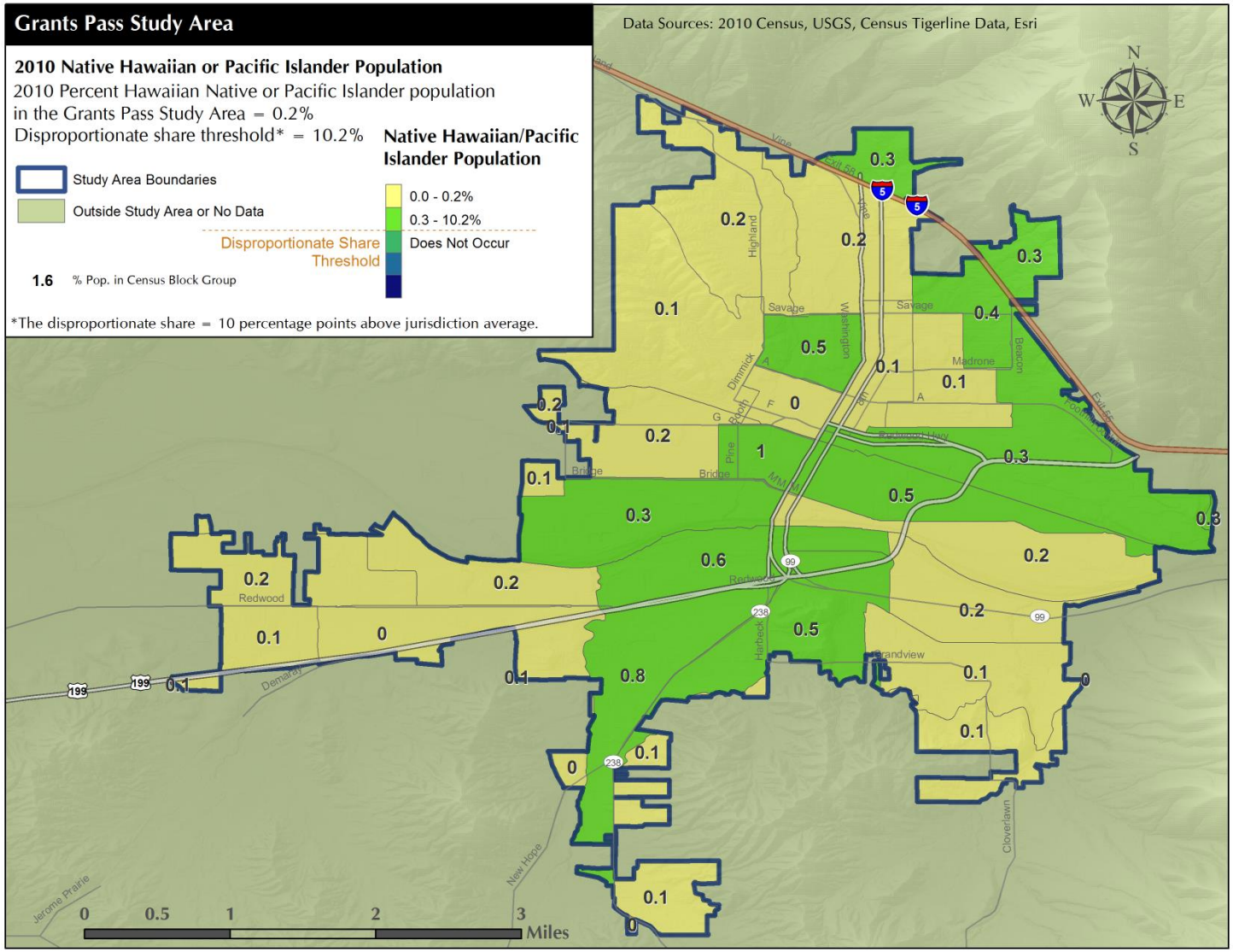
Map II.6
Black Population by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



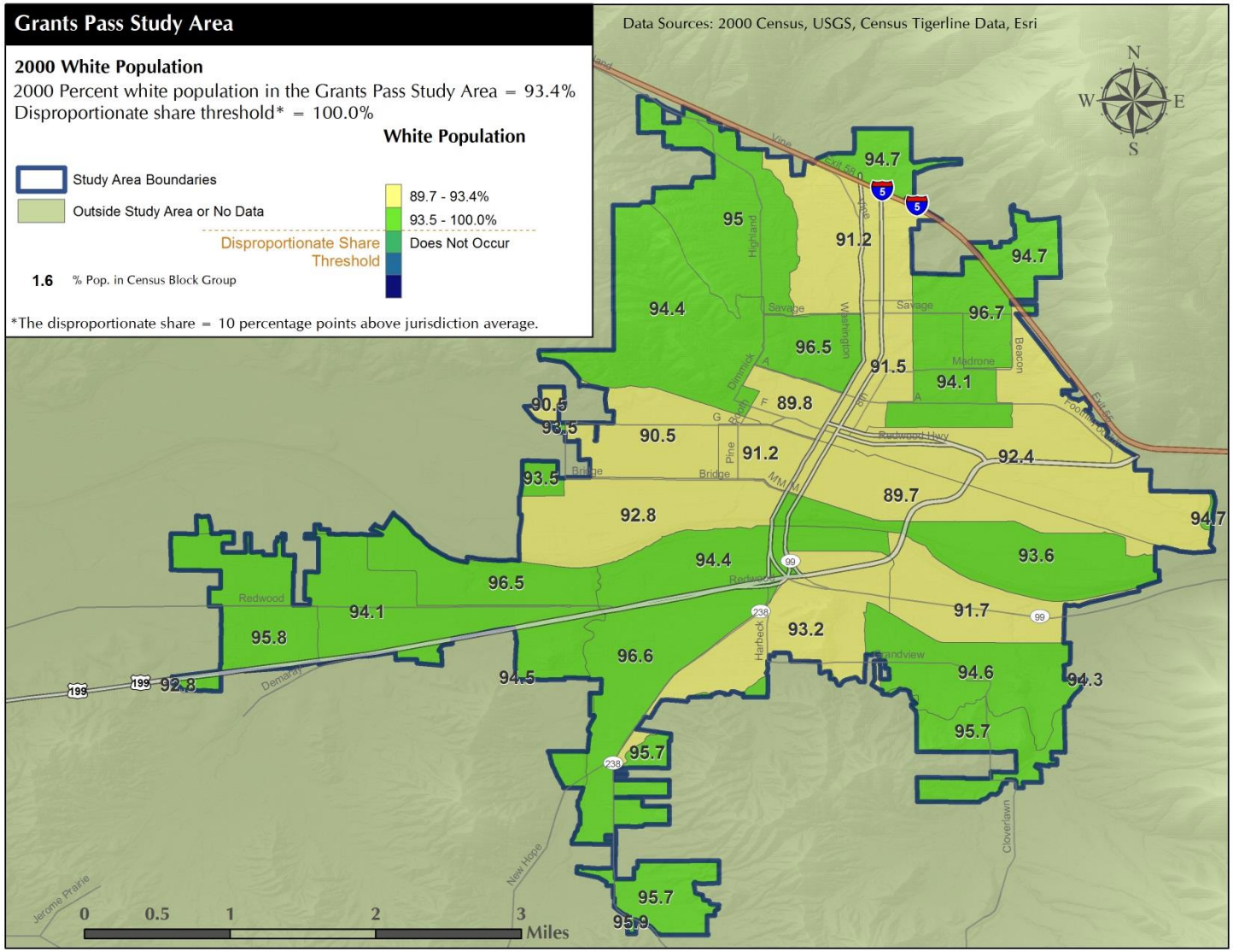
Map II.7
Native Hawaiian/Pacific Islander Population by Block Group, 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



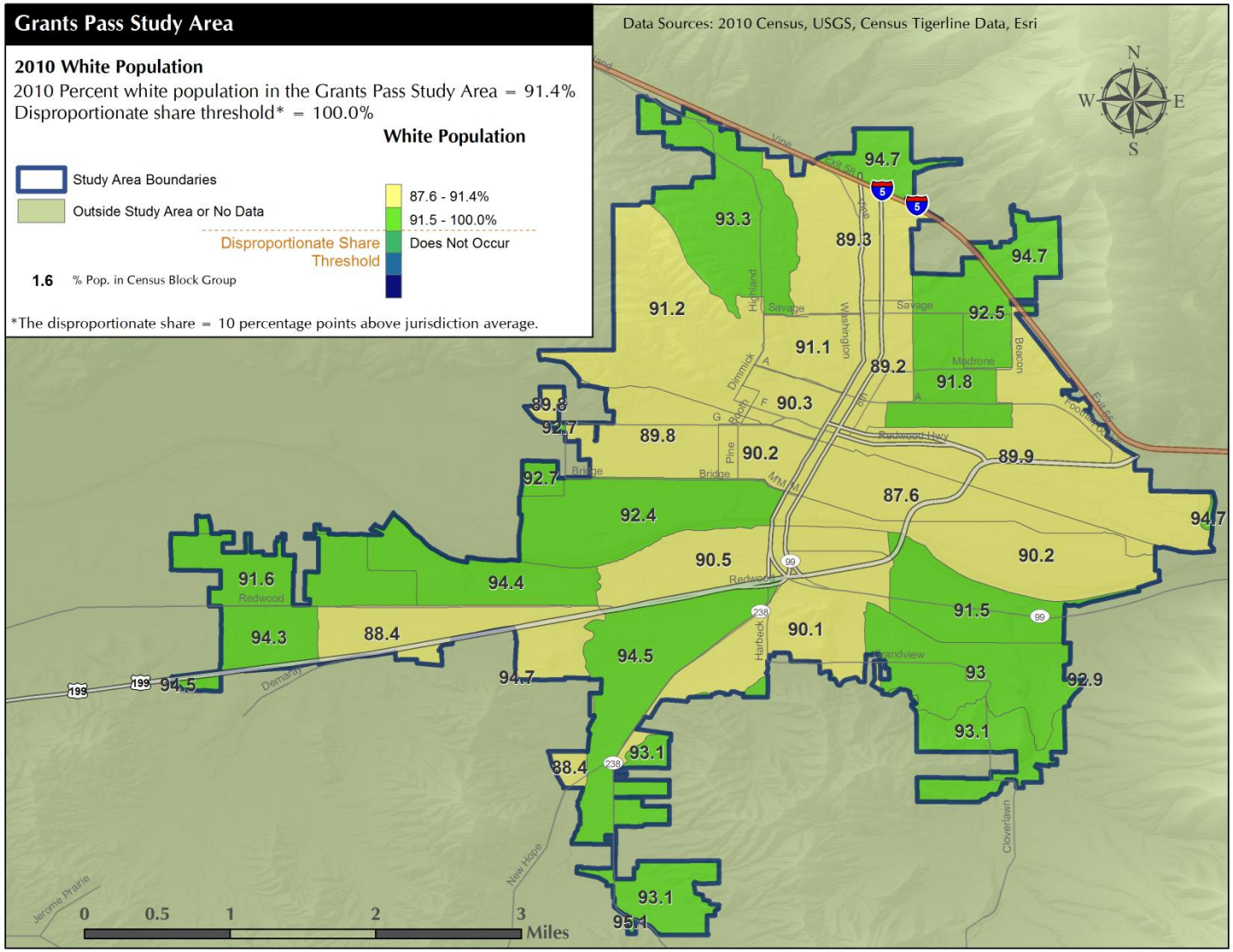
Map II.8
Native Hawaiian/Pacific Islander Population by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



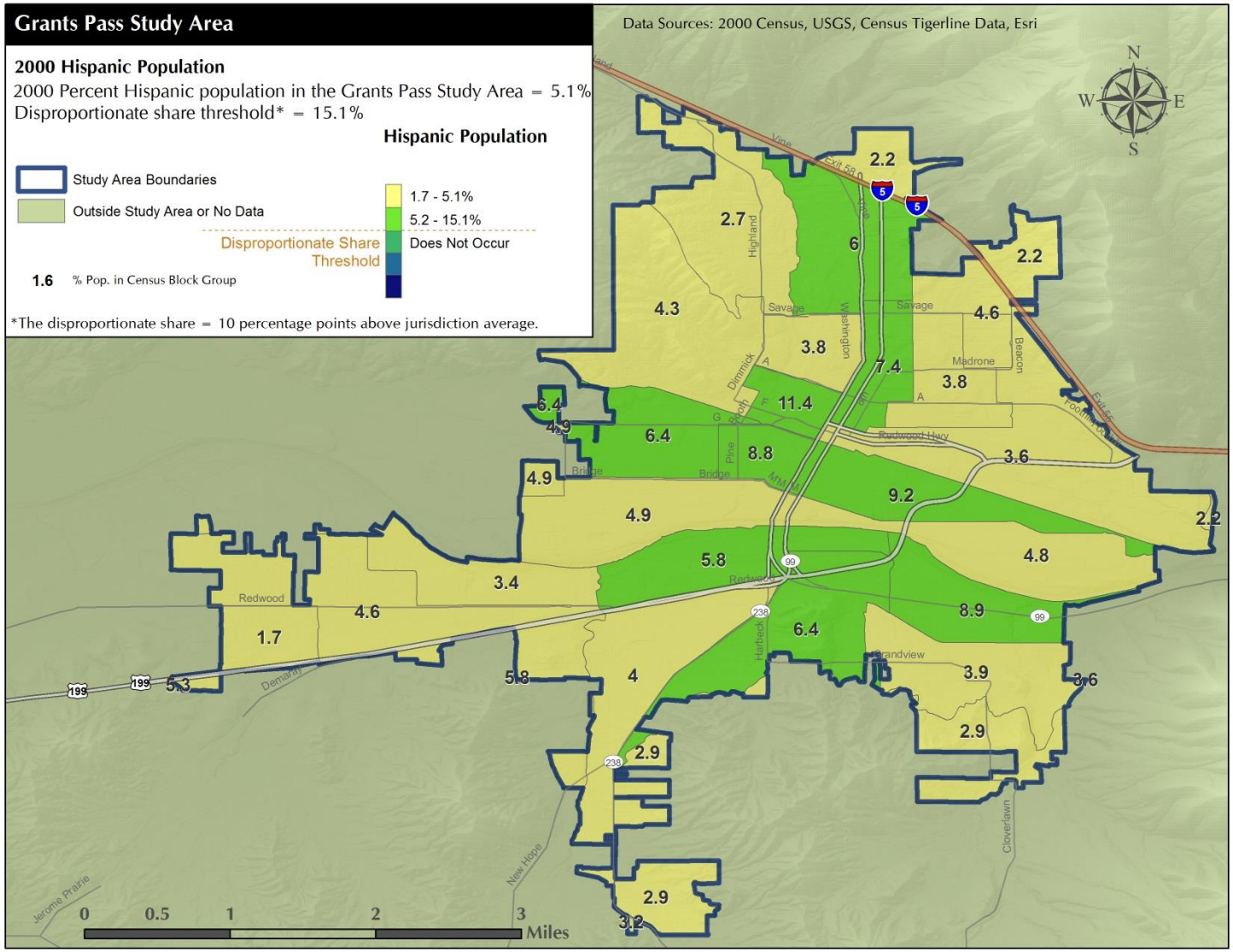
Map II.9
White Population by Block Group, 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



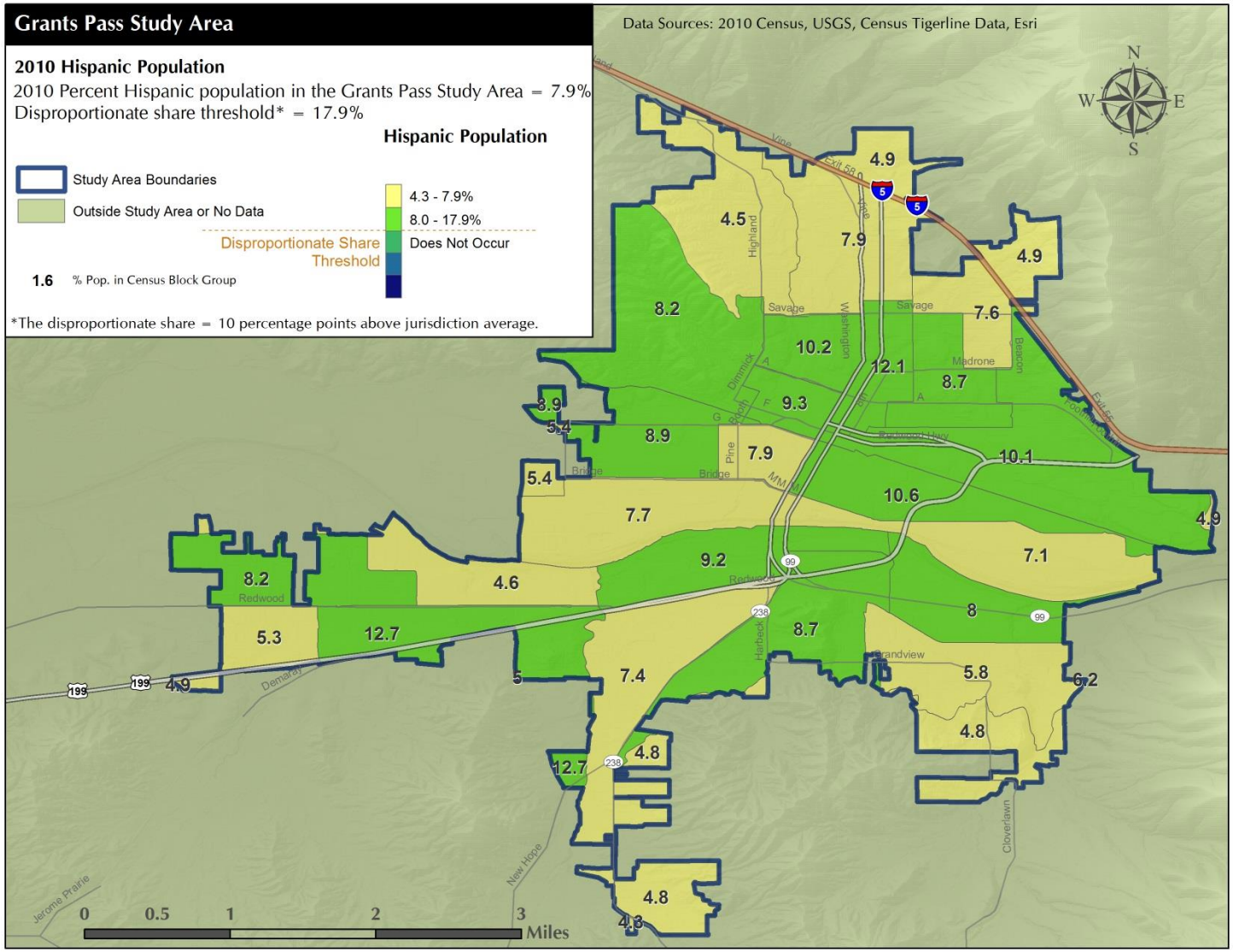
Map II.10
White Population by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



Map II.11
Hispanic Population by Block Group, 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



Map II.12
Hispanic Population by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



Disability Status

An estimated 17.3 percent of the study area population was living with some form of disability in 2010-2014, as shown in Table II.6 below. Female residents, 18.3 percent of whom were living with a disability during that time, were more likely than male residents to have a disability (an estimated 16.2 percent of male residents had a disability in 2010-2014). As shown in Map II.13 on the following page, Census tracts with above-average concentrations of residents with disabilities were located exclusively to the south of the railroad tracks that pass through the center of town. Note that disability data are not available at the block group level, and so are presented here by Census tract.

Table II.6
Disability by Age
Grants Pass Study Area
2014 Five-Year ACS Data: 2015 City Boundaries

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	9	.9%	0	.0%	9	.4%
5 to 17	126	3.9%	38	1.3%	164	2.7%
18 to 34	183	5.4%	188	5.2%	371	5.3%
35 to 64	1,124	19.2%	1,457	22.4%	2,582	20.9%
65 to 74	558	33.0%	501	22.4%	1,059	27.0%
75 or Older	674	48.9%	1,257	54.6%	1,931	52.5%
Total	**2,673**	**16.2%**	**3,442**	**18.3%**	**6,114**	**17.3%**

Economics

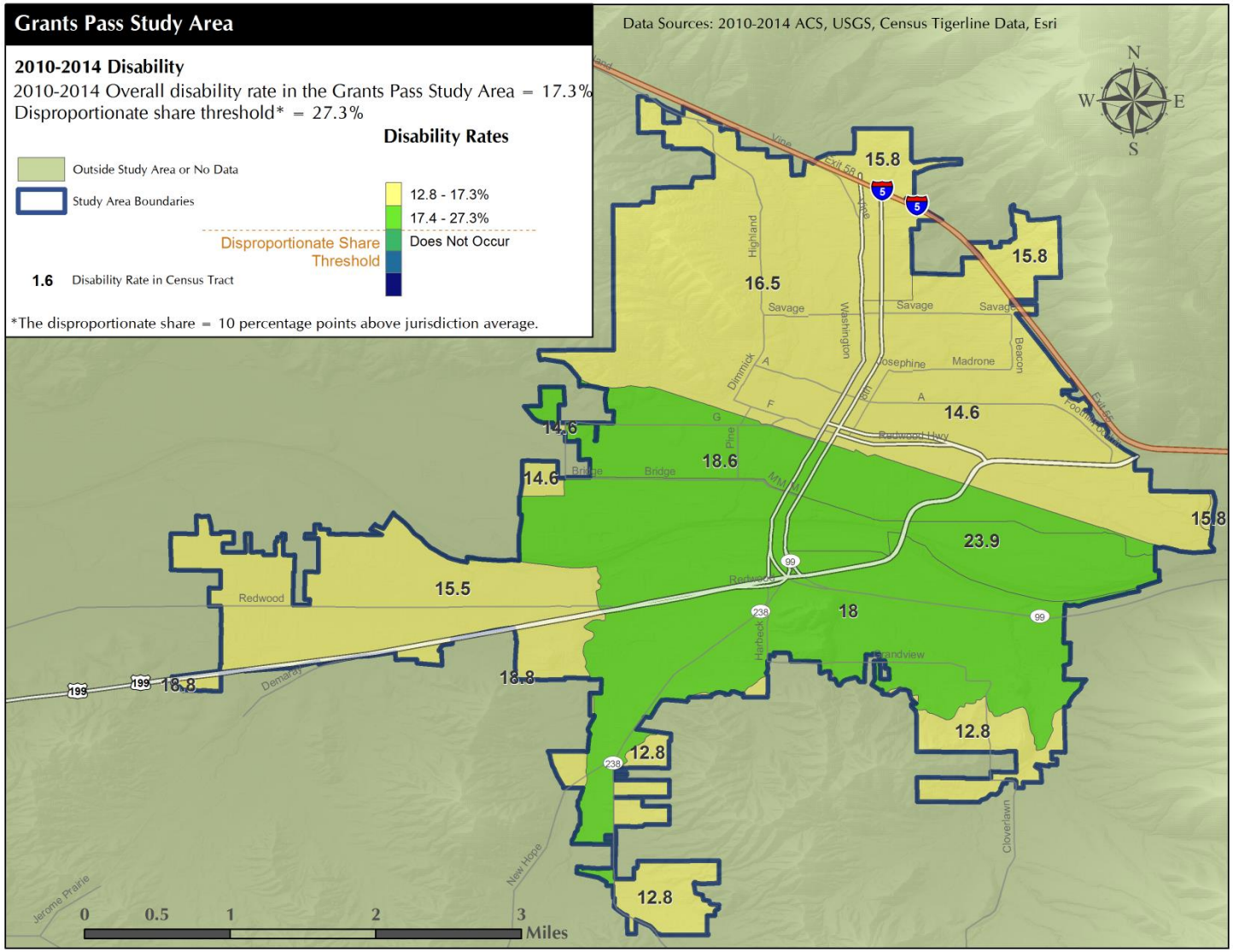
Data indicating the size and dynamics of the City of Grants Pass's job markets, workforce, incomes, and persons in poverty provide essential contextual background and indicate the potential buying power or other financial limitations of city residents when making a housing choice. A review of the city's residents in such a context shows where additional attention may be needed to address needs and challenges.

Labor Force and Employment

The Bureau of Labor Statistics collects data on labor force participation and employment, and represents a count of people either working or seeking work. These data are collected through the Current Employment Statistics program, which surveys about 144,000 businesses and government agencies each month. The unemployment rate is based on the gap between the number of employed persons and the total number in the labor force; this gap is represented as a percentage of the total labor force.

Unlike most of the data presented in this study, yearly employment, income, and earnings data reflect the city boundaries that were in effect in each year reported. This is because these data are reported at the city level rather than by Census tract, so the weighting procedure employed for other datasets in the study is not applicable to BLS data. To emphasize this distinction, the discussion from this section will refer to trends occurring in the "City of Grants Pass" rather than the "Grants Pass Study Area", as is more typical in this report. This means that some of the growth figures reported in the following section may be attributable to annexation.

Map II.13
Population with Disabilities by Census Tract, 2010-2014
Grants Pass Study Area
2010-2014 ACS Data: 2015 City Boundaries

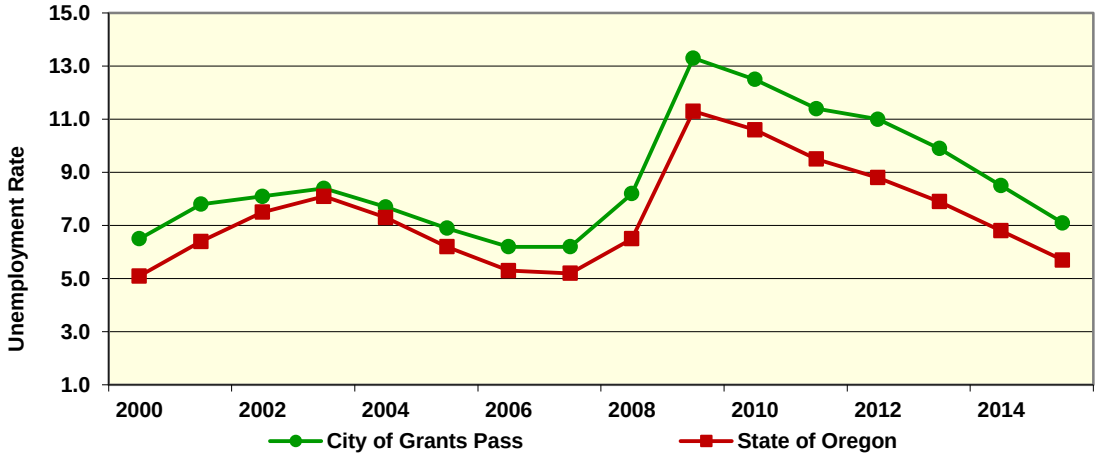


From 2000 through 2007, growth in the number of employed workers in the city generally kept pace with changes in the size of the labor force, as shown in Diagram II.1 below. The number of employed, which stood at around 9,000 in 2001, grew steadily over the following three years. That growth accelerated rapidly after 2004, and by 2007 the labor force had grown by around 4,000 workers.

Diagram II.1
Employment and Labor Force
City of Grants Pass
2000 - 2015 BLS Data

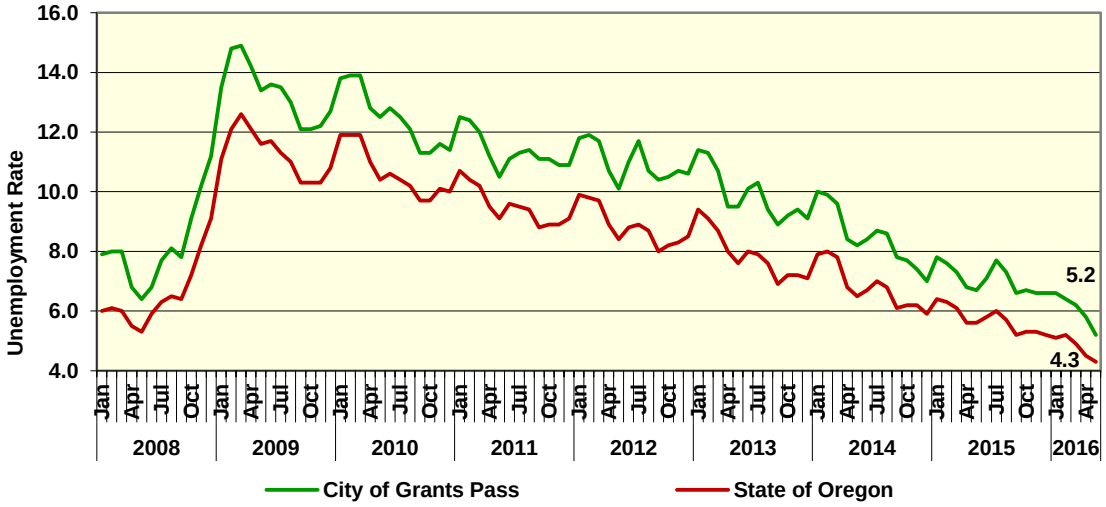
As the size of the labor force remained stable at around 14,500 after 2007, the number of employed workers began to decline. By 2009, employment had fallen from its 2007 peak (13,604) to around 12,558. The result, as shown in Diagram II.2 below, was a dramatic increase in the unemployment rate, which topped 13 percent in 2009. Since that time, the gap between the number of employed and the number in the labor force has narrowed, contributing to a steady decline in unemployment. By 2015, the unemployment rate in the city had declined to 7.1 percent, within one percentage point of pre-recession unemployment rates.

Diagram II.2
Unemployment Rate
City of Grants Pass
2000 - 2015 BLS Data



Though the unemployment rate reached its peak in the City of Grants Pass in 2009, the sustained decline in unemployment appears to have begun early that same year. As shown in Diagram II.3 below, the monthly unemployment rate has declined steadily from its March 2009 peak of 14.9 percent; though, as is typical, there has been marked seasonal variation in the unemployment rate since that time. In May 2016, the unemployment rate in the city stood at 5.2 percent.

Diagram II.3
Monthly Unemployment Rate
City of Grants Pass
2000 - 2015 BLS Data



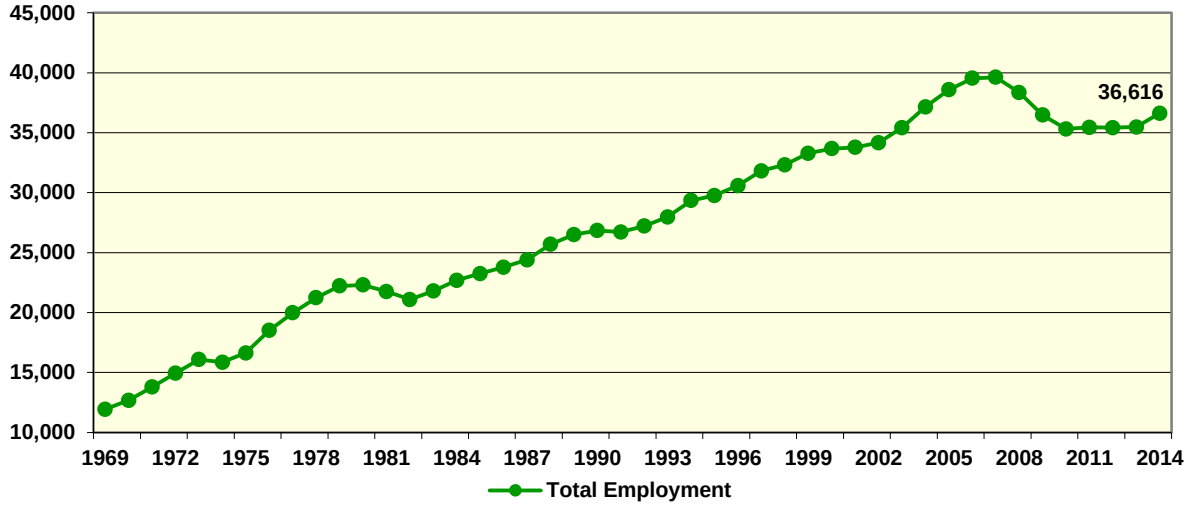
FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

The Bureau of Economic Analysis provides county-level estimates of "total employment", i.e., the number of full- and part-time jobs at a given point in time.[19] As shown in Diagram II.4 on the following page, the number of jobs in Josephine County generally grew steadily through the 1970's, '80s, and '90s, though there were periods of recession in the mid-1970s and early 1980s, along with a brief slowdown in the 1990s. That growth accelerated after 2002, and the number of full- and part-time jobs in the county rose by roughly 5,500. In 2007, on the eve of the recent global recession, the number of jobs in the county stood at around 39,600.

As the nation entered into recession after 2007 the number of jobs in Josephine County fell by around 4,300. Total employment since the recession, which hovered just above 35,000 between 2010 and 2013, ticked upward to 36,616 in 2014.

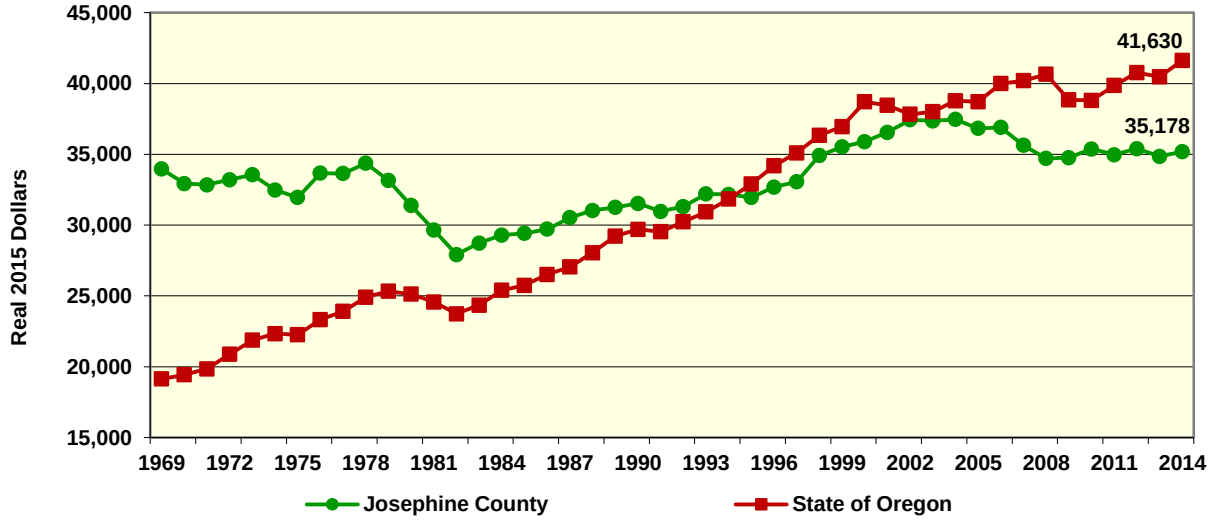
[19] Note that because one worker may hold more than one job, the same worker may appear more than once in this dataset.

Diagram II.4
Full- and Part-Time Employment
Josephine County
1969–2014 BEA Data



From 1969 to 1994, real average earnings per job[20] in Josephine County exceeded statewide figures, as shown in Diagram II.5 below. However, due to comparatively rapid growth in earnings at the state level, average earnings in Josephine County have fallen behind statewide figures since that time. Nevertheless, earnings continued to grow in the county through 2003, when the average worker earned just over $38,000 per year, in 2015 dollars, at his or her job. However, earnings fell by around $3,300 over the next five years, and have remained near $35,000 per year since 2008.

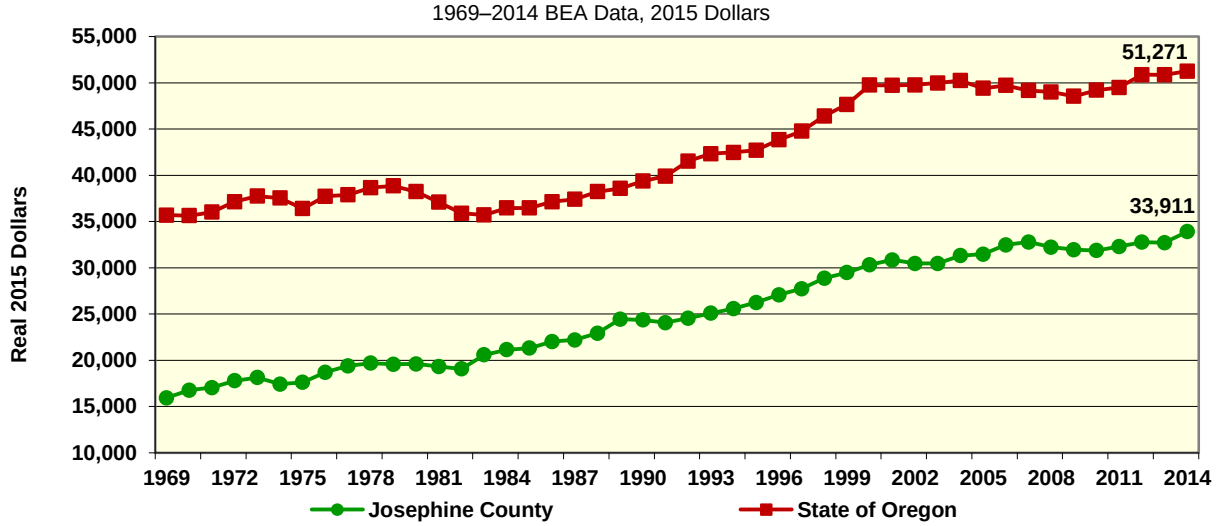
Diagram II.5
Real Average Earnings Per Job
Josephine County
1969–2014 BEA Data, 2015 Dollars



[20] Real average earnings per job is equal to total earnings from employment divided by the number of jobs in an area. Those earnings figures are adjusted for inflation, and presented in 2015 dollars.

Unlike real earnings, the real per capita income (PCI) in the county has been consistently below statewide PCI since 1969[21]. However, as shown in Diagram II.6 below, PCI has also remained more stable than real earnings: In fact, real PCI in Josephine County continued to grow after 2003, even as average earnings declined. Real PCI declined slightly after 2007, at which time the average resident had an income of $32,782. Growth in PCI resumed after 2010, and by 2014 the income of the average county resident stood at $33,911 in real dollars.

Diagram II.6
Real Per Capita Income
Josephine County
1969–2014 BEA Data, 2015 Dollars



HOUSEHOLD INCOME

There appeared to be an upward shift in the household incomes of study area residents from 2000 through 2010-2014, in nominal dollars.[22] As shown in Table II.7 below, the share of households with incomes of $100,000 per year or more grew by 5.8 percentage points, and the number of those with incomes from $75,000 up to $100,000 grew by three percentage points. At the same time, an increasing percentage of households had incomes of $15,000 to $19,999 per year: 9.6 percent in 2010-2014, up from an estimated 8.3 percent in 2000.

Table II.7
Households by Income
Grants Pass Study Area
2000 Census SF3 & 2014 Five-Year ACS Data: 2015 City Boundaries

Income	2000 Census		2014 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than $15,000	2,877	23.0%	2,715	18.6%
$15,000 to $19,999	1,033	8.3%	1,400	9.6%
$20,000 to $24,999	1,423	11.4%	1,247	8.5%
$25,000 to $34,999	1,939	15.5%	2,334	16.0%
$35,000 to $49,999	2,308	18.5%	2,131	14.6%
$50,000 to $74,999	1,721	13.8%	2,085	14.3%
$75,000 to $99,999	676	5.4%	1,262	8.6%
$100,000 or More	518	4.1%	1,444	9.9%
Total	**12,494**	**100.0%**	**14,618**	**100.0%**

[21] Per capita income includes income from all sources, including wages, investment income, and transfer payments. It is equal to the total income of an area divided by the number of area residents. Real PCI is adjusted for inflation, and presented in 2015 dollars.
[22] Nominal dollars, unlike real dollars, have not been adjusted for inflation.

POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for its size, then that family, and every individual in it, is counted as living in poverty. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index[23]. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps.

In spite of the fact that a larger percentage of households were earning $50,000 or more in 2010-2014 than were in 2000, the poverty rate rose from 14.9 to 22.5 percent over that same time period, as shown in Table II.8 below.

Table II.8
Poverty by Age
Grants Pass Study Area
2000 Census SF3 & 2014 Five-Year ACS Data: 2015 City Boundaries

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

The share of households living in poverty in a given Census tract is presented in Map II.14 on the following page. As shown, households living in poverty accounted for as much as a quarter of total households in the Census tracts to the south of the city center in 2000.

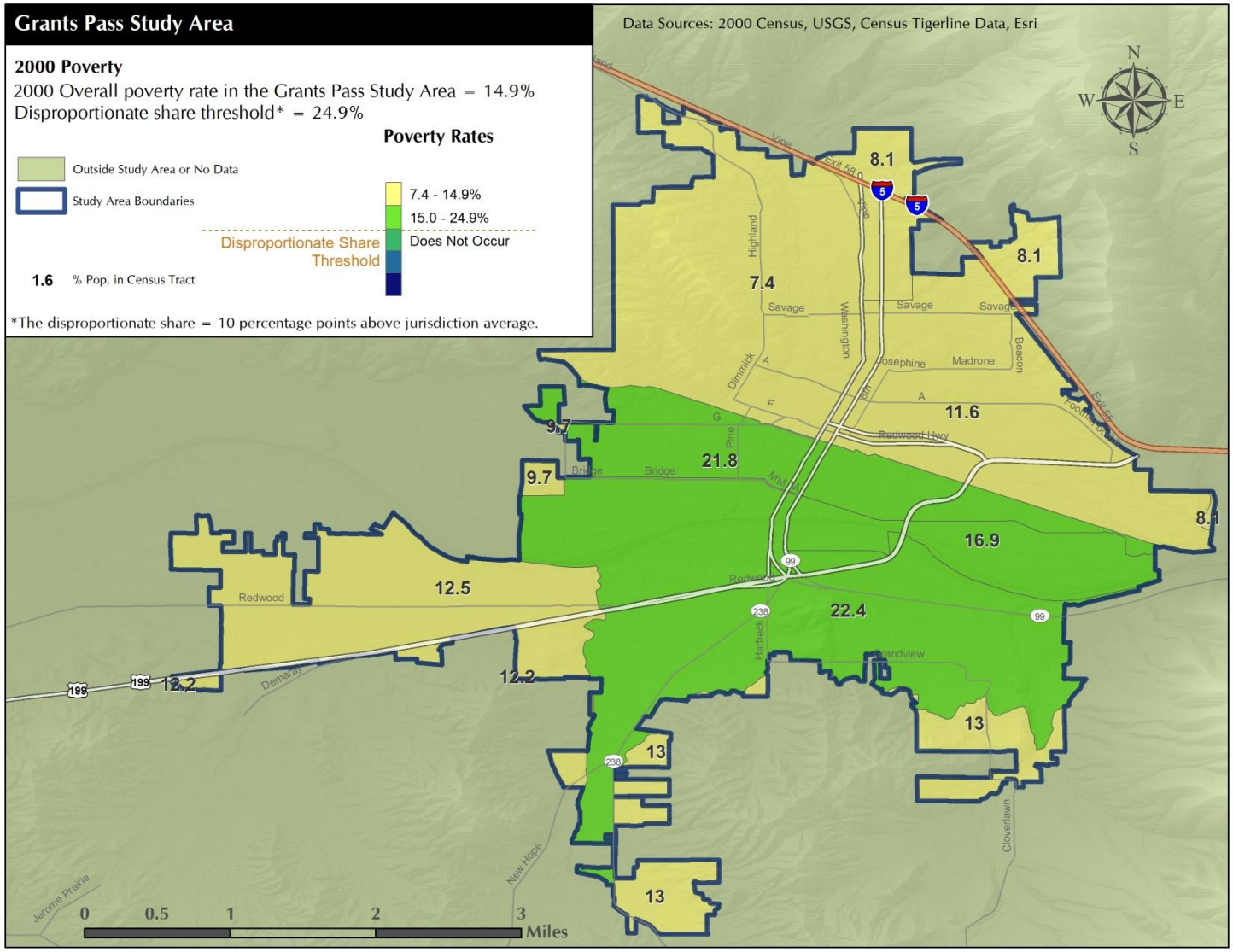
By 2010-2014, the poverty rate had risen in the study area as a whole. As shown in Map II.15 on page 48, more than one-third of households to the northeast of the city center were living in poverty at that time, in an area encompassed by Northwest 6th Street, the railroad tracks, and the northeast study area boundaries. In the city center, the poverty rate exceeded the overall study area average of 22.5 percent.

HOUSING

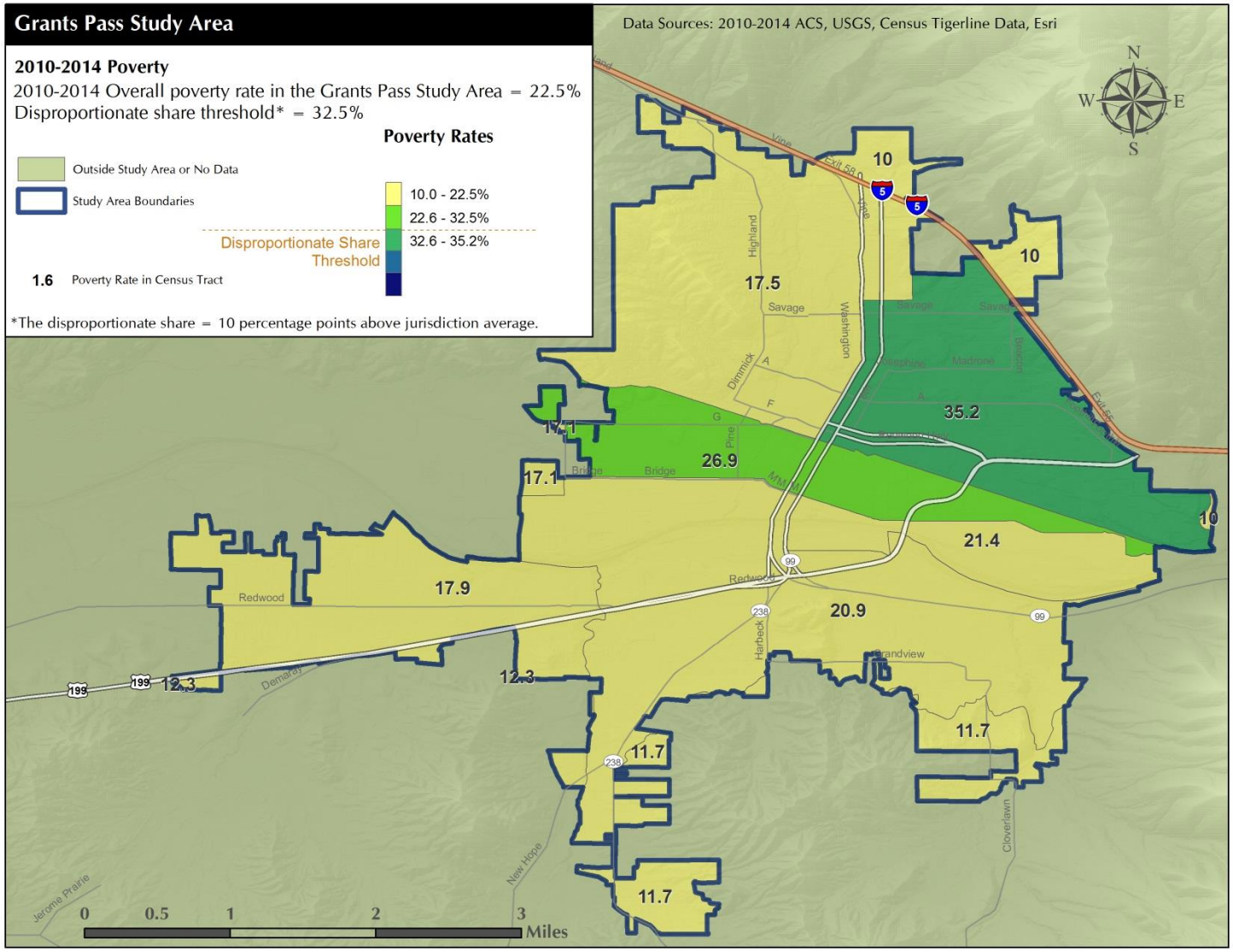
Simple counts of housing by age, type, tenure, and other characteristics form the basis for the housing stock background, suggesting the available housing in the city from which residents have to choose. Examination of households, on the other hand, shows how residents use the available housing, and shows household size and housing problems such as incomplete plumbing and/or kitchen facilities. Review of housing costs reveals the markets in which housing consumers in the city can shop, and may suggest needs for certain populations.

[23] 2015 Poverty thresholds for families of different compositions and characteristics are included in Table D.22, Appendix D.

Map II.14
Poverty Rate by Census Tract
Grants Pass Study Area
2000 Census Data



Map II.15
Poverty Rate by Census Tract
Grants Pass Study Area
2014 Five-Year ACS Data



TENURE

More than 90 percent of housing units in the Grants Pass study area were occupied in 2000 and 2010, as shown in Table II.9 below. There was a shift toward rental tenancy among occupied units over the decade, as the percentage of occupied units with owner-occupants fell from 58.6 to 53.9 percent. The housing stock as a whole grew by around 23 percent over the decade, outpacing growth in the number of households. As a result, vacant housing units accounted for a larger share of the housing stock in 2010, or 8.1 percent, than they had in 2000.

Table II.9
Housing Units by Tenure: 2000 and 2010
Grants Pass Study Area
2000 & 2010 Census SF1 Data: 2015 City Boundaries

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

The shift toward rental-occupied housing continued after 2010, as renter-occupied units rose from 46.1 to 47 percent of the occupied housing stock, as shown in Table II.10 below. The percentage of vacant units in the study area has fallen since 2010, and occupied housing units represented around 92.2 percent of the housing stock in 2010-2014.

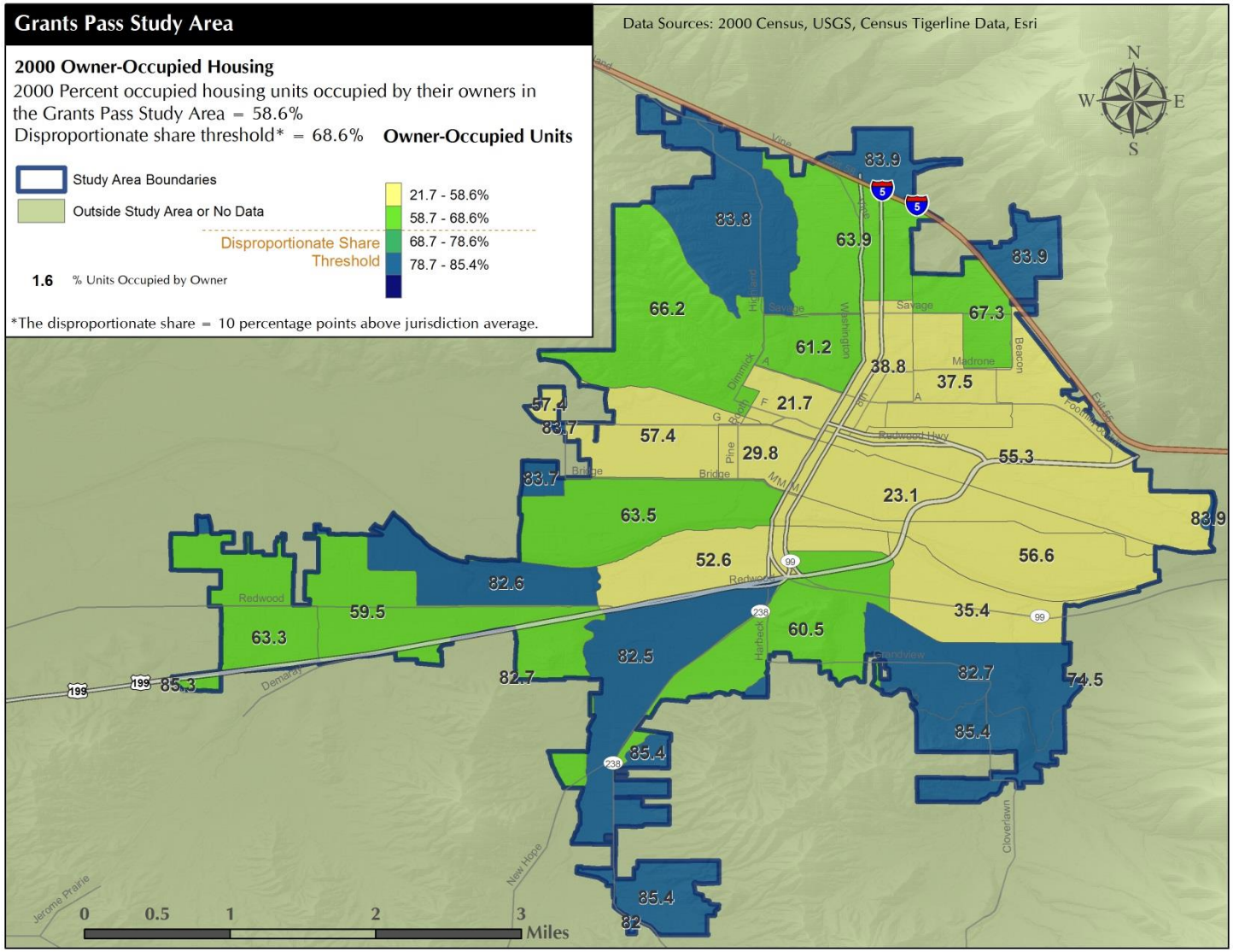
Table II.10
Housing Units by Tenure: Since 2010
Grants Pass Study Area
2010 Census & 2014 Five-Year ACS Data: 2015 City Boundaries

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

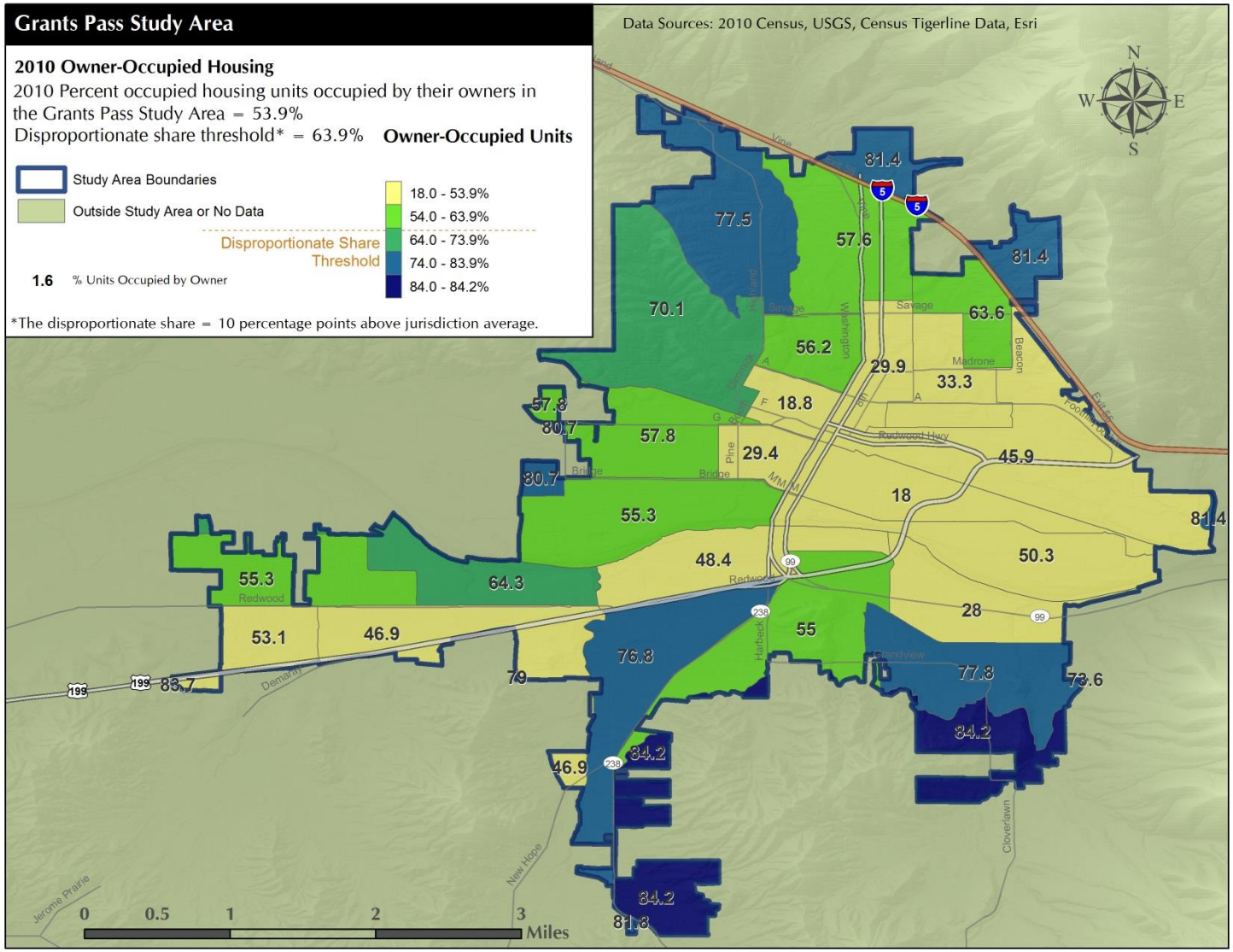
Owner-occupied housing units tended to be concentrated in outlying block groups in the Grants Pass study area in 2000, as shown in Map II.16 on the following page. Between 78.7 and 85.4 percent of occupied units in block groups around the outskirts of the study area were occupied by their owners at that time.

The trend toward higher concentrations of owner-occupied housing units in peripheral areas continued through 2010. As shown in Map II.17 on page 51, owner-occupied units accounted for as much as 84.2 percent of occupied units to the south of the study area, and 64 to 83.9 percent of housing units in peripheral block groups within the study area.

Map II.16
Owner-Occupied Housing by Block Group, 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



Map II.17
Owner-Occupied Housing by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



As one might expect, given the comparatively high concentrations of owner-occupied units around the outskirts of the study area in 2000 and 2010, renter-occupied units tended to be concentrated in central areas of the city. Between 71.5 and 78.3 percent of occupied units housed rental tenants in two block groups near the city center, as shown in Map II.18 on the following page.

As renter-occupied units came to account for a larger share of the occupied housing stock between 2000 and 2010, these units became even more concentrated in central parts of the study area. As shown in Map II.19 on page 54, renter-occupied units represented more than two-thirds of the occupied housing stock in several block groups throughout the eastern/central portion of the study area.

VACANT HOUSING

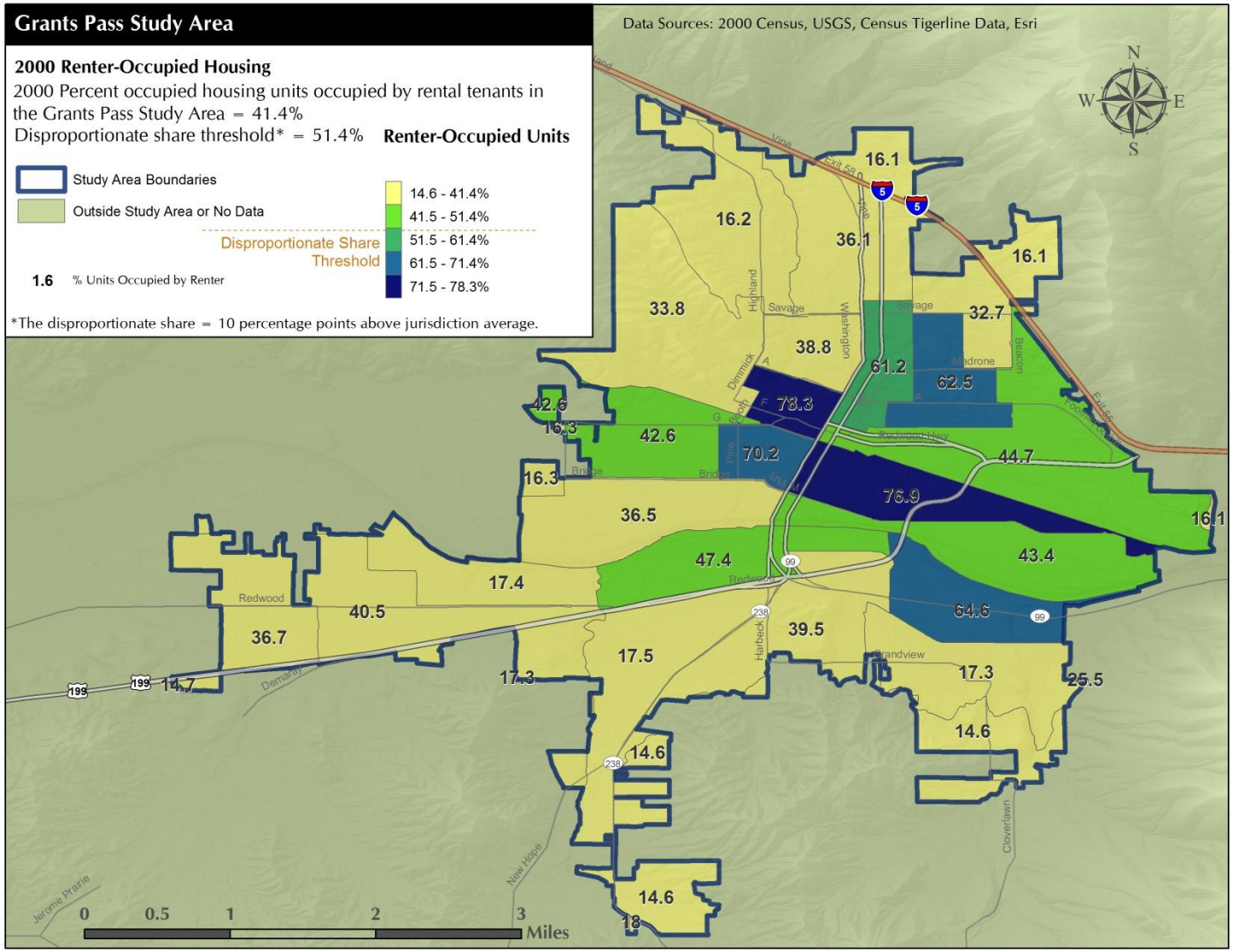
A majority of vacant housing units were available for sale or for rent in 2000 and 2010, as shown in Table II.11 below. Around a quarter of vacant units (both single- and multifamily) were classified as "other vacant" in 2000, or an estimated 177 units within the Grants Pass study area. Units may be classified as "other vacant" if the owner does not wish to sell the unit, is using it for storage, is elderly and living with relatives or in a nursing home, or the unit is foreclosed. These units can present more of a problem than other types of vacant housing units, as they are often not available to the market place. Without regular maintenance, they may fall into dilapidation and contribute to blight in areas where they are highly concentrated.

Table II.11
Disposition of Vacant Housing Units: 2000 and 2010
Grants Pass Study Area
2000 & 2010 Census SF1 Data: 2015 City Boundaries

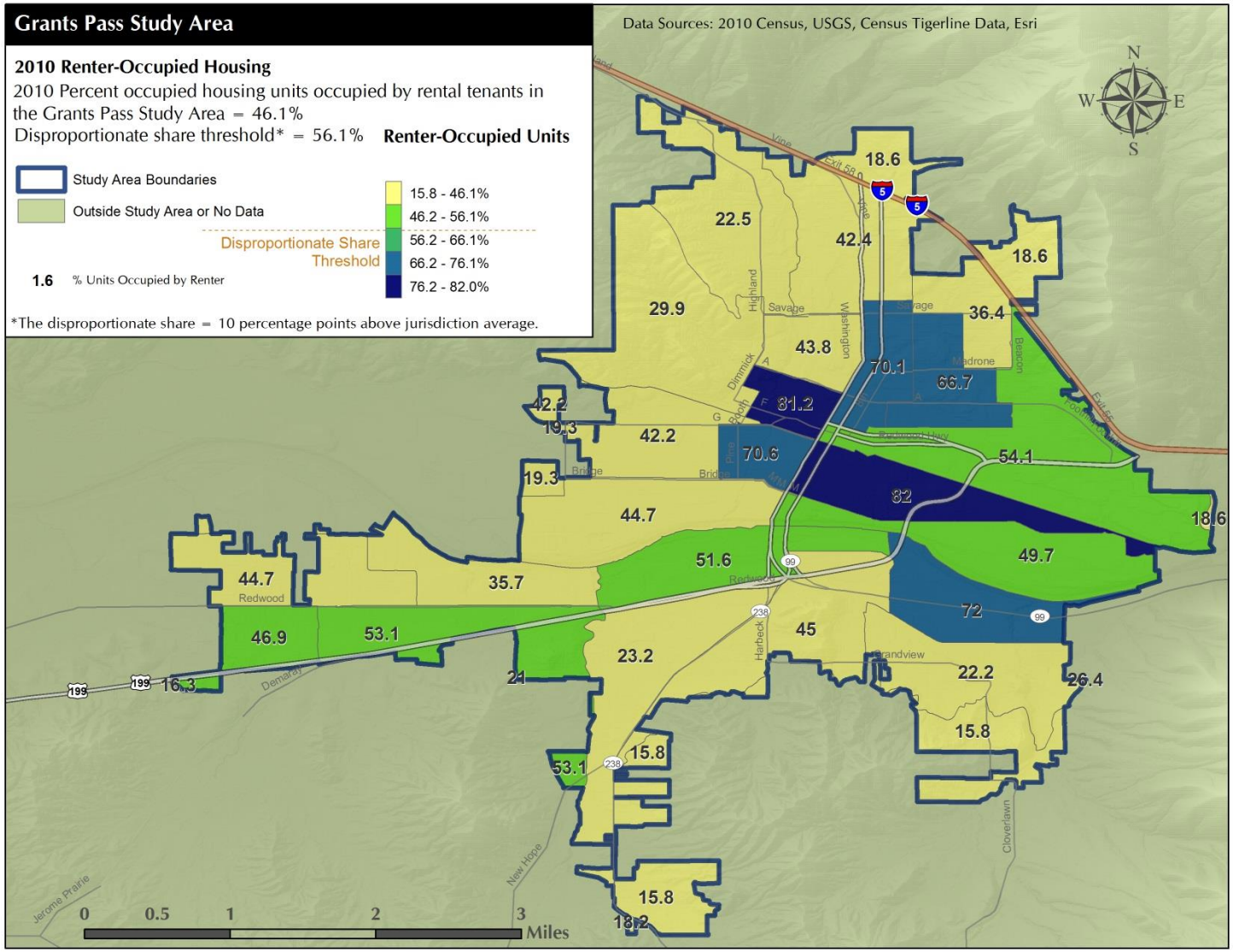
Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	279	39.1%	544	41.6%	94.86%
For Sale	145	20.4%	246	18.8%	69.39%
Rented or Sold, Not Occupied	48	6.7%	73	5.6%	53.11%
For Seasonal, Recreational, or Occasional Use	65	9.1%	141	10.8%	117.28%
For Migrant Workers	0	0.0%	0	0.0%	278.88%
Other Vacant	177	24.7%	302	23.1%	71.10%
Total	**714**	**100.0%**	**1,308**	**100.0%**	**83.1%**

As shown in Map II.20 on page 55, several block groups to the north of the city center held above-average shares of vacant units in 2000, along with peripheral block groups to the south of the study area. The distribution of vacant housing units was similar in 2010, as shown in Map II.21 on page 56. Unlike owner-occupied and renter-occupied housing, vacant units were not observed to be disproportionately concentrated in any study area block groups in 2000 or 2010. However, there were some considerable increases in the vacancy rate between 2000 and 2010.

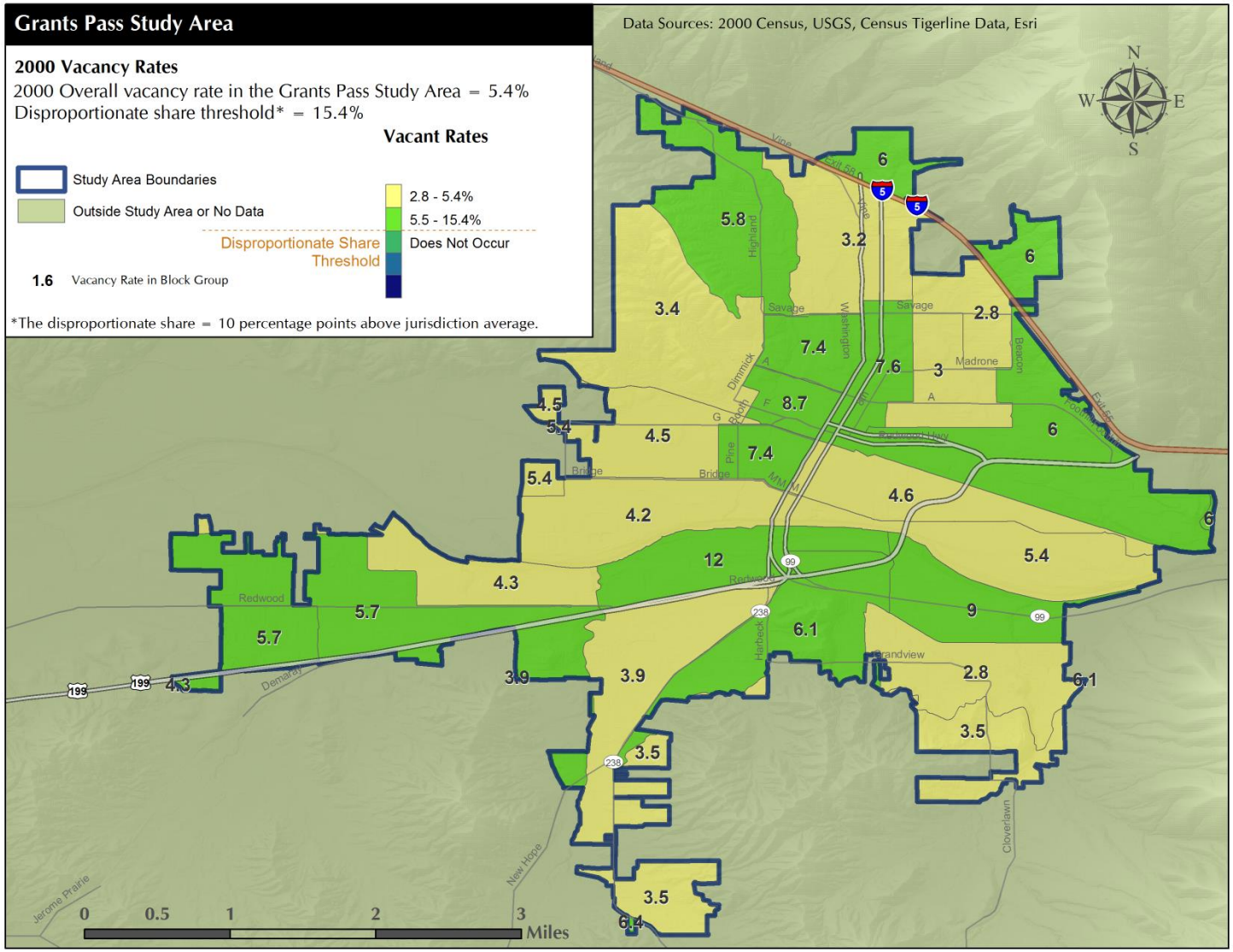
Map II.18
Renter-Occupied Housing by Block Group, 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



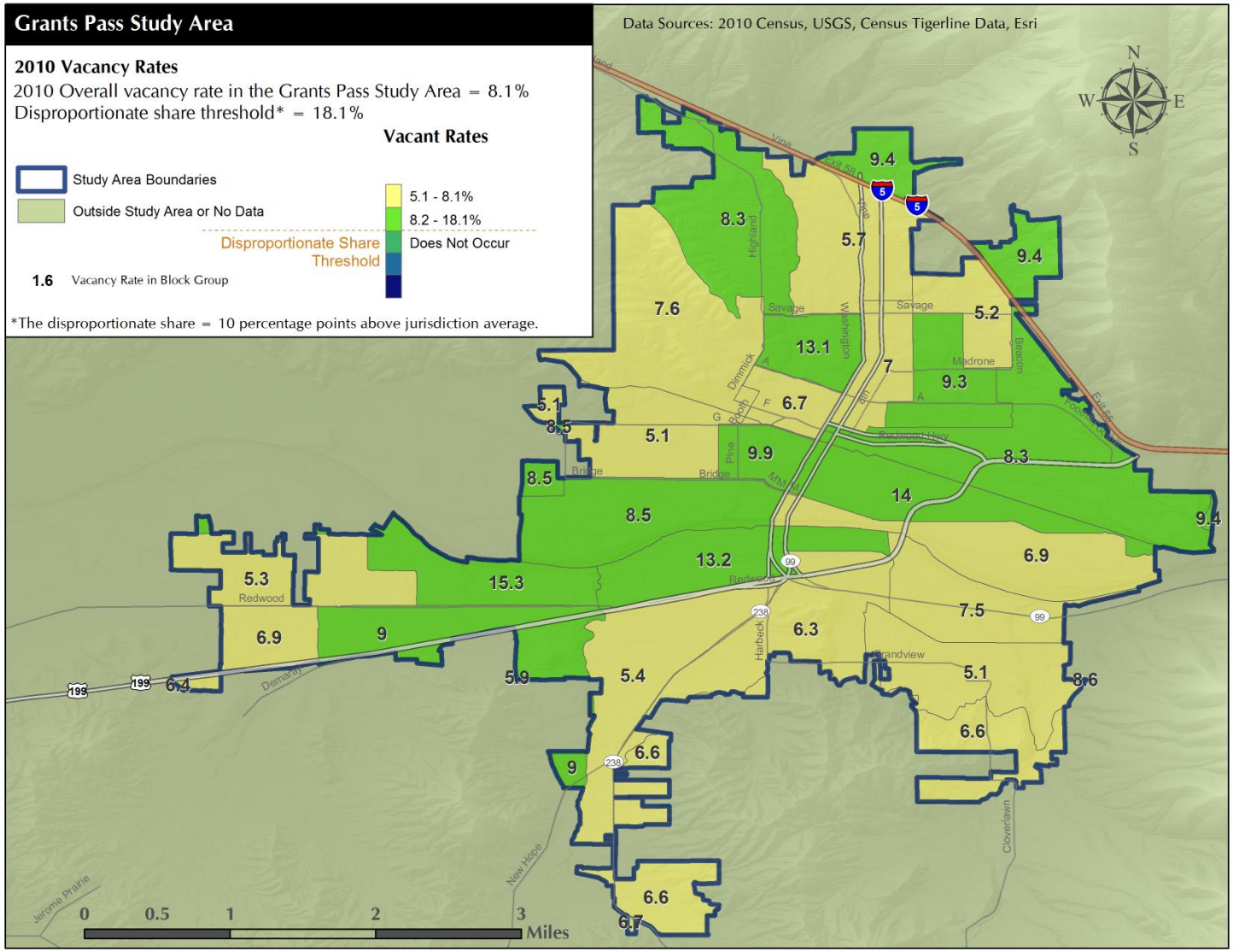
Map II.19
Renter-Occupied Housing by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



Map II.20
Vacant Housing by Block Group
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



Map II.21
Vacant Housing by Block Group, 2010
Grants Pass Study Area
2010 Census Data: 2015 City Boundaries



Even as the vacant housing stock fell as a share of the overall housing stock after 2010, a greater percentage of those vacant units came to be classified as "other vacant." As shown in Table II.12 below, these units accounted for an estimated 37 percent (456 units) of all vacant units in 2010-2014, up from 23.1 percent in 2000 (302 units).

The geographic distribution of these units in 2000 is presented in Map II.22 on the following page. As shown, these units tended to represent larger percentages of the vacant housing stock in central, southern, and northeastern block groups in 2000.

By 2010, it was the peripheral Census tracts in the study area that tended to have higher concentrations of "other vacant" units, as shown in Map II.23 on page 59. In neither year was there a marked trend toward greater numbers of these units in areas with higher concentrations of racial or ethnic minority residents, or residents with disabilities.

Table II.12
Disposition of Vacant Housing Units: Since 2010
Grants Pass Study Area
2010 Census & 2014 Five-Year ACS Data: 2015 City Boundaries

Disposition	2010 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	544	41.6%	394	32.0%
For Sale	246	18.8%	106	8.6%
Rented or Sold, Not Occupied	73	5.6%	147	12.0%
For Seasonal, Recreational, or Occasional Use	141	10.8%	128	10.4%
For Migrant Workers	0	0.0%	0	.0%
Other Vacant	302	23.1%	456	37.0%
Total	**1,308**	**100.0%**	**1,233**	**100.0%**

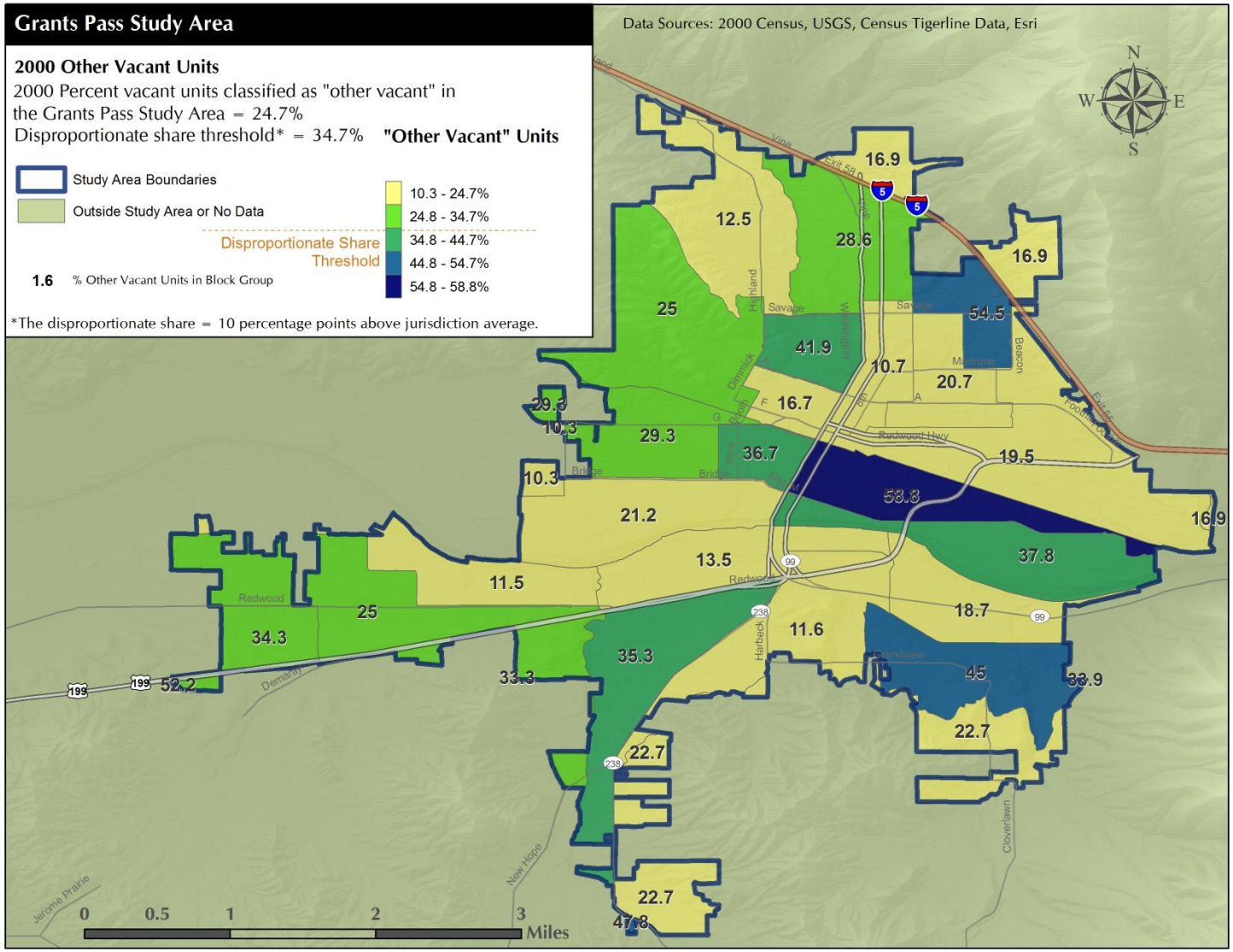
HOUSEHOLD SIZE

The average household was smaller in 2010 than in 2000, owing to comparatively rapid growth in the number of one-person households. As shown in Table II.13 below, more than two-thirds of all households included one or two residents in both years. In spite of the shift toward smaller households over the decade, six- and seven-person households were also estimated to have grown in number and as a percentage of total households over the decade

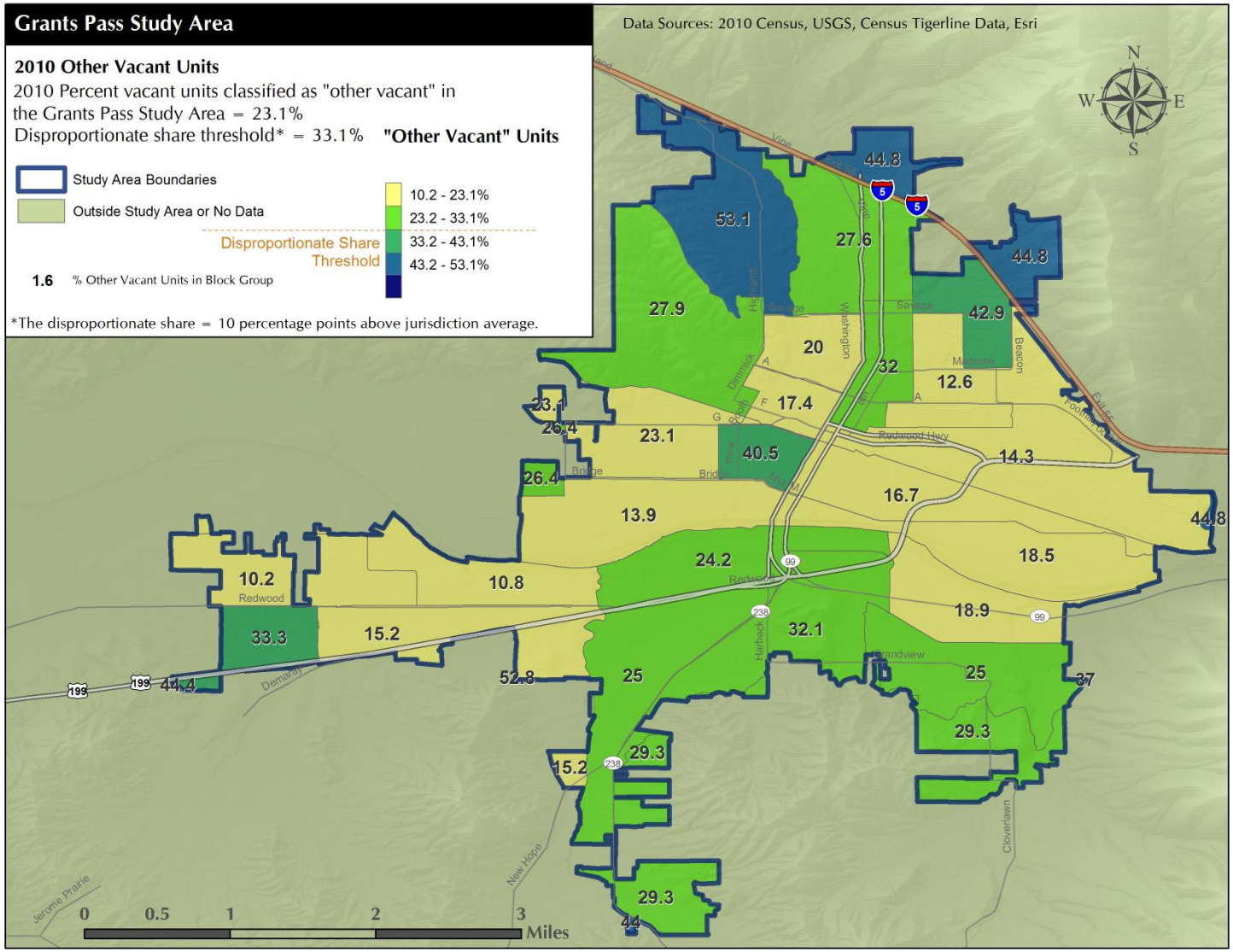
Table II.13
Households by Household Size
Grants Pass Study Area
2000 & 2010 Census SF1 Data: 2015 City Boundaries

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	3,732	29.9%	4,883	32.7%	30.8%
Two Persons	4,526	36.3%	5,147	34.5%	13.7%
Three Persons	1,780	14.3%	2,132	14.3%	19.8%
Four Persons	1,468	11.8%	1,544	10.3%	5.2%
Five Persons	645	5.2%	755	5.1%	17.1%
Six Persons	199	1.6%	298	2.0%	49.7%
Seven Persons or More	126	1.0%	165	1.1%	31.1%
Total	**12,476**	**100.0%**	**14,925**	**100.0%**	**19.6%**

Map II.22
"Other Vacant" Housing Units: 2000
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



Map II.23
"Other Vacant" Housing Units: 2010
Grants Pass Study Area
2000 Census Data: 2015 City Boundaries



HOUSING STOCK

Single-family units accounted for more than two-thirds of all housing units in 2000 and in 2010-2014, a share which grew by just over a percentage point during that time, as shown in Table II.14 below. Apartment units also came to account for a larger percentage of the housing stock, representing 11.9 percent of housing units in 2010-2014, up more than two percentage points from 2000. Mobile homes declined as a percentage of the overall housing stock from 2000 through 2010-2014, from 10.3 to 7.7 percent.

Table II.14
Housing Units by Type
Grants Pass Study Area
2000 Census SF3 & 2014 Five-Year ACS Data: 2015 City Boundaries

Unit Type	2000 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	9,008	68.3%	11,014	69.5%
Duplex	805	6.1%	1,015	6.4%
Tri- or Four-Plex	690	5.2%	618	3.9%
Apartment	1,274	9.7%	1,879	11.9%
Mobile Home	1,359	10.3%	1,222	7.7%
Boat, RV, Van, Etc.	55	.4%	102	0.6%
Total	**13,190**	**100.0%**	**15,851**	**100.0%**

HOUSING PROBLEMS

The Census Bureau collects data on several topics that HUD has identified as "housing problems". For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

A relatively small percentage of households were considered over-crowded in 2000, meaning that they included more than one resident per room but less than 1.5. The same was true of severely overcrowded households, which include 1.5 residents per room or more. As shown in Table II.15 below, an estimated 2.9 percent of households were over-crowded in 2000. That figure rose slightly after 2000, to around 3.1 percent in 2010-2014. On the other hand, the percentage of severely overcrowded units fell from 1.5 percent to 0.1 percent over that same time period. Renter-occupied units were generally more likely than owner-occupied units to be overcrowded, but taken together, renter- and owner-occupied units that were overcrowded accounted for less than four percent of all housing units in the study area in 2010-2014.

Table II.15
Overcrowding and Severe Overcrowding
Grants Pass Study Area
2000 Census SF3 & 2014 Five-Year ACS Data: 2015 City Boundaries

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	7,121	97.5%	142	1.9%	41	.6%	7,304
2014 Five-Year ACS	7,634	98.5%	97	1.3%	17	.2%	7,748
Renter							
2000 Census	4,812	93.0%	215	4.1%	146	2.8%	5,172
2014 Five-Year ACS	6,507	94.7%	361	5.3%	2	0.0%	6,870
Total							
2000 Census	11,932	95.6%	357	2.9%	187	1.5%	12,476
2014 Five-Year ACS	14,141	96.7%	459	3.1%	19	.1%	14,618

An even smaller fraction of households were lacking complete plumbing facilities in 2000, and that share had only fallen by 2010-2014. Plumbing facilities are considered to be incomplete if a household is missing any of the following: a flush toilet, piped hot and cold running water, a bathtub, or a shower. As shown in Table II.16 below, these features were missing from less than one percent of households in the Grants Pass study area.

Table II.16
Households with Incomplete Plumbing Facilities
Grants Pass Study Area
2000 Census SF3 & 2014 Five-Year ACS Data: 2015 City Boundaries

Households	2000 Census	2014 Five-Year ACS
With Complete Plumbing Facilities	12,386	14,555
Lacking Complete Plumbing Facilities	89	63
Total Households	**12,476**	**14,618**
Percent Lacking	**0.7%**	**0.4%**

On the other hand, households lacking complete kitchen facilities became increasingly common after 2000, though these households still represented less than four percent of households overall, as shown in Table II.17 below. A household is considered to lack complete kitchen facilities when it does not have a range or cook top and oven, a sink with piped hot and cold running water, and a refrigerator.[24]

Table II.17
Households with Incomplete Kitchen Facilities
Grants Pass Study Area
2000 Census SF3 & 2014 Five-Year ACS Data: 2015 City Boundaries

Households	2000 Census	2014 Five-Year ACS
With Complete Kitchen Facilities	12,333	14,115
Lacking Complete Kitchen Facilities	142	503
Total Households	**12,476**	**14,618**
Percent Lacking	**1.1%**	**3.4%**

Cost-burdening, an increasingly common problem after 2000, affected a much larger share of households in the study area. A household is considered cost-burdened when between 30 and 50 percent of its income goes toward housing costs, and severely cost-burdened when housing costs consume more than 50 percent of a household's income. As shown in Table II.18 on the following page, an estimated 18.7 percent of study area households were paying between 30 and 50 percent of their monthly income toward housing costs in 2000 and by 2010-2014 that share had grown by nearly one percentage point. Nearly a quarter of households were severely cost-burdened in 2010-2014, up from 13.9 percent in 2000. Renters were more likely to experience a cost burden or severe cost burden than homeowners, even those who were still under mortgage.

For homeowners, housing costs potentially include mortgage payments, a second mortgage, real estate taxes, homeowners insurance, condominium payments, mobile home costs, and utilities (electricity, gas, water, sewer, and other utilities). For renters, calculated housing costs are based on contract rental costs and money spent on utilities.[25]

[24] It is possible that some of these units represent illegal conversions or use of guest quarters.
[25] "Housing Cost and Housing Quality Fact Sheet." U.S. Census Bureau website. Accessed September 13, 2016 at http://www.census.gov/housing/hsgcostfactsheet.html.

Table II.18
Cost Burden and Severe Cost Burden by Tenure
Grants Pass Study Area
2000 Census & 2014 Five-Year ACS Data: 2015 City Boundaries

Data Source	31%-50%		Above 50%		Total
	Households	% of Total	Households	% of Total	
Owner With a Mortgage					
2000 Census	841	21.80%	385	10.00%	3,852
2014 Five-Year ACS	844	18.30%	1,136	24.60%	4,619
Owner Without a Mortgage					
2000 Census	99	4.90%	36	1.80%	2,008
2014 Five-Year ACS	321	10.20%	293	9.40%	3,130
Renter					
2000 Census	1,120	21.80%	1,110	21.60%	5,145
2014 Five-Year ACS	1,704	24.80%	2,158	31.40%	6,870
Total					
2000 Census	2,061	18.70%	1,531	13.90%	11,006
2014 Five-Year ACS	2,868	19.60%	3,587	24.50%	14,618

SUMMARY

Socio-economic data provide an essential context for the analysis of impediments, characterizing the environment in which housing choices are made. In its 1996 *Fair Housing Planning Guide* and subsequent guidance, HUD recommends the inclusion and analysis of demographic, economic, and housing data as part of a thorough review of the local housing market and potential impediments to fair housing choice. Accordingly, this study provides a review of demographic and economic data provided by the Census Bureau along with economic and employment data gathered from the Bureau of Labor Statistics and Bureau of Economic Analysis. Data from the Census Bureau were primarily drawn from the 2000 and 2010 decennial Census counts, but were supplemented with data from the 2010-2014 American Community Survey.

The population within the Grants Pass study area grew by an estimated 18 percent between 2000 and 2010. As it did, racial and ethnic minority residents came to account for larger and larger percentages of the study area population. This was particularly true of the Hispanic population, which grew from an estimated 1,552 in 2000 (5.1 percent of the population) to 2,830 in 2010 (7.9 percent) and has continued to grow since 2010, accounting for 8.9 percent of the population in 2010-2014.

From a fair housing perspective, it is important to determine the degree to which residents are segregated by race or ethnicity. Some degree of segregation may be natural, and may not represent a fair housing challenge; however, where there are high concentrations of residents of one race or ethnicity, and where those concentrations exist in areas with high poverty and low access to opportunity, such conditions are a cause for concern. For the purposes of this report, residents of different demographic groups are considered to be disproportionately concentrated in Census tracts or block groups where they account for a share of the population that exceeds the overall study area average by ten percentage points. For example, if black residents account for 0.5 percent of the population throughout the study area, they will be

considered "disproportionately" concentrated in any Census block group where they make up 10.5 percent of residents or more.[26]

In fact, there were no Census block groups in the study area with disproportionate shares of residents from any racial or ethnic group in 2000 or 2010. All groups were well below the ten-point disproportionate share threshold in all block groups throughout the city in 2000 and 2010. As noted previously, racial and ethnic minority residents have grown as a share of the study area population since 2000. At present, there are few indications that this growth has been focused in a specific area. However, non-white and Hispanic residents have come to account for a larger share of the population in a Census tract to the northeast of the city center. This same area saw a dramatic increase in the percentage of residents living in poverty from 2000 to 2010-2014 (as discussed below). These trends are discussed in more detail below.

Residents with disabilities accounted for 17.3 percent of the city population in 2010-2014. At that time, residents with disabilities accounted for 18 to 24 percent of the population of Census tracts in the south of the city. However, there were no areas in which these residents would be considered disproportionately concentrated based on the criteria described above.

Like much of the nation, the City of Grants Pass[27] experienced a marked decline in employment after 2007. At that time, there were around 14,500 workers in the city's labor force, 13,600 of whom were employed. Over the following three years, the number of workers in the labor force held steady while the number of employed declined. This contributed to a spike in the unemployment rate, which rose from 6.2 percent in 2007 to 13.3 percent by 2009. The unemployment rate has declined steadily since that time, dropping to 7.1 percent by 2015.

Prior to 1995, real average earnings in Josephine County exceeded those at the state level. However, due to rapid growth in earnings at the state level, the amount that the average worker in the county earned at his or her job fell behind statewide figures in that year, and has remained behind since. The average worker in the county earned $35,178 at his or her job in 2014, down from around $38,000 in 2003.

On the other hand, real per capita income (PCI), which is the inflation-adjusted average income of all residents in the county, has not declined in recent years. However, at $33,911, real PCI in the county in 2014 was considerably below the statewide average of $51,271 that same year.

The poverty rate has also risen considerably since 2000, from 14.9 percent to 22.5 percent in 2010-2014. Unlike in the distribution of residents by race and ethnicity, there did appear one Census tract in which households in poverty were disproportionately concentrated in 2010-2014. In that Census tract, which lay to the northeast of the city center, 35.2 percent of households were living in poverty in 2010-2014.[28]

---

[26] Note: Where possible, geographic data are presented at the block group level. This geographic unit is smaller than a Census tract, and therefore allows for a more detailed analysis of demographic, economic, and housing trends. However, data on some topics (specifically, disability and poverty) are not available at the Census tract level in recent American Community Survey estimates. These data are presented by Census tract.

[27] These figures are based on data from the Bureau of Labor Statistics, which are reported at the city level. For that reason, it was not possible to estimate the trends in employment within the stable limits of the study area, and these figures are presented as occurring within the "City of Grants Pass."

[28] In 2010, a family of four with two children was considered to be living in poverty if the family income was less than $22,113 per year.

As noted previously, this same Census tract saw an increase in the percentage of non-white residents from 2000 through 2010, from 6.4 to 9.2 percent. The Hispanic population more than doubled as a percentage of the population of that same Census tract over the same time period, accounting for 9.5 percent of the tract population in 2010. At present, these figures do not approach the demographic threshold that HUD uses to identify Census tracts as racially-ethnically concentrated areas of poverty (50 percent non-white), even if the poverty rate is close to the 40 percent threshold specified by HUD.

However, in future fair housing studies it will be important to continually reassess demographic and economic conditions in this and other parts of the study area. This will put the City in a position of being able to anticipate and prevent the development of racially-ethnically concentrated areas of poverty, rather than having to address such areas that have already formed. This in turn will allow for greater flexibility in future planning efforts and ensure that area residents have equitable access to economic and housing opportunities.

Between 2000 and 2010, the estimated number of housing units in the study area grew faster than the number of households to fill those units: the result was an increase in the vacancy rate, which rose from 5.4 percent of the housing stock in 2000 to 8.1 percent in 2010. Since that time, vacant units have fallen to 7.8 percent of the housing stock.

Around a quarter of vacant units in 2000 were classified as "other vacant". Units may be classified as "other vacant" if the owner does not wish to sell the unit, is using it for storage, is elderly and living with relatives or in a nursing home, or the unit is foreclosed. These units are often more problematic than other types of housing units, as they are not available to the market place and may fall into dilapidation, contributing to blight in areas where they are grouped in close proximity.

Among occupied housing units, the study area saw a marked shift toward rental housing from 2000 through 2010 and continuing through 2010-2014. In 2000, an estimated 41.4 percent of occupied units were occupied by rental households. By 2010-2014, that figure had risen to 47 percent. Rental housing tended to account for a greater share of occupied housing units in central areas of the city in 2000 and 2010, while owner-occupied units represented a greater share of occupied units in peripheral parts of the study area.

Single-family units (attached and unattached) accounted for nearly 70 percent of the housing stock in 2000 and 2010-2014. Apartment units grew as a share of the housing stock, from 9.7 percent in 2000 to 11.9 percent by 2010-2014. Mobile homes declined as a share of the overall housing stock, from an estimated 10.3 to 7.7 percent.

Fewer than five percent of households in the study area were impacted by overcrowding, incomplete plumbing facilities, or incomplete kitchen facilities: three of four conditions that HUD categorizes as "housing problems." The fourth, cost burden, was considerably more common. Roughly a fifth of all households in the city were paying between 30 percent and half of their income toward housing costs in 2000 and 2010-2014. The share of households paying more than half of their income in housing costs grew from 13.9 percent in 2000 to nearly a quarter in 2010-2014. Renters were considerably more likely to be living under a cost burden than homeowners, even homeowners who were still paying on a mortgage.

SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW

As part of the AI process, existing fair housing laws, studies, cases, and other relevant materials were reviewed on a national and local scale. Results of this review are presented below.

FAIR HOUSING LAWS

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

> *Fair Housing Act* Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).[29]
>
> Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act* . . . In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.[30]
>
> *Title VI of the Civil Rights Act of 1964.* Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.
>
> *Section 504 of the Rehabilitation Act of 1973* Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.
>
> *Section 109 of the Housing and Community Development Act of 1974* Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program.
>
> *Title II of the Americans with Disabilities Act of 1990.* Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

[29] "HUD Fair Housing Laws and Presidential Executive Orders." http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws
[30] "Title VIII: Fair Housing and Equal Opportunity." http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

Architectural Barriers Act of 1968 The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975 The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972 Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.[31]

STATE FAIR HOUSING LAWS

In addition to federal law, citizens of the City of Grants Pass and the State of Oregon are protected from housing discrimination under Oregon state law (O.R.S. Chapter 659A). Oregon law provides protection from housing discrimination on the same bases included in the federal Fair Housing Act, as well as discrimination based on legal sources of income, status as a survivor of domestic violence, marital status, sexual orientation, and gender identity. Housing discrimination law in Oregon is enforced by the state's Bureau of Labor and Industries.

FAIR HOUSING IN THE UNITED STATES

THE FIRST FORTY YEARS OF THE FAIR HOUSING ACT

The Fair Housing Act of 1968 was a product of the turbulent time in which it was passed. Coming near the end of a decade marked by concerted and often violent struggles for civil rights, it was a profound statement of a nation's commitment, despite considerable reluctance in many quarters, to work toward the end of segregation by race, color, religion, sex, and national origin. It was also, upon its passage, a relatively weak law. Indeed, it was only after the enforcement provisions of the Act were considerably blunted that it was able to secure enough support to ensure its passage.[32]

Due in part to the weakening of those enforcement provisions, the Act was initially of only limited effectiveness in eradicating residential segregation, one of the policy goals that motivated passage of the law. According to one analyst, the first two decades of the Fair Housing Act constitute a "lost opportunity in terms of race relations in the United States[33]". Nevertheless, the period following the passage of the Act was marked by a "minority rights revolution[34]", the germinal moment of which was the movement for civil rights for black Americans. This revolution was soon expanded to encompass the drive for equality for women, ethnic minorities, gays and lesbians, and the disabled.[35] The civil rights movement had a limited impact on residential segregation, however, which has persisted since 1968 due in part to persistent discrimination in the housing market[36] [37]

[31] "HUD Fair Housing Laws and Presidential Executive Orders."
[32] Denton, Nancy A. *Half Empty or Half Full: Segregation and Segregated Neighborhoods 30 Years After the Fair Housing Act*. Cityscape: A Journal of Policy Development and Research, 1999. Vol. 4, No. 3. P. 111.
[33] *Ibid.*
[34] Skrentny 2002. *The Minority Rights Revolution*. Harvard University Press, 2004.
[35] Marsden, Peter V. *Social Trends in American Life: Findings from the General Social Survey since 1972*.
[36] Denton 1999.

However, the cultural shifts of the late twentieth century helped to pave the way for passage of the Fair Housing Amendments Act of 1988, which broadened the enforcement provisions of the Act, gave increased authority to the US Department of Housing and Urban Development (HUD) to administer and enforce fair housing law, and increased the penalties to those who violated the act.[38] In addition, reflecting the impact of advocacy on behalf of those with disabilities as well as marked changes to the traditional family structure over the previous two decades[39], the 1988 law added new protections based on "handicap" and "familial status."

The ten years following the passage of the 1988 amendments saw an increase in the number of fair housing complaints filed with HUD, as well as an evolution in housing discrimination to a form that was, in the estimation of former HUD Secretary Andrew Cuomo, "more sophisticated, less obvious, but more insidious."[40] An example of such segregation was to be found, according to a 1999 HUD study, in the home lending market. That study, which was based on the results of paired testing of home mortgage lenders in selected cities, concluded that minority applicants were given less time with loan officers than non-minority applicants, received less information on prospective loan products, and were quoted higher interests rates in most of the cities included in the study. This differential treatment occurred in spite of the fact that the paired testers represented themselves as being similarly situated with respect to credit history and other relevant characteristics.[41]

It was not clear in the late 1990s whether HUD's increasing fair housing case load was the result of increasing segregation or growth in the number of US residents taking advantage of newly expanded fair housing enforcement measures. To help answer this question, HUD conducted a massive three-part study of discrimination in metropolitan housing markets, publishing the results of the first phase in 2000. In the course of the study HUD, once again availing itself of the paired testing employed in earlier studies, demonstrated the persistence of housing discrimination on the basis of race and ethnicity and its continuation into the twenty-first century. As in the 1999 study in mortgage lending, the HUD report revealed that minority housing seekers were, on average, shown fewer units and given fewer housing options than their majority counterparts, even when their financial circumstances were similar.[42] These findings were reinforced by a study conducted jointly by the University of Southern California and Oregon State University on the Los Angeles County housing market in 2006.[43]

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[37] Yinger, John. *Measuring Racial Discrimination with Fair Housing Audits: Caught in the Act.* The American Economic Review, Vol. 76, No. 5: 1986. P. 881. This study, based on the results of paired fair housing tests in the city of Boston, concluded that housing agents, in "[catering] to the prejudices of current or potential white customers", told black housing seekers about 30 percent fewer available housing units. A similar methodology was employed in a 2012, which demonstrated the persistence of this form of discrimination (See "Housing Discrimination Against Racial and Ethnic Minorities 2012," published by the US Department of Housing and Urban Development).
[38] Denton 1999.
[39] Marsden 2008
[40] Janofsky, Michael. "HUD Plans Nationwide Inquiry on Housing Bias." *The New York Times*, 17 November 1998.
[41] Turner, Margery A. et al. "What We Know About Mortgage Lending Discrimination in America". The Urban Institute. September 1999.
[42] *The Housing Discrimination Study*. Department of Housing and Urban Development. (HDS 2000).
[43] Carpusor, Adrian and William Loges. "Rental Discrimination and Ethnicity in Names." *Journal of Applied Social Psychology* 36(4).

Recent Trends in Fair Housing Law and Policy

Released by the Poverty & Race Research Action Council in January 2008, *Residential Segregation and Housing Discrimination in the United States* asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, if the majority of public housing residents are non-white and most public housing accommodations are grouped in the same Census tracts, this results in residential segregation.[44]

Published in 2009 by the National Fair Housing Alliance, *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination* presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing advertisements, no such law exists for websites like Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. While individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies like Craigslist that post the discriminatory advertisements. Newspapers and other publishers of content are required to screen the advertisements they accept for publishing for content that could be seen as discriminatory. This may include phrases like "no children" or "Christian only," which violate provisions of the Fair Housing Act identifying familial status and religion as federally protected characteristics.[45]

In May 2010, the National Fair Housing Alliance published a fair housing trends report, *A Step in the Right Direction*. The report began with a commendation of HUD's federal enforcement of fair housing law and noted the agency's willingness to challenge local jurisdictions that failed to affirmatively further fair housing. In addition, the document reported that in response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk. However, this report suggests that policies that tighten credit markets, such as requiring larger cash reserves, higher down payments, and better credit scores, may disproportionally affect lending options for communities of color and women. *A Step in the Right Direction* concludes with a series of policy prescriptions, including addressing discriminatory internet advertisements and adding gender identity, sexual orientation, and source of income as federally protected characteristics.[46]

The positive note that the NFHA struck in its 2010 report carried over into the following year's *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*, published by the Alliance in April of 2011. This report began by noting a downward trend in the proportion of individuals in large metropolitan areas living in segregation, which had dropped from 69 to 65 percent between 2000 and 2010, according to census data from 2010. The report also highlighted the work of fair housing organizations to combat systemic and institutionalized discrimination produced by exclusionary zoning, NIMBYism, the dual credit market, and other fair housing challenges, often on limited budgets

[44] U.S. Housing Scholars and Research and Advocacy Organizations. *Residential Segregation and Housing Discrimination in the United States*. January 2008. http://prrac.org/pdf/FinalCERDHousingDiscriminationReport.pdf
[45] National Fair Housing Alliance. *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination*. August 2009. http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=zgbukJP2rMM%3D&tabid=2510&mid=8347
[46] National Fair Housing Alliance. *A Step in the Right Direction: 2010 Fair Housing Trends Report*. May 2010. http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202010.pdf

and with limited personnel. The NFHA closed its 2011 report by praising the work of private fair housing organizations while underscoring the need for continued work.[47]

The 2012 report from the NFHA focused on issues of fair housing in the context of the shifting demographic composition of the United States, where the white, non-Hispanic population is projected to no longer represent a majority of residents within thirty years. The report discussed signals from HUD and the Justice Department, who have "increased their efforts and announced landmark cases of mortgage lending, zoning, and other issues that get to the heart of the [Fair Housing] Act: promoting diverse and inclusive communities[48]." The report also highlights a new arena for discrimination in housing, which has emerged as a result of the massive level of foreclosures in the country in recent years: uneven maintenance of Real Estate Owned (REO) properties in white and minority areas. In concluding, the report hails the creation of the Consumer Financial Protection Bureau as a new ally for fair housing and equal opportunity.[49]

However, even as the 2012 NFHA underscored lack of maintenance of foreclosed properties as a nascent form of housing discrimination, a HUD report issued in the following year highlighted the persistence of more traditional forms of discrimination. Echoing the results of earlier paired tests for housing discrimination, the study demonstrated that where differences in the treatment of minority and white housing seekers occur, it is the white housing seekers who are more likely to benefit from such differential treatment. However, on an encouraging note, the study also demonstrated that well-qualified buyers are generally equally likely to get an appointment to hear about at least one available unit, regardless of race.[50]

The 2013 NFHA report outlines an ambitious policy goal: expansion of the Fair Housing Act to prohibit discrimination based on source of income, sexual orientation, gender identity, and marital status. The report relates that cases of housing discrimination in general increased between 2011 and 2012, and that complaints based on federally non-protected statuses (source of income, etc.) were included in that upward trend. In spite of this, only 12 states include protections based on source of income, 21 states prohibit discrimination based on sexual orientation, sixteen states protect against discrimination based on gender identity, and 22 states offer protections based on marital status (the District of Columbia also extends protections on all of these bases). In concluding the report, the NFHA advocates the modernization and expansion of the FHA to bring the protection of individuals based on source of income, sexual orientation, gender identity, and marital status within its compass.

In its 2014 Fair Housing trends report, entitled "Expanding Opportunities: Systemic Approaches to Fair Housing", the NFHA began by lauding the efforts of HUD, DOJ, and private non-profit fair housing organizations for their efforts over the past year in promoting fair housing choice across the United States. The report also noted an increase in the number of fair housing complaints relating to real estate sales, homeowner's insurance, and housing advertisements, even as the overall number of housing complaints remained relatively steady. The 2014 report also featured a regional analysis of housing discrimination complaints, which

[47] *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination.* National Fair Housing Alliance 2011 Fair Housing Trends Report. 29 April 2011.
http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=SbZH3pTEZhs%3d&tabid=3917&mid=5321
[48] http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=GBv0ZVJp6Gg%3d&tabid=3917&mid=5321
[49] *Ibid.*
[50] Turner, Margery A. et al. "Housing Discrimination Against Racial and Ethnic Minorities 2012." The Urban Institute. June 2013.

indicated that complaints of housing discrimination were more common in the more racially and ethnically segregated metropolitan statistical areas of the country.[51]

A Changing Fair Housing Landscape

National Fair Housing Cases

As noted in the introduction to this report, provisions to affirmatively further fair housing (AFFH) are long-standing components of HUD's Housing and Community Development programs. In fact, in 1970, Shannon v. HUD challenged the development of a subsidized low-income housing project in an urban renewal area of Philadelphia that was racially and economically integrated. Under the Fair Housing Act, federal funding for housing must further integrate community development as part of furthering fair housing, but the plaintiffs in the Shannon case claimed that the development would create segregation and destroy the existing balance of the neighborhood. As a result of the case, HUD was required to develop a system to consider the racial and socio-economic impacts of their projects.[52] The specifics of the system were not decided upon by the court, but HUD was encouraged to consider the racial composition and income distribution of neighborhoods, racial effects of local regulations, and practices of local authorities.[53] The Shannon case gave entitlement jurisdictions the responsibility of considering the segregation effects of publicly-funded housing projects on their communities as they affirmatively further fair housing.

More recently, in a landmark fraud case, Westchester County, New York, was ordered to pay more than $50 million to resolve allegations of misusing federal funds for public housing projects and falsely claiming their certification of affirmatively furthering fair housing. The lawsuit was filed in 2007 by the Anti-Discrimination Center (ADC), a New York-based non-profit organization, under the False Claims Act. According to the ADC, the County "failed to consider race-based impediments to fair housing choice; failed to identify and take steps to overcome impediments; and failed to meet its obligations to maintain records concerning its efforts."

In a summary judgment in February 2009, a judge ruled that the County had made "false certifications on seven annual AFFH certifications and on more than a thousand implied certifications of compliance when it requested a drawdown of HUD funds". Pursuant to a settlement agreement brokered by the Obama Administration in April 2009, Westchester County was required to pay more than $30 million to the federal government, with roughly $20 million eligible to return to the County to aid in public housing projects. The County was also ordered set aside $20 million to build public housing units in suburbs and areas with mostly white populations, and to promote legislation "currently before the Board of Legislators to ban 'source-of-income' discrimination in housing (§33(g))".[54]

Finding that Westchester had failed to affirmatively further fair housing in the manner agreed upon in the earlier settlement, HUD rejected the County's AFFH certification and discontinued

[51] *Expanding Opportunity: Systemic Approaches to Fair Housing.* National Fair Housing Alliance. August 13, 2014.
[52] U.S. HUD. *39 Steps Toward Fair Housing.* http://www.hud.gov/offices/fheo/39steps.pdf
[53] Orfield, Myron. "Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit." *Vanderbilt Law Review*, November 2005.
[54] http://www.hud.gov/content/releases/settlement-westchester.pdf

federal funding in 2011. The case has had ramifications for entitlement communities across the nation, with activities taken to affirmatively further fair housing being held to higher levels of scrutiny to ensure that federal funds are being spent to promote fair housing and affirmatively further fair housing. The case also signals an increased willingness on the part of HUD to bring enforcement pressure to bear in order to insure that state and local jurisdictions comply with the AFFH requirements.

Affirmatively Furthering Fair Housing

At the same time that HUD has pursued a more active role in fair housing enforcement, the agency has sought to bring additional guidance and clarity to fair housing policy. This effort was inspired in part by the agency's own assessment of shortcomings in current policy and in part by criticism from other agencies; notably the Government Accountability Office (GAO).[55]

In 2009, HUD noted that many of the AI's it reviewed as part of an internal study did not conform to the agency's guidelines. This finding was reaffirmed in a 2010 study conducted by the GAO, which sought to assess the effectiveness of Analyses of Impediments as a tool to affirmatively further fair housing, as well as their effectiveness as planning documents. According to the GAO, an estimated 29 percent of CDBG and HOME grantees' AIs had been prepared in 2004 or earlier, and were therefore likely to be of limited usefulness in current planning efforts. Furthermore, the GAO found that those AIs that were up to date largely lacked features that would render them more effective as planning documents, including timetables and the signatures of top elected officials. More generally, the GAO noted that HUD guidelines concerning AIs are unclear, and that its requirements for the analyses are minimal[56]. Under those requirements, the agency observed, grantees are "not required through regulation to update their AIs periodically, include certain information, follow a specific format in preparing AIs, or submit them to HUD for review[57]."

The conclusion of the GAO study is reflected in its title: *HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions' Fair Housing Plans*. In response to the criticism of the GAO, as well as a longstanding recognition on the part of HUD that fair housing policy stood in need of improvement and clarification, the agency developed and published a proposed rule entitled *Affirmatively Furthering Fair Housing* in July of 2013, finalizing that rule in early July of 2015. The rule represents a substantial restructuring of the AFFH process, eliminating the AI and replacing it with the Assessment of Fair Housing (AFH). According to the rule, the AFH must (1) incorporate key demographic and economic metrics specifically identified by HUD, (2) be completed with nationally uniform data provided by HUD, and (3) be submitted to HUD for review in advance of the consolidated plan to insure that the findings of the fair housing analysis are fully integrated into the consolidated planning process.[58]

Note that because the new requirements set forth in the rule will not take effect immediately for all jurisdictions, the current AI for Grants Pass is being undertaken in conformance with

[55] 24 CFR §5, 91, 92, et al. (2013)(Proposed Rule)
[56] "HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions' Fair Housing Plans". *Government Accountability Office*. September 2010.
[57] *Ibid.*, page 32.
[58] 24 CFR §5, 91, 92, et al. (2015)(Final Rule)

HUD guidance that is currently in place, as articulated in the Fair Housing Planning Guide and subsequent memoranda, and as required by the AFFH rule itself.[59]

Discriminatory Effects and the Fair Housing Act

Prior to publishing the proposed AFFH rule, HUD finalized a rule in February 2013 that was intended to "formalize HUD's long-held interpretation of the availability of 'discriminatory effects' liability under the Fair Housing Act[60]." According to HUD, individuals and businesses may be held liable for policies and actions that are neutral on their face but have a discriminatory effect on housing choice. This theory of liability had not yet been articulated by the signing of the Civil Rights Acts of 1964 or 1968; however, it has been an important test for discrimination in employment since the Supreme Court found in 1971[61] that the Civil Rights Act "proscribes not only overt discrimination but also practices that are fair in form, but discriminatory in operation[62]."

The first test of "disparate impact theory" in housing law came in 1974, *with United States v. City of Black Jack*[63]. In that case, the government alleged that the City of Black Jack had "exercised its zoning powers to exclude... a federally-subsidized housing development", thereby excluding residents of low-income housing, who were disproportionately black.[64] In deciding the matter, the Eight Circuit Court maintained that a plaintiff "need prove no more than that the conduct of the defendant actually or predictably results in racial discrimination" to make a case that the conduct is itself discriminatory[65]. The theory of discriminatory effect established in this case has been consistently applied in fair housing cases and upheld in numerous district court decisions.[66]

However, disparate impact theory was to face a considerable legal challenge in early 2015 in the case of *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project*. In this case, the Supreme Court of the United States was asked to finally settle the question of whether or not housing providers and policy makers could be held liable not just for intentional discrimination, but for the effects of neutral policies that produce discriminatory outcomes.

Texas Department of Housing and Community Affairs v. The Inclusive Communities Project

In 2008, a Dallas-based non-profit organization called the Inclusive Communities Project ("the Project") sued the Texas Department of Housing and Community Affairs ("the Department"), claiming that the point system by which it allocates federal tax subsidies serves to concentrate subsidized housing in low-income communities.[67] In the lawsuit, the Project relied in part on

[59] 24 CFR §5.151 (2015)
[60] 24 CFR §100 (2015)
[61] Garrow, David J. "Toward a Definitive History of *Griggs v. Duke Power Company*". 67 Vand. L. Rev. 197 (2014).
[62] *Griggs v. Duke Power Co.*, 401 U.S. 430 (1971).
[63] Rich, Joseph D. "HUD's New Discriminatory Effects Regulation: Adding Strength and Clarity to Efforts to End Residential Segregation." Lawyers' Committee for Civil Rights Under Law. May 2013.
[64] *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974)
[65] *Ibid.*
[66] 24 CFR §100 (2013); Rich, Joseph D. "HUD's New Discriminatory Effects Regulation: Adding Strength and Clarity to Efforts to End Residential Segregation." Lawyers' Committee for Civil Rights Under Law. May 2013.
[67] *Inclusive Communities Project v. Texas Department of Housing and Community Affairs* (2014).

disparate impact theory, which had been established through decades of jurisprudence but upon which the Supreme Court had, at the time, never definitively ruled.

According to the Project, the Department disproportionately allocated low-income housing tax credits in minority areas while denying those credits in predominantly white communities. In addition to the direct effect of concentrating units subsidized through these tax credits, the Project alleged that this manner of allocation led to the further concentration of Section 8 Housing in those same areas[68], which served to limit housing options for low-income, minority residents to areas with high concentrations of racial minority residents.[69] In its original complaint, the Project argued both that the point scheme was intentionally discriminatory and that it produced a disparate impact on minority residents. The District Court for the Northern District of Texas found that the Project had failed to prove intentional discrimination but had proved its disparate impact claim.

Having been upheld in the U.S. Court of Appeals for the Fifth Circuit, the matter then moved to the Supreme Court at the request of the Department.[70] In asking the Supreme Court to consider the case, the Department presented the court with two questions: First, "are disparate-impact claims cognizable under the Fair Housing Act?"[71] In other words, does the Act permit disparate-impact claims? Second, in the event that the Court finds that the FHA does allow such claims, the Department also asked "what are the standards and burdens of proof that should apply?"[72] The Court's decision on this matter, handed down on June 25, 2015, upheld disparate impact theory while imposing limitations on the way the theory is applied in practice. Having done so, the Court sent the case back to the lower courts to determine whether the Department's policies were discriminatory under disparate impact theory, in light of the limitations imposed by the Court.[73] In a decision issued on August 26, 2016, the U.S. District Court for the Northern District of Texas ruled that the Inclusive Communities Project had failed to demonstrate that the Department's policies caused a statistically-significant disparity in the location of low-income housing, and dismissed the case.

LOCAL FAIR HOUSING CASES

Recent U.S. Department of Justice Cases

The U.S. Department of Justice (DOJ) enacts lawsuits on behalf of individuals based on referrals from HUD. Under the Fair Housing Act, the DOJ may file lawsuits in the following instances:

[68] *Ibid*. Section 8 housing vouchers, which are often not accepted by private landlords, cannot be turned down by those who receive low income housing tax credits.
[69] *Ibid*.
[70] Howe, Amy. "Will the third time be the charm for the Fair Housing Act and disparate-impact claims? In Plain English." Supreme Court of the United States Blog. January 6, 2015. Accessible at "http://www.scotusblog.com/2015/01/will-the-third-time-be-the-charm-for-the-fair-housing-act-and-disparate-impact-claims-in-plain-english/"
[71] *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project* (2014). Petition for a Writ of Certiorari.
[72] *Ibid*.
[73] *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project* (2015). These limitations include the requirement that plaintiffs establish a robust causal connection between a challenged practice and alleged disparities in impact. For more, see "Symposium: The Supreme Court recognizes but limits disparate impact in its Fair Housing Act decision." Supreme Court of the United States Blog. Accessed September 13, 2016 at http://www.scotusblog.com/2015/06/paul-hancock-fha/.

- Where there is reason to believe that a person or entity is engaged in what is termed a "pattern or practice" of discrimination or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights; and
- Where persons who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court. [74]

The 2016 AI process included a review of fair housing cases that the Department of Justice has filed in the last decade. The review revealed no DOJ claims against housing providers in the City of Grants Pass or Josephine County during that period.[75]

SUMMARY

The federal Fair Housing Act (FHA) is the foundation for a suite of laws at the national level designed to protect residents of the United States from discrimination in the housing market. As originally passed in 1968, the Act prohibited discrimination on the basis of race, color, religion, gender, and national origin. Subsequent amendments passed in 1988 added additional protections on the basis of disability and familial status, and strengthened the enforcement provisions of the Act. Amendments to the FHA passed from 1964 to the present have generally broadened the protections guaranteed under the FHA, applying stricter and more comprehensive protections that apply to housing providers who benefit from federal funding.

In addition to the fair housing protections provided by federal law, Oregon residents are protected from discrimination in the state housing market by state-level anti-discrimination law (O.R.S. Chapter 659A). This law, which is enforced by the Bureau of Labor and Industry's Civil Rights Division (BOLI), prohibits discrimination on all of the bases included in the federal Fair Housing Act, as well as discrimination based on legal sources of income, status as a survivor of domestic violence, marital status, sexual orientation, and gender identity. HUD has recognized Oregon's anti-discrimination statutes as "substantially equivalent" to the Fair Housing Act, meaning that the rights, responsibilities, and remedies that Oregon law guarantees are at least as comprehensive as those provided under federal law (although as noted Oregon goes further by recognizing additional protected characteristics).

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened the Act's relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless "actually or predictably[76]" result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

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[74] "The Fair Housing Act." The United States Department of Justice. http://www.justice.gov/crt/about/hce/housing_coverage.php
[75] A summary of the fair housing cases filed by the DOJ is available at "Housing and Civil Enforcement Section Cases". The U.S. Department of Justice website. Accessed August 30, 2016 at https://www.justice.gov/crt/housing-and-civil-enforcement-section-cases-1.
[76] *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* The case originated in a lawsuit against the Texas Department of Housing and Community Affairs ("the Department") based on the claim that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies, whether or not those disparities were intentional. In doing so, the Court imposed restrictions on the application of disparate impact theory, ruling that under fair housing law the theory required the demonstration of a causal connection between a policy or practice and the alleged discriminatory effects of that policy.

Having affirmed the validity of disparate impact theory as a cause of action under fair housing law, the Supreme Court sent the case back to the lower courts to determine if the Department's policies amounted to a violation of the Fair Housing Act in light of the restrictions the Court imposed on the application of disparate impact theory. In a decision issued on August 26, 2016, the U.S. District Court for the Northern District of Texas ruled that the Inclusive Communities Project had failed to demonstrate that the Department's policies caused a statistically-significant disparity in the location of low-income housing, and dismissed the case.

Even though the Supreme Court case upholding disparate impact advanced at roughly same time that HUD was finalizing its new affirmatively furthering fair housing (AFFH) rule, the AFFH obligation arises from a different section of the federal Fair Housing Act than disparate impact liability. It is important to emphasize that disparate impact liability does not depend on entitlement status or the receipt of HUD funding: any individual, business, or local government agency may potentially be held liable for violating the Fair Housing Act by adopting policies that predictably cause disparate outcomes among residents with protected characteristics.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. For the City of Grants Pass, these changes will not take effect until the next Consolidated Planning cycle, which begins in 2019.

SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE

The purpose of this section is to provide a profile of fair housing in the City of Grants Pass based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

FAIR HOUSING AGENCIES

FEDERAL AGENCIES

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Seattle oversees housing, community development, and fair housing enforcement in Oregon, as well as in Alaska, Idaho, and Washington State.

The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Seattle office enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions. HUD provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with city and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP), as described below.

Fair Housing Assistance Program

The Fair Housing Assistance Program (FHAP) was designed to support local and city agencies that enforce local fair housing laws, provided that these laws are substantially equivalent to the Fair Housing Act. Substantial equivalency certification is a two-phase process: in the first phase, the Assistant Secretary for Fair Housing and Equal Opportunity determines whether a state or local law, as written, recognizes legal rights and provides legal remedies that are similar to those provided by the federal Fair Housing Act (FHA). Once this determination has been made, and the law has been judged to be substantially equivalent, the agency enforcing the law is certified on an interim basis for a period of three years. During those three years, the local enforcement organization "builds its capacity to operate as a fully certified substantially equivalent agency." FHAP grants during this time period are issued to support the process of building capacity. When the interim certification period ends after three years, the Assistant Secretary issues a determination on whether or not the city law is substantially equivalent to the Fair Housing Act "in operation", this is the second phase of the certification process. If the law is judged to be substantially equivalent in operation, the agency enforcing the law is fully certified as a substantially equivalent agency for five years.

HUD will typically refer most complaints of housing discrimination to a substantially equivalent city or local agency for investigation (such complaints are dual-filed at HUD and the state or local agency), if such an agency exists and has jurisdiction in the area in which the

housing discrimination was alleged to have occurred. When federally subsidized housing is involved, however, HUD will typically investigate the complaint.

The benefits of substantially equivalent certification include the availability of funding for local fair housing activities, shifted enforcement power from federal to local authorities, and the potential to make the fair housing complaint process more efficient by vesting enforcement authority in those who are more familiar with the local housing market. Furthermore, additional funding may be available to support partnerships between local FHAP grantees and private fair housing organizations. The Oregon Bureau of Labor and Industries serves state residents as a FHAP grantee.

Fair Housing Initiative Program

The Fair Housing Initiative Program (FHIP) is designed to support fair housing organizations and other non-profits that provide fair housing services to people who believe they have faced discrimination in the housing market. These organizations provide a range of services including initial intake and complaint processing, referral of complainants to government agencies that enforce fair housing law, preliminary investigations of fair housing complaints, and education and outreach on fair housing law and policy.

FHIP funding is available through three initiatives[77]: the Fair Housing Organizations Initiative (FHOI), the Private Enforcement Initiative (PEI), and the Education and Outreach Initiative (EOI). These initiatives are discussed in more detail below:

- **The Fair Housing Organizations Initiative (FHOI)**: FHOI funds are designed to help non-profit fair housing organizations build capacity to effectively handle fair housing enforcement and outreach activities. A broader goal of FHOI funding is to strengthen the national fair housing movement by encouraging the creation of fair housing organizations.

- **The Private Enforcement Initiative (PEI)**: PEI funds are intended to support the fair housing activities of established non-profit organizations, including testing and enforcement, and more generally to offer a "range of assistance to the nationwide network of fair housing groups".

- **The Education and Outreach Initiative (EOI)**: EOI funding is available to qualified fair housing non-profit organizations as well as city and local government agencies. The purpose of the EOI is to promote initiatives that explain fair housing to the general public and housing providers, and provide the latter with information on how to comply with the requirements of the FHA.

Non-profit organizations are eligible to apply for funding under each or all of these initiatives. To receive FHOI funding, such organizations must have at least two years' experience in complaint intake and investigation, fair housing testing, and meritorious claims in the three years prior to applying for funding. Eligibility for PEI funding is subject to "certain requirements related to the length and quality of previous fair housing enforcement experience."

[77] Though there are four initiatives included in the FHIP, no funds are currently available through the Administrative Enforcement Initiative.

Organizations applying for the EOI must also have two years' experience in the relevant fair housing activities. EOI funds are also potentially available to city and local government agencies.

The Fair Housing Council of Oregon is a full-service fair housing organization that currently serves residents of Oregon as a FHIP grantee. In 2015, the Council was granted $325,000 under the Private Enforcement Initiative to support the following activities:

- Identification, investigation, and referral of alleged housing violations to HUD;
- Development and expansion of current systematic investigation efforts;
- Increased fair housing enforcement, including expanded intakes from groups who are least likely to report discrimination; and
- Identification and elimination of community policies that perpetuate segregation.[78]

Legal Aid Services of Oregon is also a current FHIP grantee operating in Oregon, having received $325,000 in continuing development funding in FY2015. At present, the organization is focusing on increasing outreach and enforcement capacity in Linn, Benton, and Lincoln Counties.[79]

STATE AGENCIES

The Oregon Bureau of Labor and Industries

The Civil Rights Division of the Oregon Bureau of Labor and Industries is responsible for "defending the rights of all Oregonians to equal opportunity in employment, housing, public accommodations and career schools[80]." The division is responsible for enforcing Oregon's anti-discrimination law, including provisions that outlaw discrimination in the housing market based on legal sources of income, marital status, sexual orientation, and gender identity, as well as discrimination against survivors of domestic violence. Those who believe that they have experienced illegal discrimination in the Oregon housing market may contact the Civil Rights Division through the following information:

Address: 800 NE Oregon Street, Suite 1045
Portland, Oregon 97232
Telephone: (971) 673-0764 (English)
Telephone: (971) 673-2818 (Español)
FAX: (971) 673-0765
Email: crdemail@boli.state.or.us

[78] Project Descriptions: FY2015 Fair Housing Initiatives Program Grant Recipients. U.S. Department of Housing and Urban Development. 2015. Available from http://portal.hud.gov/hudportal/documents/huddoc?id=FY2015FHIPPROJDESC.pdf. Accessed August 19, 2016
[79] Ibid.
[80] "Oregon Civil Rights Division". Bureau of Labor and Industries website. Accessed August 30, 2016 at http://www.oregon.gov/BOLI/CRD/pages/index.aspx

NON-PROFIT ORGANIZATIONS

The Fair Housing Council of Oregon (FHCO) is a full-service fair housing organization that works to "eliminate housing discrimination through access to enforcement and education[81]." The organization serves Oregon residents as a participant in HUD's Fair Housing Initiatives Program. Those who believe that they have experienced discrimination in the Oregon housing market may contact the Fair Housing Council through the following information:

Address: 1221 SW Yamhill Street #305
Portland, Oregon 97205
Telephone: (503) 223-8197 Ext. 2
Toll free: (800) 424-3247 Ext. 2 (Translation available)
Email: information@fhco.org

The Oregon Law Center provides civil legal assistance to low-income Oregonians. As part of its mission, the organization provides advice and representation in matters relating to Fair Housing, government subsidized housing, landlord-tenant law, homelessness. Residents of Grants Pass who believe they have experienced discrimination in the local housing market may contact the organization through the following information:

Oregon Law Center
424 NW 6th Street #102
PO Box 429
Grants Pass, OR 97528
Telephone: (541)476-1058

COMPLAINT PROCESS REVIEW

COMPLAINT PROCESSES FOR FAIR HOUSING AGENCIES

U.S. Department of Housing and Urban Development

The intake stage is the first step in the complaint process. When a complaint is submitted, intake specialists review the information and contact the complainant (the party alleging housing discrimination) in order to gather additional details and determine if the case qualifies as possible housing discrimination. If the discriminatory act alleged in the complaint occurred within the jurisdiction of a substantially equivalent city or local agency under the FHAP, the complaint is referred to that agency, which then has 30 days to address the complaint. If that agency fails to address the complaint within that time period, HUD can take the complaint back.

If HUD determines that it has jurisdiction and accepts the complaint for investigation, it will draft a formal complaint and send it to the complainant to be signed. Once HUD receives the signed complaint, it will notify the respondent (the party alleged to have discriminated against the complainant) within ten days that a complaint has been filed against him or her. HUD also

[81] "The Work We Do". Fair Housing Council of Oregon website. Accessed August 30, 2016 at http://www.fhco.org/about-us/the-work-we-do.

sends a copy of the formal complaint to the respondent at this stage. Within ten days of receiving the formal complaint, the respondent must respond to the complaint.

Next, the circumstances of the complaint are investigated through interviews and examination of relevant documents. During this time, the investigator attempts to have the parties rectify the complaint through conciliation. The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If conciliation fails, and reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.[82] In the event that the federal court judge finds the discrimination alleged in a complaint to have actually occurred, the respondent may be ordered to:

- Compensate for actual damages, including humiliation, pain, and suffering;
- Provide injunctive or other equitable relief to make the housing available;
- Pay the federal government a civil penalty to vindicate the public interest, with a maximum penalty of $10,000 for a first violation and $50,000 for an additional violation within seven years; and/or
- Pay reasonable attorneys' fees and costs.[83]

If neither party elects to go to federal court, a HUD Administrative Law Judge will hear the case. Once the judge has decided the case, he or she issues an initial decision. If the judge finds that housing discrimination has occurred, he or she may award a civil penalty of up to $11,000 to the complainant, along with actual damages, court costs, and attorney's fees. When the initial decision is rendered, any party that is adversely affected by that decision can petition the Secretary of HUD for review within 15 days. The Secretary has 30 days following the issuance of the initial decision to affirm, modify, or set aside the decision, or call for further review of the case. If the Secretary does not take any further action on the complaint within 30 days of the initial decision, the decision will be considered final. After that, any aggrieved party must appeal to take up their grievance in the appropriate court of appeals.[84]

The Oregon Bureau of Labor and Industries

In Oregon, the Bureau of Labor and Industries (BOLI) accepts fair housing complaints as a substantially equivalent agency. A complaint must be filed within one year of occurrence of the discriminatory incident. The complaint process takes seven months to complete on average, although it may take as long as one year. The process begins with the complainant submitting a discrimination questionnaire, which can be obtained online at the BOLI website (http://www.oregon.gov/BOLI/) or by phone (971-673-0764).

After the questionnaire is submitted it is then reviewed by an intake officer, who determines if the alleged action or actions were in violation of the complainant's protected class status. If insufficient evidence of discrimination is found or the complaint is determined to be beyond the jurisdiction of the BOLI, then the complainant is notified in writing.

[82] "HUD's Title VIII Fair Housing Complaint Process." http://www.hud.gov/offices/fheo/complaint-process.cfm
[83] "Fair Housing—It's Your Right." http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm
[84] "HUD's Title VIII Fair Housing Complaint Process." http://www.hud.gov/offices/fheo/complaint-process.cfm

However, if sufficient evidence is found the intake officer then drafts a formal complaint, which is forwarded to the complainant to be signed in front of a notary public and then returned to a bureau office. Any changes to the complaint must be made before the complaint is signed. Once the signed complaint is received, it is dually filed with HUD.

In the investigation phase of the process, the complaint is assigned to a civil rights senior investigator. The investigator sends notice of the complaint to the respondent and asks for a response and also schedules an interview with the complainant. Substantial evidence must be supplied by the complainant. The complaint can be withdrawn or dismissed at any time during this phase. A fact-finding conference may also be held to try to resolve the dispute through conciliation.

If conciliation cannot be reached, the case may proceed to an administrative hearing. Similar to a court hearing, an administrative hearing resolves the case with either a remedy or compensation to the complainant or a dismissal of the case.[85]

SUMMARY

There are a variety of avenues available to Grants Pass residents who believe that they have experienced discrimination in the local housing market. The Department of Housing and Urban Development enforces the federal Fair Housing Act, and those who believe that they have suffered housing discrimination based on race, color, religion, sex, national origin, familial status, or disability, may file a complaint with the agency.

Because HUD has recognized Oregon anti-discrimination laws as "substantially equivalent" to the federal Fair Housing Act, the state agency enforcing those laws, the Bureau of Labor and Industries (BOLI), partners with HUD for state-level fair housing enforcement. Concretely, this means that fair housing complaints alleging discrimination in the private housing market[86] that are initially filed with HUD are typically referred to BOLI for investigation and enforcement. Because Oregon laws prohibits discrimination on based on characteristics not included in federal law, complaints alleging discrimination on those bases are investigated and enforced by BOLI.

In addition, the Fair Housing Council of Oregon (FHCO) accepts complaints from state residents who believe that they have experienced discrimination in the state housing market, and conducts initial identification, investigation, and referral of fair housing violations to HUD for enforcement. The FHCO offers outreach, education, and training to residents, housing providers, and local officials on fair housing and related topics.

Finally, the Oregon Law Center (OLC) offers civil legal assistance to low-income Oregonians, providing services that include advice and representation on Fair Housing, and other housing matters.

Contact information for HUD, BOLI, the FHCO, and the OLC are included in **Section IV** of this report and following the report's title page.

[85] http://www.boli.state.or.us/BOLI/CRD/C_Crcompl.shtml#questionnaire
[86] In the case of housing complaints alleging discrimination in federally funded programs, HUD will retain and investigate the complaint.

SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, the U.S. Department of Housing and Urban Development (HUD) suggests that the analysis focus on possible housing discrimination issues in both the private and public sectors. This section focuses on research regarding the city's private sector, including the mortgage lending market, the real estate market, the rental market, and other private sector housing industries.

LENDING ANALYSIS

HOME MORTGAGE DISCLOSURE ACT

Since the late 1960s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

- The 1968 *Fair Housing Act* prohibits discrimination in housing based on race, color, religion, and national origin. Later amendments added sex, familial status, and disability. Under the Fair Housing Act, it is illegal to discriminate on the basis of any of those protected characteristics in the following types of residential real estate transactions: making loans to buy, build, or repair a dwelling; selling, brokering, or appraising residential real estate; and selling or renting a dwelling.
- The *Equal Credit Opportunity Act* was passed in 1974 and prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the Consumer Credit Protection Act.
- The *Community Reinvestment Act* was enacted in 1977 and requires each federal financial supervisory agency to encourage financial institutions in order to help meet the credit needs of the entire community, including low- and moderate-income neighborhoods.
- Under the *Home Mortgage Disclosure Act (HMDA)*, enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the Census tract in which the loan is proposed as well as outcome of the loan application.[87] The analysis presented herein is from the HMDA data system.

Data collected under the HMDA provide a comprehensive portrait of home loan activity, including information pertaining to home purchase loans, home improvement loans, and refinancing.

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988[88]. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial

[87] *Closing the Gap: A Guide to Equal Opportunity Lending,* The Federal Reserve Bank of Boston, April 1993. http://www.bos.frb.org/commdev/closing-the-gap/closingt.pdf
[88] Prior to that year, Congress had to periodically reauthorize the law.

institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;[89]
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than $25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2014, the most recent year for which these data are available.

[89] Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Home Purchase Loans

Banks and other lending institutions handled 12,261 home purchase loans and loan applications in the Grants Pass study area from 2008 through 2014. As shown in Table V.1 below, a majority of these loans, or around 7,200, were refinance loans. The 4,578 home purchase loans represented around 37 percent of all loans and loan applications.

Table V.1
Purpose of Loan by Year
Grants Pass Study Area
2008–2014 HMDA Data

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

It is these home purchase loans, and specifically the "owner-occupied" home purchase loans that will be the focus of the following discussion, as the outcomes of owner-occupied home purchase applications provide the most direct index of the ability of prospective homeowners to choose where they will live. As shown in Table V.2 below, around 85 percent of home-purchase loan applications were submitted by those who intended to live in the home that they purchased.

Table V.2
Occupancy Status for Home Purchase Loan Applications
Grants Pass Study Area
2008–2014 HMDA Data

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

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- "Originated," which indicates that the loan was made by the lending institution;
- "Approved but not accepted," which notes loans approved by the lender but not accepted by the applicant;
- "Application denied by financial institution," which defines a situation wherein the loan application failed;
- "Application withdrawn by applicant," which means that the applicant closed the application process;
- "File closed for incompleteness" which indicates the loan application process was closed by the institution due to incomplete information; or
- "Loan purchased by the institution," which means that the previously originated loan was purchased on the secondary market.

As shown in Table V.3, just over 1,905 home purchase loan applications were originated over the 2008-2014 period, and 375 were denied, for an overall denial rate of 16.4 percent.

Table V.3
Loan Applications by Action Taken
Grants Pass Study Area
2008–2014 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	Total
Loan Originated	244	254	212	210	302	309	374	1,905
Application Approved but not Accepted	27	30	19	18	19	20	23	156
Application Denied	71	64	28	41	41	59	71	375
Application Withdrawn by Applicant	45	35	33	40	56	47	68	324
File Closed for Incompleteness	11	6	5	5	10	4	6	47
Loan Purchased by the Institution	143	207	164	138	190	137	87	1,066
Preapproval Request Denied	0	0	0	0	0	0	0	0
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0
Total	**541**	**596**	**461**	**452**	**618**	**576**	**629**	**3,873**
Denial Rate	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**

The most common reasons cited in the decision to deny one of these loan applications related to the debt-to-income ratio of the prospective homeowner, as shown in Table V.4 below: credit history and collateral were also commonly given as reasons to deny home purchase loans.

Table V.4
Loan Applications by Reason for Denial
Grants Pass Study Area
2008–2014 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	Total
Debt-to-Income Ratio	25	16	4	8	10	12	13	88
Employment History	1	1	0	1	0	1	0	4
Credit History	6	8	7	5	10	13	7	56
Collateral	4	11	3	12	8	12	19	69
Insufficient Cash	0	5	1	2	1	0	1	10
Unverifiable Information	2	1	3	1	1	1	2	11
Credit Application Incomplete	5	2	0	2	4	3	2	18
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	6	18	4	6	3	6	6	49
Missing	22	2	6	4	4	11	21	70
Total	**71**	**64**	**28**	**41**	**41**	**59**	**71**	**375**

Denial rates fell considerably as the income of the prospective homebuyer increased. As shown in Table V.5 below, those denial rates declined from 50 percent for those with incomes of $15,000 per year or less to 13.2 percent for those with incomes ranging from $60,001 to $75,000 per year. Unusually, the denial rate for those earning more than $75,000 per year was slightly higher, at 14 percent, than the denial rate for those in the next lower income bracket.

Table V.5
Denial Rates by Income of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Total
$15,000 or Below	100.0%	.0%	33.3%	100.0%	75.0%	25.0%	50.0%	50.0%
$15,001–$30,000	22.2%	26.2%	18.6%	22.2%	7.8%	27.3%	27.1%	21.6%
$30,001–$45,000	21.6%	23.4%	9.8%	17.8%	10.8%	21.9%	18.1%	17.9%
$45,001–$60,000	25.0%	13.1%	8.5%	11.8%	12.3%	13.9%	12.6%	14.1%
$60,001–$75,000	20.0%	27.3%	7.4%	7.1%	9.5%	4.8%	12.5%	13.2%
Above $75,000	20.3%	16.9%	11.4%	15.0%	15.8%	9.0%	12.5%	14.0%
Data Missing	18.2%	33.3%	33.3%	25.0%	.0%	33.3%	25.0%	21.1%
Total	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**

Denial rates were observed to differ by race and ethnicity, as shown in Table V.6 below. However, some care is required in interpreting these results: non-white loan applicants accounted for only around 2 percent of all applicants whose race was specifically identified; that is an estimated 45 applicants over 7 years, or just over 6 applications per year, on average. At such small numbers, it is uncertain how well the data represent the ability of prospective non-white loan applicants to secure a loan.[90]

Table V.6
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Race		2008	2009	2010	2011	2012	2013	2014	Total
American Indian	Originated	1	1	2	2	1	3	0	10
	Denied	0	0	0	1	1	0	0	2
	Denial Rate	.0%	.0%	.0%	33.3%	50.0%	.0%	%	16.7%
Asian	Originated	4	3	2	3	1	2	5	20
	Denied	2	0	2	2	0	1	2	9
	Denial Rate	33.3%	.0%	50.0%	40.0%	.0%	33.3%	28.6%	31.0%
Black	Originated	0	0	2	0	0	0	2	4
	Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	.0%	%	%	%	.0%	.0%
White	Originated	225	221	200	195	290	287	348	1,766
	Denied	65	57	24	35	36	53	65	335
	Denial Rate	22.4%	20.5%	10.7%	15.2%	11.0%	15.6%	15.7%	15.9%
Not Available	Originated	14	29	6	10	10	16	19	104
	Denied	4	7	2	3	4	5	4	29
	Denial Rate	22.2%	19.4%	25.0%	23.1%	28.6%	23.8%	17.4%	21.8%
Not Applicable	Originated	0	0	0	0	0	1	0	1
	Denied	0	0	0	0	0	0	0	0
	Denial Rate	22.2%	19.4%	25.0%	23.1%	28.6%	23.8%	17.4%	.0%
Total	**Originated**	**244**	**254**	**212**	**210**	**302**	**309**	**374**	**1,905**
	Denied	**71**	**64**	**28**	**41**	**41**	**59**	**71**	**375**
	Denial Rate	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**
Non-Hispanic	Originated	226	216	195	196	281	280	344	1,738
	Denied	61	56	24	38	33	49	64	325
	Denial Rate	21.3%	20.6%	11.0%	16.2%	10.5%	14.9%	15.7%	15.8%
Hispanic	Originated	4	5	11	5	10	12	12	59
	Denied	4	0	1	0	3	3	2	13
	Denial Rate	50.0%	.0%	8.3%	.0%	23.1%	20.0%	14.3%	18.1%

On the other hand, it is possible to be more definitive on variations in denial rates by gender, owing to the larger number of applications received from applicants of both genders. As shown in Table V.7 on the following page, the denial rate for prospective female homeowners was 18 percent, nearly three percentage points higher than the denial rate for male applicants. Differences in denial rates for male and female applicants differed considerably by year: In some years, female applicants were more successful than their male counterparts. In 2014, for example, female applicants experienced a denial rate that was 3.6 percentage points lower than that of male applicants. By contrast, in 2010 the denial rate for female applicants was nearly three times that of male applicants, and in 2013 the denial rate for female applicants exceeded that of male applicants by nearly ten percentage points.

[90] For example, 2 applications with 1 denial in a given year yields a 50 percent denial rate.

Table V.7
Denial Rates by Gender of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	20.6%	25.6%	36.4%	%	22.5%
2009	19.7%	23.8%	12.9%	%	20.1%
2010	7.1%	19.5%	28.6%	%	11.7%
2011	14.9%	16.3%	36.4%	%	16.3%
2012	12.5%	9.4%	30.0%	%	12.0%
2013	12.9%	22.8%	16.7%	.0%	16.0%
2014	17.0%	13.4%	21.1%	%	16.0%
Average	**15.3%**	**18.0%**	**22.8%**	**.0%**	**16.4%**

In the period from 2008 through 2011, owner-occupied home purchase loans were more likely to be denied if the prospective home was located in the north of the city (i.e., north of the railroad tracks) than in the center of town, as shown in Map V.1 on the following page. Denial rates were also above the seven-year average of 16.4 percent in Census tracts that lay to the south of Highway 199.

From 2012 through 2014, the geographic pattern in denial rates was just the opposite: owner-occupied home purchase loans were more likely to be denied in the Census tract that straddles the Rogue River, as shown in Map V.2 on page 90. In neither time period did the denial rate in any Census tract exceed the overall average by more than ten points.

Predatory Lending

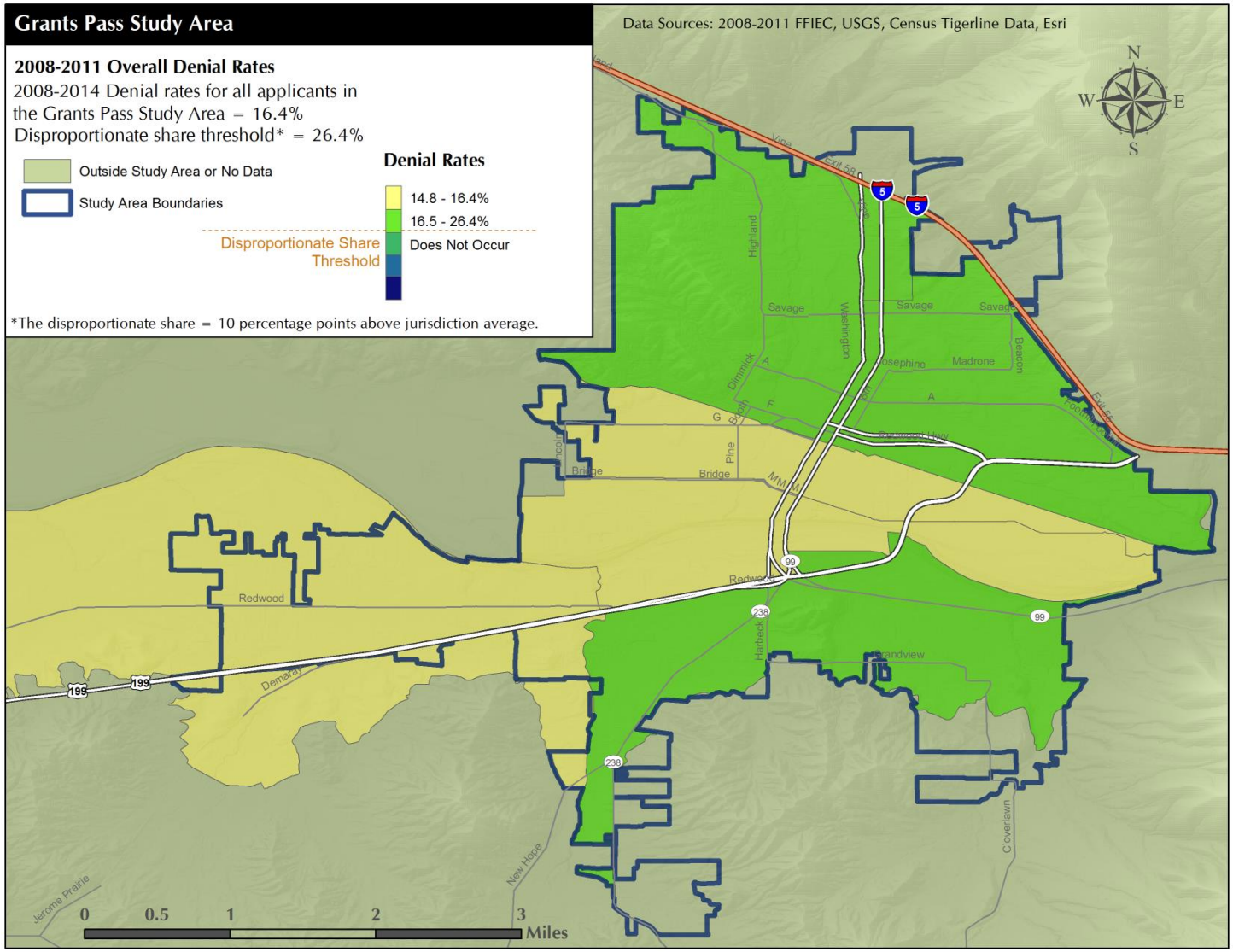
In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;[91]
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.[92]

For the 2014 AI analysis, originated owner-occupied home purchase loans qualifying as HALs were examined for 2008 through 2014. As noted previously, home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table V.8 on page 91, only 26 home purchase loans issued in 2008 and after have carried high-annual percentage rates, or 1.4 percent of all owner-occupied home purchase loans issued in the study area.

[91] Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." http://www.ffiec.gov/hmda/glossary.htm#H
[92] 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

Map V.1
Home Purchase Loan Denial Rates by Census Tract: 2008-2011
Grants Pass Study Area
2008-2011 HMDA Data: 2015 City Boundaries



Map V.2
Home Purchase Loan Denial Rates by Census Tract: 2012-2014
Grants Pass Study Area
2012-2014 HMDA Data: 2015 City Boundaries

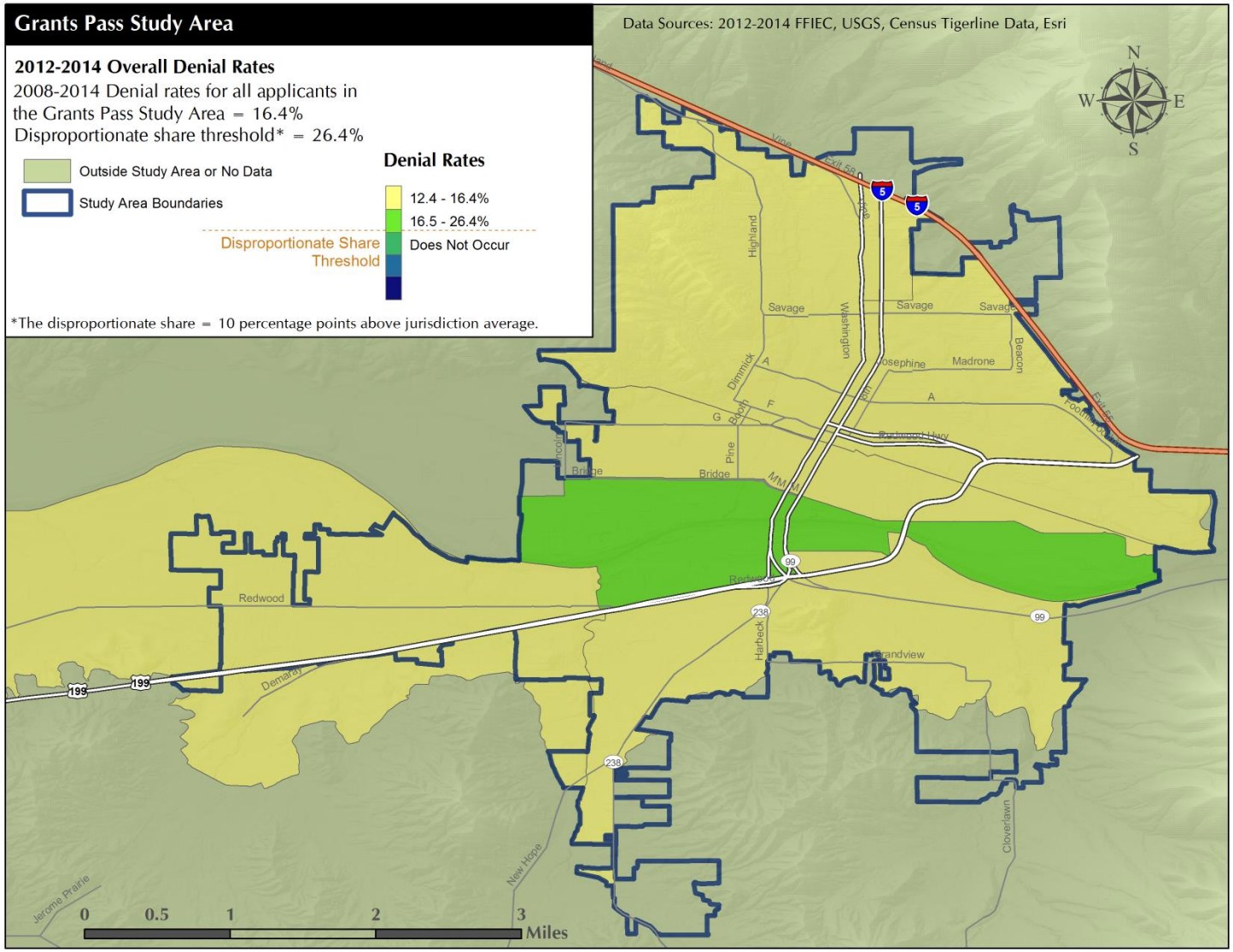


Table V.8
Originated Owner-Occupied Loans by HAL Status
Grants Pass Study Area
2008–2013 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	Total
Other	234	245	212	208	298	309	373	1,879
HAL	10	9	0	2	4	0	1	26
Total	**244**	**254**	**212**	**210**	**302**	**309**	**374**	**1,905**
Percent HAL	4.1%	3.5%	.0%	1.0%	1.3%	.0%	.3%	1.4%

Twenty-one of those high-annual percentage rate loans, or around 80 percent, have gone to white purchasers, as shown in Table V.9 below. On the other hand, nearly all borrowers in the study area; that is, 98 percent; were white, so white borrowers are not over-represented among those with high annual percentage rate loans.

Table V.9
HALs Originated by Race of Borrower
Grants Pass Study Area
2008–2013 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	Total
American Indian	1	0	0	0	0	0	0	1
Asian	1	0	0	0	0	0	0	1
Black	0	0	0	0	0	0	0	0
White	7	7	0	2	4	0	1	21
Not Available	1	2	0	0	0	0	0	3
Not Applicable	0	0	0	0	0	0	0	0
Total	**10**	**9**	**0**	**2**	**4**	**0**	**1**	**26**
Non-Hispanic	9	7	0	2	3	0	1	22
Hispanic	0	0	0	0	1	0	0	1

HAL rates were below average for borrowers earning less than $75,000 per year, as shown in Table V.10 below. For those earning $75,000 per year or more, the HAL rate was 2.1 percent.

Table V.10
Rates of HALs by Income of Borrower
Grants Pass Study Area
2008–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Average
$15,000 or Below	%	.0%	.0%	%	.0%	.0%	.0%	.0%
$15,001–$30,000	.0%	3.2%	.0%	.0%	2.1%	.0%	.0%	.8%
$30,001–$45,000	1.7%	2.8%	.0%	1.7%	.0%	.0%	1.1%	1.0%
$45,001 -$60,000	3.5%	4.1%	.0%	.0%	1.4%	.0%	.0%	1.3%
$60,001–$75,000	5.8%	.0%	.0%	.0%	.0%	.0%	.0%	1.1%
Above $75,000	8.5%	6.1%	.0%	2.9%	.0%	.0%	.0%	2.1%
Data Missing	.0%	.0%	.0%	.0%	33.3%	.0%	.0%	6.7%
Average	**4.1%**	**3.5%**	**.0%**	**1.0%**	**1.3%**	**.0%**	**.3%**	**1.4%**

COMMUNITY REINVESTMENT ACT DATA

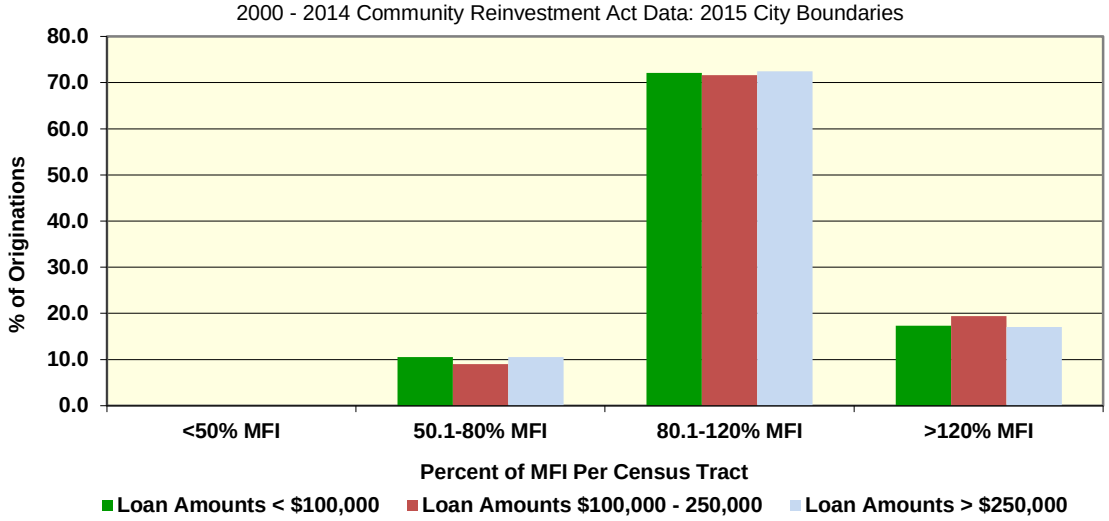
Economic vitality of neighborhoods can partly be measured through Community Reinvestment Act (CRA) data. According to these data, 14,425 small business loans were extended to businesses in the Grants Pass study area during the period from 2000 to 2014. Of these, 6,218 loans went to businesses with annual revenues of less than $1 million. Approximately 94.4

percent of loans issued in the city were valued at less than $100,000. Tables with complete CRA data are presented in Appendix A.

Diagram V.1 below presents the distribution of small business loans by value and income level of the Census tract in which those loans were issued. Roughly ten percent of small business loans went to Census tracts in which the median family income ranged from 50.1 to 80 percent of the area median family income.[93] Between 15 and 20 percent of small business loans went to upper income Census tracts, or those in which the MFI exceeded 120 percent of the area MFI. A majority of small business loans, or roughly 70 percent, went to middle-income Census tracts.

While there were no small business loans issued in low-income Census tracts (i.e., below 50 percent of the area MFI), there were in fact no Census tracts that qualified as low income in the city or county in any year included in the study.

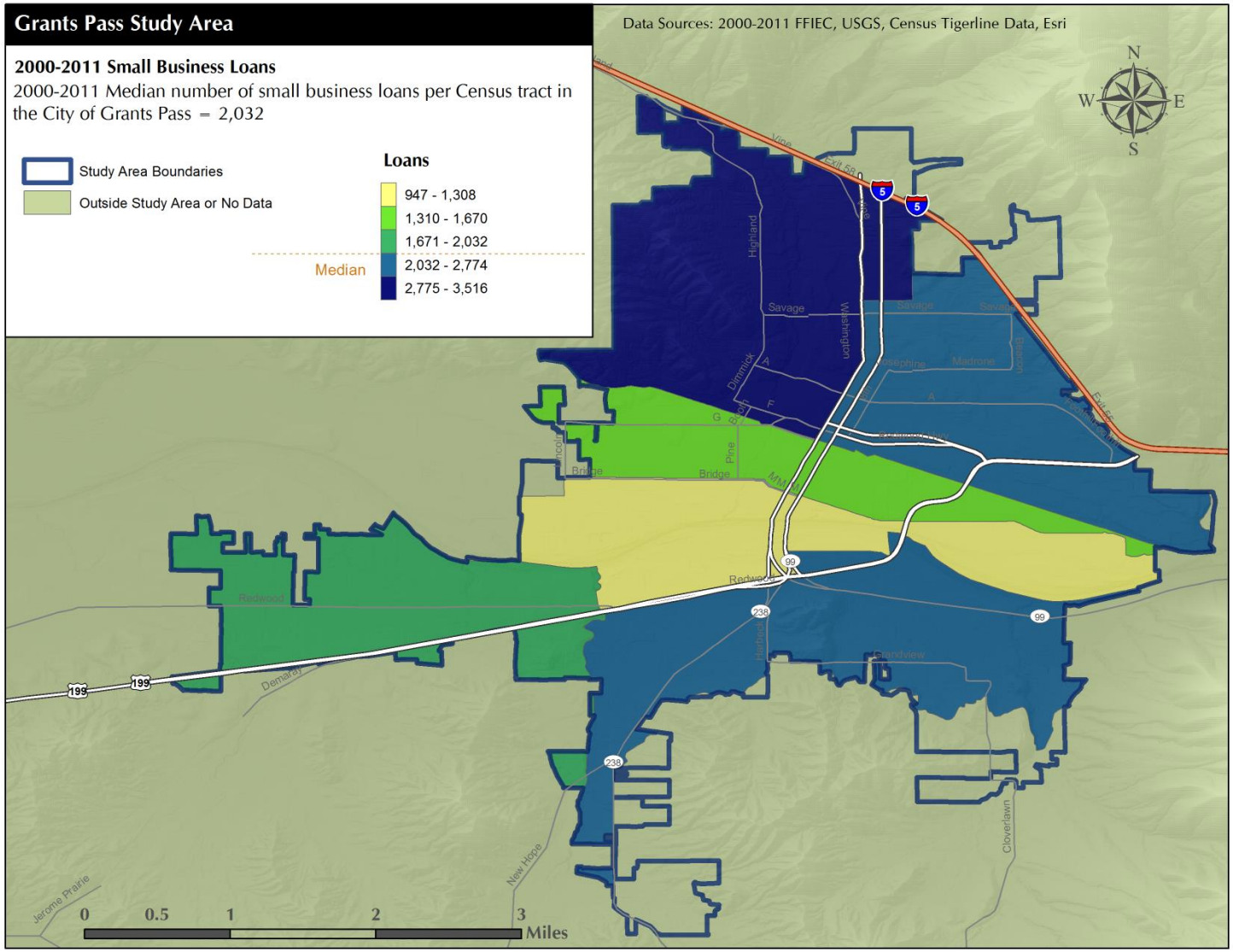
Diagram V.1
Percent of Small Business Loans Originated by Census Tract MFI
Grants Pass Study Area
2000 - 2014 Community Reinvestment Act Data: 2015 City Boundaries



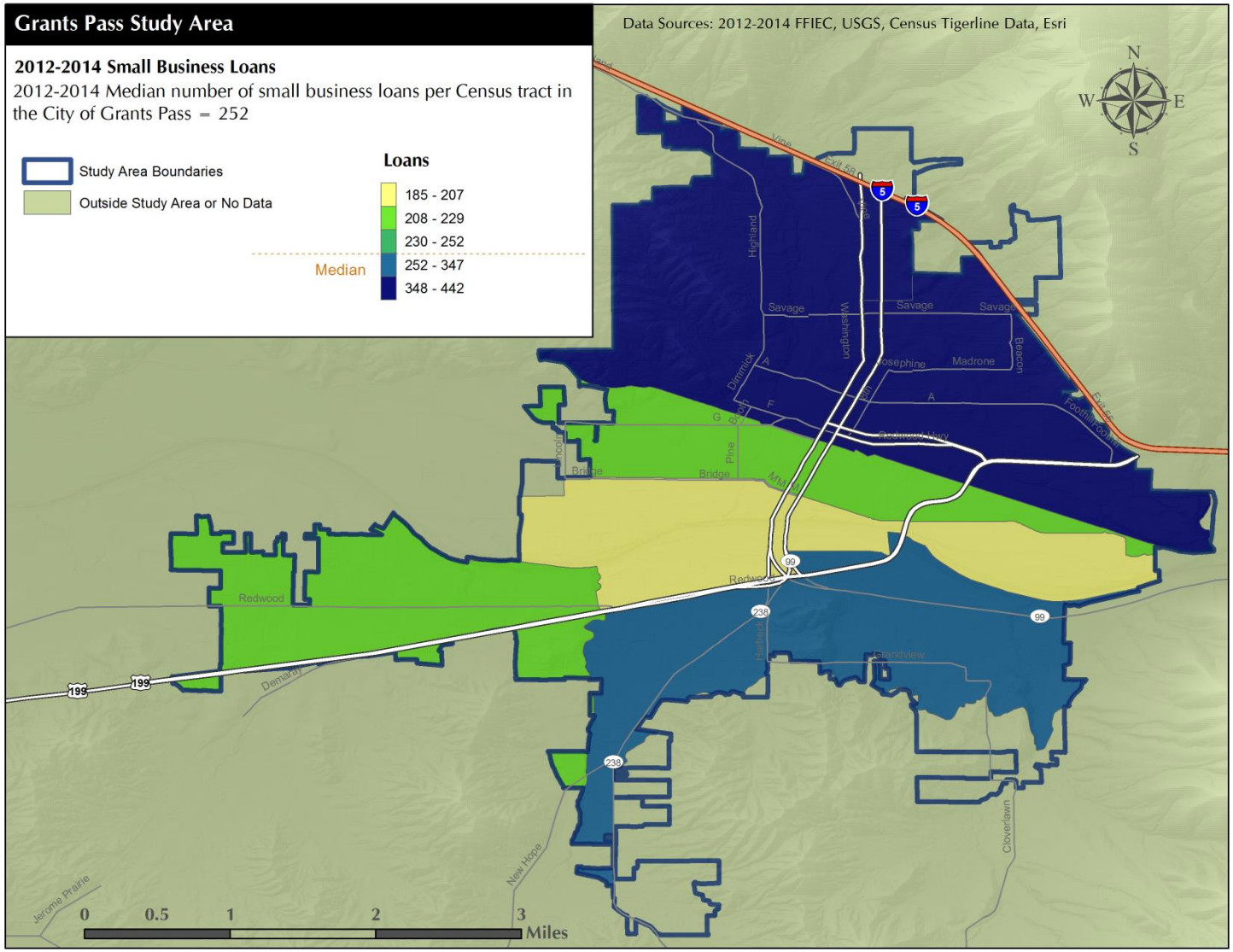
The median number of small business loans issued in study area Census tracts from 2000 through 2011 was 2,032. As shown in Map V.3 on the following page, the number of loans issued in outlying Census tracts to the north and south of the city center tended to be at or above median, while the number of loans issued in Census tracts toward the center of the city tended to be below median. The same overall pattern was observed in 2012-2014, as shown in Map V.4 on page 94. During that time period the median number of loans issued in city Census tracts was 252.

[93] In 2014, the area median family income is defined as the median family income in the Grants Pass metropolitan statistical area (MSA), which includes all of Josephine County. Prior to the establishment of the Grants Pass MSA in 2014, the area median family income was defined as the median family income of all areas not included in a MSA in the State of Oregon.

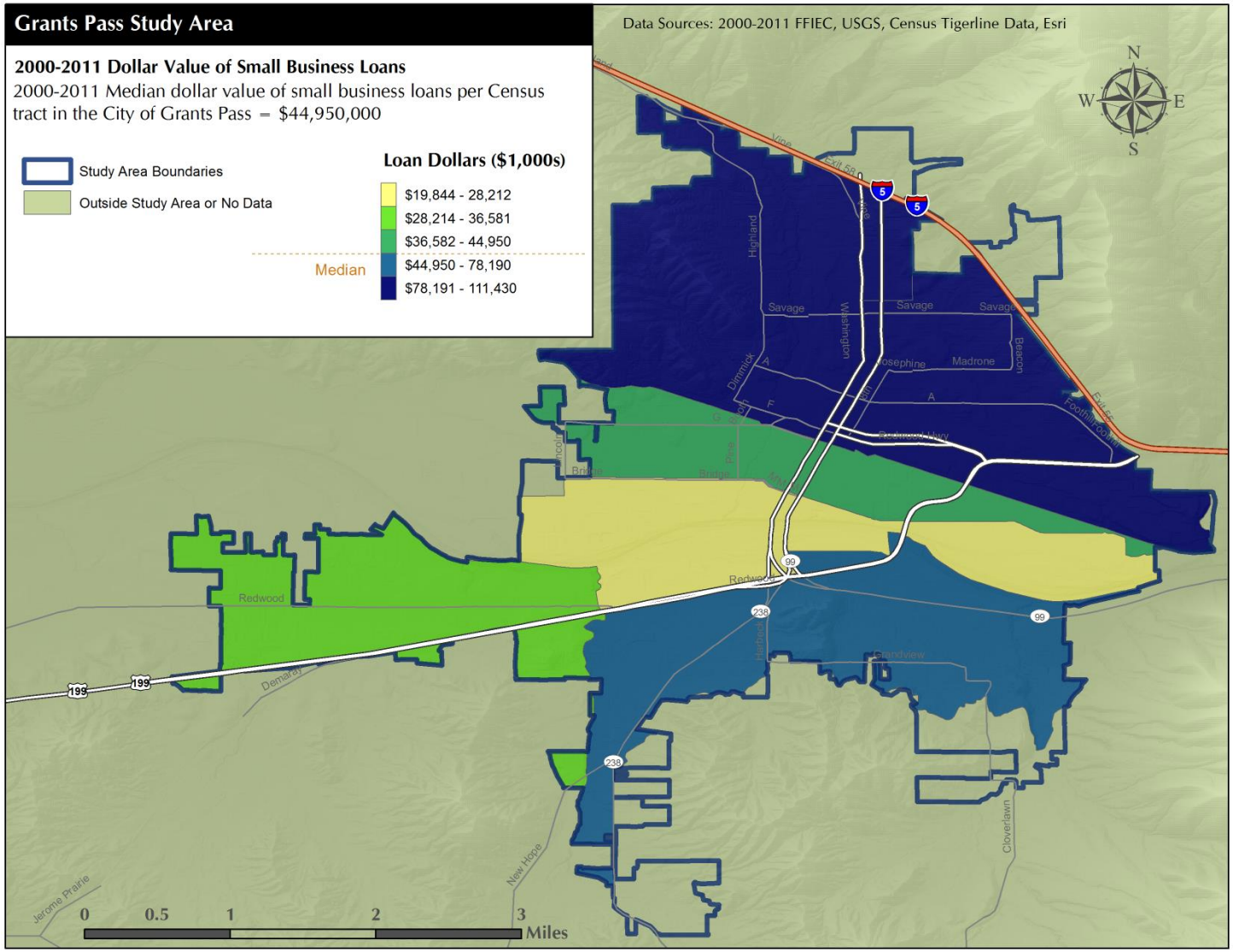
Map V.3
Number of Small Business Loans by Census Tract: 2000-2011
Grants Pass Study Area
2000-2011 FFIEC CRA: 2015 City Boundaries



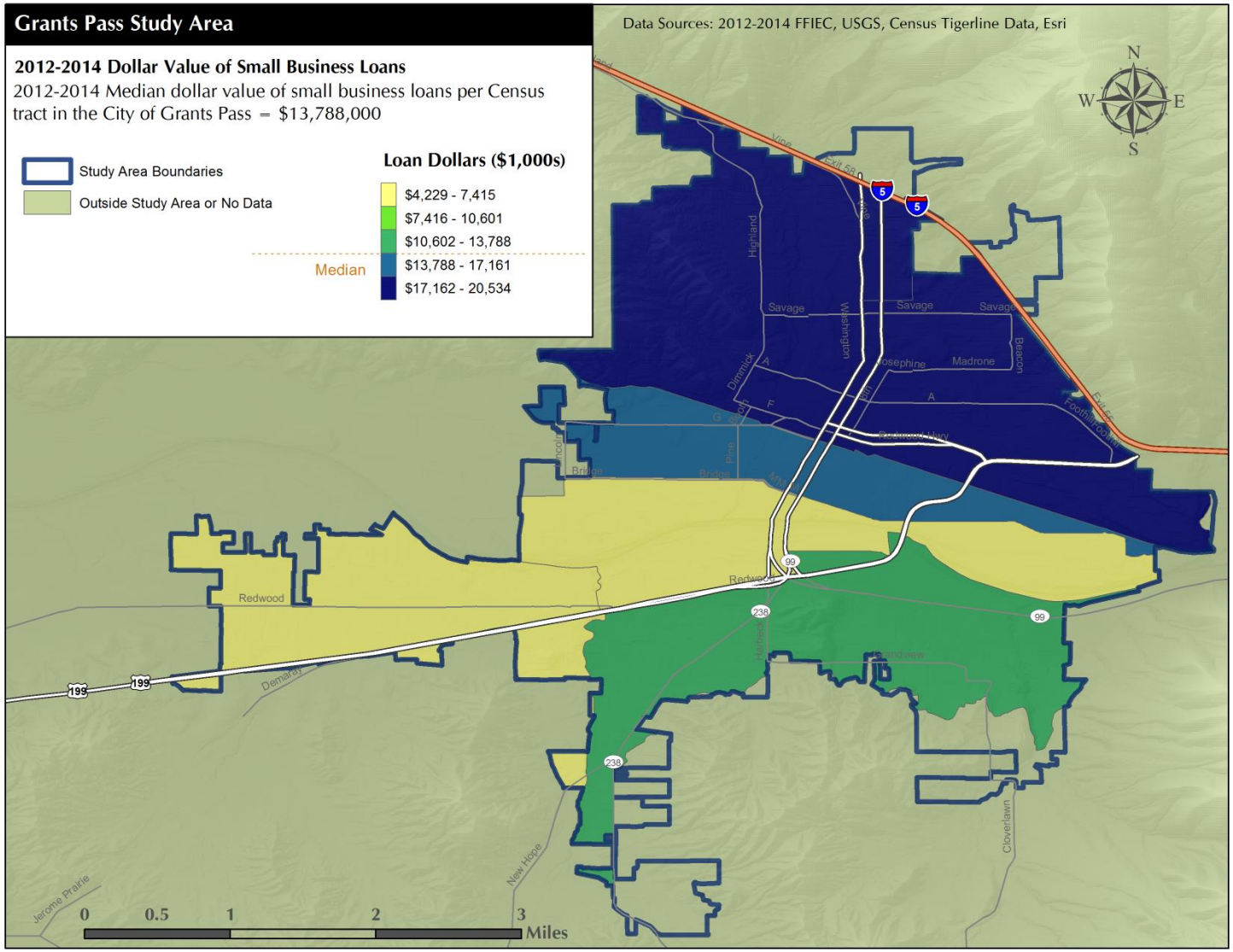
Map V.4
Number of Small Business Loans by Census Tract: 2012-2014
Grants Pass Study Area
2012-2014 FFIEC CRA: 2015 City Boundaries



Map V.5
Total Value of Small Business Loans by Census Tract: 2000-2011
Grants Pass Study Area
2000-2011 FFIEC CRA: 2015 City Boundaries



Map V.6
Total Value of Small Business Loans by Census Tract: 2012-2014
Grants Pass Study Area
2012-2014 FFIEC CRA: 2015 City Boundaries



As one might expect, the total value of small business loans tended to be higher in areas that received more individual loans. As shown in Map V.5 on page 95, more than $78 million in small business loans were issued in outlying Census tracts to the north of the city center from 2000 through 2011, with more than $44.9 million going to outlying areas in the south of the study area.

Since 2011, the total value of loans issued to the north of the river has generally been above the overall median ($13.8 million). As shown in Map V.6 on the previous page, the total value of loans issued in the south of the study area was below median.

Fair Housing Complaints

U.S. Department of Housing and Urban Development

HUD maintains records of complaints that represent potential and actual violations of federal housing law, as described previously in the Complaint Process Review. Over the 2008 through 2016 study period, the agency received a total of 7 complaints alleging discrimination in the Grants Pass housing market. All but one of these complaints cited perceived discrimination based on disability, as shown in Table V.11 below.

Table V.11
Fair Housing Complaints by Basis
City of Grants Pass
2008–2016 HUD Data

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

Those who file fair housing complaints with the Department of Housing and Urban Development may include more than one discriminatory action, or *issue*, in those complaints. Fair housing complaints from Grants Pass cited 12 issues total, with the most common being failure to make reasonable accommodation (4 complaints), as shown in Table V.12 below.

Table V.12
Fair Housing Complaints by Issue
City of Grants Pass
2008–2016 HUD Data

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

Two of the complaints against Grants Pass housing providers were resolved. As shown in Table V.13 on the following page, one of those complaints was successfully conciliated or settled,

and the other was closed when the complainant withdrew his or her complaint following resolution of that complaint. The other five were closed after the complainant failed to cooperate, when the investigator was unable to locate the complainant, or after HUD's investigation failed to produce sufficient evidence to issue a charge of discrimination.

Table V.13
Fair Housing Complaints by Closure Status
City of Grants Pass
2004–2013 HUD Data

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

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the City of Grants Pass was conducted via an online survey of stakeholders that began in July of 2016. The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into the knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing. Results and comments related to the questions in the private sector are presented in the following narrative, and additional survey results are discussed in **Sections VI** and **VII**.

The 2016 City of Grants Pass Fair Housing Survey was completed by 101 persons and was conducted entirely online. Individuals solicited for participation included citizens of Grants Pass, representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple "yes," "no," or "don't know" responses, although many questions allowed the respondent to offer written comments. When many respondents reported that they were aware of questionable practices or barriers, or when multiple narrative responses indicated similar issues, findings suggested likely impediments to fair housing choice.

Numerical tallies of results and summaries of some comment-driven questions are presented in this section. A complete list of written responses is available in Appendix B.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in the city's private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector, including the following:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industry,
- Housing construction or accessible housing design fields,
- Home insurance industry,

- Home appraisal industry, and
- Any other housing services.

If respondents indicated that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented on the following page in Table V.14 below. As shown, majorities of respondents generally were not aware of any barriers to fair housing in the private housing market, with the exception of the rental housing market. Eighteen respondents (roughly a quarter of those who responded to the question) maintained that they were aware of fair housing issues in the rental housing market. No more than ten percent of respondents noted an awareness of barriers to fair housing choice in any other private sector area mentioned.

Table V.14
Barriers to Fair Housing in the Private Sector
City of Grants Pass
2016 Fair Housing Survey

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

When asked to provide additional information on the types of discrimination that they had observed in the private sector, many respondents focused on perceived discrimination in the rental housing market. In some cases, commenters cited a discriminatory situation involving themselves or an acquaintance, as in the case of one respondent whose co-worker was informed that a landlord "only rents to married Christian couples" or another who stated that he or she was rejected by landlords once they learned that he or she had four children. Several commenters shared the perception that a tight local rental market allows rental housing providers to be more selective, and potentially more discriminatory in their decisions concerning whom to offer available units.

SUMMARY

Fair housing choice may be influenced by factors in the private housing market, including patterns in home and small business lending and the decisions that rental housing providers to accept or reject potential tenants. To assess the degree to which these factors may influence fair housing choice in the City of Grants Pass, this report includes an analysis of home lending data collected under the Home Mortgage Disclosure Act (HMDA), small business lending data collected in accordance with the Community Reinvestment Act (CRA), fair housing complaints filed against housing providers in the city, and data summarizing the experience of stakeholders and residents in the local housing market gathered through the 2016 City of Grants Pass Fair Housing Survey.

Banks and other lending institutions handled 12,261 home loans and loan applications from 2008 through 2014. Around 37 percent (4,578) of these were home purchase loans, and

approximately 85 percent of those home purchase loans were intended to finance the purchase of a home in which the buyer intended to live.

Based on the 1,905 loans that were originated in the city during that time period, and the 375 that were denied, owner-occupied home purchase loan applicants in the study area saw an overall denial rate of 16.4 percent. The most common reasons that these loans were denied included debt-to-income ratio and credit history. As one might expect, denial rates tended to fall as the income of the prospective applicant increased.[94]

One of the reasons that it is important to examine home lending data in the context of fair housing is to determine whether there are marked differences in the success of home loan applications by protected class status. Data gathered under the HMDA include information on the race or ethnicity of the buyer, as well as his or her gender, allowing for a comparison of denial rates between these groups.

However, home lenders working in the Grants Pass housing market received comparatively few home loan applications from non-white residents: an estimated 45 applicants over seven years, or roughly 6 applicants per year on average. Given such a small sample, it is difficult to comment definitively on whether there are significant differences in the ability of racial or ethnic minority applicants to secure a home loan in the city.

However, there were a substantial number of applications from both male and female applicants. The outcomes of those applications indicate that female applicants were more likely than male applicants to be denied a loan, though the overall difference between the two was not that great: an 18 percent denial rate in the case of female applicants compared to 15.3 percent for male applicants.

High-cost home purchase loans[95] were relatively uncommon in the period from 2008 through 2014. Twenty-six of these high-annual percentage rate loans, or HALs, were issued during that time, most of them in 2009 and 2010. No racial or ethnic minority group received more than one such loan during that time period.

There were also no substantial fair housing concerns revealed through an analysis of small business lending data gathered under the Community Reinvestment Act (CRA). Small business lending was fairly evenly distributed by income level, and was notably absent from areas with above-average concentrations of racial/ethnic minorities or households living in poverty.

City residents (or prospective residents) filed seven fair housing complaints against housing providers in the city from 2008 through 2016. All but one of those complaints cited perceived discrimination on the basis of disability, and failure to make reasonable accommodation was the most common discriminatory activity alleged in these complaints. Two of those complaints were resolved through an agreement between the complainant and housing provider; the rest were closed after the complainant failed to cooperate, investigators were unable to locate the

[94] This was not universally the case: the denial rate for applicants with incomes of more than $75,000 per year was higher, at 14 percent, than the denial rate for those with incomes between $60,001 and $75,000 per year (13.2 percent).
[95] That is, loans with annual percentage rates rates that are three or more percentage points higher than treasury rates on comparable loans.

complainant, or an investigation failed to produce sufficient evidence to warrant a charge of discrimination against the housing provider.

Respondents to the 2016 Fair Housing Survey weighed in on a range of industries and activities in the city's private housing sector:

- The rental housing market;
- The real estate industry;
- The mortgage and home lending industry;
- The housing construction or accessible design fields;
- The home insurance industry;
- The home appraisal industry; or
- Any other housing services.

In most cases, fewer than ten percent of respondents were aware of any questionable practices or barriers to fair housing choice. However, around a quarter of respondents who answered the question relating to the rental housing market maintained that they were aware of such practices. When asked to elaborate on their response, respondents cited discriminatory actions based on religion, family size, disability, or race.

SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented a review of the status of fair housing in the private sector, this section will focus specifically on fair housing in the public sector. The U.S. Department of Housing and Urban Development (HUD) recommends that the AI investigate a number of housing factors within the public sector, including health and safety codes, construction standards, zoning and land use policies, tax policies, and development standards. The AI should also examine the placement of public housing as well as its access to government services.

PUBLIC SERVICES

Community features, including public services and facilities, and the location of public and assisted housing are essential parts of good neighborhoods, leading to a more desirable community and more demand for housing in these areas.

MULTI-FAMILY ASSISTED HOUSING DEVELOPMENTS

ACCESS of Jackson County is a member of the Community Action Partnership of Oregon. The organization, which designs, funds, and manages affordable housing developments, provided a list of developments owned or operated by any provider in the city of Grants Pass. Those developments are presented by the number of affordable units in Map VI.1 on the following page.

As shown, affordable developments in a range of sizes could be found throughout most of the study area, though these units tended to be more concentrated in the northeast of the city, an area in which the poverty rate was relatively high in 2010-2014. Around 15.6 percent of the study area population lived in that Census tract in 2010. By comparison, 45 percent of affordable housing developments (and 44 percent of affordable units), are located in that area.

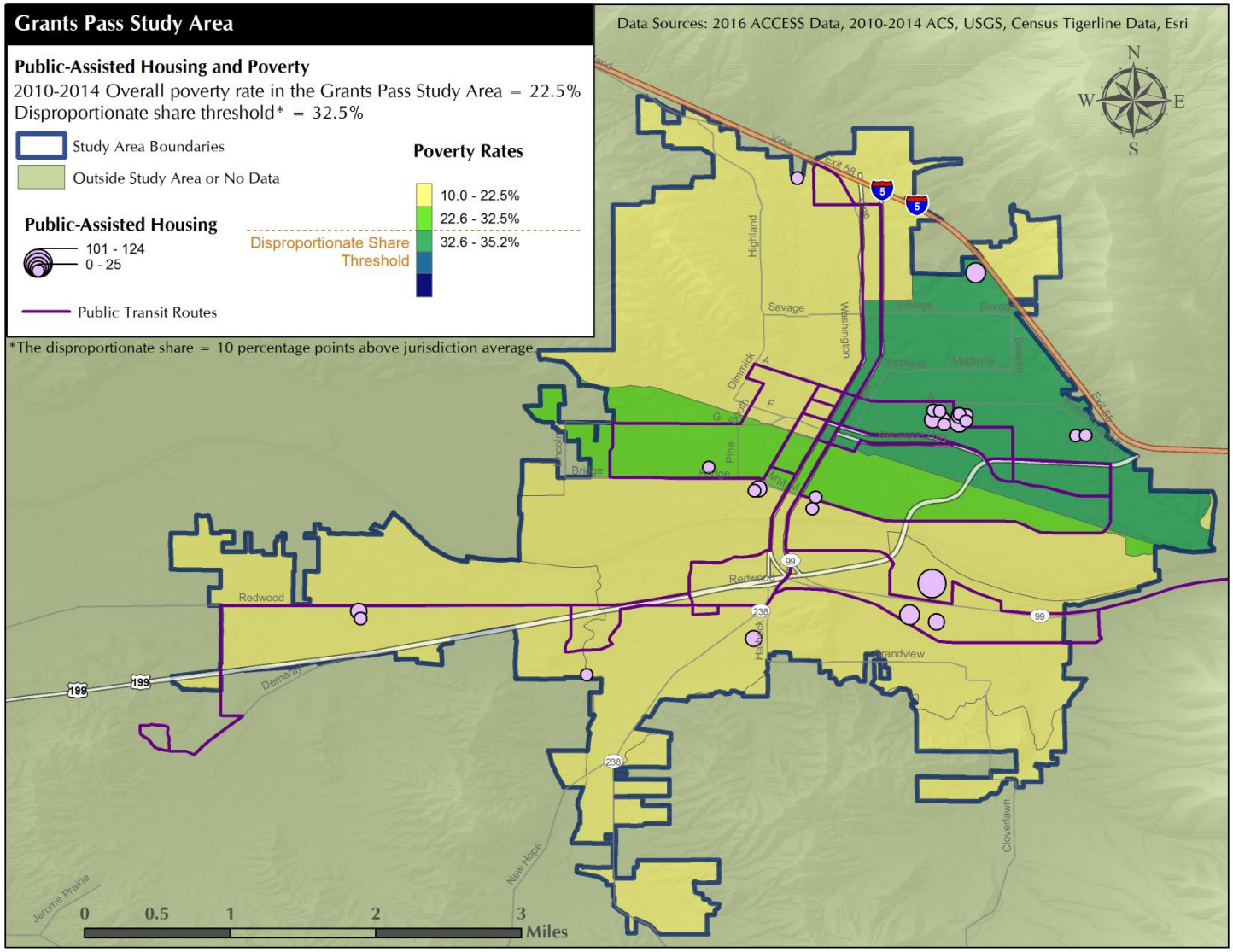
Many of the developments that were located in that area were designated for use by low-income seniors or residents with disabilities, as shown in Map VI.2 on page 105. In fact, all but two of the developments designated for senior residents or those with disabilities were located in that Census tract.

TYPES OF ASSISTANCE

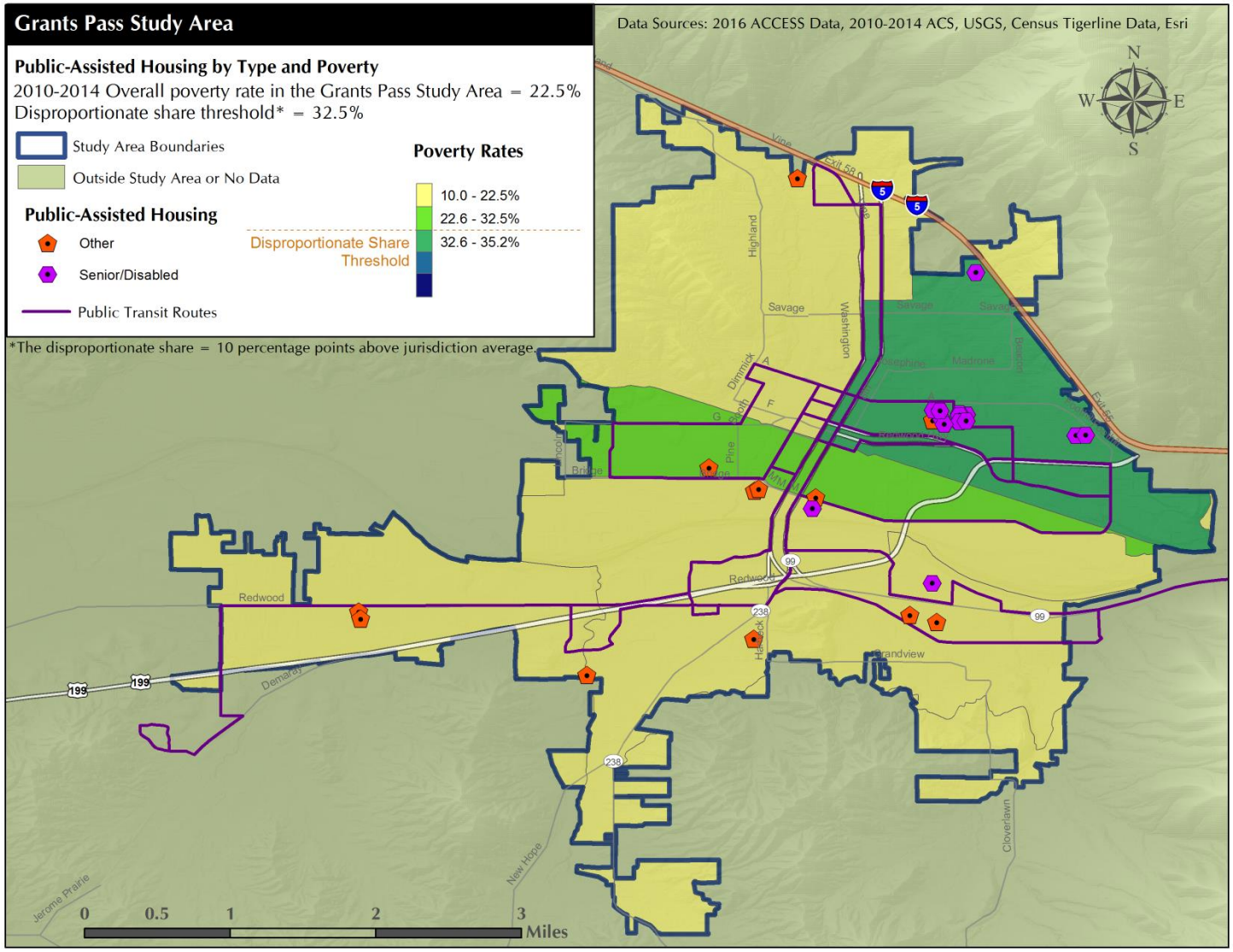
Affordable developments portrayed in these maps are funded through a variety of federal programs, including low-income housing tax credits (LIHTC), Section 202, Section 811, HOME, Project-Based Section 8, and Rural Development.

The Low-Income Housing Tax Credit (LIHTC) Program is designed to promote investment in affordable rental housing by providing tax credits to developers of qualified projects. To qualify for the tax credits, housing projects must be residential rental properties in which a proportion of available units are rent-restricted and reserved for low-income families. Property owners are required to maintain rent and income restrictions for at least thirty years, pursuant to the HUD-mandated minimum affordability period, though in some areas they are required to operate under these restrictions for longer time periods.

Map VI.1
Multi-Family Assisted Housing Units
Grants Pass Study Area
2016 ACCESS Data



Map VI.2
Multi-Family Assisted Housing Units by Type
Grants Pass Study Area
2016 ACCESS Data



Section 202 Supportive Housing for the Elderly is a program designed to expand the supply of affordable housing for elderly residents. The program supplies capital advances to developers to who plan to develop such units for low-income elderly residents, and does not require repayment of those advances provided that the project remains affordable to very low-income elderly residents for a period of 40 years. In addition to providing housing, the program is designed to ensure that tenants retain the ability to live independently while providing supportive services, including cleaning, cooking, and transportation services.

Section 811 Supportive Housing for Persons with Disabilities may also be funded through the use of capital advances; alternatively, these units may be funded through rental assistance to state housing agencies. The purpose of Section 811 is to ensure the availability of supportive housing to very low- and extremely-low income adults with disabilities. Developers, often non-profit organizations, who receive support for their projects through Section 811 are required to have a supportive services plan, which identifies the need for various types of services and outlines how the develop will ensure that those needs are met.

Among other functions, HOME Investment Partnerships provide for the development of affordable housing by funding tenant-based rental assistance, housing rehabilitation, assistance to homebuyers, and new construction. Housing developed through HOME funding must serve low- and very low-income families.

Project-Based Section 8 housing units are supported through the Housing Choice Voucher program. Housing Choice Vouchers are designed to support low-income families through rental subsidies: these subsidies cover the difference between what a low-income family can afford to pay for their rent (30 percent or less of the total family income) and the total cost of their rent. While vouchers are designed to be portable, meaning that tenants may use them anywhere they are accepted, public housing agencies may use up to 20 percent of its available vouchers for project-based vouchers.

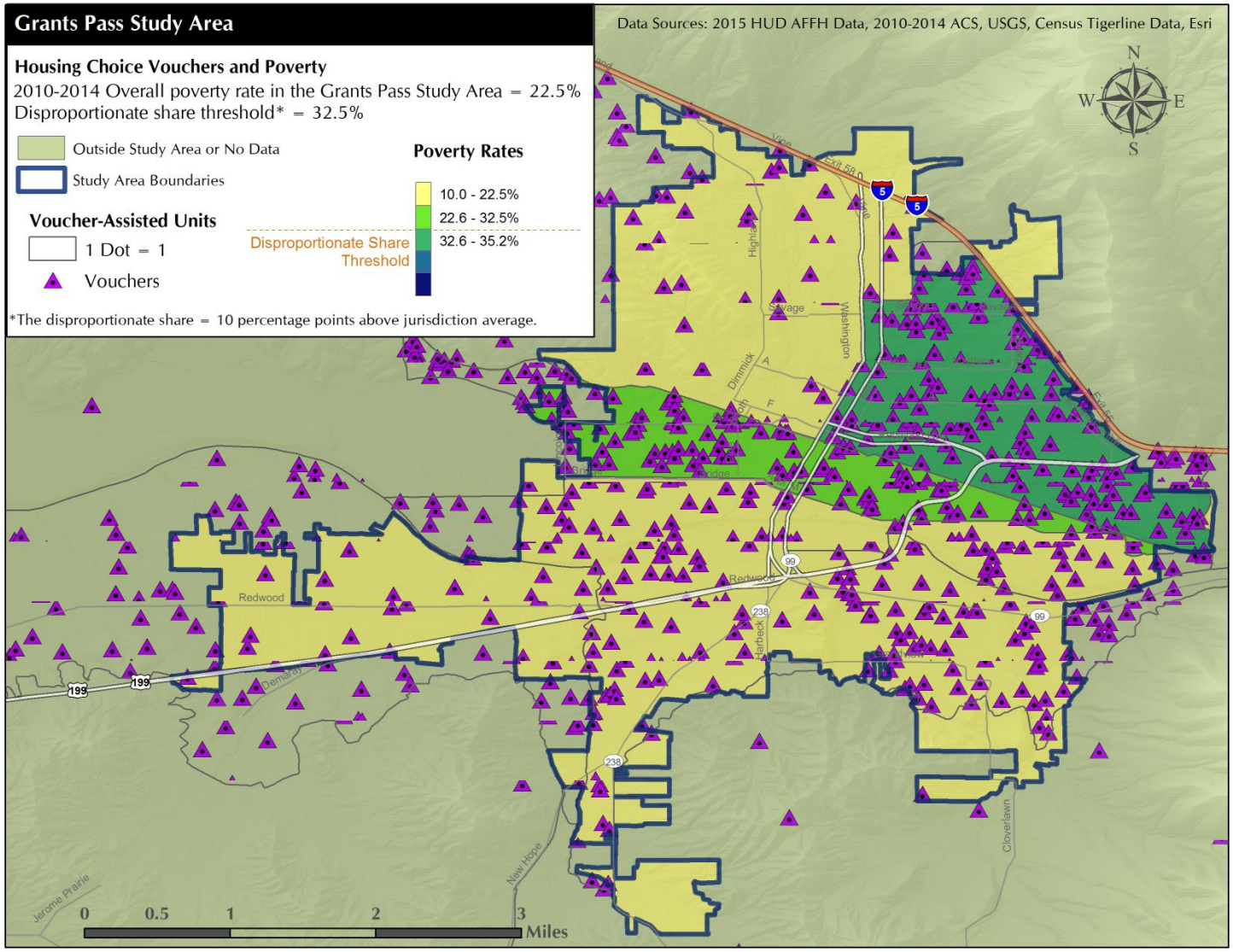
The United States Department of Agriculture also provides assistance to developers of affordable housing through a variety of rural development programs, providing loan guarantees, rural housing site loans, technical assistance grants, and other grants and funding sources. The purpose of both programs is to increase the supply of affordable rental housing for low- and moderate-income individuals and families in eligible rural areas and towns.

HOUSING CHOICE VOUCHERS

As noted, housing choice vouchers provide rental support to low-income families, who may use those vouchers anywhere that a landlord will accept them. Under Oregon law, landlords are not permitted to refuse a tenant on the basis that he or she receives rental assistance, including assistance in the form of housing choice vouchers.

As shown in Map VI.3 on the following page, housing choice vouchers were widely distributed throughout the city, based on HUD-provided data from late 2015. There was only a moderate tendency for these units to be concentrated in Census tracts with above-average poverty rates. Based on rough estimates of the number of vouchers in the city, around 22 percent of those vouchers (151) were located to the northeast of the city center, in a Census tract with a relatively high concentration of poverty and an estimated 15.6 percent of the city population.

Map VI.3
Housing Choice Vouchers
Grants Pass Study Area
December 2015 HUD AFFH Raw Data



PUBLIC POLICIES

Information on municipal codes, ordinances, and other local policies was reviewed to determine the degree to which they provide clear guidance on development policies that may impact residents differently depending on protected characteristics, and to identify potential challenges that might serve to restrict fair housing choice.

Zoning, Procedures, Development Standards, and Definitions

Zoning & Procedures

Zoning is typically reviewed to ensure there isn't a discriminatory disparate impact by zoning certain uses out of a community altogether. It is also reviewed to ensure there isn't disparate impact resulting from zoning which severely restricts where certain residential uses can occur within a community. Further, zoning must not have the effect of treating protected characteristics differently, such as treating housing for a group of persons with disabilities living together as a household unit more restrictively than housing for other household units.

Zoning can also serve to provide opportunity: for example, by providing locations for affordable housing which are located near transit routes and accessible to jobs and services.

In Oregon, development standards for 'needed housing' must also be clear and objective to allow for efficient review procedures and clear expectations regarding outcomes.

Zoning Map and Permitted Uses

The zoning map provides opportunities for a variety of housing types throughout the city. Residential development is always a permitted use (not a conditionally-permitted use). In some zones, certain housing types that aren't normally permitted uses in those zones can also be authorized as part of a larger master-planned Planned Unit Development (PUD).

State-licensed Residential (Care) Homes (with one to five residents) and Residential Care Facilities up to 15 residents are also permitted in all residential zones and most commercial zones, and Residential Care Facilities of 16 or more residents are permitted in most residential zones and most commercial zones.

Group Quarters and Group Care homes are also permitted in higher density residential zones.

Residential zoning districts aren't exclusively separated into "single family" and "multi-family" districts, although there are some zones where one type of unit may be more common than the other. Rather, the zones are based on density, and many zones allow for a mix of residential uses and types, consistent with the density provisions.

Mixed-Use Housing

Updated development and zoning codes allow or encourage mixed-use housing through mixed-used zoning districts, which allow residential development in areas that include commercial or office buildings, while also ensuring lands zoned for multi-family development aren't used exclusively for commercial or office buildings. According to feedback from city officials and stakeholders, these provisions allow for substantial mixed-use development.

Affordable Housing

The Development Code contains a number of development standards and options to allow for increased density in a dispersed manner, without a requirement to apply for a special density bonus. These include Cottage Housing Development, Accessory Dwelling Units (ADUs) in all residential zones, and a percentage of small lot allowances in zones. Recent code amendments also reduced minimum lot sizes proportionately by zoning district, and increased the permitted density in the highest-density districts. These provisions promote the development of affordable housing by reducing the cost of developing affordable units and allowing a greater number of units to be constructed on a property than would otherwise be allowed under the code. ADUs also provide opportunities to accommodate extended families, aging parents, or provide supplemental income to offset housing costs for the owner of the main dwelling.

However, feedback from local officials and stakeholders also suggests that there may be factors that hinder the development of low- to moderate-income housing, including local resistance to affordable housing projects (NIMBYism), whether those projects are multifamily or single-family projects in zones where those uses are permitted by right and at permitted densities.

Development Standards

Development standards are reviewed to ensure they don't contain provisions which would have the effect of being more restrictive or cumbersome based on protected characteristics. Further, they should ensure site accessibility and reasonable accommodation of disabilities.

Codes should avoid standards that may be more extensive for affordable housing development than for equivalent non-affordable housing, where disparate impact may otherwise result.

As noted above, development standards for 'needed housing' are clear and objective to allow for efficient review procedures and clear expectations regarding outcomes.

The Development Code also contains provisions for ADA accessible parking (which is also addressed in the Building Code).

The Development Code also provides 'built-in' exceptions to certain development standards (such as allowing ramps and handrails within setback areas) so it isn't necessary to go through a variance process to allow for reasonable accommodations or modifications

for disabilities. In Oregon, land use decisions which involve discretion typically require a quasi-judicial land use hearing process to ensure due process, so these 'built-in' exceptions can avoid the need to go through a variance process. A variance process is available should other accommodations still be required.

Definitions

Definitions are typically reviewed to ensure definitions related to dwellings and families aren't discriminatory. As with zoning, definitions must not have the effect of treating protected characteristics differently, such as treating housing for a group of persons with disabilities living together as a household unit more restrictively than housing for other household units.

The Development Code contains several definitions that relate to residential use and development. These include: Building Types, Residential: Single Detached-One, Single Detached-Two, Duplex, Single Attached, Multi-Dwelling, Cottage Development; Duplexes; Dwelling, Multi-; Dwelling Unit, Residential; Dwelling Unit, Existing Residential; Family; Group Quarters; Group Care Home; Residential Home; Residential Facility.

Recent code changes, including codification of an earlier practice established as a result of an Oregon Department of Justice Opinion related to statutory provisions for "Residential Homes" and "Residential Facilities", were intended to ensure appropriate standards relating to the Fair Housing Act. Some definitions may need to be reviewed to ensure internal consistency and to address any remaining issues where there may be duplication, non-mutually exclusive definitions, and/or other policy considerations.

Some of the key definitions included in the Development Code are discussed below:

Dwelling Unit: "One or more habitable rooms which are occupied or which are intended or designed to be occupied by one family with one housekeeping facilities for living, sleeping, cooking and eating.

Dwelling Unit, Existing Residential: "A residential dwelling unit that is currently certified for occupancy, that was constructed as a new residential dwelling unit in accordance with the standards in effect at the time of its construction[96]."

Family: "Any of the following: 1) An individual or group of persons not to exceed fifteen in number, related by blood, marriage or adoption; (2) An individual or group of disabled persons, not to exceed fifteen in number. (3) An individual or a group of not more than five persons (excluding servants) who need not be related by blood, marriage or adoption, living together in a dwelling unit."[97]

Group Quarters: "The residential occupancy of living units by groups of more than five persons who are not all related by blood, marriage or adoption, and where the communal kitchen and/or dining facilities are provided[98]."

[96] City of Grants Pass Development Code, Page 30-12
[97] *Ibid.*
[98] *Ibid.* P. 30-16

Group Care Home: "Facilities licensed by the State of Oregon and the appropriate governing bodies providing convalescent or chronic care for periods exceeding 24 hours for elderly or physically dependent persons, or providing care and training on a daily basis for physically or mentally handicapped persons, for sixteen or more persons not related by blood, marriage or adoption to the administrator of such care and training[99]."

While the definition of "family" does include traditional conceptions of family, it also allows for non-traditional family arrangements, including groups of up to 15 persons with disabilities and up to five people unrelated by blood, marriage, or adoption.

Further review may be needed. The definition of "group quarters" should also be reviewed to ensure it is mutually exclusive from the definition of "dwelling unit" which relies on the definition of "family." These should also be reviewed together with the definitions of "Residential Home" and "Residential Facility".

Building Code

The Building Code addresses numerous issues. All jurisdictions in Oregon are subject to the same building code. Along with life and safety issues, the code addresses a number of other topics, including ADA accessibility. This means local codes do not need to duplicate these provisions.

Oregon's building code contains ADA accessibility provisions that apply to multi-family development (3 or more units). These provisions do not apply to one- and two-family dwellings. Homebuyers, homeowners, and builders may choose to include accessibility and universal design elements in one- and two-family dwellings. Renters of one- or two-family dwellings, as well as renters of multi-family units, have rights for reasonable modifications/accommodation, though some elements may be more challenging to modify than others.

The building code for multi-family development requires that a certain number of units be adaptable and/or accessible, depending on a formula specified in the code for different occupancy types (R-1, R-2, etc). The building code also contains the standards and specifications for accessible elements, accessible parking, and accessible routes.

The code is enforced by reviewing plans for new construction, which must comply with the building code before a building permit is issued. Building inspections also ensure the development is built in accordance with the approved plans before a certificate of occupancy is issued.

[99] *Ibid.* P. 30-15

Other Policies

Residential Occupancy Standards

There are no residential occupancy standards or limits outside of standard building codes that serve to restrict the number of persons per bedroom or based on persons per X square feet.

Sale or Demolition of Public-Assisted Housing

As a participant in the Community Development Block Grant (CDBG) program, the City has adopted Resolution No. 15-6336. This resolution includes, among other provisions, the City's Anti-Displacement and Relocation Policy, which identifies a series of actions the City must take if any use of CDBG funds results in the displacement or relocation of lower-income residents. Those actions include:

- Steps to minimize the direct or indirect displacement of persons from their homes;
- Replacement of any low/moderate income housing units demolished or converted to another use, within three years of the demolition or conversion;
- Will provide for public outreach and information relating to the demolition or conversion of low-income housing, along with the location and characteristics of the replacement housing.

As of yet, the City has not needed to make use of this policy.

Fair Housing Policy

As noted in **Section III**, the City of Grants Pass Fair Housing Policy (Resolution No. 13-6105) commits the city to supporting equal opportunity in housing for all people, regardless of race, color, national origin, religion, sex, familial status, or handicap, and to assist people who believe that they have suffered discrimination on one of these bases "within resources available to the city."

In recognition of its commitment to affirmatively further fair housing choice in Grants Pass, the City regularly posts advertisements in local media concerning fair housing training and laws, how residents may file a complaint if they believe they have faced discrimination in the housing market, the public participation plan, and information relating to consolidated planning documents.

Community Development Block Grant Funding

The City receives Community Development Block Grant Funds. At least 70% of funds must be used to predominantly benefit low and moderate income persons.

The City's Consolidated Plan also includes funding to conduct the Assessment of Fair Housing, which must be submitted before starting into the next Consolidated Planning cycle.

FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

As mentioned previously, further evaluation of the status of fair housing within City of Grants Pass was conducted via an online 2016 Fair Housing Survey, which was completed by 101 stakeholders and citizens. Those solicited for participation included a wide variety of individuals in the fair housing arena. Most questions in the survey required "yes," "no," or "don't know" responses, and many allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-heavy questions, a complete list of written responses is available in Appendix B. Other survey results are also discussed in **Sections V** and **VII**.

FAIR HOUSING IN THE PUBLIC SECTOR

Public sector effects on housing can be complex and varied. The questions in this section of the survey asked respondents to think about possible barriers to fair housing choice within very specific areas of the public sector, as follows:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

If respondents indicated affirmatively that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table VI.1 below. As was the case in questions pertaining to the private housing market (discussed in **Section V**), respondents were generally not aware of fair housing issues in the public housing market. An exception was in responses to the question relating to limited access to government services: more than a quarter of those who answered the question affirmed that they knew of barriers to fair housing in this area.

Table VI.1
Barriers to Fair Housing in the Public Sector
City of Grants Pass
2016 Fair Housing Survey

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

Those who commented on perceived barriers connected to government services tended to focus on perceived limitations in the extent and hours of operation of the public transit system. However, others who highlighted those limitations in public transit nevertheless observed that the public transit system is improving.

SUMMARY

The ability of residents to choose where they will live is also impacted by laws, policies, and actions in the public sector. Factors influencing the supply and location of affordable housing units may expand or restrict housing choice for certain groups, and limitations in public transit or other government services may restrict access to employment or educational opportunities. To identify any potential areas of concern in public policy, this AI report reviews the location of publicly-funded affordable housing units; a variety of provisions in local land-use and planning codes and policies; and public input gathered through the 2016 Fair Housing Survey.

There were around 20 multifamily housing developments supported by funding from HUD or the U.S. Department of Agriculture's Rural Development programs, or subsidized through tax credits. All told these developments comprised some 713 affordable units. Though there were affordable developments in most parts of the city, there was some tendency toward concentration of these units in areas with above-average poverty rates. The Census tract with the highest poverty rate (35.2 percent in 2010-2014) held 45 percent of public-assisted affordable housing developments and 44 percent of units in those developments, while only containing around 16 percent of the city population.

Housing choice vouchers, housing subsidies which are not specific to a development but may be used anywhere they are accepted, were distributed more widely throughout the city. There was some tendency for these vouchers to be concentrated in areas with higher poverty, but not to the degree that fixed housing developments were concentrated in those areas (an estimated 22 percent of vouchers were located in the same Census tract discussed in the previous paragraph).

Review of local land-use and zoning provisions and feedback from city officials reveals that the city has procedures in place to promote mixed-use and affordable housing development, but that local opposition to affordable housing has at times served to restrict or limit the development of public-assisted affordable housing developments, whether single-family or multi-family.

According to the City's fair housing policy, Grants Pass is committed to promoting equal opportunity in housing, regardless of race, color, religion, sex, national origin, family status, or disability, within the resources available to the city.

Respondents to the 2016 Fair Housing Survey noted whether they were aware of barriers or impediments to fair housing choice in the following public policy areas:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,

- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

In most cases, few respondents were aware of barriers to fair housing choice in these areas. The exception was in the question concerning access to government services: more than a quarter of those who answered this question stated that they were aware of barriers to fair housing choice in this area. In specifying the types of barriers of which they were aware, most respondents noted limitations in the public transit network.

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the City of Grants Pass as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily indicate the existence of citywide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis may reinforce findings concerning impediments to fair housing choice.

FAIR HOUSING SURVEY

As discussed in previous sections, a 2016 Fair Housing Survey represented a large portion of the public involvement efforts associated with the development of the 2016 AI. The purpose of the 2016 Fair Housing Survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the city were invited to participate.

A total of 101 people in the City of Grants Pass took the survey, which was conducted entirely online. A complete list of responses is included in Appendix B, including additional comments that survey respondents submitted with questions discussed in **Sections V and VI.**

Respondents were asked to identify their primary role in the housing industry. As shown in Table VII.1, at right, 10 respondents were advocates/service providers, 8 were local government officials, and 7 worked in property management.

Table VII.1
Role of Respondent
City of Grants Pass
2016 Fair Housing Survey Data

Primary Role	Total
Advocate/Service Provider	10
Local Government	8
Property Management	7
Law/Legal Services	4
Service Provider	3
Other Role	13
Missing	55
Total	**101**

Table VII.2
How Familiar are you with Fair Housing Laws?
City of Grants Pass
2016 Fair Housing Survey Data

Familiarity	Total
Not Familiar	21
Somewhat Familiar	39
Very Familiar	22
Missing	19
Total	**101**

Respondents were also asked to assess their own level of familiarity with fair housing laws. As shown in Table VII.2 at left, a majority of those who responded (82 responded to this question) considered themselves to be at least somewhat familiar with those laws, and over a quarter of respondents considered themselves to be very familiar.

A majority of respondents, or 68 out of the 82 who responded to the question, considered fair housing laws to be useful, as shown in Table VII.3 on the following page. About a quarter of respondents felt that fair housing laws are difficult to understand or follow, though around 48 percent (38 respondents) disagreed. There was a moderate level of support for changes to fair housing policy: when asked to specify what sort of changes they would like to see, respondents offered suggestions ranging from rescinding fair housing laws and offering relief from those laws to housing providers on the one hand and prohibiting discrimination in rental housing based on credit scores on the

other. Some commenters felt that fair housing laws are not adequately enforced, an impression shared by nearly 60 percent (42) of respondents to the following question.

Table VII.3
Federal, State, and Local Fair Housing Laws
City of Grants Pass
2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	68	5	9	19	101
Are fair housing laws difficult to understand or follow?	19	38	23	21	101
Do you think fair housing laws should be changed?	21	21	35	24	101
Do you thing fair housing laws are adequately enforced?	23	42	6	30	101

The next section in the survey related to fair housing activities, including outreach and education and testing and enforcement. As shown in Table VII.4 below, 23 respondents were aware of available fair housing training opportunities: about a third of those who responded to the question. Twenty respondents had participated in such training. Of those who felt that they could weigh in on current levels of outreach and education activity, most felt that those levels were insufficient. Few respondents were aware of any fair housing testing, and most who weighed in on current levels of testing felt that there was too little.

Table VII.4
Fair Housing Activities
City of Grants Pass
2016 Fair Housing Survey Data

Question		Yes	No	Don't Know	Missing	Total
Is there a training process available to learn about fair housing laws?		23	42	6	30	101
Have you participated in fair housing training?		20	9		72	101
Are you aware of any fair housing testing?		7	46	18	30	101
Testing and education	**Too Little**	**Right Amount**	**Too Much**	**Don't Know**	**Missing**	**Total**
Is there sufficient outreach and education activity?	28	9	1	33	30	101
Is there sufficient testing?	15	1	1	55	29	101

As part of the process of measuring understanding of fair housing law, respondents were asked to list their awareness of classes of persons protected by fair housing laws on federal, city, and local levels. Race and disability were offered as examples of protected classes in the question narrative, and respondents were encouraged to continue on and list other protected classes. Results of this question are presented at right in Table VII.5. Out of the 68 who answered the question, a majority were able to correctly identify religion, sexual orientation, and gender as groups protected under federal or state fair housing laws. Fewer respondents, but still more than 20 percent, correctly identified national origin, family status, marital status, income, and color.

Table VII.5
Protected Characteristics
City of Grants Pass
2016 Fair Housing Survey Data

Protected Class	Total
Gender	42
Religion	42
Sexual Orientation	40
Age	26
National Origin	26
Family Status	25
Income	17
Marital Status	16
Color	14
Disability	5
Domestic Violence	4
Race	3
Military	2
Ethnicity	1
Other	26
Total	**291**

In a concluding series of questions, respondents were asked a series of questions relating to local fair housing policy and fair housing issues. Responses to these questions are summarized in Table VII.6 on the following page. As shown, ten respondents were aware of a city or county fair housing ordinance, regulation, or plan, or around 17 percent of those who

responded to the question.[100] Eleven reported being aware of specific geographic areas with fair housing problems: those who cited particular areas in supplemental commentary highlighted different areas, though several underscored a general lack of affordable housing throughout the city.

Table VII.6
Local Fair Housing
City of Grants Pass
2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	10	34	18	39	101
Are there any specific geographic areas that have fair housing problems?	11	10	42	38	101

Respondents were also asked to offer any additional comments that they might have regarding fair housing in their communities. As one might expect, this question prompted a range of responses: Some commenters took the opportunity to highlight their concerns with fair housing laws, perceiving those laws to be too restrictive of the rights of landlords and other housing providers. Others called for more education on the subject of fair housing. One of the more common concerns shared in this section related to the tight rental market in the city, and the lack of affordable housing that was believed to be connected to the low availability of rental housing in general.

Fair Housing Forum and Council Workgroup Sessions

Efforts to promote public involvement during the AI process also included a series of workgroup sessions with the city council, a fair housing forum, and public input session, and a final presentation of the findings from the AI process.

City Council Workgroups

An August 22, 2016 meeting of the Grants Pass City Council included a brief presentation regarding to the 2016 AI effort. This presentation provided an introduction to fair housing policy, the AI process, and preliminary findings. The meeting took place at 11:45 in the City Council Chambers.

An additional workgroup session is scheduled for September 19, 2016, and will also take place in the City Council Chambers.

Fair Housing Forum

The 2016 City of Grants Pass Fair Housing Forum was held at 3:00 PM on August 22, 2016 in the City Council Chambers. The purpose of this meeting was to provide members of the public with an overview of fair housing policy and the AI process, as well as an opportunity to provide feedback on the process and their experience in the Grants Pass housing market. A

[100] The City of Grants Pass Fair Housing Policy (Resolution No. 13-6105) commits the city to supporting equal opportunity in housing for all people, regardless of race, color, national origin, religion, sex, familial status, or handicap, and to assist people who believe that they have suffered discrimination on one of these bases "within resources available to the city." The city's Fair Housing Policy may be viewed at https://www.grantspassoregon.gov/474/Housing-Resources.

transcript of commentary from the meeting is included in Appendix C. Apart from clarifying questions concerning the data included in the presentation, much of the feedback during the fair housing forum highlighted a need for education on the subject of fair housing, whether relating to the requirements of fair housing law or the availability of resources to assist individuals who believe that they have faced discrimination in the housing market.

FAIR HOUSING PUBLIC INPUT SESSION

A review of the Fair Housing Public Input Session, scheduled for September 19, will be included in the final draft of the document.

PUBLIC COMMENT PERIOD

The Fair Housing Public Input Session marks the beginning of the public comment period, which will last for 30 days, ending on October 18, 2016.

SUMMARY

Efforts to promote public involvement in the 2016 AI process included the 2016 Fair Housing Survey, a series of City Council workgroup sessions and presentations, a Fair Housing Forum presentation, a public input presentation, and a final presentation.

A total of 101 people responded to the Fair Housing Survey. Respondents were generally supportive of fair housing laws, and considered themselves at least somewhat familiar with those laws. Many respondents also felt that current levels of fair housing testing and outreach and education were insufficient to meet the city's fair housing needs. However, some respondents were less supportive, considering fair housing laws to go too far in protecting individuals in search of housing at the expense of the rights of housing providers.

A common concern among those who contributed written responses to survey questions was the current state of the rental housing market. These respondents perceive the current market to be tight, and the supply of decent affordable rental housing to be short.

This was also a concern raised during the Fair Housing Forum. However, the primary contribution of participants in the forum discussion was to underscore the need for fair housing education and outreach for residents, housing providers, and local officials and policy makers.

As of the submission of this draft, several public outreach events are yet to occur. A summary of these events will be included in future drafts.

SECTION VIII. SUMMARY OF FINDINGS

This AI reviews both the public and private sector contexts for the City of Grants Pass's housing markets, in order to determine the effects these forces have on housing choice.

Socio-Economic Context

Socio-economic data provide an essential context for the analysis of impediments, characterizing the environment in which housing choices are made. In its 1996 *Fair Housing Planning Guide* and subsequent guidance, HUD recommends the inclusion and analysis of demographic, economic, and housing data as part of a thorough review of the local housing market and potential impediments to fair housing choice. Accordingly, this study provides a review of demographic and economic data provided by the Census Bureau along with economic and employment data gathered from the Bureau of Labor Statistics and Bureau of Economic Analysis. Data from the Census Bureau were primarily drawn from the 2000 and 2010 decennial Census counts, but were supplemented with data from the 2010-2014 American Community Survey.

The population within the Grants Pass study area grew by an estimated 18 percent between 2000 and 2010. As it did, racial and ethnic minority residents came to account for larger and larger percentages of the study area population. This was particularly true of the Hispanic population, which grew from an estimated 1,552 in 2000 (5.1 percent of the population) to 2,830 in 2010 (7.9 percent) and has continued to grow since 2010, accounting for 8.9 percent of the population in 2010-2014.

From a fair housing perspective, it is important to determine the degree to which residents are segregated by race or ethnicity. Some degree of segregation may be natural, and may not represent a fair housing challenge; however, where there are high concentrations of residents of one race or ethnicity, and where those concentrations exist in areas with high poverty and low access to opportunity, such conditions are a cause for concern. For the purposes of this report, residents of different demographic groups are considered to be disproportionately concentrated in Census tracts or block groups where they account for a share of the population that exceeds the overall study area average by ten percentage points. For example, if black residents account for 0.5 percent of the population throughout the study area, they will be considered "disproportionately" concentrated in any Census block group where they make up 10.5 percent of residents or more.[101]

In fact, there were no Census block groups in the study area with disproportionate shares of residents from any racial or ethnic group in 2000 or 2010. All groups were well below the ten-point disproportionate share threshold in all block groups throughout the city in 2000 and 2010. As noted previously, racial and ethnic minority residents have grown as a share of the study area population since 2000. At present, there are few indications that this growth has been focused in a specific area. However, non-white and Hispanic residents have come to

[101] Note: Where possible, geographic data are presented at the block group level. This geographic unit is smaller than a Census tract, and therefore allows for a more detailed analysis of demographic, economic, and housing trends. However, data on some topics (specifically, disability and poverty) are not available at the Census tract level in recent American Community Survey estimates. These data are presented by Census tract.

account for a larger share of the population in a Census tract to the northeast of the city center. This same area saw a dramatic increase in the percentage of residents living in poverty from 2000 to 2010-2014 (as discussed below). These trends are discussed in more detail below.

Residents with disabilities accounted for 17.3 percent of the city population in 2010-2014. At that time, residents with disabilities accounted for 18 to 24 percent of the population of Census tracts in the south of the city. However, there were no areas in which these residents would be considered disproportionately concentrated based on the criteria described above.

Like much of the nation, the City of Grants Pass[102] experienced a marked decline in employment after 2007. At that time, there were around 14,500 workers in the city's labor force, 13,600 of whom were employed. Over the following three years, the number of workers in the labor force held steady while the number of employed declined. This contributed to a spike in the unemployment rate, which rose from 6.2 percent in 2007 to 13.3 percent by 2009. The unemployment rate has declined steadily since that time, dropping to 7.1 percent by 2015.

Prior to 1995, real average earnings in Josephine County exceeded those at the state level. However, due to rapid growth in earnings at the state level, the amount that the average worker in the county earned at his or her job fell behind statewide figures in that year, and has remained behind since. The average worker in the county earned $35,178 at his or her job in 2014, down from around $38,000 in 2003.

On the other hand, real per capita income (PCI), which is the inflation-adjusted average income of all residents in the county, has not declined in recent years. However, at $33,911, real PCI in the county in 2014 was considerably below the statewide average of $51,271 that same year.

The poverty rate has also risen considerably since 2000, from 14.9 percent to 22.5 percent in 2010-2014. Unlike in the distribution of residents by race and ethnicity, there did appear one Census tract in which households in poverty were disproportionately concentrated in 2010-2014. In that Census tract, which lay to the northeast of the city center, 35.2 percent of households were living in poverty in 2010-2014.[103]

As noted previously, this same Census tract saw an increase in the percentage of non-white residents from 2000 through 2010, from 6.4 to 9.2 percent. The Hispanic population more than doubled as a percentage of the population of that same Census tract over the same time period, accounting for 9.5 percent of the tract population in 2010. At present, these figures do not approach the demographic threshold that HUD uses to identify Census tracts as racially-ethnically concentrated areas of poverty (50 percent non-white), even if the poverty rate is close to the 40 percent threshold specified by HUD.

However, in future fair housing studies it will be important to continually reassess demographic and economic conditions in this and other parts of the study area. This will put the City in a

[102] These figures are based on data from the Bureau of Labor Statistics, which are reported at the city level. For that reason, it was not possible to estimate the trends in employment within the stable limits of the study area, and these figures are presented as occurring within the "City of Grants Pass."

[103] In 2010, a family of four with two children was considered to be living in poverty if the family income was less than $22,113 per year.

position of being able to anticipate and prevent the development of racially-ethnically concentrated areas of poverty, rather than having to address such areas that have already formed. This in turn will allow for greater flexibility in future planning efforts and ensure that area residents have equitable access to economic and housing opportunities.

Between 2000 and 2010, the estimated number of housing units in the study area grew faster than the number of households to fill those units: the result was an increase in the vacancy rate, which rose from 5.4 percent of the housing stock in 2000 to 8.1 percent in 2010. Since that time, vacant units have fallen to 7.8 percent of the housing stock.

Around a quarter of vacant units in 2000 were classified as "other vacant". Units may be classified as "other vacant" if the owner does not wish to sell the unit, is using it for storage, is elderly and living with relatives or in a nursing home, or the unit is foreclosed. These units are often more problematic than other types of housing units, as they are not available to the market place and may fall into dilapidation, contributing to blight in areas where they are grouped in close proximity.

Among occupied housing units, the study area saw a marked shift toward rental housing from 2000 through 2010 and continuing through 2010-2014. In 2000, an estimated 41.4 percent of occupied units were occupied by rental households. By 2010-2014, that figure had risen to 47 percent. Rental housing tended to account for a greater share of occupied housing units in central areas of the city in 2000 and 2010, while owner-occupied units represented a greater share of occupied units in peripheral parts of the study area.

Single-family units (attached and unattached) accounted for nearly 70 percent of the housing stock in 2000 and 2010-2014. Apartment units grew as a share of the housing stock, from 9.7 percent in 2000 to 11.9 percent by 2010-2014. Mobile homes declined as a share of the overall housing stock, from an estimated 10.3 to 7.7 percent.

Fewer than five percent of households in the study area were impacted by overcrowding, incomplete plumbing facilities, or incomplete kitchen facilities: three of four conditions that HUD categorizes as "housing problems." The fourth, cost burden, was considerably more common. Roughly a fifth of all households in the city were paying between 30 percent and half of their income toward housing costs in 2000 and 2010-2014. The share of households paying more than half of their income in housing costs grew from 13.9 percent in 2000 to nearly a quarter in 2010-2014. Renters were considerably more likely to be living under a cost burden than homeowners, even homeowners who were still paying on a mortgage.

Review of Fair Housing Laws, Studies, and Cases

The federal Fair Housing Act (FHA) is the foundation for a suite of laws at the national level designed to protect residents of the United States from discrimination in the housing market. As originally passed in 1968, the Act prohibited discrimination on the basis of race, color, religion, gender, and national origin. Subsequent amendments passed in 1988 added additional protections on the basis of disability and familial status, and strengthened the enforcement provisions of the Act. Amendments to the FHA passed from 1964 to the present have generally broadened the protections guaranteed under the FHA, applying stricter and

more comprehensive protections that apply to housing providers who benefit from federal funding.

In addition to the fair housing protections provided by federal law, Oregon residents are protected from discrimination in the state housing market by state-level anti-discrimination law (O.R.S. Chapter 659A). This law, which is enforced by the Bureau of Labor and Industry's Civil Rights Division (BOLI), prohibits discrimination on all of the bases included in the federal Fair Housing Act, as well as discrimination based on legal sources of income, status as a survivor of domestic violence, marital status, sexual orientation, and gender identity. HUD has recognized Oregon's anti-discrimination statutes as "substantially equivalent" to the Fair Housing Act, meaning that the rights, responsibilities, and remedies that Oregon law guarantees are at least as comprehensive as those provided under federal law (although as noted Oregon goes further by recognizing additional protected characteristics).

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened the Act's relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless "actually or predictably[104]" result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc*. The case originated in a lawsuit against the Texas Department of Housing and Community Affairs ("the Department") based on the claim that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies, whether or not those disparities were intentional. In doing so, the Court imposed restrictions on the application of disparate impact theory, ruling that under fair housing law the theory required the demonstration of a causal connection between a policy or practice and the alleged discriminatory effects of that policy.

The Supreme Court sent the case back to the lower courts to determine if the Department's policies amounted to a violation of the Fair Housing Act in light of the restrictions the Court imposed on the application of disparate impact theory. In a decision issued on August 26, 2016, the U.S. District Court for the Northern District of Texas ruled that the Inclusive Communities Project had failed to demonstrate that the Department's policies caused a statistically significant disparity in the location of low-income housing, and dismissed the case.

[104] *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

Even though the Supreme Court case upholding disparate impact advanced at roughly same time that HUD was finalizing its new affirmatively furthering fair housing (AFFH) rule, the AFFH obligation arises from a different section of the federal Fair Housing Act than disparate impact liability. It is important to emphasize that disparate impact liability does not depend on entitlement status or the receipt of HUD funding: any individual, business, or local government agency may potentially be held liable for violating the Fair Housing Act by adopting policies that predictably cause disparate outcomes among residents with protected characteristics.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. For the City of Grants Pass, these changes will not take effect until the next Consolidated Planning cycle, which begins in 2019.

Fair Housing Structure

There are a variety of avenues available to Grants Pass residents who believe that they have experienced discrimination in the local housing market. The Department of Housing and Urban Development enforces the federal Fair Housing Act, and those who believe that they have suffered housing discrimination based on race, color, religion, sex, national origin, familial status, or disability, may file a complaint with the agency.

Because HUD has recognized Oregon anti-discrimination laws as "substantially equivalent" to the federal Fair Housing Act, the state agency enforcing those laws, the Bureau of Labor and Industries (BOLI), partners with HUD for state-level fair housing enforcement. Concretely, this means that fair housing complaints alleging discrimination in the private housing market[105] that are initially filed with HUD are typically referred to BOLI for investigation and enforcement. Because Oregon law prohibits discrimination on based on characteristics not included in federal law, complaints alleging discrimination on those bases are investigated and enforced by BOLI.

In addition, the Fair Housing Council of Oregon (FHCO) accepts complaints from state residents who believe that they have experienced discrimination in the state housing market, and conducts initial identification, investigation, and referral of fair housing violations to HUD for enforcement. The FHCO offers outreach, education, and training to residents, housing providers, and local officials on fair housing and related topics.

Finally, the Oregon Law Center (OLC) offers civil legal assistance to low-income Oregonians, providing services that include advice and representation on Fair Housing, and other housing matters.

[105] In the case of housing complaints alleging discrimination in federally funded programs, HUD will retain and investigate the complaint.

Contact information for HUD, BOLI, the FHCO, and the OLC are included in **Section IV** of this report and following the report's title page.

Fair Housing in the Private Sector

Fair housing choice may be influenced by factors in the private housing market, including patterns in home and small business lending and the decisions that rental housing providers to accept or reject potential tenants. To assess the degree to which these factors may influence fair housing choice in the City of Grants Pass, this report includes an analysis of home lending data collected under the Home Mortgage Disclosure Act (HMDA), small business lending data collected in accordance with the Community Reinvestment Act (CRA), fair housing complaints filed against housing providers in the city, and data summarizing the experience of stakeholders and residents in the local housing market gathered through the 2016 City of Grants Pass Fair Housing Survey.

Banks and other lending institutions handled 12,261 home loans and loan applications from 2008 through 2014. Around 37 percent (4,578) of these were home purchase loans, and approximately 85 percent of those home purchase loans were intended to finance the purchase of a home in which the buyer intended to live.

Based on the 1,905 loans that were originated in the city during that time period, and the 375 that were denied, owner-occupied home purchase loan applicants in the study area saw an overall denial rate of 16.4 percent. The most common reasons that these loans were denied included debt-to-income ratio and credit history. As one might expect, denial rates tended to fall as the income of the prospective applicant increased.[106]

One of the reasons that it is important to examine home lending data in the context of fair housing is to determine whether there are marked differences in the success of home loan applications by protected class status. Data gathered under the HMDA include information on the race or ethnicity of the buyer, as well as his or her gender, allowing for a comparison of denial rates between these groups.

However, home lenders working in the Grants Pass housing market received comparatively few home loan applications from non-white residents: an estimated 45 applicants over seven years, or roughly 6 applicants per year on average. Given such a small sample, it is difficult to comment definitively on whether there are significant differences in the ability of racial or ethnic minority applicants to secure a home loan in the city.

However, there were a substantial number of applications from both male and female applicants. The outcomes of those applications indicate that female applicants were more likely than male applicants to be denied a loan, though the overall difference between the two was not that great: an 18 percent denial rate in the case of female applicants compared to 15.3 percent for male applicants.

[106] This was not universally the case: the denial rate for applicants with incomes of more than $75,000 per year was higher, at 14 percent, than the denial rate for those with incomes between $60,001 and $75,000 per year (13.2 percent).

High-cost home purchase loans[107] were relatively uncommon in the period from 2008 through 2014. Twenty-six of these high-annual percentage rate loans, or HALs, were issued during that time, most of them in 2009 and 2010. No racial or ethnic minority group received more than one such loan during that time period.

There were also no substantial fair housing concerns revealed through an analysis of small business lending data gathered under the Community Reinvestment Act (CRA). Small business lending was fairly evenly distributed by income level. Lending was not notably absent from areas with above-average concentrations of protected class groups or households living in poverty.

City residents (or prospective residents) filed seven fair housing complaints against housing providers in the city from 2008 through 2016. All but one of those complaints cited perceived discrimination on the basis of disability, and failure to make reasonable accommodation was the most common discriminatory activity alleged in these complaints. Two of those complaints were resolved through an agreement between the complainant and housing provider; the rest were closed after the complainant failed to cooperate, investigators were unable to locate the complainant, or an investigation failed to produce sufficient evidence to warrant a charge of discrimination against the housing provider.

Respondents to the 2016 Fair Housing Survey weighed in on a range of industries and activities in the city's private housing sector:

- The rental housing market;
- The real estate industry;
- The mortgage and home lending industry;
- The housing construction or accessible design fields;
- The home insurance industry;
- The home appraisal industry; or
- Any other housing services.

For most private sector activities, fewer than ten percent of respondents were aware of any questionable practices or barriers to fair housing choice. However, around a quarter of respondents who answered the question maintained that they were aware of questionable practices in the rental housing market. When asked to elaborate on their response, respondents cited discriminatory actions based on religion, family size, disability, or race.

Fair Housing in the Public Sector

The ability of residents to choose where they will live is also impacted by laws, policies, and actions in the public sector. Factors influencing the supply and location of affordable housing units may expand or restrict housing choice for certain groups, and limitations in public transit or other government services may restrict access to employment or educational opportunities. To identify any potential areas of concern in public policy, this AI report reviews the location

[107] That is, loans with annual percentage rates rates that are three or more percentage points higher than treasury rates on comparable loans.

of publicly-funded affordable housing units; a variety of provisions in local land-use and planning codes and policies; and public input gathered through the 2016 Fair Housing Survey.

There were around 20 multifamily housing developments supported by funding from HUD or the U.S. Department of Agriculture's Rural Development programs, or subsidized through tax credits. All told these developments comprised some 713 affordable units. Though there were affordable developments in most parts of the city, there was some tendency toward concentration of these units in areas with above-average poverty rates. The Census tract with the highest poverty rate (35.2 percent in 2010-2014) held 45 percent of public-assisted affordable housing developments and 44 percent of units in those developments, while only containing around 16 percent of the city population.

Housing choice vouchers, housing subsidies which are not specific to a development but may be used anywhere they are accepted, were distributed more widely throughout the city. There was some tendency for these vouchers to be concentrated in areas with higher poverty, but not to the degree that fixed housing developments were concentrated in those areas (an estimated 22 percent of vouchers were located in the same Census tract discussed in the previous paragraph).

Review of local land-use and zoning provisions and feedback from city officials reveals that the city has procedures in place to promote mixed-use and affordable housing development, but that local opposition to affordable housing has at times served to restrict or limit the development of public-assisted affordable housing developments, whether single-family or multi-family.

According to the City's fair housing policy, Grants Pass is committed to promoting equal opportunity in housing, regardless of race, color, religion, sex, national origin, family status, or disability, within the resources available to the city.

Respondents to the 2016 Fair Housing Survey noted whether they were aware of barriers or impediments to fair housing choice in the following public policy areas:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

In most cases, few respondents were aware of barriers to fair housing choice in these areas. The exception was in the question concerning access to government services: more than a quarter of those who answered this question stated that they were aware of barriers to fair housing choice in this area. In specifying the types of barriers of which they were aware, most respondents noted limitations in the public transit network.

Public Involvement

Efforts to promote public involvement in the 2016 AI process included the 2016 Fair Housing Survey, a series of City Council workgroup sessions and presentations, a Fair Housing Forum presentation, a public input presentation, and a final presentation.

A total of 101 people responded to the Fair Housing Survey. Respondents were generally supportive of fair housing laws, and considered themselves at least somewhat familiar with those laws. Many respondents also felt that current levels of fair housing testing and outreach and education were insufficient to meet the city's fair housing needs. However, some respondents were less supportive, considering fair housing laws to go too far in protecting individuals in search of housing at the expense of the rights of housing providers.

A common concern among those who contributed written responses to survey questions was the current state of the rental housing market. These respondents perceive the current market to be tight, and the supply of decent affordable rental housing to be short.

This was also a concern raised during the Fair Housing Forum. However, the primary contribution of participants in the forum discussion was to underscore the need for fair housing education and outreach for residents, housing providers, and local officials and policy makers.

As of the submission of this draft, several public outreach events are yet to occur. A summary of these events will be included in future drafts.

SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS

The following impediments to fair housing choice are based on a range of data examined during the 2016 AI process. In recognition of both the strengths and limitations of those data, the actions and measurable objectives below reflect and emphasis outreach and education, targeting residents, stakeholders, local government officials, and other interested parties. The topics to be addressed in outreach and education sessions range from reasonable accommodation/modification for residents with disabilities, fair housing laws and policies, home financing and methods for building credit, and other subjects related to housing.

Apart from outreach and education, the 2016 includes recommendations relating to the development of public-assisted affordable housing, by reiterating development goals included in the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan and recommending continuing exploration of rehabilitation and redevelopment as a means to shore up the supply of affordable housing units.

Finally, the 2016 AI proposes actions that entities in the public sector may take, including review of land-use ordinances for consistency across provisions relating to "family", and consideration of local government agencies to promote fair housing outreach and education (potentially with funding from HUD through the Fair Housing Initiatives Program).

Private Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Refusal to make reasonable accommodation or modification as required by law.** This impediment was identified through a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development and input from the public through the 2016 Fair Housing Survey.

Action 1.1: Conduct ongoing outreach and education to local landlords, property managers, and residents. These outreach and education sessions should highlight the rights and responsibilities provided for in the Americans with Disabilities Act and the Fair Housing Act regarding reasonable accommodation. However, it is also important to include a discussion of what the laws do *not* require, e.g., an obligation for private landlords to make expensive, irreversible modifications to a property at the owner's expense.

Measurable Objective 1.1: The number of outreach and education sessions conducted on a yearly basis, marketing materials relating to those efforts, and the number of participants.

***Impediment 2*: Discriminatory actions in the rental housing market.** This impediment was identified through a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development and input from the public through the 2016 Fair Housing Survey.

Action 2.1: Conduct ongoing fair housing outreach and education to local residents and housing providers, focusing on the rights and responsibilities provided for in federal and state fair housing laws.

Measurable Objective 2.1: The number of fair housing outreach and education sessions held on a yearly basis, marketing materials relating to those sessions, and the number of participants.

Action 2.2: Partner with the Fair Housing Council of Oregon to conduct fair housing outreach and education, and to assess the need for additional fair housing services.

Measurable Objective 2.2: Partnership with the Fair Housing Council and the number of outreach and education sessions conducted.

***Impediment 3*: Challenges in home lending.** This impediment was identified through a review of home mortgage lending data gathered under the Home Mortgage Disclosure Act (HMDA). Female applicants had a higher rate of loan denials than male applicants over all. In some years included in the study, the denial rate for female applicants exceeded that of male applicants by ten percentage points. There were also relatively few home purchase loan applications from racial/ethnic minority residents. For example, while Hispanic residents accounted for around 8 percent of the population in 2010, an estimated 3.4 percent of home loan purchase loan applications were from Hispanic applicants.

Action 3.1: Conduct or promote home mortgage credit education, focusing on techniques to build and maintain good credit.

Measurable Objective 3.1: The number of credit education classes held and the number of participants who are female, and are representative of the area's racial/ethnic minority residents.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Difficulty siting public-assisted affordable housing developments.** This impediment was identified through review of commentary submitted with the 2016 Fair Housing Survey, housing information gathered from the Census Bureau, and feedback provided during the public input process.

Action 1.1: Continue efforts to maintain the supply and condition of existing affordable housing units, in accordance with the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan.

Measurable Objective 1.1: Efforts undertaken to maintain the supply and condition of affordable housing in the city.

Action 1.2: Explore opportunities for redevelopment or rehabilitation of residential properties for the purposes of increasing the stock of affordable housing.

Measurable Objective 1.2.1: The number of properties identified as having a potential for rehabilitation or redevelopment for the purpose of providing affordable housing.

Measurable Objective 1.2.2: The number of properties rehabilitated or redeveloped as affordable housing units.

Action 2.1: In fair housing outreach and education sessions, include materials relating to affordable housing, including the benefits of affordable housing and an overview of affordable housing programs.

Measurable Objective 2.1: The number of outreach and education sessions including materials of affordable housing programs.

***Impediment 2*: Need for ongoing outreach and education on the subject of fair housing law and policy.** The identification of this impediment is based on feedback gathered through the public input process, including commentary submitted with responses to the 2016 Fair Housing Survey and during the City Council Workgroup and Fair Housing Forum presentations.

Action 2.1.1: Identify local government agencies as candidates to provide outreach and education relating to fair housing.

Action 2.1.2: Assess the eligibility of these agencies for funding under the Education and Outreach component of the Fair Housing Initiatives Program.

Action 2.1.2: Contingent on eligibility, encourage the agency chosen to provide fair housing outreach and education to submit an application for funding to promote outreach and education under the FHIP.

Measurable Objective 2.1.1: (1) Identification of candidate agencies to perform outreach and education, and (2) the schedule of outreach events.

Measurable Objective 2.1.2: Assessment of the eligibility for funding under the FHIP, in the form of correspondence with HUD, internal memoranda, or other documentation.

Measurable Objective 2.1.3: Application for fair housing outreach and education funding under the FHIP, and the results of that application.

Action 2.2: Update the City's Housing Resources page to include a discussion of groups protected from housing discrimination under state law.

Measurable Objective 2.2: Updates made to the City's Housing Resources page.

***Impediment 3*: Inconsistency in land-use code and definitions relating to "family".** This impediment was identified through review of public land-use and development policies and in consultation with local government.

Action 3.1.1: Review local land-use provisions to ensure consistency between definitions relating to family.

Action 3.1.2: Update local provisions where needed.

Measurable Objective 3.1: The results of the review of local land-use provisions and updates to the development code.

SECTION X. GLOSSARY

Accessible housing: Housing designed to allow easier access for physically disabled or vision impaired persons.

ACS: American Community Survey

AI: Analysis of Impediments to Fair Housing Choice

AMI: Area median income

BEA: Bureau of Economic Analysis

BLS: Bureau of Labor Statistics

CDBG: Community Development Block Grant

Census tract: Census tract boundaries are updated with each decennial census. They are drawn based on population size and ideally represent approximately the same number of persons for each tract.

Consolidated Plan: Consolidated Plan for Housing and Community Development

Cost burden: Occurs when a household has gross housing costs that range from 30.1 to 50 percent of gross household income. A **severe cost burden** occurs when gross housing costs represent 50.1 percent or more of gross household income.

CRA: Community Reinvestment Act

Disability: A lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

Disproportionate share: Exists when the percentage of a population is 10 percentage points or more above the study area average.

DOJ: U.S. Department of Justice

ESG: Emergency Shelter Grants program

Fannie Mae: Federal National Mortgage Association (FNMA), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

Family: A family is a group of two people or more related by birth, marriage, or adoption and residing together.

FFIEC: Federal Financial Institutions Examination Council

FHAP: Fair Housing Assistance Program

FHEO: Fair Housing and Equal Opportunity

FHIP: Fair Housing Initiative Program

Floor area ratio: The ratio of the total floor area of a building to the land on which it is situated, or the limit imposed on such a ratio.

Freddie Mac: Federal Home Loan Mortgage Corporation (FHLMC), a government-sponsored enterprise that purchases mortgages from lenders and repackage them as mortgage-backed securities for investors.

GAO: U.S. General Accounting Office

Gross housing costs: For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and electricity or natural gas energy charges.

HAL: High annual percentage rate (APR) loan, defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.[108]

HMDA: Home Mortgage Disclosure Act

HOME: HOME Investment Partnerships

HOPWA: Housing Opportunities for Persons with AIDS

Household: A household consists of all the people who occupy a housing unit. A house, an apartment or other group of rooms, or a single room, is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live with any other persons in the structure and there is direct access from the outside or through a common hall.

Housing problems: Overcrowding, incomplete plumbing or kitchen facilities, or cost burdens

HUD: U.S. Department of Housing and Urban Development

Incomplete kitchen facilities: A housing unit is classified as lacking complete kitchen facilities when any of the following are not present: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

Incomplete plumbing facilities: A housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower.

Labor force: The total number of persons working or looking for work

MFI: Median family income

Mixed-use development: The use of a building, set of buildings, or neighborhood for more than one purpose.

MSA: Metropolitan Statistical Area

NIMBYism: "Not in my backyard" mentality among community members, often in protest of affordable or multi-family housing.

Other vacant units: Housing units that are not for sale or rent

Overcrowding: Overcrowding occurs when a housing unit has more than one to 1.5 persons per room. **Severe overcrowding** occurs when a housing unit has more than 1.5 persons per room.

Poverty: The Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps).

Predatory loans: As defined by the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA), loans are considered predatory based on:

1. If they are HOEPA loans;[109]
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of HALs. For full definition, see **HAL.**

[108] 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

[109] Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." http://www.ffiec.gov/hmda/glossary.htm#H

Protected Class: Group of people protected from discrimination and harassment. City of Grants Pass residents are protected from housing discrimination based on race, color, religion, sex, national origin, family status, disability, legal sources of income, marital status, sexual orientation, and gender identity, as well as to survivors of domestic violence.

Public housing: Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities.

RDA: Redevelopment agency

Severe cost burden: (See **Cost Burden**).

Severe overcrowding: (See **Overcrowding**)

Steering: Actions of real estate agents or landlords to discourage a prospective buyer or tenant from seeing or selecting properties in certain areas due to their racial or ethnic composition.

Tenure: The status by which a housing unit is held. A housing unit is "owned" if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is "owned" only if the owner or co-owner lives in it. All other occupied units are classified as "rented," including units rented for cash rent and those occupied without payment of cash rent.

APPENDICES

The following sections present additional data prepared in development of the City of Grants Pass Analysis of Impediments to Fair Housing Choice.

A. COMMUNITY REINVESTMENT ACT DATA

Table A.1
Small Business Loans Originated: $100,000 or Less by Tract MFI
City of Grants Pass
2000–2014 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
			Number of Loans			
2000	0	0	410	0	0	410
2001	0	0	511	0	0	511
2002	0	0	785	0	0	785
2003	0	190	1,075	0	0	1,265
2004	0	181	733	317	0	1,231
2005	0	166	704	327	0	1,197
2006	0	253	1,015	503	0	1,771
2007	0	290	1,190	472	0	1,952
2008	0	175	897	370	0	1,442
2009	0	71	365	148	0	584
2010	0	48	268	99	0	415
2011	0	61	284	122	0	467
2012	0	0	542	0	0	542
2013	0	0	506	0	0	506
2014	0	0	533	0	0	533
Total	**0**	**1,435**	**9,818**	**2,358**	**0**	**13,611**
			Loan Amount ($1,000s)			
2000	0	0	4,569	0	0	4,569
2001	0	0	4,246	0	0	4,246
2002	0	0	7,586	0	0	7,586
2003	0	1,880	9,874	0	0	11,754
2004	0	2,230	8,304	3,444	0	13,978
2005	0	1,989	7,608	3,911	0	13,508
2006	0	2,221	9,824	5,017	0	17,062
2007	0	3,060	13,711	5,538	0	22,309
2008	0	1,664	10,893	4,268	0	16,825
2009	0	1,418	6,445	2,125	0	9,988
2010	0	762	4,283	1,307	0	6,352
2011	0	1,039	4,071	2,142	0	7,252
2012	0	0	7,422	0	0	7,422
2013	0	0	7,641	0	0	7,641
2014	0	0	6,233	0	0	6,233
Total	**0**	**16,263**	**112,710**	**27,752**	**0**	**156,725**

Table A.2
Small Business Loans Originated: $100,001 to $250,000 by Tract MFI
City of Grants Pass
2000–2014 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
			Number of Loans			
2000	0	0	16	0	0	16
2001	0	0	21	0	0	21
2002	0	0	18	0	0	18
2003	0	3	26	0	0	29
2004	0	7	32	17	0	56
2005	0	2	20	11	0	33
2006	0	1	14	15	0	30
2007	0	4	23	14	0	41
2008	0	8	33	11	0	52
2009	0	7	18	8	0	33
2010	0	3	17	6	0	26
2011	0	5	11	4	0	20
2012	0	0	26	0	0	26
2013	0	0	24	0	0	24
2014	0	0	19	0	0	19
Total	**0**	**40**	**318**	**86**	**0**	**444**
			Loan Amount ($1,000s)			
2000	0	0	2,975	0	0	2,975
2001	0	0	3,749	0	0	3,749
2002	0	0	3,496	0	0	3,496
2003	0	484	5,002	0	0	5,486
2004	0	1,328	5,992	3,228	0	10,548
2005	0	350	3,586	1,985	0	5,921
2006	0	150	2,330	2,931	0	5,411
2007	0	609	4,101	2,531	0	7,241
2008	0	1,690	5,890	1,994	0	9,574
2009	0	1,363	3,308	1,484	0	6,155
2010	0	648	2,982	1,144	0	4,774
2011	0	995	1,754	632	0	3,381
2012	0	0	4,488	0	0	4,488
2013	0	0	4,374	0	0	4,374
2014	0	0	3,314	0	0	3,314
Total	**0**	**7,617**	**57,341**	**15,929**	**0**	**80,887**

Table A.3
Small Business Loans Originated: More than $250,000 by Tract MFI
City of Grants Pass
2000–2014 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
			Number of Loans			
2000	0	0	18	0	0	18
2001	0	0	9	0	0	9
2002	0	0	21	0	0	21
2003	0	6	26	0	0	32
2004	0	6	18	9	0	33
2005	0	6	17	13	0	36
2006	0	3	10	7	0	20
2007	0	8	18	5	0	31
2008	0	1	20	8	0	29
2009	0	4	11	9	0	24
2010	0	1	13	6	0	20
2011	0	4	8	6	0	18
2012	0	0	31	0	0	31
2013	0	0	26	0	0	26
2014	0	0	22	0	0	22
Total	**0**	**39**	**268**	**63**	**0**	**370**
			Loan Amount ($1,000s)			
2000	0	0	11,411	0	0	11,411
2001	0	0	4,243	0	0	4,243
2002	0	0	12,523	0	0	12,523
2003	0	3,481	13,059	0	0	16,540
2004	0	3,397	7,879	5,407	0	16,683
2005	0	2,738	9,264	7,782	0	19,784
2006	0	1,291	4,845	4,044	0	10,180
2007	0	4,168	9,613	3,163	0	16,944
2008	0	363	9,019	4,093	0	13,475
2009	0	2,475	5,198	4,590	0	12,263
2010	0	280	5,311	2,477	0	8,068
2011	0	1,621	3,252	3,260	0	8,133
2012	0	0	16,919	0	0	16,919
2013	0	0	12,115	0	0	12,115
2014	0	0	12,495	0	0	12,495
Total	**0**	**19,814**	**137,146**	**34,816**	**0**	**191,776**

Table A.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than $1 Million by Tract MFI
City of Grants Pass
2000–2014 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
			Number of Loans			
2000	0	0	209	0	0	209
2001	0	0	234	0	0	234
2002	0	0	240	0	0	240
2003	0	87	429	0	0	516
2004	0	76	311	136	0	523
2005	0	97	392	201	0	690
2006	0	111	448	195	0	754
2007	0	139	570	226	0	935
2008	0	53	343	126	0	522
2009	0	38	171	55	0	264
2010	0	19	143	42	0	204
2011	0	31	167	55	0	253
2012	0	0	293	0	0	293
2013	0	0	284	0	0	284
2014	0	0	297	0	0	297
Total	**0**	**651**	**4,531**	**1,036**	**0**	**6,218**
			Loan Amount ($1,000s)			
2000	0	0	5,774	0	0	5,774
2001	0	0	5,750	0	0	5,750
2002	0	0	10,136	0	0	10,136
2003	0	3,105	15,045	0	0	18,150
2004	0	2,615	10,856	6,121	0	19,592
2005	0	3,128	9,337	8,287	0	20,752
2006	0	1,399	8,179	6,399	0	15,977
2007	0	4,490	16,108	5,996	0	26,594
2008	0	765	9,287	4,878	0	14,930
2009	0	2,981	5,178	2,419	0	10,578
2010	0	847	6,056	2,368	0	9,271
2011	0	1,349	4,715	1,997	0	8,061
2012	0	0	12,249	0	0	12,249
2013	0	0	11,081	0	0	11,081
2014	0	0	7,399	0	0	7,399
Total	**0**	**20,679**	**137,150**	**38,465**	**0**	**196,294**

B. Fair Housing Survey Open Questions

Federal, State, and Local Laws

Table B.1
Where would you file a complaint if you felt that your fair housing rights had been violated?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
?
Absolutely
At the county courthouse.
BOLI
BOLI HUD Legal Aid Office
Boli for Oregon classes. HUD for federal classes
BOLI, HUD
call the fair housing council to find out
City Hall
DHS
dhs.info@state.or.us 800 442-5238
EOOC
Fair Housing
Fair housing board
Fair Housing Bureau
Fair Housing Council
Fair Housing Council of Oregon
Fair Housing Council of Oregon or 211 or Legal Aid
Fair Housing Council of Oregon or HUD
Fair Housing Council of Oregon/HUD
Fair housing council or legal aid
Federal EEOC, HS, State Secretary of, through attorney friends for guidance
Fhco.org
Housing and urban department
housing authority
Housing authority
Housing Authority
Housing Council of Oregon
HUD
HUD Office
HUD or BOLI check in first with the Fair Housing Council of Oregon
HUD or Fair Housing
HUD or FHCO
HUD, complaints reviewed by BOLI
HUD.gov and follow the Title VII fair housing complaint process.
I am unsure.
I don't know
I don't know.
I wish I knew. I applied for HUD rental. On July 25 I had my interview. Then mail was sent to me at po box in Merlin that was returned to HUD. so they dropped me. Do you really understand what homeless means? its not just not having a home....I have no way to get employment.....no way to find out what resources there are for me. I am a 69 year old woman. There is no place in this country for me.
I would call Fair Housing to be sure
I would have to look that up. I don't know.
I would start with HUD or Governor's Advocacy hotline
Legal aide
not sure.
Not sure.
Not sure. I'd have to search the state website to identify the appropriate department.
Oregon Fair housing
Oregon Law Center, Fair Housing or contact Community Alliance for Tenants
Oregon Law Center?
probably not
State
State Housing Authority
State of Oregon
State of Oregon Housing Authority.
State of Oregon, fair housing council in Portland, Oregon and or BOLI-State of Oregon
The Fair Housing Council of Oregon
through Jo. Co. Housing Authority ?
would use google to find information

Table B.2
What "Other" type of Tenure?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
Homeowner and rental owner
Home owner and rental owner
homeless
Homeless person
Managing Agent

Table B.3
How did you become aware of fair housing laws?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
As a HUD Housing Counselor and Advocate for affordable housing, I attend trainings on Federal and State Fair housing laws annually. I also advise my clients who are renting or purchasing housing in Josephine County.
As an attorney for the U.S Dept. H.U.D.
Bank literature
Being a property manager it is required
By working in the human resources industry.
By working with people navigating the rules/laws of section 8 housing
Employment
have bought and sold several homes
Have read the "Shelters Guide" to Fair Housing document on the Fair Housing website
I have a rental house
I have been a renter in the past. Even so, I found when inquiring about properties for rent I was discriminated against because I had four children.
I have been training property managers, landlords, real estate agents and advocates throughout Oregon over the past 4 years for the Fair Housing Council of Oregon
I have had the opportunity to review the fair housing laws, but do not have them memorized.
I have owned rental homes
I have read specifics on Oregon fair housing laws.
I have worked in human services for nearly a decade but not in the field of housing. Housing and homelessness are issues related to my work and I have colleagues who work in housing and advocacy.
I have worked in the non-profit sector for many years.
I own and manage in Oregon 600 units of Rental subsidized housing units, LIHTC, Rural Development, and HUD units. In Grants Pass 269 units, 108 family units, 161 Senior/disabled units .
I watch the local news, listen to local radio, and read several daily newspapers.
I work with homeless students as a homeless liaison for Three Rivers School District, and I am on the Josephine County Homeless Task Force.
I worked for local government and know that you cannot discriminate against various classes of people--race, gender, sexual preference, etc.
Just with discussions with UCAN and Jackson County Housing Authority
Law school, employment in housing industry
Licensure
Louise Dix' training
My landlord was the first to advise of some rights. Then also from city council.
Participation in the Homelessness Task Force and also researched due to my role as a case manager and family advocate
Participation with the Homeless Task Force and reading various news articles. When I was a homeowner I also researched fair housing laws when contemplating renting rooms to others.
People attempting to gain housing visit our ministry.
People in my life telling me the laws and the news, and hud
Read literature, listen to stories, cases, etc..
Requirement for most grants
Requirement of most grants
Retired real estate lender.
reviewing the laws and website.
Self study, was thinking of renting out a home but changed my mind
Study of laws.
Through HUD and my own research
Through my work in nonprofits, and from a friend who works for the Fair Housing Commission.
Through serving on the Board of Directors of UCAN for over 12 years.
Through the media
Through working with people in shelter.
Training and experience
Training on Fair Housing laws
Trainings

Try to stay informed after hearing about the HUD position of integrating low income housing into more affluent communities.
various experiences and assumptions made regarding non-discrimination policies
we have rentals and I am a lawyer
Work in land use and as an affordable housing advocate.
Worked as a real estate agent for two years
Years of exposure through work.

Table B.4
How should fair housing laws be changed?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:

Companion animal provisions are important but have gone to far.
Fair housing laws should move to cover landlords from liability when a tenant's dog (aka service animal) injures another person on the landlords property. This could be done through the Good Samaritan law in the same way that a food bank is covered when someone gets sick from eating food they distributed. Both the food bank and the landlord are trying to be "Good Samaritans" and neither should bear the weight of liability in that attempt so long as some level of diligence was observed. This would help landlords be less fearful of the potential consequences related to compliance and smooth out this process.
I assume they are inadequate to protect all classes equally and that funding for enforcement is low
I believe that fair housing laws should actually be rescinded. Being discriminated against is not acceptable but being integrated into an affluent community just because liberal laws think this is a good thing is also unacceptable. Why should I be punished with neighbors who do not take care of or respect their property? I have worked 55 hours a week for many years to be where I am and I am seeing people who do not want to work and have not worked getting houses at a fraction of what I have had to pay. These houses become eyesores and decrease surrounding property values in short periods of time. I am speaking from experience in these matters.
I believe that landlords should not be able to discriminate on household size. If a family with 5 kids feel comfortable in a 3 bedroom home, why should landlord be able to say only 4 people may reside there?
I feel all people are equal and no persons should be identified as protected class. The laws are for all people, I don't feel we need to single out certain people to receive extra protections. Laws have gone too far. Renter's have too many rights.
I greatly dislike the phraseology that forces a predetermined answer by the questioner.
I think people who receive aid are not always treated respectfully in the housing process.
I think they should be enforced.and firmer follow income people.and disabled peopl
I'm not sure how it would actually be accomplished, however, some protections or guidelines could be put in place to assist those in need in overcoming previous evictions, lower credit scores, etc. When landlords prevent applicants based on on these criteria (a common issue within the homeless community), there is little to no hope of escaping homelessness. When individuals comply with all requirements for assistance (i.e., counseling, drug or alcohol treatment, etc.), and then they are denied housing based on previous history, they are left defeated. There is no incentive for them to even try to become 'active citizens' again because it seems that no matter what they do they are relegated to a life of poverty and destitution.
If someone is being helped by medical marijuana they shouldn't be rejected for rental help. I know that is FEDERAL monies so maybe I'm just typing this for no reason other than for someone, somewhere to read this.
In some cases yes, being in the industry I have seen and do see abuses where one person get benefit of fair housing complaint but several other suffer from that benefit one person received.
It should be easier for people who are discriminated against to do something about it. we should have mandatory statutory damages when landlords do discriminate
Its not fair that a renter's ability to pay rent is based on a credit report. The requirement for a credit report, and the high cost of renters having to pay for each credit check on each property is not fair. I have been homeless since 2008 because I owe $3,000 to a credit card. That is not fair.
Legalism's can be construed via courts and legal manipulations. Plain, understandable, clear statements as to rights of renters, owners.
make it easier to get tenants out who violate rental agreements and make it so landlords have to fix problems with the hosing units in a more timely manner
People that grow marijuana indoors or out, should not have the right to occupy a rental. The Renter has very little rights to evict immediately !! Same with squatters that haven't paid rent !!
people with animals for disabilities should have documentation of the animal being a certified helping animal and not just a pet
Remove them
Rental requirements are bonkers crazy. Even if you do qualify the competition is bringing resumes and bidding rent up.
require landlords and property managers to complete fair housing education
Strengthened
There should be more protections for homeowners and communities. Communities should not be FORCED to sell, rent, or provide housing that is not consistent with the makeup of the community, ie, a community should not be forced to build low income housing in an area that consists of large, expensive homes that include an acreage requirement.

LOCAL FAIR HOUSING

Table B.5
Are there any specific geographic areas that have fair housing problems?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
All over
Almost all that I know of have higher rates of crime.
Lack of housing, thus fair housing problems, inside the entire city. There are no places to rent at a reasonable price because landlords are driving up their prices due to high demand for rentals.
Low income housing
Lower income areas (southwest, southeast).
NW
Poor nieghboor hoods is off Bridge Street, Maple Lane area.
Some areas are more prone to police action indicating a myriad of service issues not reaching population segments. Because I don't read the police reports religiously, I can't provide streets and areas except Cloverlawn which is mentioned so often, even I notice.
Southeast Northeast wards
There is a lack of affordable housing throughout the city.

Table B.6
Please share any additional comments.
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
I am very interested in seeing the service animal dilemma solved, but if fairness is truly the objective then it should be sought for both the tenant and landlord. I'm convinced that removing the concern of liability from litigation that may arise when a service animal injures another person or animal (especially a child) will go a long way to removing a landlords fear of allowing, and therefore discrimination of, people with service animals.
I believe the " connectivity" philosophy taking place by the planning commission will affect the housing industry and spread crime. This may not be part of any fair housing laws but it should be. I buy a house because it is isolated and quiet and then someone thinks it should be connected to a high crime low income housing area by developing new roads into these areas is not fair to the housing choices I have made. They will lower my property values and bring crime into my neighborhood that has been relatively crime free for over twenty years. Once again, why should I pay for bad choices others have made?
I don't feel there are problems with fair housing, I feel the problem is our state encourages people to not work because they receive too many benefits for not working and supporting themselves and their family. It makes more sense to not work and receive OHP coverage, rental assistance, utility assistance, cell phone, food, transportation and more. I feel we should not be making it easy for people to live in Grants Pass without working and paying their own way. Downtown GP is filled with homeless, drug and marijuana effected people being feed at the soup kitchen. It is frightening for normal people to walk around town. I haven't gone out at night in GP in years due to the crime. I have seen City Police drive by people smoking marijuana in the open on the city benches and do nothing. I say don't encourage dead beat people to stay in GP and we would have a vibrant town without housing problems. If people do receive state benefits they should be tested regularly and if found positive for substance abuse, they do not receive benefits. Workers are tested and lose they job if positive. If people are effected by drugs or alcohol they can't get a job anyway.
I have answered don't know to many of these questions because I am not aware of any specific examples. However I am hesitant to answer no when I believe that there may be possibility that it occurs
I understand there are always problems with funding. But lack of funding does not need to lead to a failure to further fair housing. If fair housing is kept in mind when transacting city business and development then it will be a natural and integral part of the city's planning. What is needed is continued education, discussion and dissemination.
I used to practice law in GP, but no longer do. It is a very difficult place to be anything other than white and upper middle class.
I'm concerned about the lack of affordable housing for anyone with a low income. There are very few units of any kind available and the waiting lists to get into appropriate housing is over a year for many people. This is unacceptable.
I'm personally not aware of any fair housing issues. As a side note, there is a crisis in rental availability in the entire valley. Many reliable/professional sources have told me that the rental availability here is just 1%. Basically, there are no rentals available. I'd estimate that over 70% of all homes are rentals i.e. these are investment properties with many of them owned by out of state/absentee owners. Much of this could be verified with realtors and property management companies. Home ownership nation wide had declined to a level not seen since 1965 according to the U.S. Census Bureau http://www.zerohedge.com/news/2016-07-28/us-homeownership-rate-crashes-lowest-1965. We're seeing a housing crisis here of affordability and availability. A huge negative in respect to quality of life and a barrier towards economic growth. Perhaps a subject to quantify through another survey.
I've been helped by Fair Housing in the past and I thank them profusely. I'm hoping to get additional help in the near future.
Land owners should have rights too. It takes an act of Congress to evict tenants that have excessively damaged premises and also went more than 2 months without paying rent (causing a hardship on the owner that is paying property taxes).
My biggest issue in this city is the amount of "NO ANIMALS " permitted . You know, just because a person has a dog(for example) does NOT mean the owner of that animal is a PIG or careless person.
My concerns would relate to vulnerable populations including domestic violence victims who through self medication or coercion often have substance abuse and subsistence issues.
My request would be that training on fair housing practices be made available to agencies and ministries that work with the poor. The training is probably posted on the internet but those of us working with the poor are so often in a crisis response mode that we don't do important, proactive education work. Thanks.
Shelter, transitional and permanent housing need direct engagement by Fair Housing in Oregon. We have made repeated calls for

assistance for training that exists to help educate landlords, property managers etc.
The is basic lack of housing, and what is available is overpriced for the employment nature of Grants Pass jobs. Lower priced apartments are poorly maintained and criminals are not made to move out.
We need to combine our efforts with Josephine County to adequately address the housing needs.

FAIR HOUSING IN THE PRIVATE SECTOR

Table B.7
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:

A co-worker was told by a landlord that she only rents to married Christian couples!! A black shelter resident was told numerous times to pick up rental applications only to be told when arriving that the unit was rented.
An acquaintance was denied rental housing after the manager met their disabled son.
As I said before, the impediment is a costly credit check, and a bad credit score. People usually pay their rent before their credit cards. Basing ability to pay rent on credit scores should be disallowed everywhere.
Because of the shortage of housing, landlords are discriminating against applicants to choose those with the highest income, or with favorable things like no pets, no kids, etc. because they have such a wide pool of applicants. Those who make low income, have kids or pets, or have poor credit are unable to find anywhere to rent right now, even if they were the first applicant.
discrimination goes on all the time but is very hard to prove.
displacement and refusal to rent to HUD vouchers; refusal to rent to low income with subsidy; refusal to rent to individuals receiving state/federal benefits
Governmental intrusion into the private market is, for me, problematic, If government monies are being received that individual has opened themselves up to government restrictions; otherwise it is not government's business.
I have been given anecdotal evidence of rental discrimination based on race.
I have heard of several cases where families were refused a rental unit because of sexual orientation, and source of income.
I know people who are LGBT and have been denied housing locally and denied business services.
I've seen advertising for rental housing frequently on a church based Facebook page and not seen corresponding ads elsewhere. Advertising tyo only one group is inherently unfair. These are private owners, not property management firms.
landlords won't rent to people with service animals; they don't take calls from the deaf; they discriminate against people who have been involved in the courts; they won't take children, etc. etc.
People are asked for SS numbers, especially if they are obvious immigrants
People would hang up on me when I enquired about housing because I had four children. Or they would say they didn't rent to people with that many kids. They always assumed that I was on assistance. Either way I was discriminated against and it was very hard to even get information about properties.
Refusing to rent because of status in a protected class
Refusing to rent to someone who has HUD
source of income discrimination large families
The amount of unoccupied rental housing is so low that there are many pretexts that can be given to discriminate against an applicant. Even neutral but strict eligibility criteria can have a disproportionate impact against protected classes. Many rental owners are unaware of fair housing laws and think they are not violating the law when they discriminate against some categories like same sex couples or households with children.

Table B.8
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:

People with families normally want a house in a "certain area" for safety of their children.
See my answer to #1
The local realtors tend to send folks to areas they think they fit in. This isn't always what the client wants. and they discriminate in terms of the two school districts.

Table B.9
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:

refusing to work with individuals trying to remedy high interest rates
same as above
See my answer to #1

Table B.10
Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
A lot of the new duplexes seem to be very narrow at entryway, and step is to close to door jam.
If it's upstairs good luck. There are no elevators in most rental housing areas of which I am aware.
Kitchen & bath counters too high Entrance ramps Door openers
Private businesses that build or remodel their businesses seem to be unaware of some requirements like wheelchair access or the amount of force necessary to open certain doors, also threshold height.
putting stairs, even a few, in almost all houses
See my answer to #1
Two story housing without access to the second story.

Table B.11
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:

Table B.12
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
I understand SOAppraisals has had complaints for refusing to give comparisons from requested/better areas. No personal knowledge.

Table B.13
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
Extremely limited emergency and low-income housing. Barriers to access of residences and shelter services. Extremely limited or non-existent services for teens (until Hearts with a Mission opens - still limited after that). Faith-based services may create unintended barriers.
No established Housing Commission to act as clearinghouse (PHA does not have this status in Josephine County, unlike other communities)
Persons on probation, parole or with a criminal background
See my answer to #1
Small minded businesses who deny services such as landscaping and repair work.
Subsidized landlord's discrimination

Fair Housing in the Public Sector

Table B.14
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
Access to certain types of housing are limited e.g. manufactured homes that may exclude certain socio-economic individuals that can't afford more conventional housing choices
Facilities do not allow for families or enough parking for tenants.
I don't think our land use policies support low income or disabled housing enough
I look at Josephine County being part of the dynamic in providing housing and land use policies restrict reasonable options.
It's hard to find a rental these days in the Grants Pass area. I'm staying put though I would like to move to a downstairs apt. There just are not enough apts/duplexes.
Land is premium in area and little to be utilized for multifamliy development in City
SDC are very much impediment to develop low income projects, and so are added fees to utility bills, as Social Security recipients

do not get annual raises based on fees charged by City.
See my response to 4.1
The city is doing better now that adus are allowed in sf zones and densities have been adjusted.
The few low-income HUD housing areas that we have in Grants Pass are full of multi-family households.
The Grants Pass city council has sued the Josephine County Housing Authority to keep stop more low income housing from being built in the city.

Table B.15
Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
Access to develop / build alternative housing choices may need to be expanded
It was extremely difficult to get the new low-income apartment complex in the Fruitdale area built. We need more like it, but the city has too many regulations that prevent easy building of those types of dwellings.
same as above.
See above comment
See my response to 4.1
The building code restricts the use of the second floor buildings in the commercial district due to access and earthquake standards.
The Grants Pass City Council's refusal to approve Parkview Terrace despite the City Planning Department testifying that it met all requirements seems an obvious impediment. This is a clear example that there are serious fair housing issues in our community if even professionals like the city councilors can fail to recognize their fair housing obligations.

Table B.16
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
City keeps the more affluent neighborhoods maintained better. No enforcement of codes in the poor/rental neighborhoods.
Heath & safety codes are utilized to enforce what is best for merchant community, and is not enacted in wider community - blight in the out of downtown area is allowed to continue but downtown enforcement is constant
Low rent housing that suffers from poor maintenance.
Most agencies that provide funding for low income housing have there own occupancy standards which normally is 2 per bedroom plus 1
See my response to 4.1
the codes are not well enforced in the rural parts of the county. Septic systems fail, people run out of water, and they have all sorts of issues with illegal dwellings being rented out.
This is a complicated issue and habitability violations are bad throughout the city. Plus with the lack of affordable housing it may not be the best policy to shut down or red tag certain housing. Rental owners need to be encouraged somehow to maintain their properties.

Table B.17
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?
City of Grants Pass
2016 Fair Housing Survey Data

Comments:
I am not aware of any tax breaks or incentives that would support the development of low income housing
I would favor tax incentives to make fair housing accommodations as well as for general rental housing maintenance.
If these incentives exist I have never been made aware of them.
Oregon all ready offers no RE taxes on non-profit status projects and reduced on for profit developments for low income households.
See #3 for maintenance costs that are not adequately financed as inducements to landlords
See my response to 4.1

Table B.18
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:
Lengthy & costly.
Not enough owners use the permitting process and the resulting construction defects disproportionately affect fair housing category members.
Our local housing council does not have a current application in spanish, no kidding.
See my response to 4.1
The permitting process in Grants Pass is not clear and accessible to anybody who is not full time in the construction industry. Very slow and cumbersome.

Table B.19
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:
See my response to 4.1
State building codes and national law covers these areas not local code.

Table B.20
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:
Citizens seem prejudiced against low income housing.
I haven't seen problems with targeted development, just with antipathy towards low income and specialized housing in general.
If you are connected by who you know or if you are in law enforcement your street will be maintained, patrolled and codes enforced.
No clearinghouse to partner with City on projects
See my response to 4.1
The city makes it incredibly difficult to develop communities for low income housing.

Table B.21
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:
Extremely limited public transportation routes away from main routes.
Homeless persons have transportation issues. Besides overcoming barriers such as previous evictions and low credit scores, employment becomes an issue for the homeless. Many are applicants are denied housing, even with subsidized funding, because they are unemployed. In turn, these same applicants are denied employment because they don't have a permanent residence. Basically, they are told they can't get housing because they don't have a job, and they can't get a job because they don't have housing. It becomes a vicious cycle and many applicants simply give up and resign themselves to remaining homeless.
Hours are limited and can only be accessed when someone must take time off form work.
Hours of operation, ease of systems
it is extremely difficult for people to get into Grants Pass from the rural areas, many simply can't.
It is still necessary for those accessing resources to have to "run around" to numerous locations to get what is needed. HUD requires a letter from DHS and the applicant must go to that location, UCAN requires other documentation which requires more proof and letters. It's ridiculous that these agencies can't simplify or at least cooperate with documentation. Don't we all have email?
Josephine County is depressed economically and the lack of cutting timber finds no funding for the Sherriff.
Lack of transportation in outlying areas - Lack of employment opportunities
Lack of transportation used to be a much more serious problem. The more we can increase RTD and related services the less barriers there will be. Lack of transportation really affects access to employment and social services.
Our public transportation is very limited although it is a small town and you could from many areas.
Our transportation situation is expanding.
Poor level of public transit- many areas of town not accessible by bus
Public transit here is a disgrace.
Public transport is not easily accessible to the elderly and disabled.
See my response to 4.1
Social Services in our community presently is a joke, for mental health issues, and criminal lock up of offenders.
Student Loans are expensive for many.
The bus stops are not adequate to provide protection from the elements.
the examples mentioned are good - also operation hours, some are not as accessible as they could be
There is often too much red tape required for and associated with SSI & SSDI benefits. I've seen more people become homeless as a result of complications related to this than should be.

Table B.22
Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

City of Grants Pass
2016 Fair Housing Survey Data

Comments:
city representatives in council discussions stigmatizing those in need of housing and making poverty a character issue rather than one of lack of resources
High costs or rents with low rental market
Not everyone has immediate access to their ID. Can't this info be retrievable in a data base?
See my response to 4.1
The city has so many regulations that it's difficult to build low-income housing.
When the new housing opened how long was the waiting list, and how many people had to wait in line? Moreover, how much info did these poor people need to bring even to qualify?

C. Minutes from 2016 Fair Housing Public Input Sessions

Fair Housing Forum – August 22, 2016

Comment 1: Going through the data that you have it looks like Grants Pass is in a pretty good position. Is that maybe this is just your opinion, but is that because we are so spiffy or is it because we don't have any minorities?

Presenter: I think that often when you don't have historical established patterns of residential segregation. I think that certainly those problems don't tend to show up as much. So to answer your question a little more directly it may be related to the fact that there are not that many minority residents. Perhaps if there were more or if there were more applications from black or Hispanic residents we would get to the point where we would have more data that would say that we are getting more applications and we are still seeing this difference. So some of those fair housing issues might reveal themselves. I think it is yes, a combination of maybe not having long established factors where there is residential segregation; along with generally perhaps having a low minority population. Do bear in mind that protected classes include disability, families, and religion and a number of other factors that there are and where we tend to see a lot of fair housing issues and complaints tends to be related to race or color or certain disability? Sort of a long-winded way to answer your question, but I think it may have something to do with a small minority population.

Comment 2: You looked at some of the other protected classes, some of that doesn't get mapped. Is that because there is not data there for that, for example geographic distribution of religion or lending data on some of those types of things?

Presenter: We design our process based on HUD guidelines on how to do the fair housing planning. I have noticed that and I have the same question, but HUD certainly and even in the new Assessment of Fair Housing tool they don't offer to map by religion. I think maybe for whatever reason and perhaps for good reasons residential segregation by race or ethnicity seem to be the most common and that is the one that HUD is most concerned about. We map race, ethnicity, and disability and what we have chosen to map is more or less based on HUD guidance.

Comment 3: What can we do about our fair housing challenges? I think education is always the I think enforcement has to go along with the education and in my position I see it mostly in the rental market. I am not out there looking, but I think landlords will do what they can do as long as they are getting away with it. I think that is where and some of it is just ignorance which is may be an explanation, but not an excuse. Some of it is just they are just doing it because they can. So enforcement and it is unfortunate because the families that I talk to don't want to tattle, because they are afraid and that is very understandable. They are afraid that with their current landlord that they are going to be homeless. If they are looking for a place that this landlord is not going to rent to them. So they have legitimate fears. I think as long as that is the case it is going to be really difficult to enforce.

Presenter: It is unfortunate. One of the categories that HUD includes in these fair housing complaints and it is not a protected class, HUD includes retaliation.

Comment 4: I saw that on…

Presenter: Retaliation would be something like of course forbidden under the Fair Housing Act to evict someone if they make a fair housing complaint, but that is a legitimate fear and it has happened.

Comment 5: The market is so tight that nobody wants to rock the …They do whatever they want to do.

Presenter: Frankly, the complaint process often I think on average and this is a couple of years old, but on average it takes at least eight months. Frequently it takes more than a year to come to any kind of resolution for a housing complaint and often a person who may have a concern is like well I am out of that situation and I am in my new house. We will write is off as a loss and moves on from that.

(Presentation)

Comment 6: The Oregon Law Center in Josephine County is very proactive in landlord/tenant rights and they and my experience with them is they are willing to and if it looks like a legitimate case they are willing to help a family. We refer people all the time to them and very few people show up and again I get it.

Comment 7: You refer them to (Not Discernable).

Comment 8: When I talk to the attorneys there I am saying this is what I am hearing and this is going on. It is a property management company. I will (Not Discernable) if you tell me. So if I have heard it once, twice, three times I am starting to think that this is legitimate. I will probably say this is what I have heard and their response to me is always you can't be our client. You have to send somebody down here. So we tell people. We give out their business cards at our briefings. Is somebody is discriminating against you because you have a Section 8 voucher, do you want to go talk to the Oregon Law Center or do you just want to move on and go to the next guy. That and I understand that that is what they are doing.

Presenter: I think that is common. You just want to move on with your life.

Comment 9: Do you want a reference down at the Oregon Law Center and they force this landlord to take you as a tenant. Do you want to live there? No.

Comment 10: Just trying to figure out if some of the categories of poverty, I don't know that we in the community may have people that have a lot of assets. There are retirees that cash out of their homes and put the lot in the bank, but they don't have a lot of income. Looking at poverty is that only looking at wage income or transfer payments so there might be some of that assets that are not captured in that.

Presenter: That is a good question. I will have to follow up on that, because I am not entirely sure on that.

Comment 11: When you had the map of the affordable housing projects that wasn't just HUD was it? Do projects and tax-credits and other things in there?

Presenter: I do not think, just here we have other multi-family and project based Section 8. So we don't have low-income housing tax-credits in this one.

Comment 12: I saw a HUD sheet this is the stuff that is in our housing is reflected. So that came from …

Presenter: This is from HUD and I remember now that you did and right now I do not have that included, but we certainly will get it in the report we send out; the draft report on September 6th.

Comment 13: HUD has a tendency to only give their own data. We looked into Parkview Terrace was just built in southeast and there are others and there is already a project there.

Comment 14: Which one?

Comment 15: Oakview Gardens and they are tax-break project which is Parkview Terrace. Which I think they just got tax-credits. It used to RD. They are all…

Presenter: Now that you mention it we do have a more complete dataset and I will make sure that get into the document. You are right; HUD data tends to be more limited in terms of what they report.

Comment 16: The business side?

Presenter: Small Business.

Comment 17: The maps. So I guess trying to think through and what if there is an area that has a lot more small business than another? Would that show? Does this show you a percentage of loans similar to the housing law data? Does it give you a percentage of denials based on origination? Does that gives you just total value and doesn't have a lot of small businesses and the numbers are very low.

Presenter: This is just raw; this is just how much money is going in each Census tract. In the past we have tried to normalize it by population and things like that which gives us a little bit more like loan dollars per capita. It stands to reason if there are more populations then there are certainly more small businesses and the tendency lies in this area. Typically, we looked at the raw amounts like where the dollars are going.

Comment 18: I was wondering if this is tracts?

Presenter: Tracts.

Comment 19: So if you had something that is predominately residential and just a small portion is commercial where you don't have a lot of businesses or small businesses.

Comment 20: So going forward to the next step and taking this data and recommendations you noted the focus areas that are there and major things that came out of the data and (Not Discernable). We will be looking at potential actions to address those and we will have an opportunity to talk about those in the September meeting. Is there anything that you are

looking for from the people over here today on those issues? Our actions toward them? She talked about that a little bit. Educations and enforcement.

Presenter: Yes, education and enforcement that is certainly one thing that is helpful for me to hear in terms of developing recommendations. Another thing is a question of how true these ring: are these issues you have seen or are you aware of the difficulties of coming forward, affordable units, refusal to make reasonable accommodation or modification?

Comment 21: I don't see that reasonable modification. I don't hear that. Reasonable accommodations again and this is something that common sense says that is this is going to be your business then you need to learn how to do it correctly. So, I actually have gotten copies of letters that landlords have sent to their tenants concerning reasonable accommodation about how you don't really need that or why do you need that? He walked up here fine. So I think when mom and pops don't really understand what is reasonable accommodation. I think you are right. I think you property management companies understand that and I think they are better at it, but it is the people and unfortunately the people who come to trainings and belong to the organizations are not the ones that you need to reach. It is really tough to reach the ones you need to. I know we talked anyone point and I talked with the Oregon Law Center about doing guest opinion in the local newspaper about some of the reasonable accommodation steps and the Section 8 anti-discrimination. I don't know how and I think that is something we need to try. They are more likely to read a paper then come to training. Tenant education and letting the tenants know that they can ask for this stuff. There is a process and if they are refused there is a way to follow through on it.

(Not Discernable)

Comment 22: …landlords and the Oregon Law Center I had (not Discernable) so if you guys have questions, just ask me questions.

(Crosstalk)

Comment 23: You don't have to and if you chose not to that is what you get. (Not Discernable)

Comment 24: Is the Fair Housing Act applies to all rental situation?

Presenter: There are some, because there is the ADA as well, which I am not as familiar with. In some cases it doesn't apply unless you have four or more units. I apologize that I am not as familiar with ADA, but something tells me that it applies regardless of units. That is something I will follow up on as well.

Comment 25: Nonetheless there again should be a process. If someone asks you for a reasonable accommodation and you are not obligated to provide it then you still need to go through the process.

Comment 26: Is there still some data that you are waiting on?

Presenter: We have not received complaint data from BOLI or the Fair Housing Council. Those are the ones that come to in right away.

Comment 27: As I said I did a training with the Fair Housing Council last week and she said that statewide most of them are disability. T

Presenter: That is historic BOLI data as well and across the country. I am not sure why that is. Maybe it is easier to demonstrate that a house is out of compliance with the ADA or Fair Housing Laws.

Comment 28: I might be getting ahead a little bit here there is a little bit of information and I was just wondering what your experience is with communities try to take that on or some local organization tries to take that on? Whether that has been efficient or not.

Presenter: My understanding is that an agency, a unit of local government or state government ultimately participate in the Fair Housing Assistance Program if they are embodied and enforces the Fair Housing Law. There is a Fair Housing Policy in Grants Pass, but there is not a local fair housing law. I believe that the way to be eligible for the FHAP is be named in the Fair Housing Statue as the body that enforces the Fair Housing Statue. As far as the FHIP, those are for private organizations and non-profit organizations that can provide fair housing services, like the Fair Housing Council of Oregon is one. They can do fair housing testing, outreach and educations, and enforcement, investigation and referral to the bureau of labor and industries or HUD. Typically and I think what a typical model for an FHIP is to bud off of an existing FHIP. There are certain requirements to qualify as an FHIP. A history of meritorious compliant investigation. You have to have something like two or three years in experience. So it is kind of hard to get off the ground, but if you can split off of an existing organization then that can help you get started. Typically I don't think it is units of local government directly involved in from being an FHIP and as far as the Fair Housing Assistance Program it would have to be enforcing a local law to qualify.

Comment 29: Are there many local governments that take that on?

Presenter: Here in Oregon I am honestly not sure. I think Portland has one, but I would say just trying to think back across some of the jobs we have done probably of the ones that have some kind of a fair housing and maybe a majority of those would take that on. Typically, I shouldn't say typically, the one agency that enforces the Fair Housing Law would be reimbursed for fair housing investigations. I think the first step would be to have a local fair housing law.

Comment 30: So what is the next step after this?

(Presentation)

Fair Housing Public Input Session

Minutes from the Public Input Session to be included in the final report.

D: Additional Tables

HMDA Data: Grants Pass Study Area

Table D.1
Purpose of Loan by Year
Grants Pass Study Area
2008–2014 HMDA Data

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

Table D.2
Occupancy Status for Home Purchase Loan Applications
Grants Pass Study Area
2008–2014 HMDA Data

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

Table D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
Grants Pass Study Area
2008–2014 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	Total
Conventional	320	261	166	163	219	237	278	1,644
FHA - Insured	155	245	213	200	245	190	154	1,402
VA - Guaranteed	64	67	60	56	106	102	102	557
Rural Housing Service or Farm Service Agency	2	23	22	33	48	47	95	270
Total	**541**	**596**	**461**	**452**	**618**	**576**	**629**	**3,873**

Denial Rates

Table D.4
Loan Applications by Action Taken
Grants Pass Study Area
2008–2014 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	Total
Loan Originated	244	254	212	210	302	309	374	1,905
Application Approved but not Accepted	27	30	19	18	19	20	23	156
Application Denied	71	64	28	41	41	59	71	375
Application Withdrawn by Applicant	45	35	33	40	56	47	68	324
File Closed for Incompleteness	11	6	5	5	10	4	6	47
Loan Purchased by the Institution	143	207	164	138	190	137	87	1,066
Preapproval Request Denied	0	0	0	0	0	0	0	0
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0
Total	**541**	**596**	**461**	**452**	**618**	**576**	**629**	**3,873**
Denial Rate	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**

Table D.5
Loan Applications by Reason for Denial
Grants Pass Study Area
2008–2014 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	Total
Debt-to-Income Ratio	25	16	4	8	10	12	13	88
Employment History	1	1	0	1	0	1	0	4
Credit History	6	8	7	5	10	13	7	56
Collateral	4	11	3	12	8	12	19	69
Insufficient Cash	0	5	1	2	1	0	1	10
Unverifiable Information	2	1	3	1	1	1	2	11
Credit Application Incomplete	5	2	0	2	4	3	2	18
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	6	18	4	6	3	6	6	49
Missing	22	2	6	4	4	11	21	70
Total	**71**	**64**	**28**	**41**	**41**	**59**	**71**	**375**

Table D.6
Denial Rates by Race/Ethnicity of Applicant
Grants Pass Study Area
2008–2014 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	Average
American Indian	.0%	.0%	.0%	33.3%	50.0%	.0%	%	16.7%
Asian	33.3%	.0%	50.0%	40.0%	.0%	33.3%	28.6%	31.0%
Black	%	%	.0%	%	%	%	.0%	.0%
White	22.4%	20.5%	10.7%	15.2%	11.0%	15.6%	15.7%	15.9%
Not Available	22.2%	19.4%	25.0%	23.1%	28.6%	23.8%	17.4%	21.8%
Not Applicable	%	0%	0%	%	%	.0%	%	.0%
Average	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**
Non-Hispanic	21.3%	20.6%	11.0%	16.2%	10.5%	14.9%	15.7%	15.8%
Hispanic	50.0%	.0%	8.3%	.0%	23.1%	20.0%	14.3%	18.1%

Table D.7
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Race		2008	2009	2010	2011	2012	2013	2014	Total
American Indian	Originated	1	1	2	2	1	3	0	10
	Denied	0	0	0	1	1	0	0	2
	Denial Rate	.0%	.0%	.0%	33.3%	50.0%	.0%	%	16.7%
Asian	Originated	4	3	2	3	1	2	5	20
	Denied	2	0	2	2	0	1	2	9
	Denial Rate	33.3%	.0%	50.0%	40.0%	.0%	33.3%	28.6%	31.0%
Black	Originated	0	0	2	0	0	0	2	4
	Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	.0%	%	%	%	.0%	.0%
White	Originated	225	221	200	195	290	287	348	1,766
	Denied	65	57	24	35	36	53	65	335
	Denial Rate	22.4%	20.5%	10.7%	15.2%	11.0%	15.6%	15.7%	15.9%
Not Available	Originated	14	29	6	10	10	16	19	104
	Denied	4	7	2	3	4	5	4	29
	Denial Rate	22.2%	19.4%	25.0%	23.1%	28.6%	23.8%	17.4%	21.8%
Not Applicable	Originated	0	0	0	0	0	1	0	1
	Denied	0	0	0	0	0	0	0	0
	Denial Rate	22.2%	19.4%	25.0%	23.1%	28.6%	23.8%	17.4%	.0%
Total	**Originated**	**244**	**254**	**212**	**210**	**302**	**309**	**374**	**1,905**
	Denied	**71**	**64**	**28**	**41**	**41**	**59**	**71**	**375**
	Denial Rate	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**
Non-Hispanic	Originated	226	216	195	196	281	280	344	1,738
	Denied	61	56	24	38	33	49	64	325
	Denial Rate	21.3%	20.6%	11.0%	16.2%	10.5%	14.9%	15.7%	15.8%
Hispanic	Originated	4	5	11	5	10	12	12	59
	Denied	4	0	1	0	3	3	2	13
	Denial Rate	50.0%	.0%	8.3%	.0%	23.1%	20.0%	14.3%	18.1%

Table D.8
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	3	0	79	6	0	88	3
Employment History	0	0	0	4	0	0	4	1
Credit History	0	0	0	52	4	0	56	5
Collateral	1	0	0	63	5	0	69	0
Insufficient Cash	0	0	0	9	1	0	10	0
Unverifiable Information	1	1	0	9	0	0	11	0
Credit Application Incomplete	0	1	0	15	2	0	18	2
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	0	1	0	45	3	0	49	0
Missing	0	3	0	59	8	0	70	2
Total	**2**	**9**	**0**	**335**	**29**	**0**	**375**	**13**
% Missing	.0%	33.3%	%	17.6%	27.6%	%	18.7%	15.4%

Table D.9
Denial Rates by Gender of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	20.6%	25.6%	36.4%	%	22.5%
2009	19.7%	23.8%	12.9%	%	20.1%
2010	7.1%	19.5%	28.6%	%	11.7%
2011	14.9%	16.3%	36.4%	%	16.3%
2012	12.5%	9.4%	30.0%	%	12.0%
2013	12.9%	22.8%	16.7%	.0%	16.0%
2014	17.0%	13.4%	21.1%	%	16.0%
Average	**15.3%**	**18.0%**	**22.8%**	**.0%**	**16.4%**

Table D.10
Loan Applications by Selected Action Taken by Gender of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	Total
Male	Originated	170	163	145	131	189	210	230	1,238
	Denied	44	40	11	23	27	31	47	223
	Denial Rate	20.6%	19.7%	7.1%	14.9%	12.5%	12.9%	17.0%	15.3%
Female	Originated	67	64	62	72	106	88	129	588
	Denied	23	20	15	14	11	26	20	129
	Denial Rate	25.6%	23.8%	19.5%	16.3%	9.4%	22.8%	13.4%	18.0%
Not Available	Originated	7	27	5	7	7	10	15	78
	Denied	4	4	2	4	3	2	4	23
	Denial Rate	36.4%	12.9%	28.6%	36.4%	30.0%	16.7%	21.1%	22.8%
Not Applicable	Originated	0	0	0	0	0	1	0	1
	Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	.0%	%	.0%
Total	**Originated**	**244**	**254**	**212**	**210**	**302**	**309**	**374**	**1,905**
	Denied	**71**	**64**	**28**	**41**	**41**	**59**	**71**	**375**
	Denial Rate	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**

Table D.11
Denial Rates by Income of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Total
$15,000 or Below	100.0%	.0%	33.3%	100.0%	75.0%	25.0%	50.0%	50.0%
$15,001–$30,000	22.2%	26.2%	18.6%	22.2%	7.8%	27.3%	27.1%	21.6%
$30,001–$45,000	21.6%	23.4%	9.8%	17.8%	10.8%	21.9%	18.1%	17.9%
$45,001–$60,000	25.0%	13.1%	8.5%	11.8%	12.3%	13.9%	12.6%	14.1%
$60,001–$75,000	20.0%	27.3%	7.4%	7.1%	9.5%	4.8%	12.5%	13.2%
Above $75,000	20.3%	16.9%	11.4%	15.0%	15.8%	9.0%	12.5%	14.0%
Data Missing	18.2%	33.3%	33.3%	25.0%	.0%	33.3%	25.0%	21.1%
Total	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**

Table D.12
Loan Applications by Income of Applicant: Originated and Denied
Grants Pass Study Area
2008–2013 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	Total
$15,000 or Below	Loan Originated	0	3	2	0	1	3	1	10
	Application Denied	3	0	1	1	3	1	1	10
	Denial Rate	100.0%	.0%	33.3%	100.0%	75.0%	25.0%	50.0%	50.0%
$15,001 –$30,000	Loan Originated	21	31	35	42	47	40	35	251
	Application Denied	6	11	8	12	4	15	13	69
	Denial Rate	22.2%	26.2%	18.6%	22.2%	7.8%	27.3%	27.1%	21.6%
$30,001 –$45,000	Loan Originated	58	72	55	60	91	75	95	506
	Application Denied	16	22	6	13	11	21	21	110
	Denial Rate	21.6%	23.4%	9.8%	17.8%	10.8%	21.9%	18.1%	17.9%
$45,001 –$60,000	Loan Originated	57	73	54	45	71	68	90	458
	Application Denied	19	11	5	6	10	11	13	75
	Denial Rate	25.0%	13.1%	8.5%	11.8%	12.3%	13.9%	12.6%	14.1%
$60,001 –$75,000	Loan Originated	52	24	25	26	38	40	70	275
	Application Denied	13	9	2	2	4	2	10	42
	Denial Rate	20.0%	27.3%	7.4%	7.1%	9.5%	4.8%	12.5%	13.2%
Above $75,000	Loan Originated	47	49	39	34	48	81	77	375
	Application Denied	12	10	5	6	9	8	11	61
	Denial Rate	20.3%	16.9%	11.4%	15.0%	15.8%	9.0%	12.5%	14.0%
Data Missing	Loan Originated	9	2	2	3	6	2	6	30
	Application Denied	2	1	1	1	0	1	2	8
	Denial Rate	18.2%	33.3%	33.3%	25.0%	.0%	33.3%	25.0%	21.1%
Total	**Loan Originated**	**244**	**254**	**212**	**210**	**302**	**309**	**374**	**1,905**
	Application Denied	**71**	**64**	**28**	**41**	**41**	**59**	**71**	**375**
	Denial Rate	**22.5%**	**20.1%**	**11.7%**	**16.3%**	**12.0%**	**16.0%**	**16.0%**	**16.4%**

Table D.13
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
Grants Pass Study Area
2008–2013 HMDA Data

Race	<= $15K	$15K–$30K	$30K–$45K	$45K–$60K	$60K–$75K	Above $75K	Data Missing	Average
American Indian	%	.0%	50.0%	.0%	%	.0%	%	16.7%
Asian	100.0%	.0%	50.0%	.0%	.0%	33.3%	100.0%	31.0%
Black	%	%	.0%	.0%	%	%	%	.0%
White	44.4%	21.6%	17.6%	13.9%	14.0%	11.6%	18.2%	15.9%
Not Available	%	33.3%	17.2%	21.4%	4.8%	31.7%	.0%	21.8%
Not Applicable	%	%	%	%	%	%	.0%	.0%
Average	**50.0%**	**21.6%**	**17.9%**	**14.1%**	**13.2%**	**14.0%**	**21.1%**	**16.4%**
Non-Hispanic	47.4%	20.8%	17.1%	12.8%	14.4%	12.9%	18.2%	15.8%
Hispanic	%	25.0%	23.8%	25.0%	.0%	.0%	100.0%	18.1%

Table D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
Grants Pass Study Area
2008–2013 HMDA Data

Race		<= $15K	$15K– $30K	$30K– $45K	$45K– $60K	$60K– $75K	> $75K	Data Missing	Total
American Indian	Loan Originated	0	3	2	2	0	3	0	10
	Application Denied	0	0	2	0	0	0	0	2
	Denial Rate	%	.0%	50.0%	.0%	%	.0%	%	16.7%
Asian	Loan Originated	0	4	1	3	4	8	0	20
	Application Denied	2	0	1	0	0	4	2	9
	Denial Rate	100.0%	.0%	50.0%	.0%	.0%	33.3%	100.0%	31.0%
Black	Loan Originated	0	0	1	3	0	0	0	4
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	.0%	.0%	%	%	%	.0%
White	Loan Originated	10	236	478	428	251	336	27	1,766
	Application Denied	8	65	102	69	41	44	6	335
	Denial Rate	44.4%	21.6%	17.6%	13.9%	14.0%	11.6%	18.2%	15.9%
Not Available	Loan Originated	0	8	24	22	20	28	2	104
	Application Denied	0	4	5	6	1	13	0	29
	Denial Rate	%	33.3%	17.2%	21.4%	4.8%	31.7%	.0%	21.8%
Not Applicable	Loan Originated	0	0	0	0	0	0	1	1
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	.0%	.0%
Total	**Loan Originated**	**10**	**251**	**506**	**458**	**275**	**375**	**30**	**1,905**
	Application Denied	**10**	**69**	**110**	**75**	**42**	**61**	**8**	**375**
	Denial Rate	**50.0%**	**21.6%**	**17.9%**	**14.1%**	**13.2%**	**14.0%**	**21.1%**	**16.4%**
Non-Hispanic	Loan Originated	10	236	467	423	243	332	27	1,738
	Application Denied	9	62	96	62	41	49	6	325
	Denial Rate	47.4%	20.8%	17.1%	12.8%	14.4%	12.9%	18.2%	15.8%
Hispanic	Loan Originated	0	6	16	15	13	9	0	59
	Application Denied	0	2	5	5	0	0	1	13
	Denial Rate	%	25.0%	23.8%	25.0%	.0%	.0%	100.0%	18.1%

PREDATORY LENDING

Table D.15
Originated Owner-Occupied Loans by HAL Status
Grants Pass Study Area
2008–2013 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	Total
Other	234	245	212	208	298	309	373	1,879
HAL	10	9	0	2	4	0	1	26
Total	**244**	**254**	**212**	**210**	**302**	**309**	**374**	**1,905**
Percent HAL	4.1%	3.5%	.0%	1.0%	1.3%	.0%	.3%	1.4%

Table D.16
Loans by Loan Purpose by HAL Status
Grants Pass Study Area
2008–2013 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	2013	2014	Total
Home Purchase	Other	234	245	212	208	298	309	373	1,879
	HAL	10	9	0	2	4	0	1	26
	Percent HAL	4.1%	3.5%	.0%	1.0%	1.3%	.0%	.3%	1.4%
Home Improvement	Other	29	18	17	15	34	34	20	167
	HAL	5	1	1	1	1	1	0	10
	Percent HAL	14.7%	5.3%	5.6%	6.3%	2.9%	2.9%	.0%	5.6%
Refinancing	Other	302	494	389	286	599	465	193	2,728
	HAL	22	13	2	1	3	3	1	45
	Percent HAL	6.8%	2.6%	.5%	.3%	.5%	.6%	.5%	1.6%
Total	**Other**	**565**	**757**	**618**	**509**	**931**	**808**	**586**	**4,774**
	HAL	**37**	**23**	**3**	**4**	**8**	**4**	**2**	**81**
	Percent HAL	**6.1%**	**2.9%**	**.5%**	**.8%**	**.9%**	**.5%**	**.3%**	**1.7%**

Table D.17
HALs Originated by Race of Borrower
Grants Pass Study Area
2008–2013 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	Total
American Indian	1	0	0	0	0	0	0	1
Asian	1	0	0	0	0	0	0	1
Black	0	0	0	0	0	0	0	0
White	7	7	0	2	4	0	1	21
Not Available	1	2	0	0	0	0	0	3
Not Applicable	0	0	0	0	0	0	0	0
Total	**10**	**9**	**0**	**2**	**4**	**0**	**1**	**26**
Non-Hispanic	9	7	0	2	3	0	1	22
Hispanic	0	0	0	0	1	0	0	1

Table D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
Grants Pass Study Area
2008–2013 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	Average
American Indian	100.0%	.0%	.0%	.0%	.0%	.0%	%	10.0%
Asian	25.0%	.0%	.0%	.0%	.0%	.0%	.0%	5.0%
Black	%	%	.0%	%	%	%	.0%	.0%
White	3.1%	3.2%	.0%	1.0%	1.4%	.0%	.3%	1.2%
Not Available	7.1%	6.9%	.0%	.0%	.0%	.0%	.0%	2.9%
Not Applicable	%	%	%	%	%	.0%	%	.0%
Average	**4.1%**	**3.5%**	**.0%**	**1.0%**	**1.3%**	**.0%**	**.3%**	**1.4%**
Non-Hispanic	4.0%	3.2%	.0%	1.0%	1.1%	.0%	.3%	1.3%
Hispanic	.0%	.0%	.0%	.0%	10.0%	.0%	.0%	1.7%

Table D.19
Loans by HAL Status by Race/Ethnicity of Borrower
Grants Pass Study Area
2008–2014 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	Total
American Indian	Other	0	1	2	2	1	3	0	9
	HAL	1	0	0	0	0	0	0	1
	Percent HAL	100.0%	.0%	.0%	.0%	.0%	.0%	%	10.0%
Asian	Other	3	3	2	3	1	2	5	19
	HAL	1	0	0	0	0	0	0	1
	Percent HAL	25.0%	.0%	.0%	.0%	.0%	.0%	.0%	5.0%
Black	Other	0	0	2	0	0	0	2	4
	HAL	0	0	0	0	0	0	0	0
	Percent HAL	%	%	.0%	%	%	%	.0%	.0%
White	Other	218	214	200	193	286	287	347	1,745
	HAL	7	7	0	2	4	0	1	21
	Percent HAL	3.1%	3.2%	.0%	1.0%	1.4%	.0%	.3%	1.2%
Not Available	Other	13	27	6	10	10	16	19	101
	HAL	1	2	0	0	0	0	0	3
	Percent HAL	7.1%	6.9%	.0%	.0%	.0%	.0%	.0%	2.9%
Not Applicable	Other	0	0	0	0	0	1	0	1
	HAL	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	.0%	%	.0%
Total	**Other**	**234**	**245**	**212**	**208**	**298**	**309**	**373**	**1,879**
	HAL	**10**	**9**	**0**	**2**	**4**	**0**	**1**	**26**
	Percent HAL	**4.1%**	**3.5%**	**.0%**	**1.0%**	**1.3%**	**.0%**	**.3%**	**1.4%**
Non -Hispanic	Other	217	209	195	194	278	280	343	1,716
	HAL	9	7	0	2	3	0	1	22
	Percent HAL	4.0%	3.2%	.0%	1.0%	1.1%	.0%	.3%	1.3%
Hispanic	Other	4	5	11	5	9	12	12	58
	HAL	0	0	0	0	1	0	0	1
	Percent HAL	.0%	.0%	.0%	.0%	10.0%	.0%	.0%	1.7%

Table D.20
Rates of HALs by Income of Borrower
Grants Pass Study Area
2008–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Average
$15,000 or Below	%	.0%	.0%	%	.0%	.0%	.0%	.0%
$15,001–$30,000	.0%	3.2%	.0%	.0%	2.1%	.0%	.0%	.8%
$30,001–$45,000	1.7%	2.8%	.0%	1.7%	.0%	.0%	1.1%	1.0%
$45,001 -$60,000	3.5%	4.1%	.0%	.0%	1.4%	.0%	.0%	1.3%
$60,001–$75,000	5.8%	.0%	.0%	.0%	.0%	.0%	.0%	1.1%
Above $75,000	8.5%	6.1%	.0%	2.9%	.0%	.0%	.0%	2.1%
Data Missing	.0%	.0%	.0%	.0%	33.3%	.0%	.0%	6.7%
Average	**4.1%**	**3.5%**	**.0%**	**1.0%**	**1.3%**	**.0%**	**.3%**	**1.4%**

Table D.21
Loans by HAL Status by Income of Borrower
Grants Pass Study Area
2008–2013 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	Total
$15,000 or Below	Other	0	3	2	0	1	3	1	10
	HAL	0	0	0	0	0	0	0	0
	Percent HAL	%	.0%	.0%	%	.0%	.0%	.0%	.0%
$15,001 –$30,000	Other	21	30	35	42	46	40	35	249
	HAL	0	1	0	0	1	0	0	2
	Percent HAL	.0%	3.2%	.0%	.0%	2.1%	.0%	.0%	.8%
$30,001 –$45,000	Other	57	70	55	59	91	75	94	501
	HAL	1	2	0	1	0	0	1	5
	Percent HAL	1.7%	2.8%	.0%	1.7%	.0%	.0%	1.1%	1.0%
$45,001 –$60,000	Other	55	70	54	45	70	68	90	452
	HAL	2	3	0	0	1	0	0	6
	Percent HAL	3.5%	4.1%	.0%	.0%	1.4%	.0%	.0%	1.3%
$60,001 –$75,000	Other	49	24	25	26	38	40	70	272
	HAL	3	0	0	0	0	0	0	3
	Percent HAL	5.8%	.0%	0.0%	.0%	.0%	.0%	.0%	1.1%
Above $75,000	Other	43	46	39	33	48	81	77	367
	HAL	4	3	0	1	0	0	0	8
	Percent HAL	8.5%	6.1%	.0%	2.9%	.0%	.0%	.0%	2.1%
Data Missing	Other	9	2	2	3	4	2	6	28
	HAL	0	0	0	0	2	0	0	2
	Percent HAL	.0%	.0%	.0%	.0%	33.3%	.0%	.0%	6.7%
Total	**Other**	**234**	**245**	**212**	**208**	**298**	**309**	**373**	**1,879**
	HAL	**10**	**9**	**0**	**2**	**4**	**0**	**1**	**26**
	Percent HAL	**4.1%**	**3.5%**	**.0%**	**1.0%**	**1.3%**	**.0%**	**.3%**	**1.4%**

2015 Poverty Thresholds

Note: Poverty thresholds reported by the Census Bureau differ from poverty guidelines. Poverty guidelines are published in January of each year, and are used to determine eligibility for a variety of federal programs. Poverty guidelines apply to the current year, while poverty thresholds, which are used for statistical purposes, apply to the previous year.

Table D.22
2015 Poverty Thresholds
United States
2016 Census Bureau Data

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