

THE CITY OF  
**PEORIA**  
ARIZONA



# **Analysis of Impediments to Fair Housing Choice**

City of Peoria, Arizona

**May 2011**

**Prepared by ASK Development Solutions, Inc.**

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## EXECUTIVE SUMMARY

**Background:** The Analysis of Impediments to Fair Housing Choice (AI) is a review of impediments to fair housing choice in the City of Peoria, as required by the U.S. Department of Housing and Urban Development (HUD).

The AI involves: 1) A review of the city's demographic, economic, and housing characteristics; and laws, regulations, and administrative policies, procedures and practices; 2) An assessment of how those laws, policies and practices affect the location availability and accessibility of housing; and 3) An assessment of conditions, both public and private, affecting fair housing choices for all protected classes.

According to HUD, impediments to fair housing choice are:

1. Any actions, omissions, or decisions *taken because of* race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
2. Any actions, omissions or decisions *that have the effect of* restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

**Community Participation Process:** The City of Peoria AI includes input from many city officials, citizens, housing service providers, non-profits, and community organizations. A survey was posted online and survey information was distributed to the public at the Peoria public library, Baseball Spring Training Fan Fest, at the Public Housing Authority, and through broadcast on the community cable channel. The majority of responses suggested education and public outreach is needed to improve fair housing choice and remove impediments.

The AI includes:

- Community Profile Analysis
- Analysis of Current Planning and Zoning Barriers
- Review of Fair Housing Testing and Compliance Data, Including Mortgage Data
- Internet Surveys and Key Person Interviews
- Peoria's Fair Housing Accomplishments
- Public Outreach Efforts
- Impediments and Recommendations for Addressing Impediments

### Community Profile Summary

**(based on the U.S. Census American Community Survey 2005-2009):**

Population:	152,795
Median Household Income:	\$65,400
Households <\$25,000:	7,648 (14.5% of population below poverty level)
Households \$25,000 to \$50,000:	11,754
Civilian Labor Force:	76,562 (66% of population)

Housing Units:	57,996 (5,226 vacant)	
Public Housing Units: 70	Section 8 Housing Vouchers:	82
Educational Attainment	90% over age 25-high school diploma	
Occupied Households in Peoria	Owner-Occupied	Renter-Occupied
87,265	68%	32%

**Impediments Identified In 2011 Peoria AI:**

The research, surveys, and interviews conducted for the AI did not identify any substantial fair housing impediments within the City of Peoria. The City has made efforts to be proactive in supporting fair housing education, although public education needs to be ongoing. However, addressing the impediments identified below could strengthen fair housing choice in Peoria.

- *Education and Outreach:* This is the greatest area of impediments to fair housing for the City of Peoria. Survey results, interview responses, and analysis of fair housing complaint data indicate that the Peoria community may not have a comprehensive understanding of fair housing rights and responsibilities.
- *Fair Housing Testing:* There is no fair housing testing specifically for Peoria.
- *Data Collection, Tracking and Follow-Up:* There is no mechanism in place for the City to collect data, track, or follow-up on fair housing complaints handled by/referred to other entities.
- *Accessible Housing:* There is a need for the City to evaluate ADA education and accessible housing needs.

**Recommendations To Address Existing Impediments Identified In 2011 AI:**

- Establish a Fair Housing Officer position.
- Use existing institutional structure for fair housing education and outreach.
- Use Peoria Channel 11 and the City newsletter for fair housing information.
- Invest in fair housing testing services.
- Establish a feedback mechanism for tracking fair housing cases.
- Review accessible housing needs and provide ADA and fair housing information to the community.

## I. INTRODUCTION

### Analysis of Impediments Background

The Analysis of Impediments to Fair Housing Choice (AI) is a U.S. Department of Housing and Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sector. The AI is required for the City of Peoria, as all HUD grant entitlement jurisdictions, by federal regulatory requirements at 24 CFR 91.255(a)(1); 91.325(a)(1); and 91.425(a)(1)(I).

The AI involves:

- A review of the city's demographic, economic, and housing characteristics.
- A review of a city's laws, regulations, and administrative policies, procedures and practices;
- An assessment of how those laws, policies and practices affect the location availability and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes;

According to HUD, impediments to fair housing choice are:

3. Any actions, omissions, or decisions *taken because of* race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
4. Any actions, omissions or decisions *that have the effect of* restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

Although the AI itself is not directly approved or denied by HUD, its submission is a required component of the City's Consolidated Plan. HUD states that the purposes of the AI are to:

- serve as the substantive, logical basis for the Fair Housing Plan;
- provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- assist in building public support for fair housing efforts both within an entitlement jurisdiction's boundaries and beyond.

To most accurately evaluate current fair housing conditions within the City of Peoria, the AI includes a review of demographic and housing market data, pertinent legislation, regulations affecting fair housing, public education and outreach efforts, and a community fair housing survey. The AI allows the City to identify any existing impediments or barriers to fair housing choice and to develop an action plan containing strategies to mitigate such barriers.

### Fair Housing Act

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied

buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons. The State of Arizona has a fair housing law (Title 41, Article 7) similar to the Federal Fair Housing Act, with some enhanced protections specifically addressing familial status and disability.

### **Who Conducted the AI**

The City of Peoria's 2011 Analysis of Impediments to Fair Housing Choice was conducted by ASK Development Solutions, Inc. (ASK), a consulting firm working on behalf of the City of Peoria.

### **Participants in the AI**

The City of Peoria AI included input from many city officials, citizens, and key persons involved in the housing and community development industry, and in particular, fair housing. The consultant developed fair housing surveys for citizens, housing service providers, Realtors, and lending institutions. An online, 30-question fair housing survey was available for all stakeholders to complete via <http://www.surveymonkey.com>, and as distributed by City of Peoria staff. The survey was open in the month of January and was completed by 82 community residents, 72 (89%) were Peoria residents. All surveys stated that copies of the survey were available in hard copy and alternative format. A copy of a flyer with survey information was distributed as follows:

- posted in the Peoria Public Library;
- distributed at the February 26<sup>th</sup> Baseball Spring Training Fan Fest event in Peoria;
- given to the City Communication Department to be included on the Community Bulletin Board on Community Cable Channel 11;
- posted with a direct survey link on the City's website; and
- made available with questionnaires at the Peoria Housing Authority office.

Surveys were utilized to gather information from housing consumers and from various sectors of the housing industry about their experiences and perceptions of housing discrimination and their opinions on fair housing laws and services. ASK staff conducted interviews with key individuals from City staff, non-profits, the U.S. Department of Housing and Urban Development (HUD), and housing providers to collect additional information about fair housing practices and impediments in the City. Additionally, public meetings were conducted to solicit input on fair housing discrimination and impediments to fair housing from the City's Subcommittee on Not-For-Profit Review and Housing, various industry representatives and service providers, and the public stakeholders at large. Additional information was gathered via meeting, teleconference and email correspondence with HUD, the Arizona Attorney General's Office, and other non-profit and advocacy groups.

### **Planning and Research Methodology**

The consultant's methodology in undertaking the 2011 Peoria AI was based on the recommended methodology in the *Fair Housing Planning Guide Vol. 1* (HUD

Office of Fair Housing and Equal Opportunity); experience conducting AIs for other cities, and the desires of the City. The scope of work consisted of the following tasks:

Task 1 - Project Launch

Consultant met with the project managers from the city to refine work tasks and the project schedule, establish reporting relationships and review expectations of the project. Consultant collected relevant data, identified potential candidates for key person interviews, and discussed the public participation components of the study. Consultant then began creation of the survey instruments.

Task 2 - Community Data Review

Consultant reviewed existing demographic, economic, employment and housing market information for the City of Peoria using the 2000 U.S. Census; U.S. Census 2005-2009 American Community Survey; lending data from the Home Mortgage Disclosure Act (HMDA); foreclosure data from Realty Trac; data and maps from Peoria's Five Year Consolidated Plan for FY 2010–2014; data from the previous four Consolidated Annual Performance and Evaluation Reports (CAPER); and data and maps from documents available via the City's website. In addition, the consultant conducted public meetings and teleconferences.

Task 3 - Regulatory Review

Consultant researched and collected information regarding Peoria's current development regulations, planning and zoning fees, housing policies and programs that influence fair housing choice and impediments, through a review of the City's policies and interviews with key City staff. ASK staff corresponded via email and/or teleconference with the State Attorney General's office, as well as fair housing service providers and agencies, to further investigate fair housing policies and potential impediments.

Task 4 - Compliance Data Review

The consultant collected and analyzed all applicable available data regarding compliance with local, state and federal Fair Housing Law, including the Home Mortgage Disclosure Act (HMDA), the Fair Housing Act and the Community Reinvestment Act (CRA). ASK also analyzed reported fair housing complaints and conducted a review of legal cases in the City involving Fair Housing law.

Task 5 - Internet Surveys, Direct Surveys, and Personal Interviews

In January 2011, the consultant opened an online survey available to all Peoria residents and industry stakeholders. The survey asked respondents about their experience and perception of housing discrimination, their knowledge of fair housing laws, their utilization of Peoria's housing assistance and social service programs, and their opinions about housing and social service needs in the city. Flyers with the direct survey link were posted in public libraries and distributed at the February 26<sup>th</sup> Baseball Spring Training Fan Fest event in Peoria. Copies of the flyer, survey link, and survey were sent to the City's Communication Department for posting on the city's public television channel. The survey was posted with a direct survey link on the City's website, and made available with questionnaires at the Peoria Housing Authority office. The consultant conducted

key person interviews with members of community groups, the Arizona Attorney General's office, City of Peoria staff, and nonprofit agencies.

#### Task 6 - Identification and Analysis of Impediments

The consultant then analyzed the findings from the first five tasks in order to determine what impediments to fair housing choice exist in the City of Peoria. The consultant also reviewed previous AI reports to review what recent actions had been taken by the City.

#### Task 7 - Recommendations

In consultation with City staff, the consultant developed a recommended Action Plan for addressing the identified impediments.

#### **Summary of Impediments Found**

- Need for fair housing education and outreach.
- Lack of fair housing testing.
- Need for fair housing data collection, tracking and follow-up.
- Existence of accessible housing needs.

#### **Summary of Recommendations to Address Impediments**

- Establish a Fair Housing Officer position.
- Use existing institutional structure for fair housing education and outreach.
- Use Peoria Channel 11 and City newsletter for fair housing information.
- Invest in fair housing testing services.
- Establish a feedback mechanism for tracking fair housing cases.
- Review accessible housing needs and provide ADA and fair housing information to the community.

#### **AI Funding**

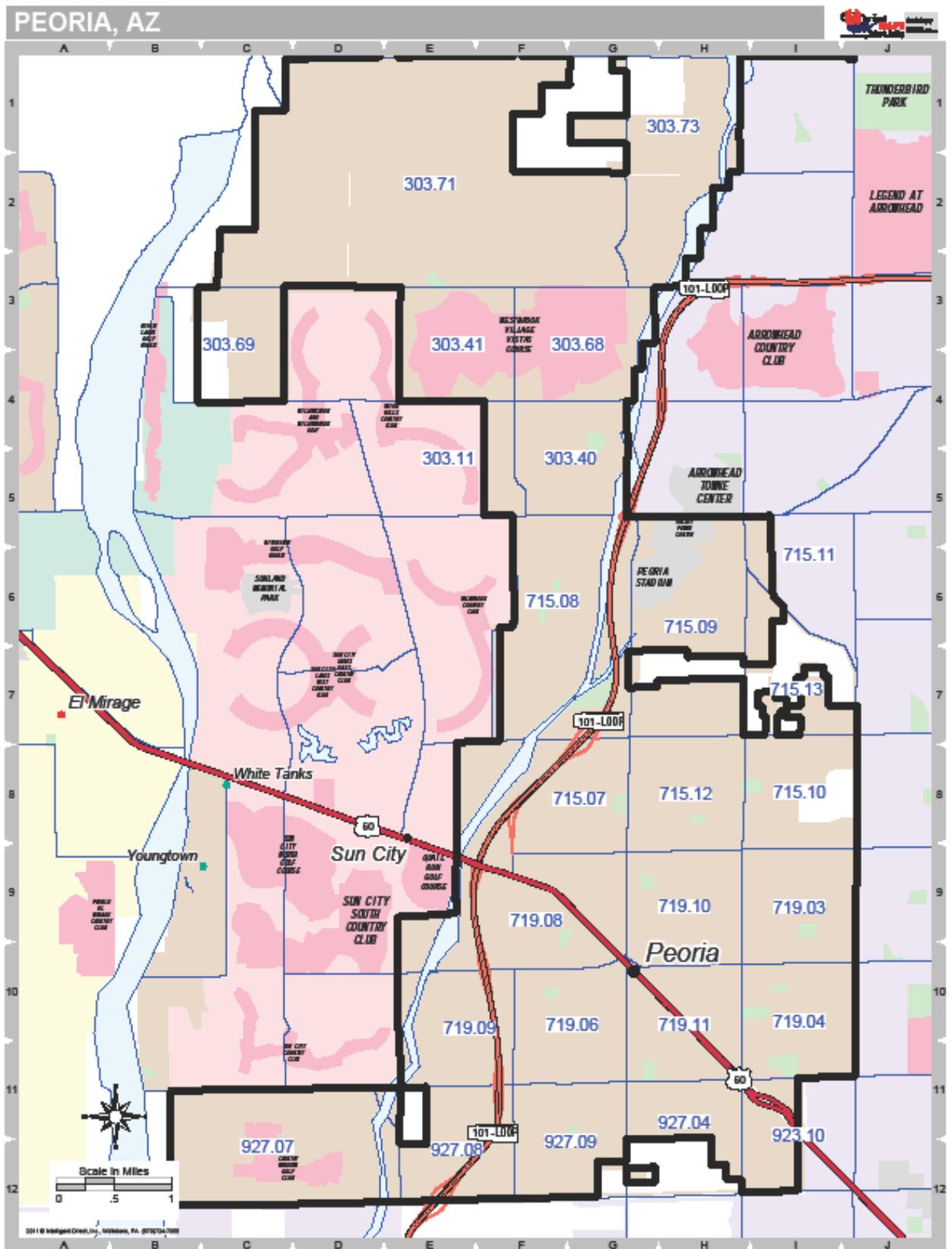
According to the City of Peoria's Consolidated Plan for FY 2011-2015, the City has not designated direct funding for fair housing activities or services. Instead, the City funded fair housing activities through its Administrative allocation.

## **II. COMMUNITY PROFILE**

#### **Introduction**

The American Community Survey 2005-2009 represents the most recent available data from the U.S. Census, providing most informational items as the decennial Census, but not always at the lowest geographic levels. The Community Survey, in addition to a variety of other highly regarded data sources were utilized for the preparation of this report, including Home Mortgage Disclosure Act (HMDA) data; RealtyTrac data service; official City of Peoria planning and reporting documents, the City of Peoria 2010 National Citizen Survey, and direct communication with local agencies. Overall, the data paints a revealing and fair portrait of the community and housing conditions therein. The following map shows the City of Peoria and all Census Tracts contained within.

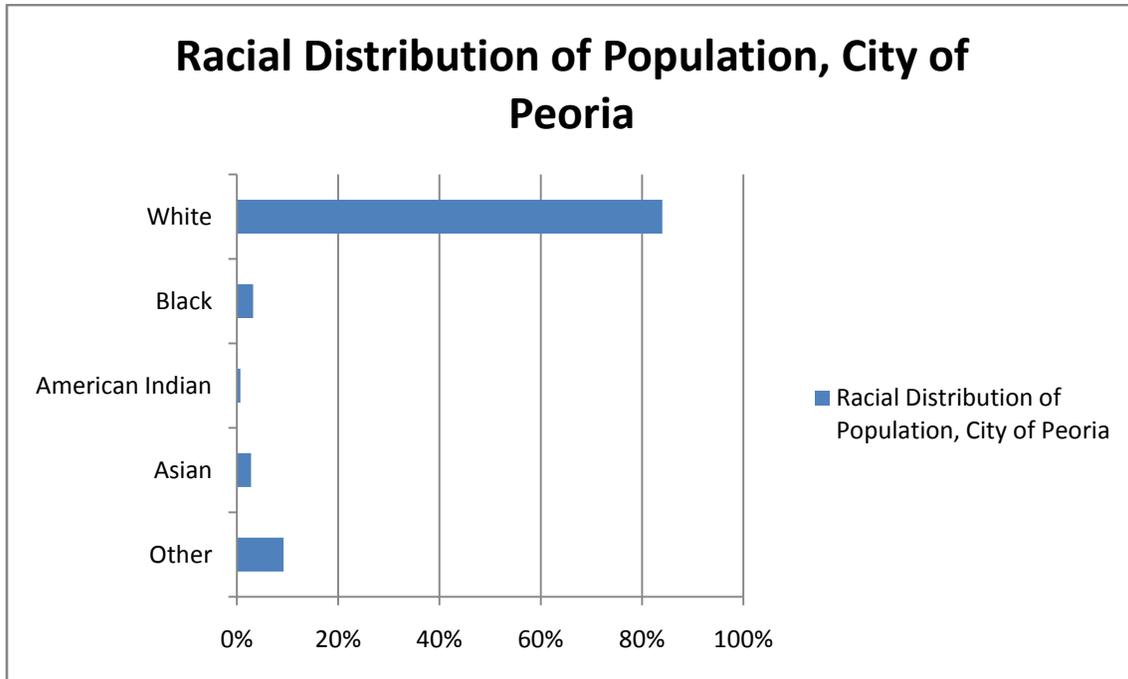
City of Peoria Analysis of Impediments to Fair Housing Choice 2011



Source: City of Peoria, GIS Division, 2011

### Population, Race, and Ethnicity

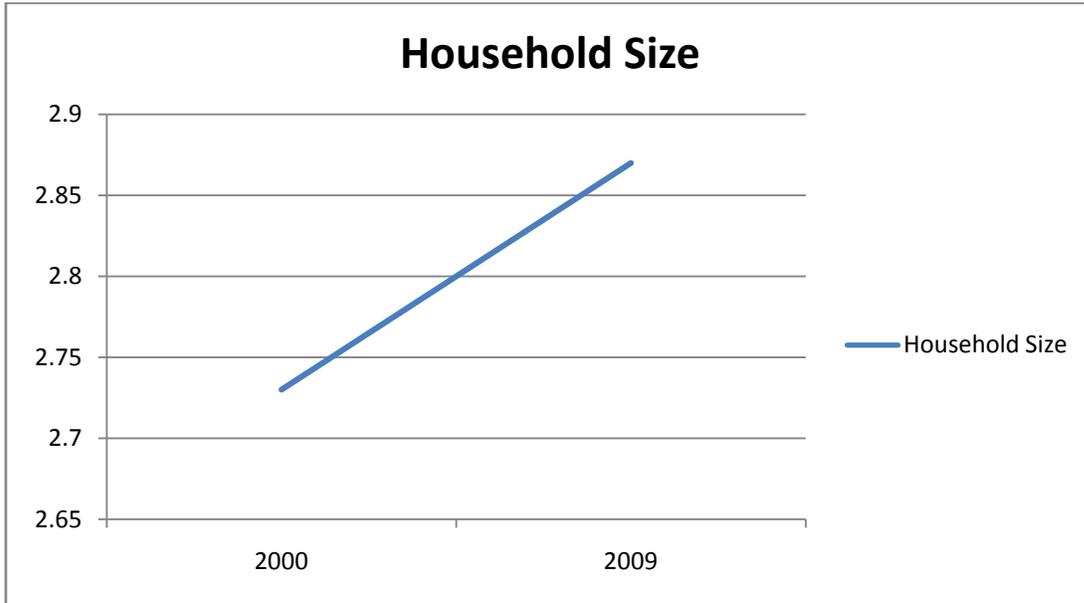
The City of Peoria had a total population of 152,795 at the time of the American Community Survey, a growth of 44,431 persons from the time of the 2000 Census. The racial makeup of the community was overwhelmingly White (84.0%), but also included populations identifying themselves as Black (3.2%), American Indian (0.7%), Asian (2.8%), and other races, including two or more (9.2%). Over 20% (30,818) of Peoria's population identified themselves as being of Latino or Hispanic origin, representing the largest ethnic population in the City. Nine percent (9%) of Peoria's population, or 14,114 persons, were born outside of the United States.



Source: U.S. Census Bureau, American Community Survey

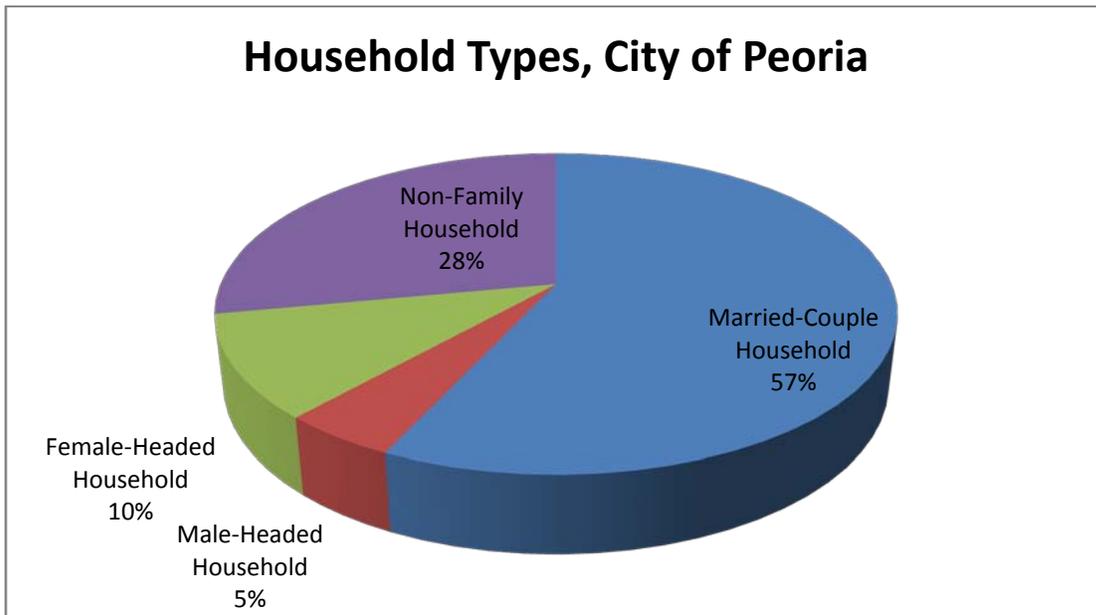
### Household Characteristics

Since the 2000 Census, average household size in Peoria has increased slightly from 2.73 persons per household to 2.87 persons per household.



Source: U.S. Census Bureau, American Community Survey

Among Peoria's 52,770 households, family households represented 72% of all households, including: 30,059 (57%) married couple families; 2,489 male-headed households (5%); and 5,466 (10%) female-headed households. Non-family households comprised a significant amount at 28% of all households.



Source: U.S. Census Bureau, American Community Survey

## Income, Education, and Employment

### Income Characteristics

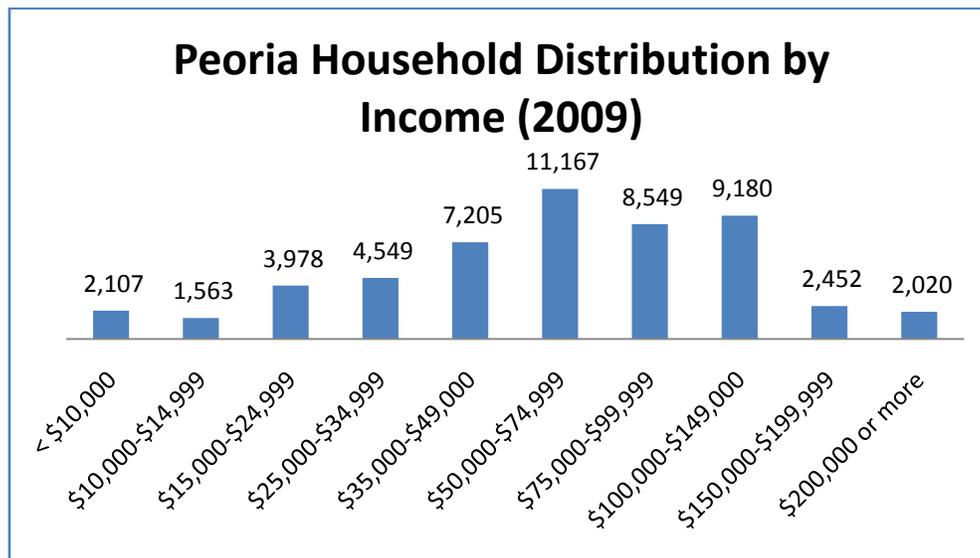
HUD's 2008 Income Limits for the Phoenix-Mesa-Scottsdale MSA, defined Very-low Income (<30% MFI) households as those earning no more than \$19,250; Low Income (31-50%MFI) households as those earning no more than \$32,100; and Moderate income (51-80%MFI) households as those earning no more than \$51,350. All figures are based on a household size of four (4) and 2008 Area Median Income of \$64,200 for the Phoenix-Mesa-Scottsdale MSA.

The median household income in the City of Peoria in 2009 was \$65,400, an increase of \$13,201 (25%) over that of 2000, and \$1,200 higher than that of the greater metropolitan area.

The relative affluence of Peoria is evident in examination of household income distribution. In 2009, of the total 52,770 households in Peoria, 14.5% earned less than \$25,000 annually, with another 22.3% having earned between \$25,000 and \$50,000. The majority of the households (63.2%) earned incomes in the middle and upper brackets in 2009, with 21.2% having earned between \$50,000 and \$75,000; 16.2% having earned between \$75,000 and \$100,000; and 25.8% having earned more than \$100,000.

Per the American Community Survey of Peoria's population (152,795 persons), only 6.3% of all people subsist below the poverty level. Female-headed households experience poverty at the greatest rate (12.6% of all families) in proportion to their incidence in the total population (10.4% of all households). In 2009, only 8.7% of Peoria's household population received some form of public assistance such as SSI, cash public assistance, or food stamps.

The following table depicts the income distribution of all households in the City of Peoria.



Source: U.S. Census Bureau, 2008 American Community Survey

Educational Attainment

The level of educational attainment of the citizens of Peoria is impressive with eighty-nine percent (89%) of persons over age twenty-five having achieved a high school diploma or its equivalency, and twenty-five percent (25%) achieving a bachelor’s degree or higher. Twenty-eight percent (28%) of this population began college coursework, but did not attain a degree; nine percent (9%) hold an Associate of Arts degree; seventeen percent (17%) attained a bachelor’s degree; and just over eight percent (8%) hold a Master’s, Doctoral, or Professional degree.

Employment

As of 2009, Peoria’s civilian labor force numbered 76,562 or approximately 66% of the City’s population 16 years and over. The labor force was approximately 53% male and 47% female.

The national economic downturn in recent years has struck the Phoenix-Mesa Metropolitan area as well, and unemployment in Maricopa County has risen dramatically from 3.4% in 2007 to 7.9% in 2009 (Bureau of Labor Statistics). Census data for the City of Peoria indicated an unemployment rate of 6.1% in 2009, demonstrating that perhaps Peoria is weathering the economic downturn better than the region as a whole.

Peoria has a well-developed and growing economic base that provides employment opportunities not only for the citizens of Peoria, but also for commuters from the surrounding communities. The City of Peoria has job opportunities in a fairly diversified economy, and the well-educated character of its population is reflected in the major industries of employment. Five top industries provide employment for over one-third of the City’s workforce:

Education, Healthcare, and Social Assistance.....	14,250 (19.8%)
Retail trade.....	10,182 (14.2%)
Finance, Insurance, and Real Estate.....	8,686 (12.1%)
Professional, Scientific, and Management.....	6,406 (8.9%)
Construction.....	6,014 (8.4%)

The 2010 Peoria National Citizen Survey asked citizens to rate a number of community features related to economic opportunity and growth. The most positively rated features were overall quality of business and service establishments in Peoria and shopping opportunities. Receiving the lowest rating was employment opportunities. Residents were asked to evaluate the speed of jobs growth and retail growth on scale from “much too slow” to “much too fast.” When asked about the rate of job growth in Peoria, 86% responded that it was “too slow,” while 29% reported retail growth as “too slow.” Fewer residents in Peoria compared to other jurisdictions believed that retail growth was too slow and more residents believed that job growth was too slow. Residents were asked to reflect on their economic prospects in the near term. Thirteen percent of the City of Peoria residents expected that the coming six months would have a “somewhat” or “very” positive impact on their family. The percent of residents

with an optimistic outlook on their household income was less than comparison jurisdictions.

## **Transportation and Commuting**

### Transportation

As is described in Peoria's 2008 General Plan and the 2009 draft update, a number of efforts will be needed for Peoria to make growth efficient and productive, revitalize Old Town, protect natural resources and community character, and improve quality of life for the city's residents. One important component will be the development of a more balanced transportation system, and specifically the development of an attractive and effective transit system. This project—the Peoria Multimodal Transportation Plan—is intended to design that system, and consists of the:

- development of improved local transit services;
- examination of the feasibility of extending light rail, or other forms of high capacity transit, to Peoria;
- development of an Old Town Transit Center
- development of improved bus stop facilities; and
- development of a process to incorporate artwork into bus stop facilities.

The City of Peoria held meetings to obtain public input on immediate changes to bus services in Peoria and future bus and rail improvement, as part of the Peoria Multimodal Transportation Plan.

The City of Peoria provides a number of transportation programs and services to help senior citizens and people with disabilities maintain their independence within the community. Peoria Dial-A-Ride was formed in 1989 to provide basic transportation services for the residents of Peoria. Since that time, the Transit Division has tripled in size and is able to provide greater services while completing approximately 48,000 transports annually. Dial-A-Ride and ADA / Paratransit services use a shared ride concept that mixes elements of traditional bus service with characteristics of taxi cab service. In addition to the regular service, a special program called Dial-A-Ride Plus (DAR+) transports Peoria residents to neighboring medical campuses located in Sun City and Glendale.

Residents responding to the 2010 Peoria National Citizen Survey were given a list of six aspects of mobility to rate on a scale of "excellent," "good," "fair" and "poor." Ease of car travel was given the most positive rating, followed by availability of paths and walking trails. These ratings tended to be similar to or lower than the benchmark. The ratings for availability of paths and walking trails and traffic flow on major streets were similar to the past citizen survey.

Commuting

As would be expected by the nature of the City’s transportation network, the overwhelming majority of commuters--92%--travel to work via automobile, truck, or van. Of all auto commuters, twelve percent (12%) do so via carpooling, commendable, but lower than Maricopa County’s carpooling rate of 15%. Approximately one percent (1%) of the workforce took a taxicab, motorcycle, or other means to work; approximately one percent (1%) walked to work; and one percent (1%) took public transportation. Of the total of employed persons aged 16 and over, five percent (5%) worked at home, roughly equivalent to Maricopa County’s 4.8% rate of home employment.

In terms of length of commute to place of employment, again looking at the same population of employed Peoria residents aged 16 and older, but excluding those who work at home, commute times were as follows:

<b>Travel Time to Work (one way)</b>	<b>% of Persons</b>
Less than 10 minutes	8.1%
10 to 14 minutes	10.3%
15 to 19 minutes	12.8%
20 to 24 minutes	15.6%
25 to 29 minutes	7.9%
30 to 34 minutes	16.4%
35 to 44 minutes	9.9%
More than 45 minutes	18.9%

Source: U.S. Census Bureau, American Community Survey

As can be seen by the data above, the length of commute for residents of Peoria was reasonable for the majority, and significantly lower than that of comparable-sized large metropolitan areas. Approximately fifty-five percent (55%) of commuters traveled less than 30 minutes to their place of work, and an additional twenty-six percent (26%) traveled 30 – 45 minutes to their place of employment. For auto commuters who also wish to use other forms of transportation, the City provides two (2) no-cost shared Park-and-Ride lots, from which commuters can access public transit services.

The City of Peoria/Valley Metro fixed route services operate Monday through Friday. Valley Metro buses are equipped with wheelchair lifts or ramps and front-mounted bicycles racks. The local bus routes connect the following areas within the Valley:

- Route 106 - The Peoria Avenue (#106) route travels from 105th Avenue at Santa Fe in Sun City, east to the Mayo Clinic in Scottsdale.
- Grand Avenue Limited - The Grand Avenue Limited travels from the Peoria Park & Ride facility, east to Phoenix’s Central Station.
- Route 67 - The 67th Avenue (#67) route travels north to south from Buckeye Road to Arrowhead Towne Center (75th Avenue and Bell Rd.).
- Route 170 - The Bell Road (170) route travels from Arrowhead Towne Center (75th Avenue and Bell Rd.) east to Raintree Drive at Northsight Blvd. Scottsdale.

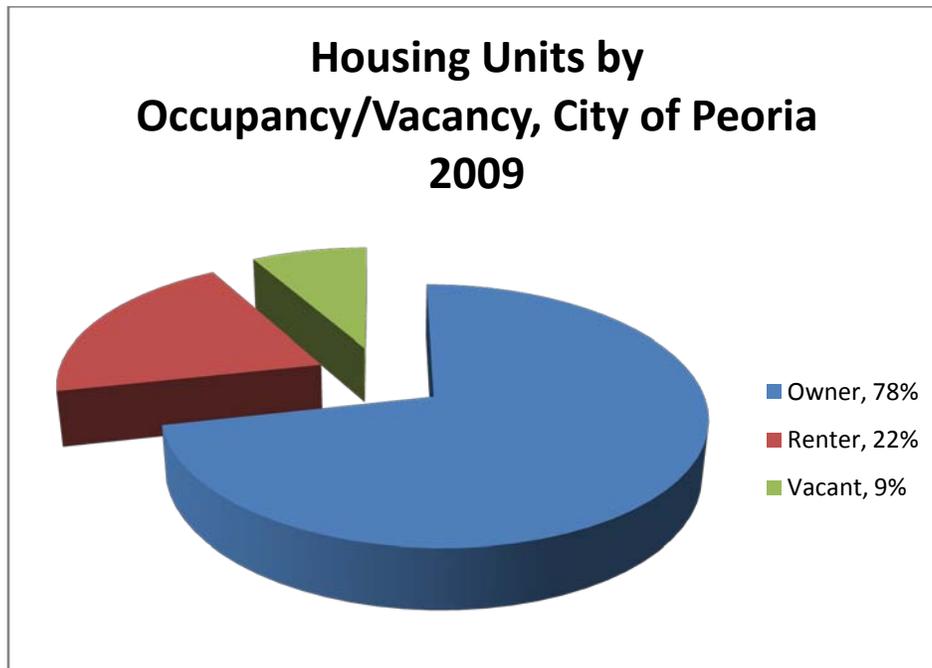
The 2010 Peoria National Citizen Survey measured the residents' choice of travel mode over time, so that the community can monitor their success in providing attractive alternatives to the traditional mode of travel, the single-occupied automobile. When asked how they typically traveled to work, single-occupancy (SOV) travel was the overwhelming mode of use. However, 3% of work commute trips were made by transit, by bicycle or by foot. These results are consistent with U.S. Census data previously analyzed.

### III. HOUSING PROFILE

#### Housing by Tenure

Since the time of the 2000 Census, the number of housing units in Peoria grew from 42,573 to a total of 57,996 housing units in 2009. The growth in housing units mirrors the growth in the City's total population. Yet, approximately 9% of all Peoria's housing units are now vacant (5,226 units).

Of the 52,770 occupied housing units in 2009, approximately 78% (41,352) were owner occupied and 22% (11,418) were renter occupied. This reflects a 6% decrease in the rate of homeownership (down from 84% in 2000) and a corresponding increase in rental tenure (16% in 2000).



Source: U.S. Census Bureau, American Community Survey

The City of Peoria Consolidated Plan 2010-2014 provides more detailed data by housing type that is illustrative of the current composition and the changing nature of the City’s housing stock in recent times. According to the Consolidated Plan, approximately ten percent (10%) of the city’s housing stock is aged over 30 years.

As of 2009, among all Peoria housing units, one-unit detached housing represented 76.6%; one-unit attached housing represented 5.7%; housing with 2 or more units represented 11.5%; and mobile homes represented 6.1%. This illustrates the characteristics of Peoria’s housing stock at a point in time, but perhaps more revealing is the change in the incidence within each housing type.

The greatest proportional growth between 2000 and 2008 occurred in one-unit detached housing units. The table below depicts the proportion of each housing unit type among the total housing stock in 2000, in 2008, and the change during the time period.

**Change in Total Housing Stock by Type, 2000 – 2008, City of Peoria**

<b>Unit Type</b>	<b>2000</b>	<b>2008</b>	<b>Change</b>
One-unit, detached	72.7%	76.6%	+3.9%
One-unit, attached	5.7%	5.7%	No change
Multi-unit	11.8%	11.5%	-0.3%
Mobile homes	8.2%	6.1%	-2.1%
Boat, RV, van, etc.	1.5%	0.1%	-1.4%

Source: U.S. Census Bureau, American Community Survey

The data show that all housing unit types decreased in relation to their proportion amongst the total population, with the exception of one-unit detached housing, which increased by a 3.9%, not only representing the only increase, but also the greatest change overall. The greatest decrease was among mobile homes which decreased by –2.1%.

**Housing Affordability**

The median value of an owner occupied housing unit in 2008 was \$267,600. Using the industry standard of three (3) times income to afford a median priced home in Peoria, a household would need to earn \$89,200 annually.

Median rent in 2008 was \$988 monthly. Based on HUD standards that a household should not pay more than 30% of its gross income for a housing unit to be considered affordable, a household would need to earn \$39,520 annually to afford the median rent.

**Median Rent and Median Home Value with Income Required for Affordability, 2008**

<b>Geographic Area</b>	<b>Median Rent</b>	<b>Income Required to Afford Median</b>	<b>Median Home Value</b>	<b>Income Required To Afford Median</b>
Maricopa County	\$786	\$31,440	\$236,600	\$78,867
Chandler	\$915	\$36,600	\$298,600	\$99,533
Gilbert	\$1,057	\$44,280	\$340,300	\$113,433
Glendale	\$706	\$28,240	\$236,000	\$78,667
Mesa	\$726	\$29,040	\$222,800	\$74,267
<b>Peoria</b>	<b>\$988</b>	<b>\$39,520</b>	<b>\$267,600</b>	<b>\$89,200</b>
Phoenix	\$718	\$28,720	\$241,900	\$80,633
Scottsdale	\$987	\$39,480	\$491,800	\$163,933

Source: American Community Survey, U.S Census Bureau

- 1) Income to afford median rent calculated by multiplying monthly rent by 12 months, and then dividing result by thirty percent (30%).
- 2) Income to afford a home of median value was calculated by real estate industry standard of multiplying household income by three (3) to determine maximum affordable purchase price.

For purposes of analyzing housing affordability change over time, the City of Peoria General Plan 2010 provided additional information on housing prices. The General Plan demonstrates that the average rent for the City of Peoria has increased 106% since 2000, and the median single-family home value has increased 103% since 2000.

In addition, the General Plan provides a housing analysis showing that the current housing stock will need to meet projected population growth, as shown in the table below.

<b><u>Housing Type</u></b>	<b><u>Population Allocation</u></b>	<b><u>Persons/Household</u></b>	<b><u>Needed Dwelling Units</u></b>
Single-family (75%)	39,145	2.9	13,498
Multi-family (25%)	9,786	1.9	5,151
<b>Total</b>	<b>48,931</b>	<b>n/a</b>	<b>18,649</b>

### Community Housing Affordability Study (CHAS) and the Consolidated Plan

HUD's Community Housing Affordability Study (CHAS) is a commonly-used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

Because 2008 CHAS data was not available for the City of Peoria, the data used in the most recent Peoria Consolidated Plan 2010-2014 was used for this purpose. Per the HUD Fair Housing Planning Guide, the Consolidated Plan combines in a single document the CHAS, the community development plan, and the submission requirements for the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing for Persons with AIDS (HOPWA) programs. The Consolidated Plan more clearly ties the needs assessment, housing market analysis, and the strategy for addressing needs and achieving housing and community development objectives to the use of program funds. Many of the fair-housing problems revolving around the choice in low- and moderate-income housing programs are already addressed in the Consolidated Plan. Peoria's entire Consolidated Plan document is available at <http://www.peoriaaz.gov>.

### National Citizen Survey

The 2010 Peoria National Citizen Survey asked respondents to reflect on the availability of affordable housing as well as the variety of housing options. The availability of affordable housing in Peoria was rated as "excellent" or "good" by 57% of respondents, while the variety of housing options in Peoria was rated as "excellent" or "good" by 69% of respondents. The rating of perceived affordable housing availability was better in the City of Peoria than the ratings, on average, in comparison jurisdictions. To augment the perceptions of affordable housing in Peoria, the cost of housing as reported in the survey was compared to residents' reported monthly income to create a rough estimate of the proportion of residents of the City of Peoria experiencing housing cost stress. About 41% of survey participants were found to pay housing costs of more than 30% of their monthly household income.

### Housing Needs in Peoria

The Peoria Consolidated Plan includes an analysis of housing needs. A household is determined to have a housing problem from the following criteria:

- A housing unit that meets the Census definition of having a physical defect (lacking a complete kitchen or bathroom);
- Persons and families living in overcrowded conditions (greater than one person per room living in a unit); and
- Persons and families cost burdened (paying greater than 30% of income for housing and utilities).

Within the Consolidated Plan, affordable housing is defined as gross housing costs totaling no more than 30% of gross income for the household. A household paying greater than 30% of income toward rent/mortgage is cost-burdened. A household paying greater than 50% of income toward rent/mortgage is severely cost-burdened.

#### Low-Income Households

Within the Consolidated Plan, the term low-income applies to households with income at or less than 50% of the adjusted family median income. The Maricopa Association of Governments (MAG) estimated in 2005 that approximately 4,941 (45%) of households in Peoria, out of 10,981 low-income households, had housing problems. Additionally, of the 10,981 low-income households, approximately 3,400 low-income renters and 1,200 low-income owners were paying more than 30% of their income for housing. These 4,600 cost-burdened, low-income households were further analyzed by MAG, as follows: 2,100 were elderly; 1,200 were small families; 700 were large families; and 600 were “other.”

The Consolidated Plan shows that of the 10,981 low-income households with housing problems, 3,733 (34%) earned less than 30% of family median income. These 3,733 households displayed the following characteristics:

- 78% had one or more housing problem;
- 77% were estimated to be cost-burdened;
- 65% were estimated to be severely cost-burdened;
- 80% of cost-burdened households were paying greater than 50% of their income on housing.

Within low-income renter households, the degree of overcrowding is estimated to be 19% within the 0%-30% median income group, and 17% among the 31%-50% median income group. Within the low-income large family renter households, the degree of overcrowding is estimated to be 80% within the 0%-30% median income group, and 70% among the 31%-50% median income group.

Within low-income owner households, the degree of overcrowding is lower than within renters. According to the 2000 Census, approximately 5% of owners within the 0%-30% median income group were considered overcrowded, and 6% within the 31%-50% median income group.

#### Moderate-Income Households

The term moderate-income applies to households with income greater than 50% but less than or equal to 80% of the adjusted family income. MAG estimated in 2005 that approximately 5,095 (44%) households of the 11,580 moderate-income households in Peoria had housing problems. Additionally, of the 11,580 moderate-income households, approximately 4,211 moderate-income renter and 2,850 moderate-income owners were paying more than 30% of their income for housing. The 4,211 cost-burdened, moderate-income renters were further analyzed by MAG, as follows: 810 were elderly; 2,100 were small families; 450 were large families; and 851 were “other.” Of these households, only 4% of renters and 7% of owners were severely cost-burdened.

Within moderate-income renter households, the degree of overcrowding is estimated to be 13% for households and 55% for large families within the 51%-80% median income group. Within moderate-income owner households, the degree of overcrowding is estimated to be 7%. The Consolidated Plan notes that overcrowding among moderate-income owners is on par with other Arizona cities.

**Middle-Income Households**

The term middle-income applies to households with income greater than 80% but less than or equal to 95% of the adjusted family income. MAG estimated in 2005 that approximately 1,957 (21%) households of the 9,320 middle-income households in Peoria had housing problems. Additionally, of the 9,320 middle-income households, approximately 870 renters and 520 owners were paying more than 30% of their income for housing. The 4,211 cost-burdened, middle-income were further analyzed by MAG, as follows: 150 were elderly; 380 were small families; 160 were large families; and 180 were “other.” There was very little evidence of severe cost-burden among these households.

**Housing Stock Available to Very Low-Income Households**

The table below depicts the housing stock available in Peoria and its neighboring communities affordable to those households earning 50% or less of median income.

Housing Stock Available to Very-Low Income (VLI) Households

Geographic Area	50% Median Owner Income	Total Occupied Owner Units	Number Affordable to VLI Owners	Percentage Affordable to VLI	50% Median Renter Income	Total Occupied Renter Units	Number Affordable to VLI Renters	Percentage Affordable to VLI Renters
Maricopa Co.	\$34,754	910,811	73,274	8.0%	\$18,204	427,237	46,795	11.4%
Chandler	\$41,888	59,184	2,900	4.9%	\$24,040	27,542	3,944	14.9%
Gilbert	\$44,492	47,714	668	1.4%	\$25,553	13,379	1,358	10.4%
Glendale	\$33,723	48,467	4,459	9.2%	\$15,844	28,029	2,538	9.3%
Mesa	\$31,006	112,834	17,038	15.1%	\$17,154	56,040	4,975	9.2%
<b>Peoria</b>	<b>\$36,412</b>	<b>41,554</b>	<b>3,449</b>	<b>8.3%</b>	<b>\$19,632</b>	<b>15,301</b>	<b>5,032</b>	<b>46.1%</b>
Phoenix	\$32,731	295,455	22,750	7.7%	\$16,199	187,755	17,986	9.9%
Scottsdale	\$43,031	66,941	2,276	3.4%	\$24,888	26,415	3,479	13.7%

Source: American Community Survey, US. Census Bureau

- 1) Fifty percent (50%) of estimated 2008 household median income by tenure for each jurisdiction.
- 2) Total and affordable renter units include both units with contract rent and units with no cash rent.

**Housing Stock Available to Disabled Persons**

The most recent comprehensive data on disability status among Peoria’s population was the 2000 Census. Of the civilian non-institutionalized population in Peoria, aged 5 years and over, 18,213 persons had a disability. Within the disabled population, the subpopulations can be broken down, as follows:

Disability Status of Peoria, Arizona Population

Subpopulation Type	# of Persons
Sensory	3,283
Physical	7,528
Mental	4,011
Self-Care	2,342
Going Outside the Home	6,689
Employment Disability	7,313

Source: 2000 U.S. Census

Many of the above individuals have more than one reported disability item, and therefore there is much duplication between categories of disability items. In total, the data indicate that among Peoria’s non-institutionalized population 5 years and older, 18.4% have one or more of the above-listed disability items.

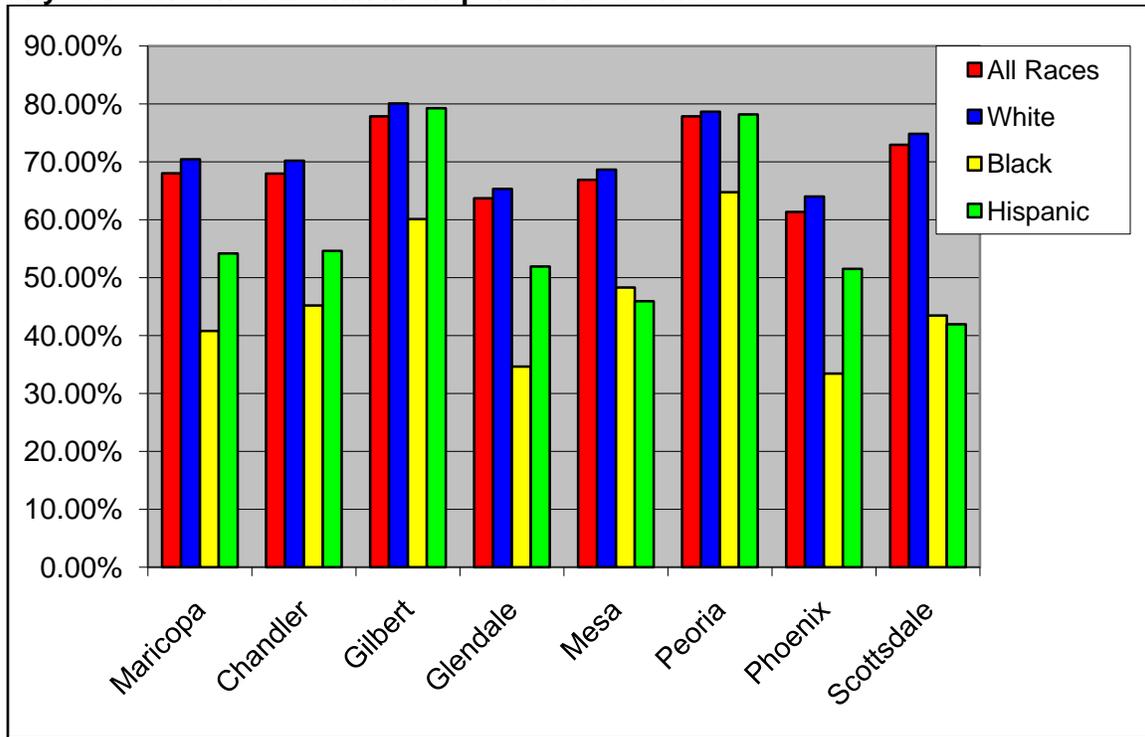
The majority of the identified disabled population is able to live independently with or without supportive services, or is cared for by family members in private housing arrangements. However, the data still indicates the need for specialized housing for disabled persons. The need for specialized housing is dependent on the type of disability. Such housing may be specialized in terms of physical modifications, sleeping accommodations, organizational structure, security monitoring, and staffing with applicable supportive services. Most home features needed to allow independent living by persons with physical mobility disabilities can be incorporated into new construction at marginal cost (estimated at 0.5% additional cost by Arizona Bridge to Independent Living (ABIL)), and without substantially altering the standard unit floor plan. Retrofitting an existing unit is more expensive, and therefore a less cost-effective alternative, but necessary for those disabled households which would like to comfortably “age in place” and not have to move from their long-time homes due to developing physical mobility limitations.

**Homeownership by Race and Ethnicity**

As in most areas of the country, rates of homeownership vary by race/ethnicity in the City of Peoria and its neighboring communities within Maricopa County. The overall rate of homeownership in Peoria, for all races, was 77.8%, significantly higher than that of Maricopa County’s 68.0%. Peoria is fairly unique in that the rates of Hispanic/Latino homeownership were comparable to that of Whites, and exceeded the rates of all the communities as a whole. The homeownership rates in Peoria are: 78.2% for Hispanic/Latino, 78.7% for White, and 64.7% for Black. The homeownership rates for Maricopa County as a whole are 70.4% for White, 54.2% for Hispanic/Latino, and 40.8% for Black. See the below table depicting homeownership rates by race in Peoria and its neighboring communities.

## Homeownership Rates by Race/Ethnicity

### City of Peoria and Phoenix Metropolitan Area Cities



Source: U.S. Census Bureau, American Community Survey, 2008

### Recent City Accomplishments

During the past four completed fiscal years, the City of Peoria made considerable progress towards serving the housing needs of the community with the HUD funding available. The City of Peoria used CDBG, HOME (within a Consortium run by Maricopa County), and more recently, NSP Program funding to provide several housing programs, including:

- Grants for emergency home repairs for homeowners;
- Loans for full rehabilitation of substandard housing; and
- Grants for exterior/interior improvements and ADA retrofitting for the elderly and disabled, and
- Loans for homebuyer assistance.

The table below lists the Assessment of Goals and Objectives, as contained in Peoria's 5<sup>th</sup> Program Year Consolidated Annual Performance and Evaluation Report (CAPER), 2009-2010:

Subrecipient Name	Allocated \$	Activity and Results
Advocates for the Disabled	3,070	Assisted 6 disabled clients in completing disability claims and provided outreach and referrals.
Arizona Bridge to Independent Living (ABIL)	40,940	Assisted 11 persons with home modifications that removed physical barriers to the safe occupancy of the residence.
Benevilla	66,525	Provided adult day care to 63 elderly and disabled residents, including wellness and quality of life counseling.
Boys and Girls Clubs	25,587	Completed renovations at the Wisotsky center in the Varney Neighborhood.
Central Arizona Shelter Services (CASS)	10,235	Replaced furniture at the single adult shelter, Vista Colina.
City of Peoria – Emergency Home Repairs	163,718	Emergency home repairs were made to 40 homes, assisting 64 occupants.
City of Peoria – Homebuyer Assistance	153,520	Provided 12 qualified homebuyers with homebuyer assistance.
Deep Within Recovery	25,587	Rehabilitated dormitory facilities.
First Presbyterian Church	12,440	Installation of energy efficient doors, partitions, and A/C units for the adult day care center.
Habitat for Humanity	4,956	Funding is being used for a larger project.
Homeward Bound	5,151	Provided utility assistance for 15 families living in transitional living at Thunderbird Family Village.
St. Mary's/Westside Food Bank	7,676	Provides food supplies for families and individuals experiencing a financial emergency.

On-Going Actions by the City of Peoria to Promote Fair Housing

The City of Peoria Planning and Community Development Department undertakes actions to promote the awareness of fair housing law and encourage the practice of fair housing. According to the 2009-2010 CAPER, Peoria has implemented the following planned strategies to address fair housing needs:

- Began a regular process of public advertisement that the City supports, and is a resource for information about Fair Housing and Equal Opportunity (FHEO).
- Implemented an informal written complaint resolution guideline/process used in conjunction with public advertisement.
- Conducted two public presentations and made several special outreach meetings concerning the AI, Fair Housing, and the Americans with Disabilities Act (ADA) compliance in relation to Peoria Section 504

compliance. Presentations were made to lenders, Realtors, and non-profit organizations.

- During monitoring of Benevilla on 1/26/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- During monitoring of ABIL on 2/10/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- During monitoring of Habitat for Humanity on 2/25/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- During monitoring of Boys and Girls Club on 3/15/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- During monitoring of St. Mary's Food Bank on 4/22/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- The City adopted a proclamation declaring April to be observed as Fair Housing Month.
- Distributed fair housing information at an annual GAIN (Getting Arizona Involved in Neighborhoods) Night sponsored by the Police Department.
- Included fair housing information in the Community Housing Resource Guide.
- The City secured fair housing training for local staff.
- Fair housing training was made available to residents and landlords in the community.
- The City maintained a fair housing web page with a direct link to the HUD Fair Housing website.
- Staff participated in events sponsored by the Arizona Fair Housing Partnership.
- The City engaged the professional housing community in a discussion of fair housing issues.
- Staff reviewed local ordinances for compliance with the Fair Housing Act and ADA.
- The City displayed fair housing posters in public buildings.
- Included the fair housing logo on local brochures and marketing information.
- Monitored subrecipients for compliance with fair housing and affirmative marketing requirements.

In addition, the City currently funds the following programs:

- A Neighborhood Programs Coordinator serves as a Homeowners Association (HOA) liaison and supervisor of the Neighborhood Pride Program.
- Community Legal Services provides citizens with assistance with legal issues through the Removing Barriers to Justice Program.
- Housing Our Communities provides fair housing education and Realtor training as part of its homebuyer education classes and counseling.

### **Public Housing Authority Policies**

The Peoria Public Housing Authority (PHA) is managed by the Housing Authority of Maricopa County (HAMC). The Peoria PHA provides housing units for low income, elderly, disabled, and other eligible individuals. The PHA also provides rent subsidy to eligible very low-income individuals and families through the Section 8 Housing Choice Voucher Program.

The HUD Section 8 Housing Choice Voucher Program is a federal program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Housing assistance is provided on behalf of the family or individual, and participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. Housing choice vouchers are administered locally by public housing agencies (PHAs). A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live.

The Peoria PHA currently has 82 Section 8 vouchers, and its service area includes 165 portable vouchers (Section 8 vouchers issued by other PHAs). At the time of this publication, the Section 8 voucher application wait list was closed in Peoria.

The Peoria PHA, managed by HAMC, owns 70 public housing units throughout the city. Of those units, 45 are one-bedroom units available for persons with disabilities, and 25 are single-family scattered site residences (3- and 4-bedroom units). There are currently no 2-bedroom units available. Applicants for the units are screened to determine if they meet the federally mandated qualifications of the program. This includes verification and eligibility of income information provided on the application. Income limits for the program eligibility are adjusted according to family size and deductible allowances specified in federal legislation. At the time of this publication, the public housing program application wait list is currently open.

The HAMC owns and/or manages 790 units in 16 communities throughout Maricopa County. The properties are generally located in smaller cities and unincorporated areas of the County. Because of the size of the Phoenix Metropolitan Area, HAMC has divided its operation into four separate areas, each with its own waiting list and area office. In addition to screening for eligibility, applicants are also screened for criminal and drug related activities. It is the goal of the HAMC to provide a safe, comfortable, and drug-free environment for its residents.

Families wishing to apply for a rental unit with the HAMC must complete a written application and submit it to the Main office. Application forms may be downloaded from the HAMC website, or they may be obtained at the main office and any of the area offices. HAMC maintains four separate Public Housing waiting lists for different areas of Maricopa County: The Northwest (Surprise), Southwest (Avondale), East Valley (Mesa) and South Phoenix (Coffelt). Applicants may apply for multiple programs and areas. If an applicant qualifies, a notification letter is sent, providing more information about the application process. The applicant's name is then added to the wait list.

The HAMC website contains information regarding fair housing, as well as a link to HUD's web page for fair housing complaints on their "Frequently Asked Questions" section. The website also contains a link to HUD's document, "Equal Opportunity for All," that provides basic information about the Fair Housing Act. The City of Peoria's Public Housing Program webpage, accessed through the City's home website, provides a link to HUD's Fair Housing webpage. There was no direct link, however, for registering a fair housing complaint via the City of Peoria's website.

### **City Regulatory Review**

The City of Peoria completed a Planning and Zoning Review of Public Policies and Practices to assist with the identification of land use and zoning regulations, practices, and procedures that may act as a barrier to development and the site/use of housing for individuals with disabilities. The following information was garnered from this review:

- Per the Peoria Zoning Ordinance, the term "*handicapped*" means a person whom: (Ord. No. 97-41)
  1. *Has a physical or mental impairment that substantially limits one or more of such person's major life activities;*
  2. *Has a record of having such impairment;*
  3. *Is regarded as having such impairment.*

*However, "handicapped" shall not include current use of or an addiction to a controlled substance as defined in Title 14 Arizona Revised Statutes or Title 21, U.S. Code.*
- The Zoning Ordinance does not deny housing opportunities for disabled individuals with on-site supportive housing services, provided the individuals meet the definition of disabled. Some types of housing (i.e. elderly group homes) are regulated with a minimum separation requirement to ensure the single family character of the area is preserved.
- The Zoning Ordinance definition of "family" limits the number of non-related individuals that may be considered a family to 10, regardless of disability status.
- All exceptions to the Zoning Ordinance that require a Variance, including those for disabled applicants, require a public hearing.
- The City has mixed use Zoning Districts, and Planned Area Developments, that permit a mix of uses. A Senior Citizen overlay Zoning District exists, however this overlay may not be expanded to new properties.

- The Zoning Ordinance does not contain special provisions for making housing accessible to persons with disabilities; this is something that would be regulated by building codes.
- The Zoning Ordinance does not include a discussion of fair housing. Diverse and inclusive housing types are discussed in the General Plan.
- All multiple family projects must meet ADA standards for providing accessible parking. This is regulated through the Building Safety division.
- *A Group Care Facility means a facility licensed by the State of Arizona, other than a detention facility, state institution, foster home or Group Foster home for more than ten children, or unwed mothers and children. (Ord. No. 97-41)*
- *Group Home means a single residential dwelling unit shared as their primary residence by not more than ten qualified handicapped individuals living together as a single housekeeping unit, in which staff persons provide on-site care, training or support for the residents. Group homes include licensed and qualified Adult Residential Care homes pursuant to A.R.S. 36-448, Group Foster Homes, Supervisory Care Homes, Adult Foster Care Homes and Adult Supportive Residential Living Centers. Group Homes shall not include boarding houses, rooming houses or similar enterprises, nursing homes, personal care homes, adult or juvenile detention facilities, recovery facilities, community residential setting facilities, group care facilities, adult day care facilities or Residential Development Disability Facilities regulated pursuant to A.R.S. 36-582. (Ord. No. 97-41)*

According to the FY 2010-2014 Consolidated Plan, the City of Peoria assessed current barriers to affordable housing. That assessment includes the following information:

- The Zoning Ordinance contains the regulatory standards governing development including density, open space, parking, building envelope and the like. There are no requirements to include “affordable housing” in mixed-use or multi-family development projects. The City has historically avoided inclusionary zoning, or stipulations requiring a certain percentage of units of a certain rental range. Market rate and affordable multi-family developments are treated uniformly in the Zoning Ordinance; that is, the development standards are designed to address the impact of the use on adjacent properties without regard to the occupant profile. The occupant profile may change over time (e.g. apartments converted to condominiums) but the impacts from the development type remain constant.
- Requests to rezone a site for a new development must be compliant with the General Plan, unless a concurrent request to amend the Plan is sought. In such cases, site circumstances and the interest from neighboring properties may affect the conditions or limitations placed on the development, such as density caps, height restrictions, setbacks, enhanced design details and landscape buffers. Often, the greatest impediment to denser housing types is neighborhood objections.

- The City continually assesses and modifies its codes and ordinances to remove outdated or ineffective provisions. Each year, staff-initiated amendments are developed and forwarded to the City Council for action. Modifications to the zoning ordinance have allowed greater flexibility in recent years for the development of various housing types, including group homes and care facilities in residential districts.
- Looking ahead, as the City contemplates the location of transit-oriented development locations along Grand Avenue and other corridors, codes will likely require adjustment to respond to these locations. Some of these adjustments may include reduced parking requirements, density and height increases and reduced processing timeframes.
- Non-profit developers are already afforded a reduction in some development plan review fees. The entitlement fees or “planning fees” are assessed at 10% of the normally required fees. These fees include rezone and use permits, site plan review, design review and others.
- The City actively pursues grant opportunities that would aid in the affordable housing mission and has enjoyed recent success in garnering grant funding for Community Housing Development Organization (CHDO) activities. City leadership remains committed to responsible development of affordable housing, both rental and new construction.

The City of Peoria completed a General Plan in 2010. Included in that plan were the following recommendations that could affect fair housing choice. The General Plan states the following objectives:

1. Promote quality residential development through diversity in housing type.
  - Encourage the development of public-private ventures developing low-moderate income housing with local, state and federal funds.
  - Evaluate zoning incentives and regulations that encourage the development of diverse housing types including attached single-family units, townhomes, condominiums, multi-family units, smaller, affordable detached single-family units.
  - Investigate alternative parking requirements to encourage higher densities and lower housing costs in appropriate areas.
  - Review demographic data and respond to housing-type preference trends. The City’s housing stock and Zoning Code should be reviewed against this data to ensure desired housing-types are provided and encouraged.
  - Pursue strategies which encourage a mix of housing types that foster sustainable living and neighborhoods.
2. Encourage owner-occupied units.
  - Utilize available federal, state, regional and local resources and programs to encourage first-time homebuyers.
  - Promote the development of quality workforce housing.
  - Promote the development of high-quality, owner-occupied, multi-story condominium and mixed-use buildings within areas appropriate for urban living, intense employment, entertainment, and/or multi-modal transportation.

- Assist the public in foreclosure prevention through informational meetings and materials and through partnerships with local and federal agencies.
3. Encourage and promote community efforts to revitalize mature neighborhoods.
    - Investigate programs to abate deteriorating neighborhood conditions.
    - Continue to assist, support and expand the efforts of the Neighborhood Pride program.
    - Incorporate funding for right-of-way landscaping along with road maintenance in older mature neighborhoods where landscaping has deteriorated.
    - Enact development regulations that encourage rehabilitation of historically-significant residential buildings, remodeling of older multi-family rental buildings and revitalization of smaller single-family residences.
  4. Provide for adequate housing opportunities for special needs groups.
    - Identify and analyze the housing needs of the special needs populations.
    - Adopt regulations to encourage the development of housing targeted to the special needs groups.
    - Consider special needs housing dispersal requirements to promote diversity throughout the City.
  5. Support programs and agencies that seek to eliminate housing discrimination.
    - Coordinate with appropriate federal, state and local housing providers to ensure that fair housing laws are enforced and the City is accommodating a diversity of housing choices.

According to the 2010 Peoria National Citizen Survey, residents were asked to evaluate the quality of new development, the appearance of the City of Peoria and the speed of population growth. Problems with the appearance of property were rated, and the quality of land use planning, zoning and code enforcement services were evaluated. The overall quality of new development in the City of Peoria was rated as “excellent” or “good” by 69% of respondents. The overall appearance of Peoria was rated as “excellent” or “good” by 65% of respondents and was similar to the benchmark. When rating to what extent rundown buildings, weed lots or junk vehicles were a problem in the City of Peoria, 8% thought they were a “major” problem. The services of land use, planning and zoning and code enforcement were rated above the benchmark, and the services of animal control were rated similar to the benchmark.

## **IV. COMPLIANCE DATA AND ANALYSIS**

### **Introduction**

This section contains an analysis of home loan, community reinvestment and fair housing complaint data. Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data are used in AIs to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist. This section also includes a summary of fair housing legal cases for 2005 to present.

### **CRA Compliance**

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. The Community Reinvestment Act (CRA) requires the FDIC, in connection with the examination of a State nonmember insured financial institution, to assess the institution's CRA performance. A financial institution's performance is evaluated in the context of information about the institution (financial condition and business strategies), its community (demographic and economic data), and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system. These ratings consist of:

- \* Outstanding
- \* Satisfactory
- \* Needs to Improve
- \* Substantial Noncompliance

The FDIC reported that there were no banks based in Peoria assessed for CRA performance. Therefore, for purposes of the AI, banks based in surrounding localities were examined. From 2005 to present, two (2) banks based in Chandler, two (2) banks based in Glendale, four (4) banks based in Scottsdale, and eight (8) banks based in Phoenix received CRA Performance Ratings. All sixteen (16) banks received a rating of "Satisfactory."

(Source: <http://www2.fdic.gov/crapes/>)

### **HMDA Data Analysis**

Home Mortgage Disclosure Act (HMDA) data consists of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions and some mortgage companies. The data contains information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data deemed most pertinent to this report and analyzed herein is limited to loan denial rates by location within areas of racial/ethnic and income distinction for loans for 1 – 4 family dwellings and manufactured homes, but excluding data on loan applications for investment purposes (non-owner occupancy). Three types of loan products were included: home-purchase loans (conventional and government-backed), re-financings, and home improvement loans.

HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tract comprising the City of Peoria. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the City as a whole, and those with a significantly higher minority concentration than the City-wide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the Census Tract in which the subject property of the loan was located to identify if there were any discernable patterns that might suggest discriminatory lending practices based on race.

It should be noted that some Census Tracts include areas both within and outside the municipal bounds of the City of Peoria. In best effort to most accurately portray HMDA data for the City, only those tracts were utilized which were either entirely within the City or whose area fell predominantly within City boundaries. Certain tracts where only a small area fell within the City boundaries were excluded from the calculations. It should be noted discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display patterns in lending to indicate potential problem areas.

#### General Loan Application Data

The most recent available HMDA data was for the 2009 calendar year, and was utilized in this analysis (extracted from HMDA Aggregate Table 1, 2009). In summary, among the Census Tracts analyzed, there were 6,491 loan applications made for purchase, refinancing, or improvement of owner-occupied homes. Of this total, 1,321 (20.4%) applications were denied. The following table shows a break-down of Census Tract data extracted from HMDA.

**Loan Applications and Denials,  
Minority Percentage, and Percent of MSA  
Median Income by Census Tract**

Census Tracts	Applications	Denials	Denial Rate	% Minority	% of MSA Median Income
303.40	274	54	19.7%	14%	123%
303.41	180	22	12.2%	2%	114%
303.68	233	28	12.0%	3%	129%
303.69	70	12	17.1%	7%	78%
303.71	1,396	258	18.5%	12%	119%
303.73	415	84	20.2%	16%	143%
715.07	260	59	22.7%	15%	127%
715.08	364	62	17.0%	16%	131%
715.09	249	46	18.5%	17%	153%
715.10	212	41	19.3%	19%	160%
715.12	319	64	20.1%	19%	138%
715.13	109	27	24.8%	15%	157%
718.01	195	44	22.6%	3%	80%
718.02	130	26	20.0%	3%	70%
719.03	241	59	24.5%	25%	102%
719.04	260	69	26.5%	36%	97%
719.06	255	72	28.2%	39%	98%
719.08	183	49	26.8%	35%	94%
719.09	162	29	17.9%	26%	92%
719.10	218	54	24.8%	39%	92%
719.11	165	31	18.8%	32%	116%
923.10	36	12	33.3%	42%	56%
927.04	2	1	50.0%	83%	78%
927.07	327	66	20.2%	20%	104%
927.08	66	14	21.2%	21%	124%
927.09	170	38	22.4%	33%	113%
	<b>6,491</b>	<b>1,321</b>	<b>20.4%</b>		

**Source:** Data extracted for City of Peoria from HMDA, Aggregate Table 1, 2009

1. Census Tracts where the denial rate exceeds the City average of 20.4% are highlighted in YELLOW.
2. "Minority" Tracts are those where the minority % exceeds the City total (16%) by at least 10%. These are highlighted in RED.

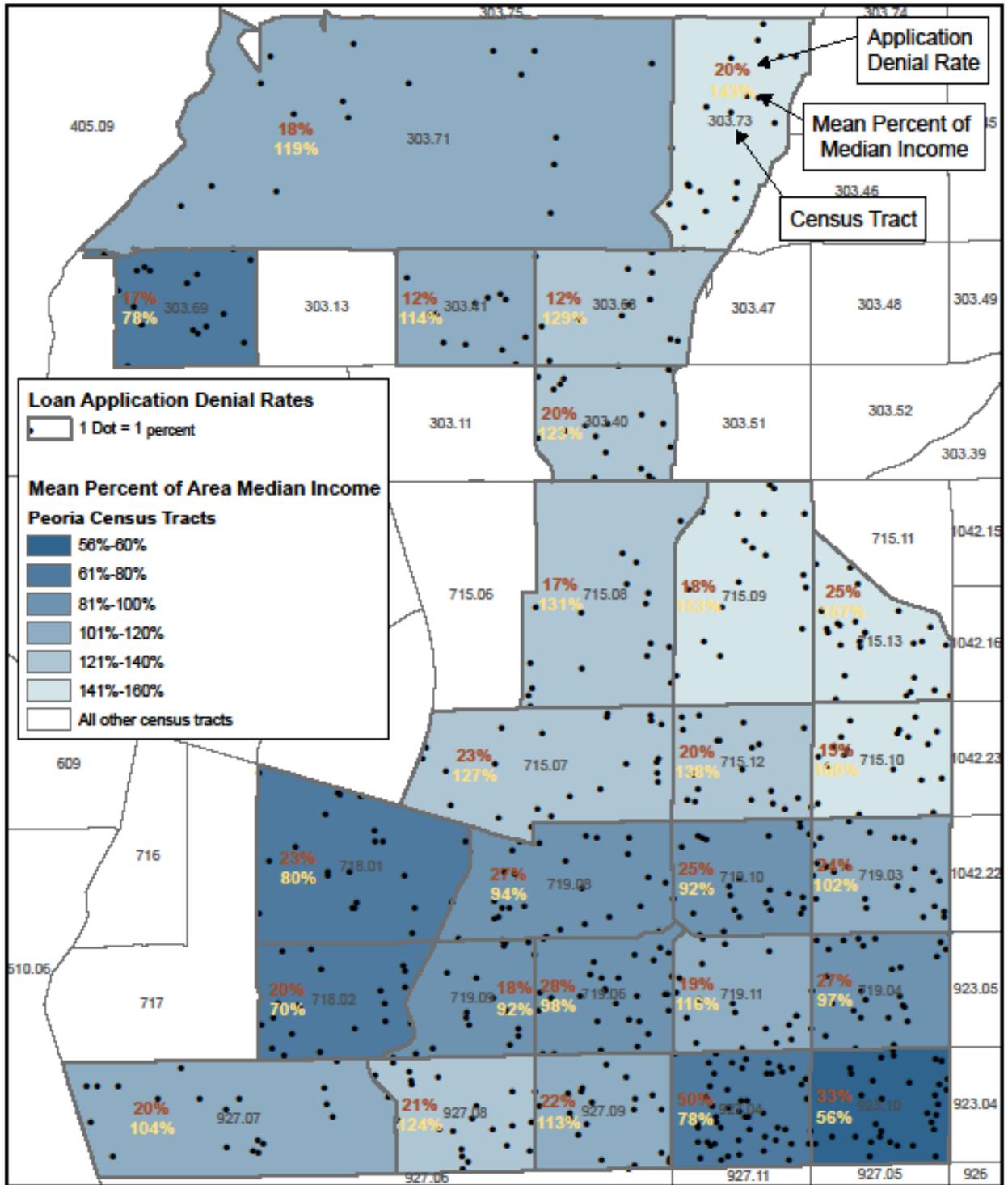
### Analysis of Denial Rates for Minority Census Tracts

For purposes of this analysis, a “minority” tract is defined as a Census Tract where the minority concentration is at least ten percent (10%) greater than that of the City of Peoria as a whole (16%). Therefore, tracts with 26% or greater minority population were considered “minority.”

Among all twenty-six (26) identified Peoria tracts, nine (9) or 35% met the definition of “minority.” Of these, seven (7) or 78% had a denial rate higher than that of the City as a whole (20.4%). Collectively, among these “minority” tracts, there were 1,451 loan applications and 355 denials, equating to a denial rate of 24.5%, which exceeds that of the City by approximately 4%. This variance may indicate the existence of some discrimination in lending based on property location in areas of minority concentration. However, a few factors, including the inclusion of income characteristics in the analysis, yield a different conclusion.

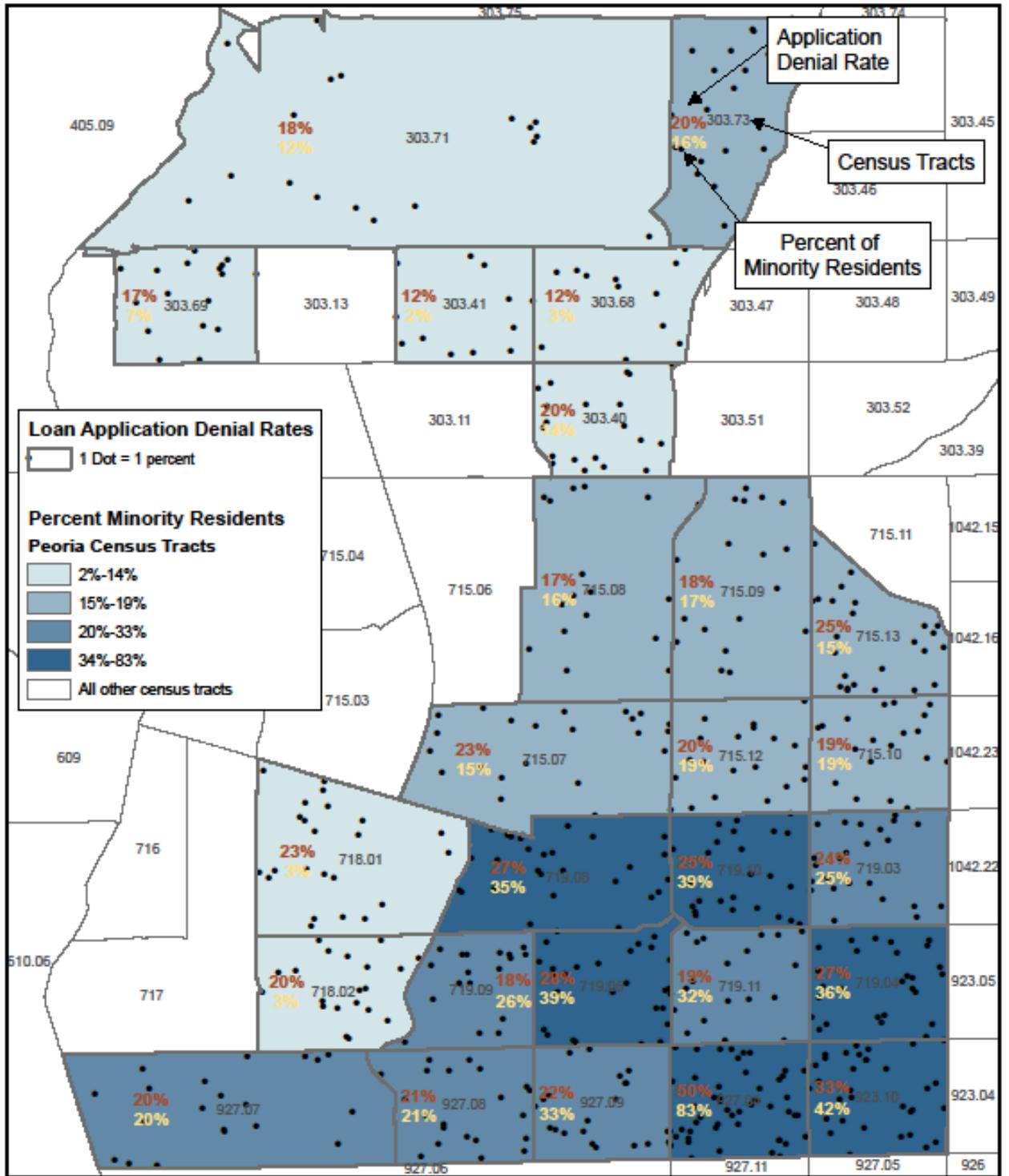
As was previously noted, the City of Peoria exhibits a median income higher than that of the Phoenix-Mesa-Scottsdale MSA. Accordingly, the majority of tracts within Peoria exhibit median incomes greater than that of the MSA. Ten (10) or 38% of Peoria tracts had median incomes lesser than that of MSA, and only three (3) tracts (12%) met HUD’s definition of low- and moderate-income (not greater than 80% of Area Median Income). Of the ten with lower median income tracts, five of them were over 90% of MSA median income. It should be noted that of these three (3) low/mod “minority” tracts, one tract showed a high denial rate for that tract of 50% and incomes at 78% of MSA median income – but this tract contained only 2 applications and 1 denial, indicating a very small number of actual residences.

In looking at all twenty-six (26) Peoria tracts in the analysis, twelve (12) or 46% had denial rates higher than the City average. Only two (7.7%) “minority” tracts had a denial rate lower than the City average. However, there were only three lower income census tracts in the City that were not minority. Of these, two (67%) had a denial rate lower than the City average. It is important to note a connection appears to exist between lower income, minority areas, and higher than average application rates. Maps on the following pages illustrate the preceding analysis.



## Mortgage Loan Application Denial Rates by Income Peoria 2009

Source: 2009 HMDA  
 Analysis by: Christopher Plummer, ASK Development Solutions  
 Prepared by: Center on Urban Poverty and Community Development  
 Mandel School of Applied Social Sciences  
 Case Western Reserve University  
 April 19, 2011



## Mortgage Loan Application Denial Rates by Percent of Minority Residents Peoria 2009

Source: 2009 HMDA  
 Analysis by: Christopher Plummer, ASK Development Solutions  
 Prepared by: Center on Urban Poverty and Community Development  
 Mandel School of Applied Social Sciences  
 Case Western Reserve University  
 April 19, 2011

**Data for Phoenix-Mesa-Scottsdale MSA**

The HMDA data for the Phoenix-Mesa-Scottsdale MSA was provided in a format that permitted a more detailed analysis in terms of origination by specific level of minority concentration, and by specific level of income within census tract of property location.

In total (all loan products combined: conventional loans, refinancings, and home improvement loans for 1-4 family and manufactured home dwellings), there were significant variances in rates of loan origination between tracts of different minority compositions. Rates of loan origination were 62.3% in tracts with less than 10% minority compositions; 57.9% in tracts with 10-19% minority composition; 55.7% in tracts with 20-49% minority composition; 46.5% in tracts with 50-79% minority composition; and 35.2% in tracts with 80-100% minority composition. This data reveals that the higher the concentration of minorities in a census tract, the lower the rate of originations – or a negative correlation between origination rates and minority composition of the property location.

**Loan Origination Rates by Minority Concentration in a Census Tract of Property Location, Phoenix-Mesa-Scottsdale MSA**

<u>Racial Composition</u>	Total, All Loan Products		
	Applications	Originations	%
Less than 10% Minority	38,167	23,773	62.3%
10-19% Minority	49,788	28,842	57.9%
20-49% Minority	60,335	33,629	55.7%
50-79% Minority	15,412	7,167	46.5%
80-100 Minority	3,050	1,074	35.2%

Source: HMDA Aggregate Tables 7-2, 7-3, 7-4, 2009

There were also significant variances in the rates of loan origination between lower income and higher income census tracts. Rates of loan origination were 34.7% in the low income tracts, 47.1% in the moderate income tracts, 55.2% in the middle income tracts, and 60.9% in the upper income tracts. This data reveals that the lower the income characteristic of the census tract, the lower the rate of loan origination – or a positive correlation between rate of loan origination and income characteristic of the property location.

**Loan Origination Rates by Income Characteristic in a Census Tract of Property Location, Phoenix-Mesa-Scottsdale MSA**

<u>Income Characteristics</u>	Total, All Loan Products		
	Applications	Originations	%
Low Income	1,176	408	34.7%
Moderate Income	23,514	11,076	47.1%
Middle Income	61,458	33,914	55.2%
Upper Income	80,558	49,063	60.9%

Source: HMDA Aggregate Tables 7-2, 7-3, 7-4, 2009

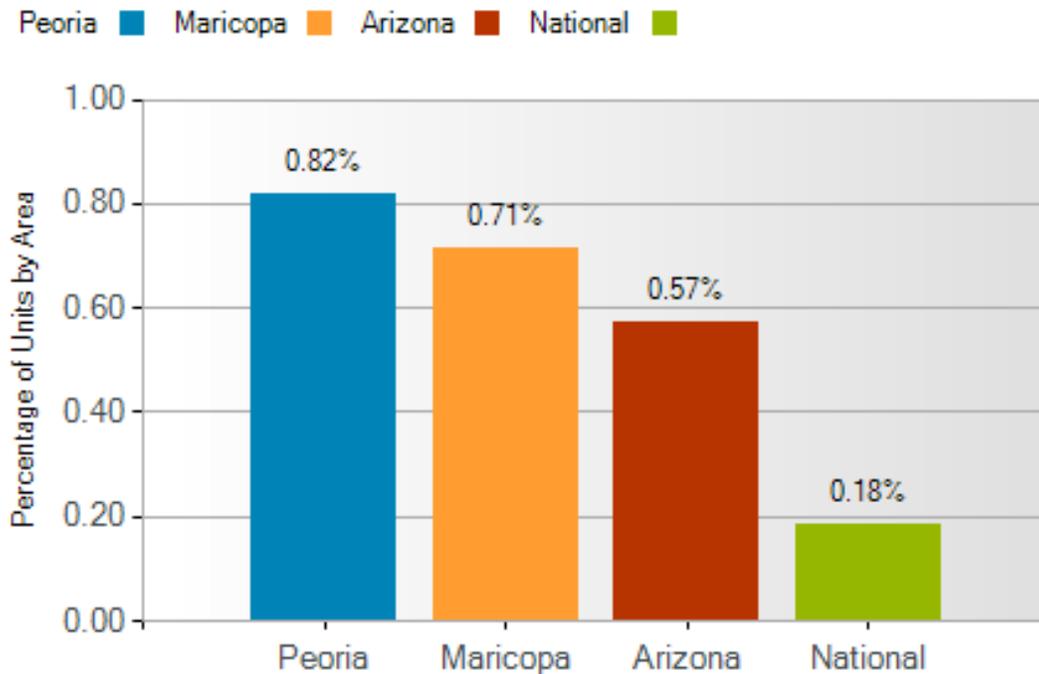
This data does not allow a conclusion to be drawn regarding possible discrimination in lending based on minority racial/ethnic characteristics of the property location. Drawing a definitive conclusion would require a much greater degree of statistical analysis, taking into consideration other applicant characteristic factors effecting underwriting decisions in the MSA.

### Foreclosure Data

The southwestern region of the United States, in particular the State of Arizona and the Phoenix-Mesa-Scottsdale MSA, has been hard hit by the recent home foreclosure crisis. Unfortunately, the City of Peoria was not spared the damaging effects of this trend. For further analysis, data was gathered from RealtyTrac.com. RealtyTrac is recognized as the most comprehensive, one-stop source of foreclosure data. The RealtyTrac data management system was utilized to gather the figures and charts cited herein, including homes in pre-foreclosure, at auction, and bank-owned (REO) properties.

The following foreclosure data was obtained by RealtyTrac and is presented as it was available in April 2011. When compared to Maricopa County, the State of Arizona, and the U.S. as a whole, Peoria currently has a higher foreclosure rate (0.82% of units) than all units of comparison: Maricopa County at 0.71% of units; Arizona at 0.57% of units; and U.S. at 0.18% of units.

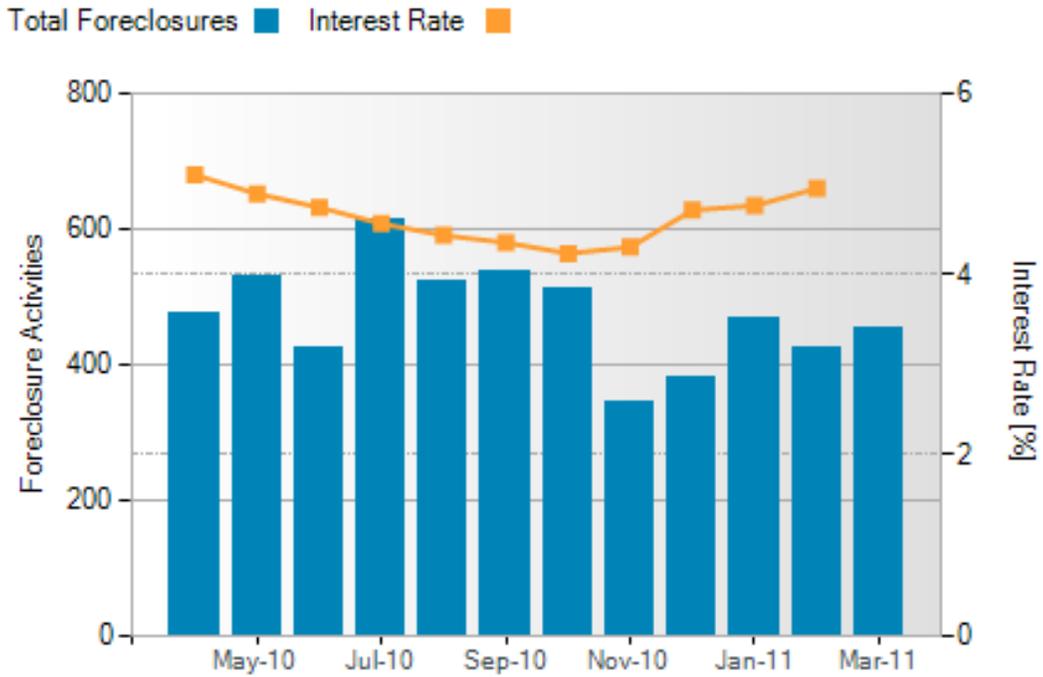
### Current Foreclosure Rate Comparison



RealtyTrac also tracks current foreclosure activity and interest rates on 30-year mortgages. In summer 2010, as interest rates continued to drop below 6%, the foreclosure activity in Peoria peaked at over 600 foreclosure activities. November 2010 showed a drop in foreclosure activity for the 10-month period

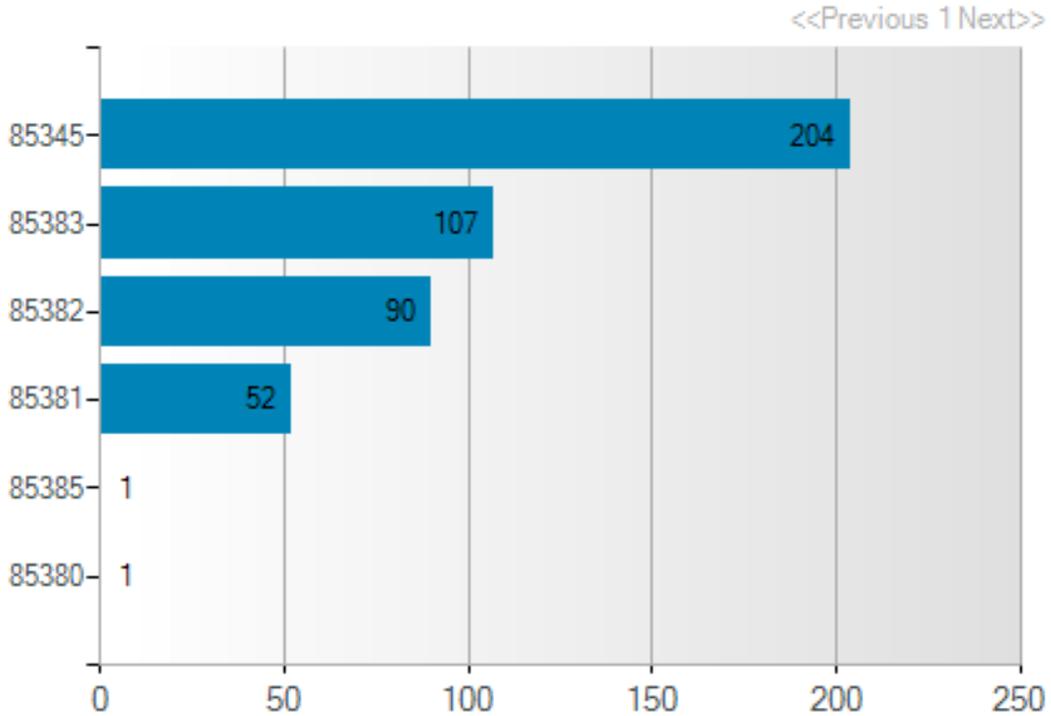
that was tracked. Even as interest rates have climbed somewhat in 2011, foreclosure activity has remained fairly steady at slightly over 400 total foreclosures.

**Foreclosure Activity and 30-Year Interest Rates – Peoria AZ**



The following foreclosure data was available from RealtyTrac by zip code. It must be noted that some of the zip codes, particularly zip code 85345, include unincorporated areas or other areas outside the municipal bounds of Peoria.

**New Foreclosure Activity by Zip Code – March 2011 – Peoria AZ**



**Fair Housing Complaint Data**

The Arizona Fair Housing Act (AFHA) of 1991 (ARS § 41.1491) provides the same substantive protections as the Federal Fair Housing Act; however, it provides different procedures for the administrative complaint processing. The AFHA also amended the Arizona Landlord and Tenant Act to bring it into compliance with the State Fair Housing Statute. Because AFHA is essentially the same as the FHA, and the Arizona Attorney General has both the administrative capability and fiscal ability to carry out the law, Arizona law has been federally designated as “Substantially Equivalent.” As a result of this designation, under the Federal Fair Housing Assistance Program (FHAP), HUD contracts with the Arizona Attorney General’s (AG) Civil Rights Division to investigate and rule on many fair housing cases on its behalf.

Citizens of Peoria who believe they have experienced fair housing discrimination may file their complaints through the following entities: the Arizona Attorney General’s office, HUD’s Office of Fair Housing and Opportunity (FHEO), the Arizona Fair Housing Center, and the Southwest Fair Housing Council. Arizona State Law gives the Arizona Attorney General administrative authority over the Fair Housing Act, including taking and investigating complaints. However, the Attorney General may refer complaints to organizations in the State with substantial equivalency (determined by HUD) and/or towns or cities in Arizona of more than 350,000 persons that have adopted a local fair housing ordinance. As part of the AI, these organizations were contacted and requested to provide summary information about cases that had been filed by or against organizations or residents in Peoria.

Arizona Attorney General, Civil Rights Division

The Arizona Attorney General Civil Rights Division investigates and resolves housing discrimination complaints and has a cooperative agreement with HUD to investigate housing discrimination complaints in Arizona. It also mediates and conciliates complaints and can bring legal action, if reasonable cause is determined, on an individual's behalf if no solution can be found prior to litigation being initiated. Most housing discrimination charges filed with the Attorney General's (AG) Office are considered to be dual-filed with the United States Department of Housing and Urban Development (HUD). There is no cost to file a housing discrimination complaint with the Civil Rights Division or HUD. Fair housing complaints must be filed within one year after the discriminatory act(s).

In 2008, the AG's Office Civil Rights Division received the highest honor given by HUD for outstanding programs that address fair housing issues, the Blue Ribbon Award. The citation praised the Office's leadership in attacking predatory lending and resolving building design issues that affect handicapped residents, and commends the Office's outreach and education efforts.

The following tables illustrate all fair housing complaints involving properties in Peoria, as investigated by the Arizona AG's office. The tables show complaints in two sets: 2000 to 2004, and 2005 to present, along with the basis of the complaint, description, and reason for closure. The fair housing complaint data for 2000-2004 illustrates a proportionately large number of complaints based on discrimination due to a disability. These complaints show a successful conciliation/settlement or no cause determination. Based on the fair housing complaint data included in the 2005-2011 tables, it is evident that over half of all fair housing complaints handled by the AG's office were deemed to have no cause determination.

**Fair Housing Complaints Involving Properties in Peoria, Arizona  
January 1, 2000 through December 31, 2004**

	<b>HUD Date Filed</b>	<b>F = FHAP Processed H = HUD Processed</b>	<b>Basis</b>	<b>Description of Complaint</b>	<b>Date Closed by HUD</b>	<b>Why File Was Closed/ Resolution</b>
1	01/31/2000	F	Race	Discriminatory refusal to rent and negotiate for rental. Discrimination in terms/conditions/privileges relating to rental.	08/11/2000	No cause determination.
2	05/15/2000	F	Disability	Non-compliance with design and construction requirements (handicap).	06/12/2001	Conciliation/ settlement successful.
3	05/25/2000	F	Disability	Non-compliance with design and construction requirements (handicap).	06/18/2001	Conciliation/ settlement successful.
4	05/15/2000	F	Disability	Non-compliance with design and construction requirements (handicap).	02/14/2001	Conciliation/ settlement successful.
5	05/15/2000	F	Disability	Non-compliance with design and construction requirements (handicap).	05/23/2003	Conciliation/ settlement successful.
6	01/23/2001	F	Disability	Discrimination in terms/conditions/privileges relating to rental. Failure to make reasonable accommodation.	06/05/2001	No cause determination.
7	02/26/2001	F	Disability	Failure to make reasonable accommodation.	06/21/2002	Conciliation/ settlement successful.
8	02/27/2002	F	Disability	Failure to make reasonable accommodation.	06/30/2002	No cause determination.
9	05/15/2002	F	Race, Color	Discrimination in the making of loans.	10/24/2003	No cause determination.
10	06/11/2002	F	Disability	Failure to make reasonable accommodation.	01/09/2003	Conciliation/ settlement successful.

Source: Arizona Attorney General, Civil Rights Division

**Fair Housing Complaints Involving Properties in Peoria, Arizona  
January 1, 2005 through February 10, 2011**

	<b>HUD Date Filed</b>	<b>F = FHAP Processed H = HUD Processed</b>	<b>Basis</b>	<b>Description of Complaint</b>	<b>Date Closed by HUD</b>	<b>Why File Was Closed/ Resolution</b>
1	10/23/2010	H	Disability	Discriminatory refusal to rent. Discriminatory acts under Section 818 (coercion, etc.). Failure to make reasonable accommodation.	n/a	n/a
2	02/24/2005	F	Race	Discriminatory terms, conditions, privileges or services and facilities.	07/11/2005	No cause determination.
3	06/24/2005	F	Race, Sex	Discriminatory refusal to sell and negotiate for sale.	01/06/2006	No cause determination.
4	12/01/2005	F	Race, Disability	Discriminatory refusal to rent and negotiate for rental. Discriminatory acts under Section 818 (coercion, etc.). Failure to make reasonable accommodation.	03/06/2006	No cause determination.
5	03/15/2006	F	Race, Disability, Family Status	Discriminatory refusal to sell and negotiate for sale.	07/03/2006	No cause determination.
6	03/23/2006	F	Retaliation	Discriminatory refusal to rent.	06/30/2006	No cause determination.
7	07/31/2006	F	Race	Discrimination in terms/conditions/privileges relating to rental. Failure to comply with poster regulations.	01/25/2007	No cause determination.
8	08/24/2006	F	Race	Discriminatory refusal to rent. Discriminatory refusal to rent and negotiate for rental. Discriminatory advertising, statements, and notices. Discriminatory terms, conditions, privileges, or services and facilities.	12/09/2008	FHAP judicial consent order.
9	10/10/2006	F	Disability	Non-compliance with design and construction requirements (handicap).	08/23/2007	Conciliation/ settlement successful.
10	10/10/2006	F	Race	Discriminatory refusal to rent. Discrimination in services and facilities relating to rental.	01/31/2007	No cause determination.
11	02/12/2007	F	Disability	Failure to make reasonable accommodation.	05/11/2007	Complainant failed to cooperate.

City of Peoria Analysis of Impediments to Fair Housing Choice 2011

12	02/12/2007	F	Disability	Failure to make reasonable accommodation.	06/25/2007	No cause determination.
13	03/01/2007	F	Disability, Retaliation	Discrimination in terms/condition/privileges relating to sale. Failure to make reasonable accommodation.	04/18/2007	No cause determination.
14	06/08/2007	F	Race	Discriminatory terms, conditions, privileges, or services and facilities.	09/21/2007	No cause determination.
15	07/13/2007	F	Race	Discriminatory advertising, statements, and notices. Discriminatory terms, conditions, privileges, or services and facilities.	10/02/2007	No cause determination.
16	08/29/2007	F	Religion	Discrimination in terms/conditions/privileges relating to rental.	11/13/2007	No cause determination.
17	07/09/2007	F	Other Origin, - Italian	Discriminatory terms, conditions, privileges, or services and facilities.	11/21/2007	No cause determination.
18	07/26/2007	F	Disability	Discriminatory terms, conditions, privileges, or services and facilities.	11/07/2007	No cause determination.
19	10/01/2007	F	Disability	Discriminatory terms, conditions, privileges, or services and facilities. Failure to make reasonable accommodation.	12/03/2007	Complaint withdrawn by complainant after resolution.
20	03/06/2008	F	Race	Discriminatory terms, conditions, privileges, or services and facilities.	06/05/2008	No cause determination.
21	04/17/2008	F	Sex, Other Origin, - Jamaican	Discrimination in terms/condition/privileges relating to sale.	07/21/2008	No cause determination.
22	06/17/2008	F	Disability	Failure to make reasonable accommodation.	09/29/2008	No cause determination.
23	07/31/2008	F	Disability	Discriminatory refusal to rent.	08/11/2008	Complaint withdrawn by complainant after resolution.
24	09/05/2008	F	Disability	Discriminatory refusal to rent. Failure to make reasonable accommodation.	10/14/2008	Complaint failed to cooperate.
25	12/19/2008	F	Disability	Other discriminatory acts.	03/02/2009	No cause determination.

City of Peoria Analysis of Impediments to Fair Housing Choice 2011

26	05/15/2009	F	Family Status	Discriminatory terms, conditions, privileges, or services and facilities.	07/13/2009	Complaint withdrawn by complainant after resolution.
27	07/08/2010	F	Sex, Family Status	Discriminatory refusal to rent and negotiate for rental. Discrimination in terms/conditions/privileges relating to rental.	09/07/2010	No cause determination.
28	07/28/2010	F	Disability, Family Status	Discriminatory refusal to rent and negotiate for rental.	11/09/2010	No cause determination.
29	09/21/2010	F	Family Status	Discriminatory refusal to rent and negotiate for rental. Discriminatory advertising, statements and notices.	n/a	No cause determination.
30	10/04/2010	F	Race	Discrimination in terms/conditions/privileges relating to rental.	11/09/2010	Complainant failed to cooperate.
31	10/04/2010	F	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities.	n/a	No cause determination.
32	11/01/2010	H	Disability	Discriminatory financing (includes real estate transactions). Discrimination in terms/conditions/privileges relating to sale. Discriminatory acts under Section 818 (coercion, etc.).	n/a	n/a

Source: Arizona Attorney General, Civil Rights Division

## **Legal Cases**

According to the Arizona AG's Office, the AG Civil Rights Division has litigated one lawsuit involving property in Peoria since 2005.

### ***State of Arizona v. Barbara Stanislawa Ogorzaly, 2006***

In this fair housing case, the Division filed a lawsuit against a landlord and Keller Williams Realty alleging that the Defendants had discriminated against prospective renters because of their race. It was discovered during the lawsuit that the landlord told her real estate agent that she would not rent to an African-American couple. The real estate agent relayed this information to the couple's real estate agent, and the landlord then made it very difficult for the couple to qualify to rent from her. The couple eventually gave up and found other housing.

The case was resolved via a Consent Decree wherein the defendants paid the charging parties \$55,000. Defendant Keller Williams also agreed to create policies prohibiting discrimination and to guide agents in handling clients who are engaged in discriminatory acts. In addition, the Consent Decree required Keller Williams to provide training on its new policies to its agents. The Consent Decree also resulted in a Town Hall meeting at Glendale Community College that addressed the impact of housing discrimination, ways to change discriminatory attitudes and specific steps that real estate professionals can take to help eradicate housing discrimination. This forum was jointly sponsored by the Attorney General's Office and Keller Williams.

## V. PUBLIC OUTREACH

### Introduction

This section summarizes the results of the surveys, public meetings, and key person interviews conducted as part of the public outreach process for the City of Peoria AI. In addition, this section gives a brief overview of fair housing public outreach conducted by stakeholders in Peoria. The consultant conducted an online and written survey available to all Peoria residents and industry stakeholders. The survey asked respondents about their experience and perception of housing discrimination, knowledge of fair housing laws, utilization of Peoria's housing assistance and social service programs, and opinions about housing and social service needs in the city. ASK also directly administered surveys, conducted public meetings, and held key person interviews with members of the Subcommittee for Not-For-Profit Review and Housing, the Public Housing Authority, community groups, City of Peoria staff, nonprofit agencies, and area real estate agents.

ASK developed fair housing surveys for citizens, housing service providers, Realtors, and lending institutions. Flyers with the direct survey link were posted in public libraries and distributed at the community's first Baseball Spring Training event. Copies of the flyer, survey link, and survey were sent to the City's Communication Department for posting on the city's public television channel.

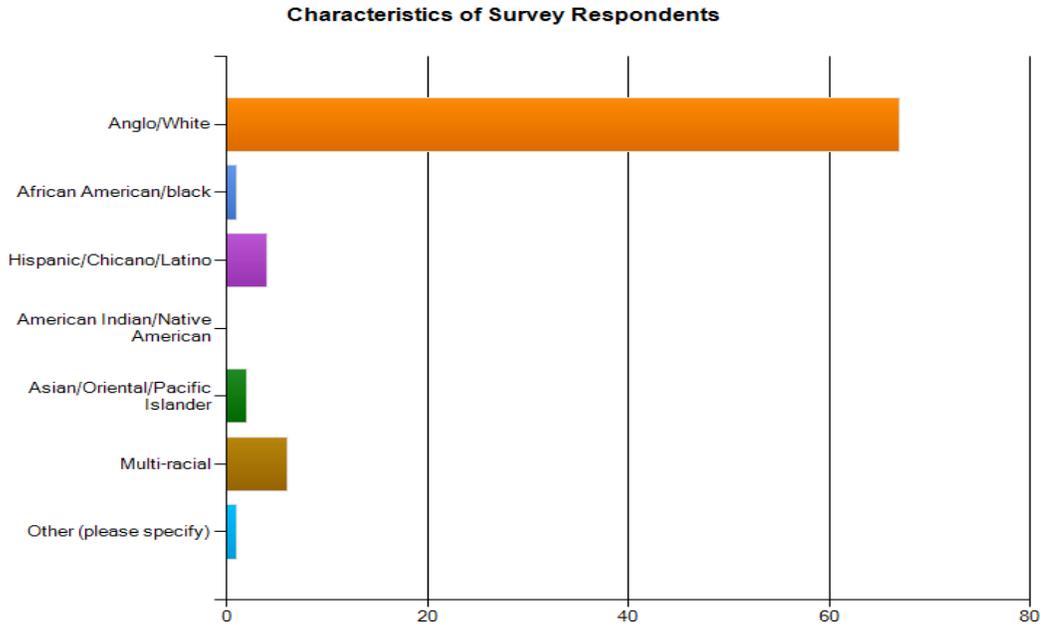
Please refer to the Appendix section of the AI to view the survey instrument. The findings from these activities are discussed in the following section.

### Citizen Surveys

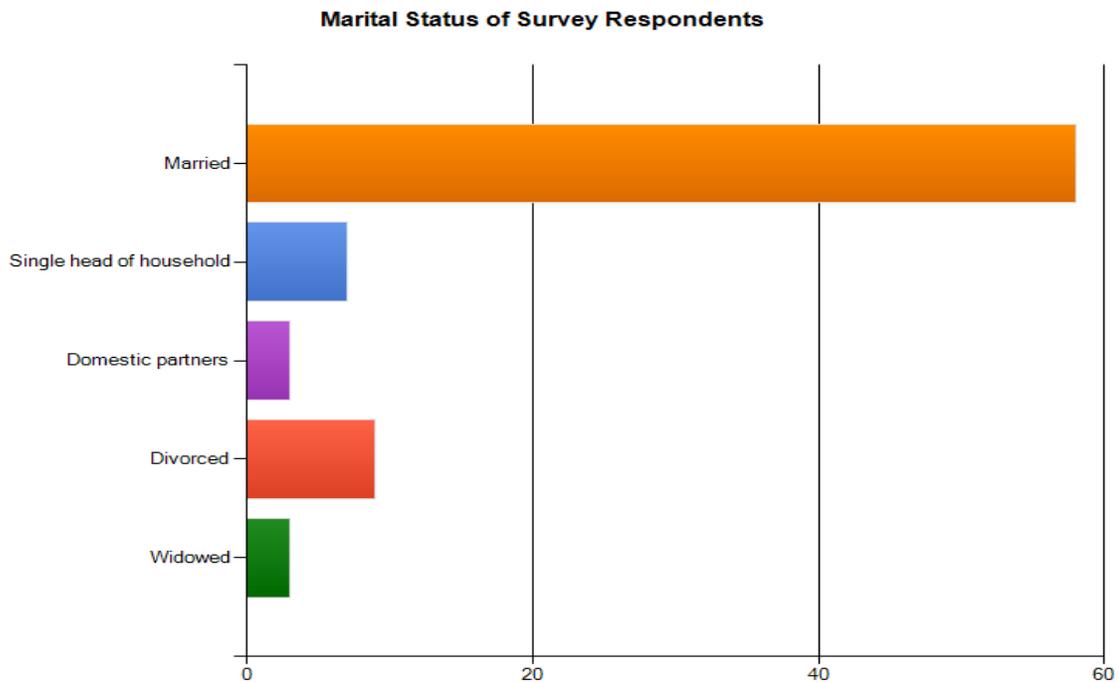
An online, 30-question fair housing survey was designed by ASK and available for all residents to complete via <http://www.surveymonkey.com>, and as distributed by City of Peoria staff. The survey was open in the month of January and was completed by 82 persons in the community, 72 (89%) of which were Peoria residents. A copy of a flyer with survey information was distributed as follows:

- posted in the Peoria Public Library;
- distributed at the February 26<sup>th</sup> Baseball Spring Training Fan Fest event in Peoria;
- given to the City Communication Department to be included on the Community Bulletin Board on Community Cable Channel 11;
- posted with a direct survey link on the City's website; and
- made available with questionnaires at the Peoria Housing Authority office.

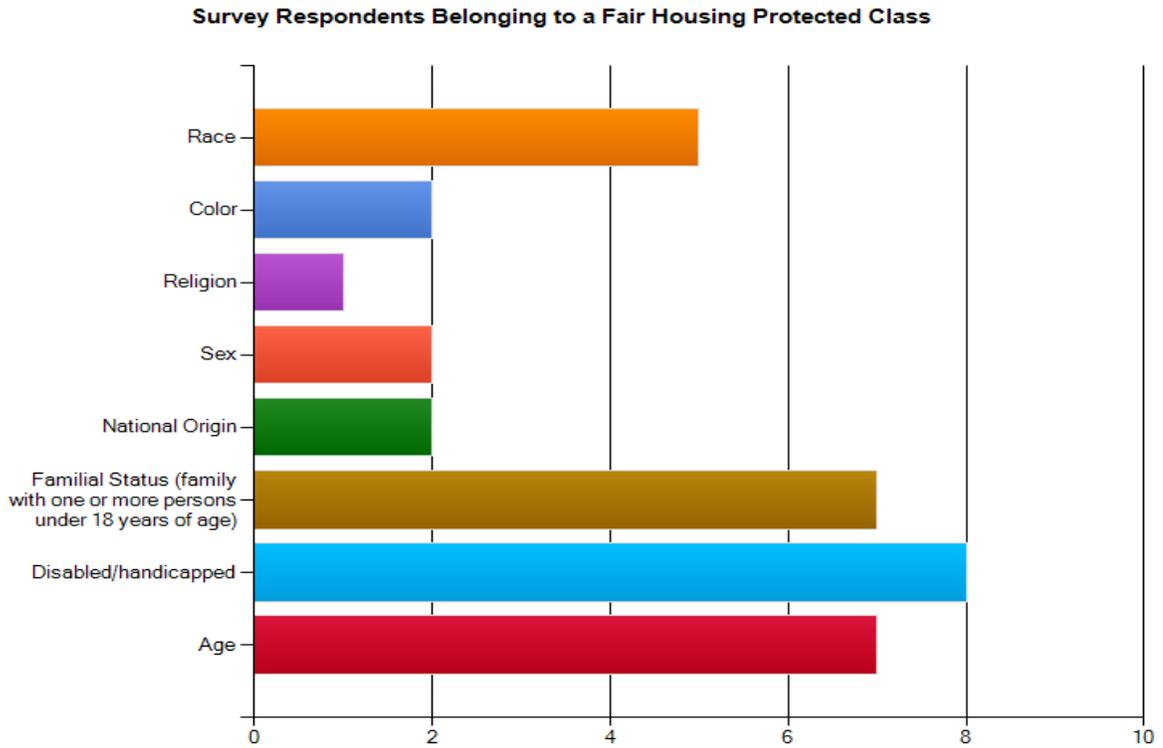
All surveys stated that copies of the survey were available in hard copy and alternative format.



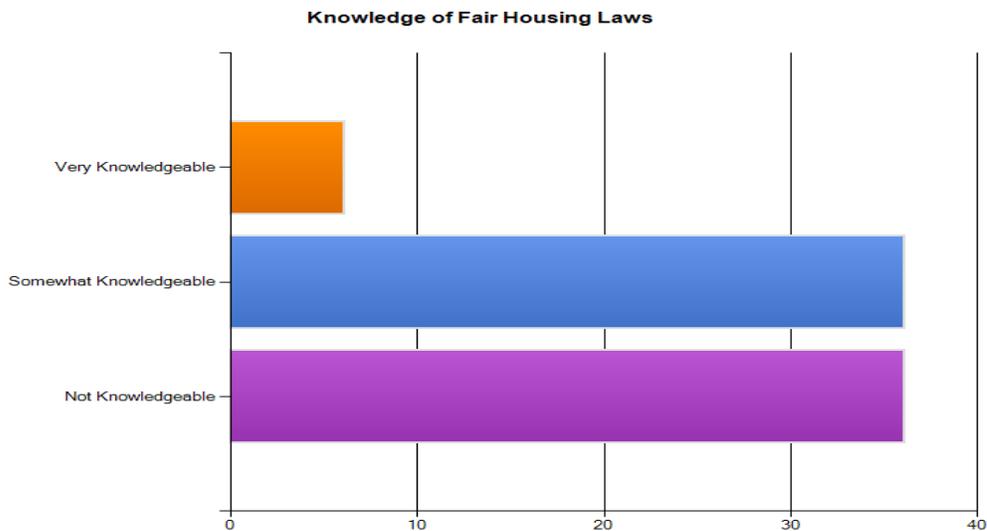
Of the citizens surveyed, 67 persons (82.7%) are White, 1 (1.2%) are Black, 4 (4.9%) Hispanic, 0 (0%) are American Indian, 2 (2.5%) are Asian, 6 (7.4%) are Multi-racial, and 1 (1.2%) are other races. This compares to the racial makeup of Peoria: White (84.0%), Black (3.2%), Hispanic (9%), American Indian (0.7%), Asian (2.8%), and other races, including two or more races (9.2%).



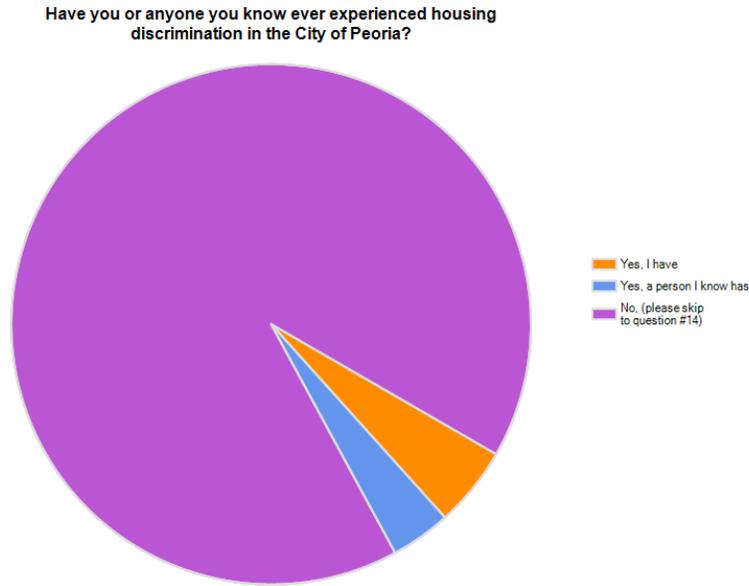
Of the citizens surveyed, 58 persons (72.5%) are married, 7 (8.8%) are single head of household, 3 (3.8%) are domestic partners, 9 (11.3%) are divorced, and 3 (3.8%) are widowed.



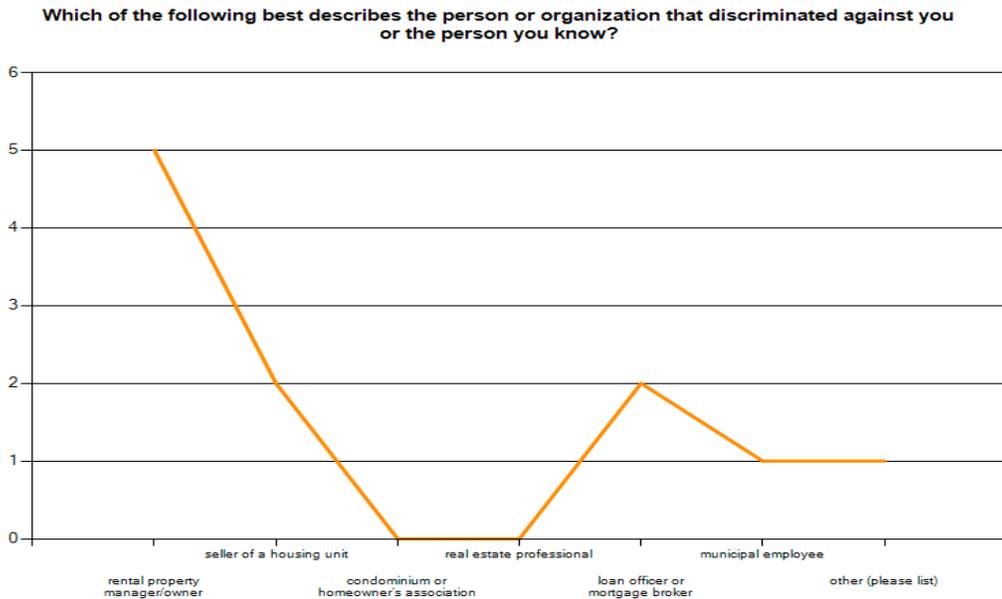
Of the 24 survey respondents that considered their household to belong to a protected class, the classification breakdown is as follows: 5 (21%) self-identified by Race; 2 (8%) by Color; 1 (4%) by Religion; 2 (8%) by Sex; 2 (8%) by National Origin; 7 (29%) by Familial Status; 8 (33%) by Disability; and 7 (29%) by Age.



Of the 78 respondents that answered the question regarding Fair Housing laws, only 6 (7%) consider themselves to be Very Knowledgeable, 36 (46%) are Somewhat Knowledgeable, and 36 (46%) are Not Knowledgeable.

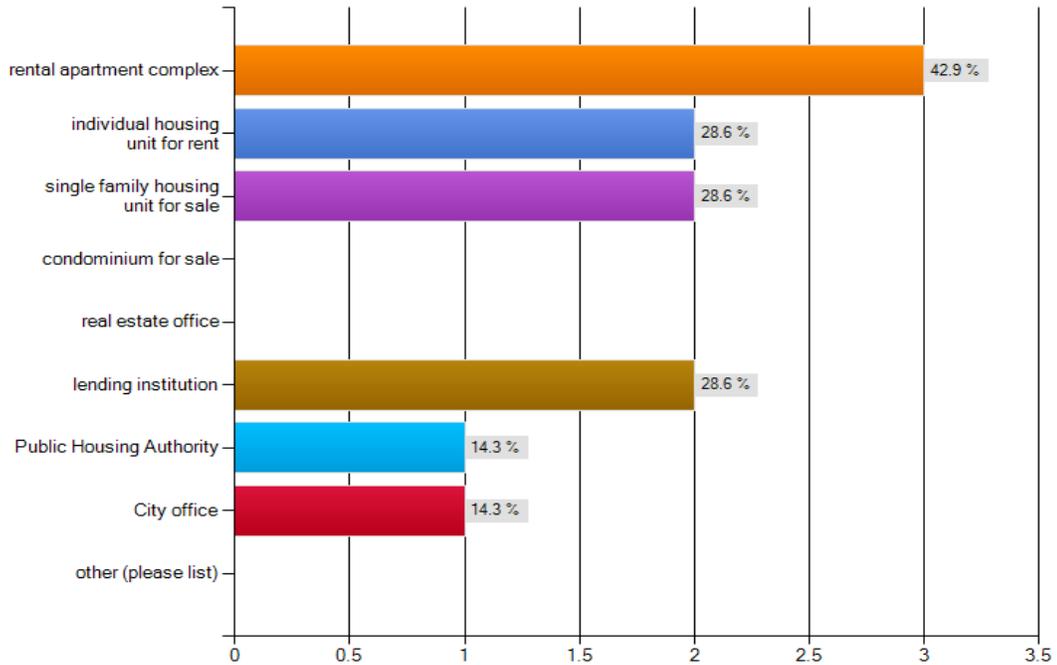


Of the 80 respondents to this question, 4 persons (5%) feel that they have experienced housing discrimination, 3 persons (4%) know of someone who has, and 73 persons (91%) have not experienced housing discrimination (not having first- or second-hand knowledge).



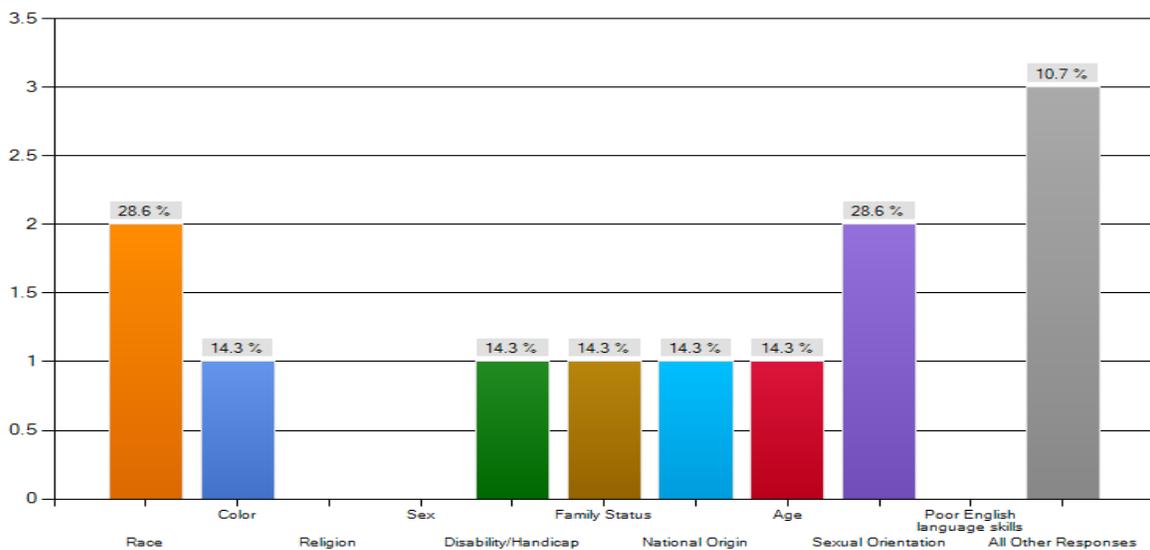
The 7 respondents to this question answered that discrimination was done by the following person/organization: rental property manager/owner (71%); seller of a housing unit (29%); loan officer or mortgage broker (29%); municipal employee (14%); and the City of Peoria Housing Assistance (14%).

**What best describes the location where the discrimination occurred?**

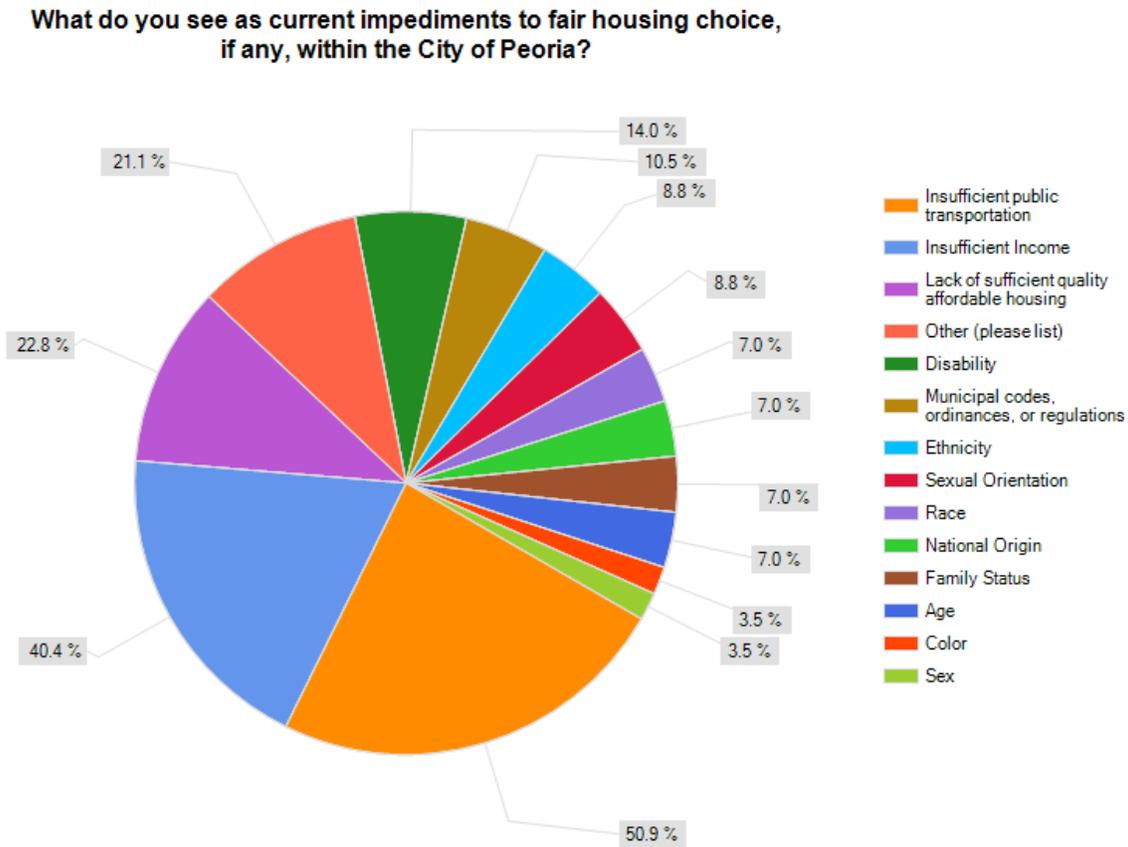


Of the 7 respondents to this question, the largest number (3) answered that a rental apartment complex as the best description for the location where discrimination occurred. The Other respondents answered an individual housing unit for rent (2); a single family housing unit for sale (2); a lending institution (2); the Public Housing Authority (1); and a City office (1).

**What do you believe was the basis for the discrimination you or the person you know experienced?**



Of the 7 respondents to this question, several indicated more than one basis of discrimination. Responses included: Race (2); Color (1); Disability (1); Family Status (1); National Origin (1); Age (1); Sex (2); and Other (3).



Of the 57 respondents to this question, the largest impediment to fair housing is shown as being Insufficient Public Transportation, followed by Insufficient Income and Lack of Sufficient Quality Affordable Housing. The 12 responses for Other included:

- Lack of jobs
- Too much red tape for the average person to become a landlord
- Lenders being tight with credit, low credit scores

Of the citizens surveyed, 32% feel that housing choices are geographically limited to certain areas or neighborhoods in the City of Peoria while 68% do not. The citizens that feel that limitations exist named the following reasons (many of these responses were repeated in various forms):

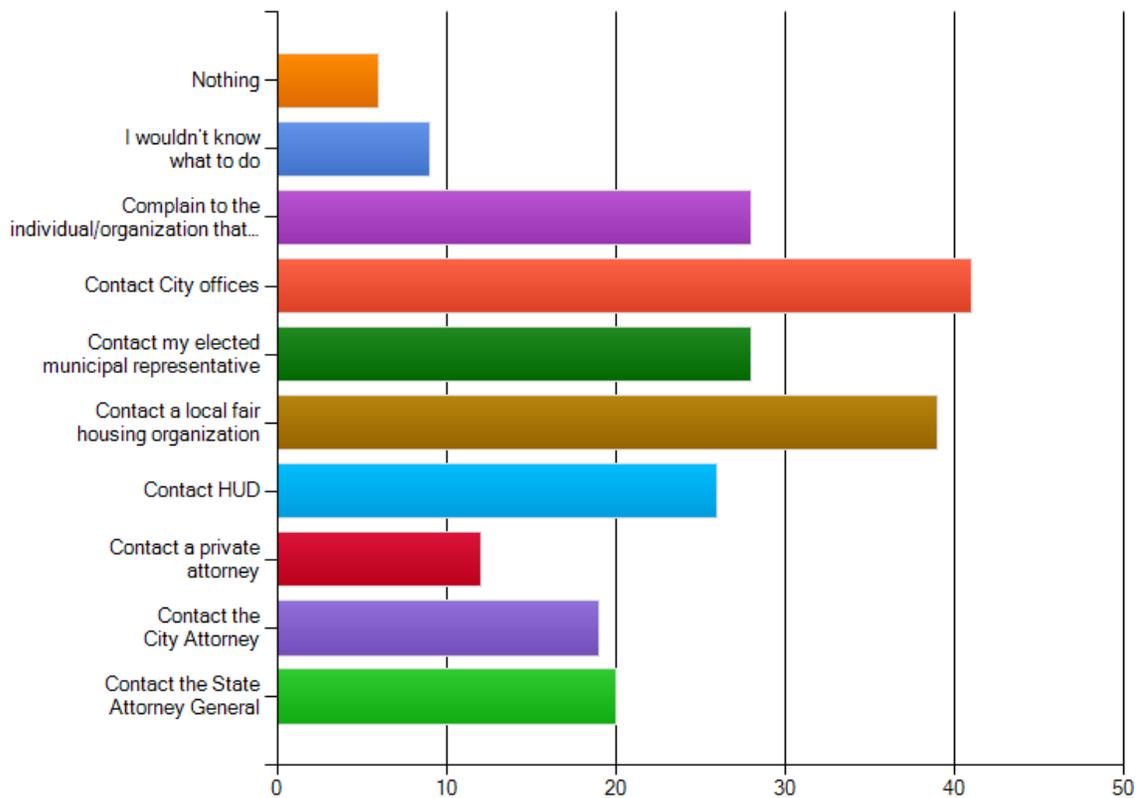
- Some neighborhoods are primarily White
- Lack of sufficient public transportation
- Public transportation forces people into certain geographic areas, particularly away from north Peoria where most new housing is being built
- Some areas are unsightly and the public rights-of-way are not kept up
- Zoning and public opinion

- South Peoria bears the burden of affordable housing – they need to put some in north Peoria as well
- The City ignores code violations in the poorer neighborhoods
- High rents

When asked if they perceive certain geographic areas or neighborhoods within Peoria to be undesirable, 73% (55) answered affirmatively.

The majority of respondents (74%) felt that there was an adequate supply of affordable housing in Peoria; 83% felt an adequate supply was available to senior citizens; 68% felt an adequate supply was available to disabled persons; and 87% felt that an adequate supply was available to families with children.

**What would you do, or did you do, if you were discriminated against in housing choice?**



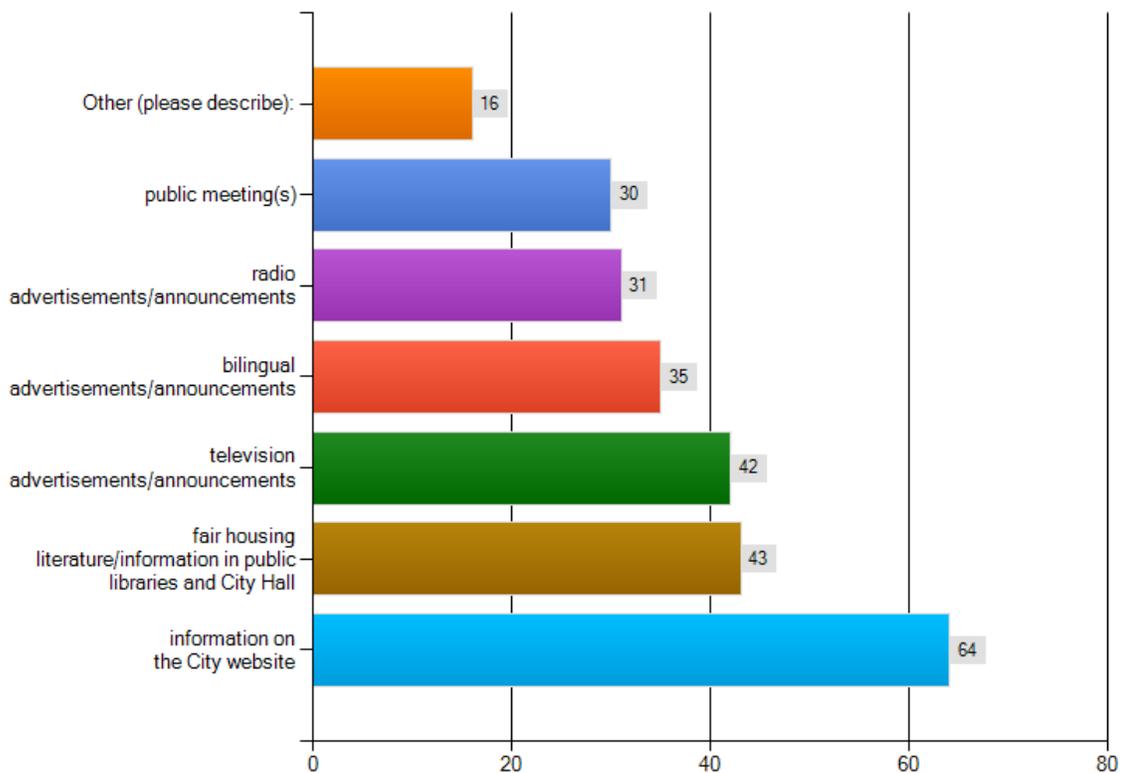
The largest number of citizens surveyed (41 persons, 53%) answered that they would contact City offices if discriminated against in housing choice. Other answers were spread throughout the other options.

Based on the survey results, there would appear to be a deficit of fair housing information that is familiar or recognizable to residents.

- Seventy-one percent (71%), or 56 persons surveyed, are not familiar with the fair housing or social services provided by the City of Peoria.

- Seventy-nine percent (79%), or 62 persons surveyed, have not seen or heard information regarding fair housing programs, laws, or enforcement within the City of Peoria.
- Twenty-four percent (24%), or 16 persons surveyed, felt that current fair housing laws and enforcement mechanisms are Highly Effective.
- Sixty-two percent (62%), or 41 persons surveyed, felt that current fair housing laws and enforcement mechanisms are Somewhat Effective.
- Fourteen percent (14%), or 9 persons surveyed, felt that current fair housing laws and enforcement mechanisms are Not Effective.
- Only 16 persons could identify any fair housing information they saw or heard.

**What is the most effective way to inform the residents of their fair housing rights and/or responsibilities?**



Of the 79 respondents to this question, the most effective way to inform residents is shown as being Information on the City Website, followed by Information in the Libraries and City Hall, and Television Announcements. Of the 16 responses for Other, most felt that there are multiple ways and used the Other category to give additional information. These responses include (many of these responses were repeated):

- Print information in languages other than English and Spanish
- Publish information in the Apartment Guide
- Provide a link to the State/Federal website from the City website
- Direct mail, flyers, brochures, etc. to homes
- Put information in rental offices
- Have homebuilders and Realtors distribute information

- Put ads in the newspaper
- Put ads on buses

The survey results reflect a recurring theme of the need for more education, public outreach, and mechanisms for enforcement/reporting. Surveyed citizens were asked for suggestions/considerations to change fair housing laws and practices to increase fair housing choice and/or remove impediments to fair housing. Suggestions included:

- Homeowners who rent out their homes are not aware of their fair housing responsibilities
- Enforce the laws enacted to protect people from unfair practices by owners and landlords
- Get property managers and landlords to attend April fair housing events by groups like AZ Fair Housing Partnership, etc.
- Promote fair housing practices
- Make landlords accountable
- Put up public service signs in fast food restaurants and gas stations
- Use Channel 11 to broadcast fair housing shows and advertise the shows in newspapers, schools, and senior centers
- As a landlord, nothing has ever been sent to me on this (fair housing), even though I've applied for all city permits
- Educate the public of their rights and landlords of their responsibilities
- Create an anonymous hotline to report discrimination

### Key Person Interviews

In conjunction with the surveys, ASK conducted key person interviews person-to-person, by teleconference, and via email correspondence with members of the City of Peoria Staff, State Attorney General's staff, and nonprofit and advocacy groups.

Organization	Key Person
City of Peoria, Planning and Community Development Department	Glen Van Nimwegen, Director
City of Peoria, Neighborhood and Revitalization Section	Carin Imig, Administrator
City of Peoria, Community Action Program	Josie Salas, Director
City of Peoria, Office of Communications	Sherine Zaya, Public Information Officer
City of Peoria, Public Works – Utilities Department	Bill Mattingly, Director
City of Peoria, Planning and Community Development Department	Melissa Sigmund, Planner
Housing Authority of Maricopa County	Jenese Bojorquez, Housing Specialist
Arizona Attorney General's Office, Civil Rights Division	Melanie Pate, Chief Counsel

Interviewees were asked a number of questions about fair housing, affordable housing and community service needs in Peoria. In addition, interviewees were asked to complete the applicable survey for supplementary data-gathering.

The following groups were also contacted regarding the development of the AI. These groups may have participated in the online survey, but did not provide any comments or considerations to be included in the AI.

Member of Public or Agency/Organization Contacted
Habitat for Humanity Central Arizona
Neighborhood Housing Services of SW Maricopa County
Arizona Center for Disability Law
Arizona Multihousing Association
Southwest Fair Housing Council
Southeast Valley Regional Association of Realtors (SEVRAR)

Community Action Program

The Peoria Community Action Program (CAP) serves elderly and low income populations through the Senior Center (the administrative arm) and various services. Not all seniors are served through CAP. Persons with disabilities are offered rental and mortgage family assistance, and CAP can assist people dealing with eviction and foreclosure. If CAP receives complaints regarding tenant rights issues, they refer those cases to the proper agency. However, there is no feedback system established. According to CAP, they are seeing lower numbers of clients. For senior citizens, CAP focuses on health education and abuse awareness. Most of the seniors are homeowners, although other senior citizens live with extended families and few live in public housing. CAP recommends that fair housing information and education be extended to a larger client base that needs to receive the information.

Office of Communications

The Office of Communications is responsible for public television and the quarterly newsletter. Media outlets include the newspaper and Community Cable Channel 11. The Office of Communication recommends that the Community Bulletin Board and other programming on public television be used to educate on fair housing issues and rights, and inform about fair housing events and training sessions. In addition, the Communications Office recommends that they use the community newsletter to educate and inform about fair housing issues and rights.

### Planning and Community Development

City Planning staff indicated that there are currently no incentives for affordable housing in the City of Peoria. The City does have an expedited plan review process based on board and staff availability, but it is fee-based, not based on affordability. The City also has expedited plan review for specific Council objectives. There are density bonus incentives available for multi-family housing with enhanced amenities and open spaces, but not based on affordability. The City's Old Town Redevelopment Area is being used as a model for higher density housing with accessibility to transit (see Appendix 4 for applicable Zoning Ordinance portions). The City's Rehabilitation Plan is awaiting rezoning and entitlement procedures. The City's plan for circulation and trails is included in general comprehensive planning. Capital Improvement Projects (CIP) are being developed by a part-time staff Engineer. Within the City, there are co-existing lots that are non-conforming. The Specialized Zoning District is being developed to accommodate non-conforming lots.

The City is involved with programs that include a fair housing component, including: Housing Our Communities (homebuyer education/counseling); web links for fair housing information; upcoming addition of fair housing information to the Homeowner's Academy curriculum; and staff attending HUD fair housing training.

The Planning and Community Development Department recommends the City begin and/or continue the following fair housing education/outreach activities:

- Increase visibility of fair housing outreach at public events, including Annual Pioneer Days.
- Continue to research and gather information regarding single-family homes being used for group homes, elderly care, and halfway houses. The City had community meetings regarding this with the Director of Health Services to provide information and outreach.
- Remain dedicated to affordable housing efforts such as the HOME CHDO 4-plex; low-income housing tax credit financed project at Ironwood Estates; the apartment complex being redeveloped by Chicanos Por La Causa (an Arizona CDC); and the Habitat for Humanity Central Area division building 17 single-family homes for low-income families.

### Public Works

The City recently completed a Peoria Multimodal Transportation Plan to look at short- and long-term transportation issues. The following forms of public transportation are included within the Peoria area: commuter rail (regional), light rail (expanding to Peoria), rapid transit (via Loop 101), the regional bus grid, and Dial-A-Ride (providing curb-to-curb service). There is limited fixed route bus service within Peoria, but routes can connect to the regional grid. Dial-A-Ride is a paratransit service that includes a fixed route for disabled persons. Dial-A-Ride Plus also allows transportation to/from neighboring regional health centers in Sun City and Glendale (Banner Boswell Medical Center and Arrowhead Hospital). Public transportation within Peoria provides approximately 32,000 trips annually.

The bus shelters within Peoria are rudimentary and are currently lacking improvements. Transit enhancements are funded solely from local transport sales tax due to the loss of

State funding approximately a year ago. The City conducts diversity training for all City employees, but does not have a training designed specifically for transit workers. The City has used CDBG in the past to install ADA retrofits in City buildings.

### Public Housing Authority

The PHA hosts annual landlord briefings, but many don't attend. The PHA advertises the briefing by sending a mass email to the landlords. In addition, the PHA provides one-on-one briefings to new landlords. The PHA provides newsletters and fair housing information to tenants and landlords. The PHA currently has two (2) complaints filed with the Arizona AG's office. The PHA has resident meetings and resident council meetings for public housing; the quarterly meetings include the 45 elderly units and scattered sites.

The PHA staff mentioned an issue regarding "double dipping" – referring to clients that receive housing assistance. In most cases, the families that are in the PHA program do not qualify for additional assistance from other agencies, as the other agencies consider this "double dipping." If a family is in need rental assistance, they will be denied assistance by the other agencies because their rental portions are already subsidized by the Housing Authority (in most cases). Other agencies won't help with rent, but may assist with utilities. Most of the families the PHA serves struggle with security deposits. There are no agencies that are able/willing to assist families in these cases.

Security deposits can prevent families from securing a place to live. Not being able to afford a security deposit also forces some families to settle into a unit or community that they may not otherwise choose. The PHA does not receive funding to help families with this expense, and the family could potentially lose their housing. If a family is not able to rent a new place within the allotted voucher period of 120 days, the voucher terminates as does their assistance. LIHEAP helps residents with these expenses, but the client must live within their jurisdiction. LIHEAP is offered through John C. Lincoln, but it is jurisdiction-based (City of Phoenix). The PHA has done a lot of research to find resources for their clients within their jurisdiction. They have found that other than the Peoria CAP office, who's funding is limited, there are not many resources for local families. Salvation Army helps when they can with clothing, furniture, etc. A few local churches help with utilities when they can, but their funding is also very limited.

### **Public Meetings and Feedback for the AI**

On March 25, 2011, the City held a public hearing and solicitation of comments for the City of Peoria Annual Action Plan. The public hearing also included Fair Housing Training as part of the notice and agenda. Appendix 3 includes a copy of the public notice. The hearing provided any interested parties with information regarding the Fair Housing Act, including training on the subject.

The Not-For-Profit Review and Housing Council Subcommittee Meeting also provided a forum for public comments on the AI. Comments were received from the members of the Subcommittee and from the public. Most comments centered around fair housing issues concerning the elderly and the need for ADA accessibility. The Subcommittee members also shared comments that described the fact that there were fewer

disparities in fair housing choice due to a decline in housing values in most Peoria neighborhoods.

The AI was advertised for a 30-day comment period in a Notice in a publication of general circulation, the City's website, and hard copies provided in the library and City Hall.

## **Fair Housing Public Outreach**

### City of Peoria

The City of Peoria Planning and Community Development Department undertakes actions to promote the awareness of fair housing law and encourage the practice of fair housing. According to the 2009-2010 CAPER, Peoria has implemented the following planned strategies to address fair housing needs:

- Began a regular process of public advertisement that the City supports and is a resource of information about Fair Housing and Equal Opportunity (FHEO).
- Implemented an informal written complaint resolution guideline/process used in conjunction with public advertisement.
- Conducted two public presentations and made several special outreach meetings concerning the AI, Fair Housing, and the Americans with Disabilities Act (ADA) compliance in relation to Peoria Section 504 compliance. Presentations were made to lenders, Realtors, and non-profit organizations.
- During monitoring of Benevilla on 1/26/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- During monitoring of ABIL on 2/10/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- During monitoring of Habitat for Humanity on 2/25/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- During monitoring of Boys and Girls Club on 3/15/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- During monitoring of St. Mary's Food Bank on 4/22/10, staff gave an overview of fair housing and protected classes. The agency was provided HUD pamphlets on fair housing.
- The City adopted a proclamation declaring April to be observed as Fair Housing Month.
- The City secured fair housing training for local staff.
- Fair housing training was made available to residents and landlords in the community.
- The City maintained a fair housing web page with a direct link to the HUD Fair Housing website.
- Staff participated in events sponsored by the Arizona Fair Housing Partnership.
- The City engaged in professional housing community in a discussion of fair housing issues.

- Staff reviewed local ordinances for compliance with the Fair Housing Act and ADA.
- The City displayed fair housing posters in public buildings.
- Included the fair housing logo on local brochures and marketing information.
- Monitored subrecipients for compliance with fair housing and affirmative marketing requirements.

In 2010, the **National Citizen Survey™** (The NCS) was conducted in Peoria. The NCS is a collaborative effort between National Research Center, Inc. (NRC) and the International City/County Management Association (ICMA). The NCS was developed by NRC to provide a statistically valid survey of resident opinions about community and services provided by local government. The survey results are to be used by staff, elected officials and other stakeholders for community planning and resource allocation, program improvement and policy making. This Peoria survey provides the opinions of a representative sample of residents about community quality of life, service delivery, civic participation and unique issues of local interest. A periodic sounding of resident opinion offers staff, elected officials and other stakeholders an opportunity to identify challenges and to plan for and evaluate improvements and to sustain services and amenities for long-term success. Portions of the survey have been previously mentioned in pertinent sections of this AI.

According to the NSC of Peoria, most residents experience a good quality of life in the City of Peoria and believe the City is a good place to live. The overall quality of life in the City of Peoria was rated as “excellent” or “good” by 83% of respondents. Almost all report they plan on staying in the City of Peoria for the next five years. A variety of characteristics of the community was evaluated by those participating in the study. Among the characteristics receiving the most favorable ratings were recreational opportunities and the overall quality of new development in Peoria. The two characteristics receiving the least positive ratings were ease of bus travel and employment opportunities in Peoria. Ratings of community characteristics were compared to the benchmark database. Of the 31 characteristics for which comparisons were available, nine were above the benchmark comparison, 12 were similar to the benchmark comparison and ten were below. Residents in the City of Peoria were somewhat civically engaged. While only 19% had attended a meeting of local elected public officials or other local public meeting in the previous 12 months, 88% had provided help to a friend or neighbor. Less than half had volunteered their time to some group or activity in the City of Peoria, which was lower than the benchmark. In general, survey respondents demonstrated trust in local government. A majority rated the overall direction being taken by the City of Peoria as “good” or “excellent.” This was higher than the benchmark. Those residents who had interacted with an employee of the City of Peoria in the previous 12 months gave high marks to those employees. About eight in ten rated their overall impression of employees as “excellent” or “good.” On average, residents gave favorable ratings to most local government services. City services rated were able to be compared to the benchmark database. Of the 34 services for which comparisons were available, 11 were above the benchmark comparison, 19 were similar to the benchmark comparison and four were below. In July 2008 Money Magazine listed Peoria in the Top 100 Places to Live.

The City of Peoria currently has 23 formal **Boards and Commissions**, as well as several Ad Hoc Committees. Most applicants must be valid registered voters and eligible to vote in a City of Peoria election. Citizens may be appointed to the following boards and commissions. Additional information is provided for those boards/commissions that may be involved fair housing issues:

- Ad Hoc Central Peoria Revitalization Plan Public Advisory Committee
- Ad Hoc Citizen Bond Committee
- Ad Hoc Neighborhood Pride
- Peoria City Council Ad Hoc Subcommittee on Recycling and Recycling Citizen Advisory Committee
- Arts Commission
- Board of Adjustment
- **Building Board of Appeals** - The Board renders technical interpretations of building, plumbing, electrical, and mechanical codes which either supports or rejects the City's Chief Building Official's interpretation.
- Census Ad Hoc Committee
- Citizen's Commission on Salaries for Elected City Officials
- **Design Review Appeals Board** - If any part of a development plan submitted to the City is rejected by Staff for noncompliance with the provisions of the City's design criteria, the applicant may appeal the decision to this Board. The Board may uphold, modify, or overrule in whole or in part the final Staff decision on the design review submittal.
- **Design Standards Advisory Board** - This Board reviews standards for commercial and residential design in the City; and recommends, to the City Council and City Manager, any changes that may be needed. The Board also works with assigned City Staff on issues in the City's design review process, and provides recommendations to the Staff, the council, and the City Manager on modifications to the process. This Board's function ensures that there has been community review and input on design review concepts.
- **Economic Development Advisory Board** - The Board shall make recommendations to the Council on economic development issues including the Economic Development Element of the City's General Plan, economic development related projects, strategies for promoting economic development in the City, representing the community with prospective economic development prospects, and cooperate with educational institutions and regional economic development organizations.
- Employee Benefits Trust Board
- Historic Preservation Committee
- Industrial Development Authority
- Library Board
- Municipal Development Authority
- Parks and Recreation Board
- Peoria Sports Complex Area Urban Design Plan Project Advisory Committee
- Personnel Board
- **Planning and Zoning Commission** - The commission is responsible for recommending planning and zoning policies governing land use in Peoria. It also

reviews and recommends approval of zoning codes and annual revisions to the City's Comprehensive Master Plan.

- Public Defender Contract Review
- Public Safety Retirement Board – Fire
- Public Safety Retirement Board – Police
- **Sister Cities Board** - The Board is responsible for development and promotion of municipal partnerships and recommends business plans, policies, programs, and other sister city activities to the City Council.
- Subcommittee for Boards and Commissions Appointment
- Subcommittee for Evaluation of Municipal Judge and City Attorney
- **Subcommittee Not-For-Profit** – This subcommittee was formed to hear presentations from not-for-profit groups applying for funding.
- **Subcommittee Not-For-Profit Review and Housing** – Oversight and review of not-for-profit groups receiving funding and the Public Housing Authority.
- Subcommittee on Ethics
- Veterans Memorial Board
- Volunteer Firefighter Pension Board
- Youth Advisory Board

**Peoria Channel 11** is the City's official television station, broadcasting through licensing agreement with Cox cable television company. Channel 11 broadcasting is also available via live streaming and on [www.youtube.com/PeoriaChannel11AZ](http://www.youtube.com/PeoriaChannel11AZ). Channel 11 programming includes:

- City Council Meetings live and rebroadcast
- City Council Study Sessions live and rebroadcast
- Planning and Zoning meetings live and rebroadcast
- To Your Health
- NASA TV
- Arizona Game & Fish
- Shamu TV
- Army News Watch
- Maricopa County Magazine
- The Conn Jackson Show
- The Pentagon Channel
- Destination Phoenix Sky Harbor
- The Future is Wild
- New Horizons
- Wonders of the Universe
- Microcosm - The Adventure Within
- The REC Show (Recreation, Education, Culture) on demand
- Focus Flash Community Spotlight videos on demand
- Sworn to Safety videos on demand
- Fiscal Year Budget videos on demand

The **City of Peoria First Time Homebuyer Assistance Program** provides homebuyer assistance to low and moderate income and HUD eligible citizens purchasing a home in Peoria. The program is managed by Housing Our Communities, Inc.

The **City of Peoria Dial-A-Ride/Dial-A-Ride Plus** program provides curbside-to-curbside, advance reservation transportation of Peoria residents with wheelchair accessible vehicles.

The **City of Peoria Utility Payment Assistance Program** provides emergency utility assistance to qualified low/moderate income and/or HUD eligible Peoria residents.

The **Neighborhood Livability** web page provides Peoria residents with a centralized location to find information about neighborhood improvements. Within this Web site residents can find important information for tenants and landlords, how to make a home safer from crime, how to report street light outages, code violations, graffiti, and abandoned vehicles and how to get involved.

Through the **Streetlight Infill Program**, residents may request to have additional street lighting installed in their neighborhood.

The **Tool Lending Center (TLC)** aims to assist homeowners, renters and neighborhood groups in undertaking landscaping projects, yard clean-ups, community rebuilding and other improvement projects. The operating principles of the program are similar to the traditional library concept – a selection of tools or equipment can be borrowed by Peoria residents for a limited period of time at no charge. The goals of the program are to support homeownership and maintenance, to assist in the revitalization of neighborhoods, and encourage beautification of property.

**Neighborhood Pride** is a revitalization program adopted by the Peoria City Council in August 1996 to assist established neighborhoods in maintaining their appearance and value. The program is a cooperative work effort between the City and neighborhood residents to eliminate City code violations while enhancing properties in compliance with City codes and ordinances. The program provides support to individual property owners for improvement of their properties through material donations and volunteer assistance. Typical improvements completed during the enhancement segment of the project include exterior house painting, minor fence and gate repair, gravel placement, and removal of unwanted items.

The City of Peoria's **Neighborhood Grants Program** is designed to assist neighborhood-based improvement projects to prevent the decline of neighborhoods throughout the city. Neighborhood groups and associations who are active partners in their community and interested in improving the quality of life of their neighborhoods are encouraged to apply. The Neighborhood Grants Program is subject to annual funding allocations determined by the Mayor and City Council. Up to \$12,000 may be awarded toward any eligible project. (Note: At the time of this publication, the Neighborhood Grants Program was not accepting applications.)

The **Homeowner's Association Academy** was created to educate HOA board members, management teams, and all interested homeowners. The information provided by the Academy will enable students to maintain vibrant, healthy and responsive homeowners associations. The West Valley Homeowners Associations (WVHOA), in partnership with the City of Peoria, offers this dynamic one day training course once a year. Topics covered include: The ABC's of HOA's; Compliance and Enforcement; HOA Budgeting, Financials and Reserves; Vendors, Specifications, Bidding and Contracting; Selecting and Working with a Management Company; and Legal Aspects of HOA's.

The **Neighborhood Registration Program** is run by the Neighborhood and Revitalization Section, which maintains a directory of traditional neighborhood associations and homeowners associations. This information is used to facilitate the flow of information regarding neighborhood issues to and from City Hall.

The **Peoria Speaker's Bureau** gives community groups and organizations an opportunity to get in-depth information on specific topics, questions answered and concerns addressed. The Speaker's Bureau is staffed by representatives from various departments who are considered the expert on specific topics of interest to the public. Upon request, a speaker can be scheduled to provide information to any community group. The Speaker's Bureau can provide city representatives for community organizations, business groups, homeowner's associations, church groups, and educational institutions to discuss city services and programs.

Civic and community groups, business organizations and even families in Peoria may join the **Adopt-A-Street Program**. The Adopt-A-Street program requires organizations to make a two year commitment to pick up litter along a designated one mile stretch of roadway, three times a year.

Through the **Graffiti Hotline and On-Line Reporting**, the City of Peoria has a very effective and aggressive graffiti removal team that works with property owners to get graffiti removed or painted over in 48 hours.

The **Peoria Leadership Institute** offers an in-depth look at all operations of city government. Class members learn more about the city's governmental structure, its budget and finances, public works, utility, police and fire operations through interactive discussions with management staff.

The **Peoria FOCUS Newsletter**, city news and recreation event newsletter, is available to residents in hard copy and on-line.

The Peoria Police Department recently launched the web-based program **CrimeMapping.com**. This program allows citizens a real-time and transparent review of police activity and incident information. The program extracts police activity daily, displaying activity as recent as the previous evening, and may be viewed by accessing the Police Department's Web page.

The **Peoria Police Department Citizen's Police Academy** is a twelve-week course in which residents learn how the various functions within the Police Department operate. The instruction is comprehensive and allows for hands-on interaction for participants in many of the topics, including Gang Awareness, Narcotics Investigation, D.U.I. Investigation, Use of Force and the Firearms Training Simulator.

The **Citizen's Ride-Along Program** provides citizens with an insight into Police activities and functions by riding with a uniformed patrol officer, during a normal shift, under controlled conditions.

The **Peoria Fire Department Citizen's Fire Academy** is five week program in which residents learn various aspects of the fire department.

#### Other Public Outreach

The **Arizona Attorney General (AG) Civil Rights Division's** website ([http://www.azag.gov/civil\\_rights/fairhousing/](http://www.azag.gov/civil_rights/fairhousing/)) offers information to the public on housing discrimination facts, the Fair Housing Act (FHA), Tenants Rights and Responsibilities handbook, FHA Accessibility Compliance Site Review form, and a direct link for making a housing discrimination complaint. Much of this information is also available in Spanish form. Since 2005, the AG Civil Rights Division has assisted with four (4) public outreach efforts in or very near Peoria, as follows:

- August 16, 2007: The Civil Rights Division gave a presentation to the Northwest Valley Women Realtor's Association regarding fair housing issues.
- April 16, 2008: The Civil Rights Division hosted a Fair Housing Forum and Workshop at neighboring Glendale Community College. Approximately 200 citizens and Realtors attended the event.
- April 14, 2009: The Civil Rights Division provided fair housing training in neighboring Glendale to the Managers Against Crime group. Approximately 45 citizens and property managers attended the event.
- February 2, 2010: The Civil Rights Division spoke to students at the Peoria Traditional High School regarding civil rights and the Division's procedures.

The **Arizona Bridge to Independent Living (ABIL)** is Arizona's largest center for Independent Living. ABIL offers and promotes programs designed to empower people with disabilities to take personal responsibility so they may achieve or continue independent lifestyles within the community. ABIL offers services to facilitate implementation of the Americans with Disabilities Act (ADA) throughout the state including ADA training, technical assistance and materials to businesses and persons with disabilities on the requirements and options of the ADA. ABIL offers advocacy services with the intent of facilitating cooperative compliance. ABIL provides ADA counseling on larger projects such as facility surveys and job accommodations. ABIL is a partner within the Arizona Fair Housing Partnership and includes coverage of Maricopa County. ABIL coordinates home modification programs for qualified persons with disabilities who live within the cities of Phoenix, Mesa, Glendale, Peoria and Scottsdale. ABIL estimates that they receive approximately 300 phone calls per month from the public, and that one-third of those calls are housing related. Information regarding cases/calls specifically within the City of Peoria is not available.

The **Southwest Fair Housing Council** (SWFHC) is a non-profit agency funded by memberships, donations, HUD, the Arizona Department of Housing, and various CDBG funding. SWFHC works to ensure fair housing by providing a variety of free services directed toward education and enforcement:

- Investigating individual complaints of housing discrimination;
  - Obtaining evidence to support enforcement action by public agencies conducting legal or administrative actions;
  - Initiating complaints and litigation to serve fair housing goals;
  - Informing and advising community residents of their fair housing rights, including presentations at community meetings and special events;
  - Conducting mediations;
  - Conducting conferences, training programs, and seminars to inform housing professionals about housing laws;
  - Assisting businesses, neighborhood groups, agencies, and units of government in the development of fair housing goals, plans and strategies, and actions; and
  - Providing information and referrals for persons and families with housing needs.
- (Source: <http://www.swfhc.com/about.htm>)

The **Arizona Fair Housing Partnership** (AZFHP) is a statewide coalition of government agencies, housing industry representatives, nonprofit organizations and housing advocates. The purpose of the AZFHP is to:

- Provide information to the public and policy officials regarding fair housing;
- Sponsor fair housing training for housing professionals;
- Monitor discriminatory practices and recommend actions to overcome fair housing barriers;
- Strive to achieve a discrimination free housing market through the partnership model; and
- Recruit agencies and representatives to promote equal access to fair housing.

On April 15, 2009, the Arizona Fair Housing Partnership hosted a Fair Housing Workshop in neighboring Chandler, at the Disability Empowerment Center. The Workshop focused on housing discrimination issues and provided training for property management companies, community groups, HOAs, and persons owning/operating rental properties. A panel of fair housing experts, including Arizona Attorney General Terry Goddard, was featured.

**Community Legal Services** (CLS) is a not-for-profit Arizona law firm incorporated in 1952 as a legal aid program organized to promote equal access to justice for all. CLS provides legal services to clients in certain civil (non-criminal) areas of the law that affect the critical needs of the low income client community. These services are provided to individuals and families residing in the CLS five county service areas, including Maricopa County and Peoria, whose household income is at or below 125% of the federal poverty guidelines. According to the CLS Housing and Foreclosure Law Project – Maricopa County (East Valley Office), CLS has provided support for fair housing questions and/or disputes in the City of Peoria. In addition, CLS provides training regarding fair housing rights and responsibilities in East Valley through the City of Mesa and Nan McKay and Associates (NMA).

The **Arizona Fair Housing Center (AFHC)** is a private, non-profit civil rights advocacy organization. Its mission is to eliminate housing discrimination through enforcement, education and outreach. AFHC is funded by federal and local governments, and private donations. AFHC can perform the following fair housing services:

- Intake of fair housing complaints;
- Systemic investigation of housing discrimination;
- Referrals to attorneys and government agencies;
- Counseling and mediation; and
- Provide technical assistance and professional support to government agencies, civil rights organizations, housing providers, social service agencies, and other housing industry professionals.

The **Arizona Multi-housing Association (AMA)** is a non-profit advocacy association for the rental housing industry. They do not participate in direct outreach to the public, but the AMA is a partner of AZFHP. Every year the AMA offer fair housing training for landlords, leasing agents, and managers. The training classes are taught by attorneys who specialize in fair housing.

**Advocates for the Disabled, Inc. (AFD)** serves individuals in the Disability Claims Program who are under the age of 65 years of age, have low income and/or homeless and have an active claim for disability benefits (including appeals on denials or termination of benefits).

Stardust Building Supplies is a Phoenix-Area non-profit organization helping people and communities by providing recycled materials and related sustainable programs that have a positive impact on our environment. Stardust Building Supplies developed **Angels On Call**, a no-cost home repair service and other related assistance program for eligible homeowners. Staffed by a team of volunteer tradesmen and technicians, Angels on Call professionals perform home repair and maintenance projects for homeowners in need of basic safety, security or quality of life in their home. Angels On Call accepts referrals from local churches, social service agencies, civic groups and other charitable organizations.

The **Boys & Girls Clubs of Metropolitan Phoenix- Wistosky/Peoria Branch** provides after school and summer programs, offers homework help and tutoring, computer access, organized league sports, the arts, health and life skills, and character building activities.

The **Benevilla Adult Day Services Program** provides daytime assistance for elderly and developmentally disabled Peoria residents at the Peoria Adult Day Health Center.

The **Central Arizona Shelter Service (CASS)** provides emergency shelter and supportive services for homeless persons.

The **West Valley Child Crisis Center** provides shelter and support to children who are victims of domestic violence.

**Habitat for Humanity Central Arizona** promotes homeownership to low and moderate income Peoria families and constructs new homes in partnership with families and other organizations.

**Housing Our Communities** provides HUD/FHA approved homebuyer education classes and one-on-one counseling to help families become educated consumers who can determine whether and when homeownership is right for them.

**St. Mary's Food Bank Alliance** provides a three to five day supply of nutritionally balanced food for families and individuals experiencing short-term financial emergencies.

**Chicanos Por La Causa, Inc. (CPLC)** is a statewide community development corporation (CDC), committed to building stronger, healthier communities as a lead advocate, coalition builder and direct service provider. CPLC promotes positive change and self-sufficiency to enhance the quality of life.

## **VI. FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS**

### **Impediments Found**

The research, surveying, and interviews conducted for the AI does not identify any substantial fair housing impediments within the City of Peoria. City of Peoria, county and state levels of government have made efforts to be proactive in encouraging fair housing education, and funding activities to support fair housing -- although survey results support the objective that public education needs to be ongoing.

There are some areas, however, that could potentially become barriers to fair housing choice in Peoria. These include:

- *Education and Outreach:* This is the greatest area of impediments to fair housing for the City of Peoria. The City does not have a Fair Housing Officer position, but the City does use its Planning and Community Development Department to undertake fair housing activities.

Survey results, interview responses, and analysis of fair housing complaint data indicate that the Peoria community does not have a comprehensive understanding of fair housing rights and responsibilities. There is a limited awareness of fair housing programs for protected classes. The majority of citizens surveyed feel that they are not knowledgeable of fair housing laws (46%), or are only somewhat knowledgeable of fair housing laws (46%). Seventy-one percent (71%) are not familiar with fair housing or social services provided by the City of Peoria. In addition, 79% have not seen or heard information regarding fair housing programs, laws, or enforcement within the City of Peoria.

In addition, data from the AG's Office shows that the majority of cases are dismissed without cause. Further education of the general public regarding fair housing law could help possible complainants understand fair housing rights and determination of cause. Lastly, there exists a need to improve outreach to existing groups, commissions, and organizations.

- *Fair Housing Testing*: There is no fair housing testing specifically for Peoria.
- *Data Collection, Tracking and Follow-Up*: There is no mechanism in place for the City to collect data, track, or follow-up on fair housing complaints handled by/referred to other entities. There is no central reporting system for fair housing complaints and/or questions within the City of Peoria. The City's PHA webpage does not have a direct link for registering a fair housing complaint.
- *Accessible Housing*: There is a need for the City to evaluate ADA education and accessible housing needs.

## **Recommendations to Address Existing Impediments**

### ***A. Impediment: Limited Fair Housing Education and Outreach; and Lack of Fair Housing Officer Position***

***Action: Improve Fair Housing Education and Outreach; Staff a Fair Housing Officer Position***

#### **Recommendation 1**

The City should maintain a Fair Housing Officer position to consistently be available to address fair housing issues. That person should maintain representation and active participation with fair housing service providers and groups providing services to protected classes.

#### **Status:**

The City does not have a Fair Housing Officer position, but the Planning and Community Development Department devotes some time to fair housing training, particularly for subrecipients.

The survey results reflect that 53% of respondents would contact City offices if they felt they were a victim of housing discrimination. Designation of a Fair Housing Officer position would allow protected classes to know exactly who to contact when assistance is needed with fair housing issues. In addition, comments from survey respondents indicated that many landlords have never received information regarding their fair housing responsibilities. A Fair Housing Officer position could ensure that those groups receive the education needed.

## **Recommendation 2**

The City's webpage for the Peoria PHA should include a direct link for registering a fair housing complaint.

**Current status:** The City's webpage for the Peoria PHA does not list fair housing resources, or include any link for residents wishing to register a fair housing complaint. This would be an important step to consider for residents of protected classes. In addition, areas of the City's website (such as the Neighborhood Livability information page) should be evaluated and updated to include all fair housing rights and responsibilities.

## **Recommendation 3**

The City should use existing resources and programs to disseminate fair housing information, provide fair housing education opportunities, and assist with fair housing complaint referrals.

### **Status:**

There exists many City-run and sponsored programs that could be used to disseminate fair housing information and provide education, on a regular basis. The Housing Our Communities program should continue to be used for fair housing education and training. In addition, these existing programs could assist with outreach efforts by properly referring citizens with fair housing questions and/or complaints. The City should target additional local, countywide, and statewide resources for this purpose, including but not limited to: Neighborhood Pride program; Neighborhood Livability website; Homeowner's Association Academy; Neighborhood Registration Program; Peoria Leadership Institute; Arizona Fair Housing Center; Southwest Fair Housing Council; and Arizona Fair Housing Partnership. By providing or expanding fair housing outreach efforts within these existing programs, the City could engage a command audience that may currently receive little fair housing information.

## **Recommendation 4**

Use existing subrecipient relationship with Community Legal Services (CLS) to report on any fair housing cases. Use designated Fair Housing Officer position to quarterly survey agencies and organizations for status of fair housing complaints/issues, and assesses data from Community Legal Services on a bi-yearly basis for any needed follow-up.

### **Status:**

There currently exists no mechanism for the City to track and follow-up on fair housing issues that may be reported to other groups or organizations. CLS receives funding from the City and provides assistance to city residents through the Removing Barriers to Justice Program. CLS should continue to provide a breakdown of cases handled, but include those designated as fair housing cases. In conjunction with Recommendation 1, the City could also target their outreach efforts to existing organization meetings to survey, track, and assess fair housing issues. If needed, the City could take any needed action or follow-up by the Fair Housing Officer position.

**Recommendation 5**

Use Peoria Cable Channel 11 programming and website, and the City newsletter, to reach more citizens with fair housing information.

**Status:**

The City uses Peoria Cable Channel 11 and the City newsletter to distribute information on various community issues, and broadcast City Council and Planning/Zoning meetings. These venues could be used for fair housing education and outreach throughout the year. Specifically, the “Focus Flash Community Spotlight” segment and “The REC Show” programming could spotlight fair housing rights, responsibilities, and education. Peoria Channel 11 programming, the City website, and the City newsletter have the potential to reach many protected classes of people with fair housing information.

***B. Impediment: Lack of Fair Housing Testing to Determine Where Fair Housing Discrimination Is Taking Place***

***Action: Fund Fair Housing Testing***

**Recommendation 6**

The City should consider investing in fair housing testing with an organization such as the Southwest Fair Housing Council, Community Legal Services, or Arizona Fair Housing Center. The City could then examine fair housing testing data and analyze it for trends in fair housing discrimination against protected classes.

**Status:**

Although the survey results reflect that some fair housing discrimination does take place in Peoria, there is currently no specific testing data for the City of Peoria. Analyzing data from fair housing testing would allow the City to determine how and where to target fair housing education efforts.

***C. Impediment: There Is No System to Collect Data, Track and Follow Up on Fair Housing Cases Within the City of Peoria***

***Action: Improve Fair Housing Data Collection, Tracking, and Follow Up***

**Recommendation 7**

The City should establish a feedback mechanism for any fair housing complaints/cases referred to the Arizona Attorney General’s Office or any fair housing service provider.

**Status:**

The City currently does not collect data, track, or follow up on any referred fair housing cases that occur in Peoria. Data collection, tracking, and follow up would allow the City to be aware of fair housing issues affecting protected classes within the City of Peoria

***D. Impediment: Accessible Housing Needs Exist***

***Action: Evaluate ADA Education and Accessible Housing Needs***

**Recommendation 8**

The City should continue to make efforts to provide builders with information packets regarding ADA requirements, post requirements on the City’s website, and incorporate ADA requirements in the development review and permitting process of housing construction.

**Recommendation 9**

It is recommended that the City consider addressing the apparent deficit of affordable housing that is ADA accessible by conducting a comprehensive review of the ADA accessible housing unit levels of supply and demand. Using that data, the City can support the development and/or retrofitting of additional ADA accessible housing units and work to educate those involved in the home construction industry by including informational handouts in Contractor packages issued by the City.

**Status:**

The 2000 U.S. Census identified over 18,000 persons in Peoria as having some form of disability.

**Timetable for Addressing Impediments**

<b>Impediment</b>	<b>Recommendation</b>	<b>Timetable</b>
Fair Housing Education and Outreach	Designate Fair Housing Officer position. Include fair housing duties within job description.	Immediate
	Direct link on PHA webpage. Update other webpages.	Immediate
	Increase fair housing education and outreach via non-profit housing groups and other organizations.	Within 1 year.
	Use Community Legal Services for fair housing complaint data. Use Fair Housing Officer position for data analysis.	Within 2 years.
	Use Cable Channel 11, City newsletters, or both, for fair housing programming, education, and information.	1-2 years.
Fair Housing Testing	Fund Fair Housing Testing.	Will be considered. If approved, will take place within 3 years.
Fair Housing Data Collection and Follow Up	Establish feedback mechanism.	1-2 years.
Evaluate ADA Education and Needs	ADA information to builders.	Include ADA information in builder packets available within 1 year.
	Review of ADA housing needs.	Review of ADA needs within 4 years.

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## APPENDIX 2 - SURVEY INSTRUMENTS

### **Citizen Fair Housing Survey:**

This survey is for the Analysis of Impediments to Fair Housing Choice (A.I.), a document required of the City of Peoria by the U.S. Department of Housing and Urban Development (HUD). The Federal Fair Housing Act prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, familial status, and disability. The A.I. seeks to identify impediments to fair housing choice, defined by HUD as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
  - Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race color, religion, sex, disability, familial status, or national origin.
- THIS SURVEY IS FOR INFORMATIONAL PURPOSES ONLY, AND ALL SURVEY RESPONDENTS' IDENTITIES WILL REMAIN ANONYMOUS.

#### **1. Do you live within the limits of the City of Peoria or have your address listed as the City of Peoria?**

Yes  
No

#### **2. Which ethnic or cultural group do you consider yourself a member of?**

##### **Please check one:**

Anglo/White  
African American/black  
Hispanic/Chicano/Latino  
American Indian/Native American  
Asian/Oriental/Pacific Islander  
Multi-racial  
Other (please specify)

#### **3. What is your current marital status? Please check one.**

Married  
Single head of household  
Domestic partners  
Divorced  
Widowed

#### **4. Which income category does your total household income fall into? Please check one:**

Less than \$20,000  
\$20,001 to \$30,000  
\$30,001 to \$40,000  
\$40,001 to \$50,000  
\$50,001 to \$60,000  
\$60,001 to \$70,000  
\$70,001 or more

#### **5. Do you, or someone in your household, qualify as a "protected class" according to the Fair Housing Act? (Please see next question for a list of protected classes.)**

Yes  
No, (please skip to question #7)

#### **6. If you answered "Yes" to question #6, to which protected class do you/your household belong? (check all that apply)**

Race  
Color  
Religion  
Sex  
National Origin

Familial Status (family with one or more persons under 18 years of age)  
Disabled/handicapped  
Age

**7. Do you have children under the age of 18 years?**

Yes  
No  
Other

**8. Housing discrimination can occur if someone is denied housing or housing financing based on which of the following categories (check all that apply):**

Race  
Color  
Religion  
Sex  
Disability/Handicap  
Familial Status (family with one or more persons under 18 years of age)  
National Origin  
Age  
Sexual Orientation  
Poor English Language Skills  
Citizenship Status  
Level of Income  
Source of Income (public assistance)  
Other (please list)

**9. How much do you know about Fair Housing Laws, including State of Arizona Fair Housing Law?**

Very Knowledgeable  
Somewhat Knowledgeable  
Not Knowledgeable

**10. Have you or anyone you know ever experienced housing discrimination in the City of Peoria?**

Yes, I have  
Yes, a person I know has  
No  
Other

**11. If yes, which of the following best describes the person or organization that discriminated against you or the person you know?**

rental property manager/owner  
seller of a housing unit  
condominium or homeowner's association  
real estate professional  
loan officer or mortgage broker  
municipal employee  
other (please list)

**12. What best describes the location where the discrimination occurred?**

rental apartment complex  
individual housing unit for rent  
single family housing unit for sale  
condominium for sale  
real estate office  
lending institution  
Public Housing Authority  
City office  
other (please list)

**13. What do you believe was the basis for the discrimination you or the person you know experienced?**

Race  
Color  
Religion  
Sex

Disability/Handicap  
Family Status  
National Origin  
Age  
Sexual Orientation  
Poor English language skills  
Citizenship Status  
Level of Income  
Source of Income (public assistance)  
Other (please list)

**14. What do you see as current impediments to fair housing choice, if any, within the City of Peoria?**

Race  
Color  
Ethnicity  
National Origin  
Sex  
Sexual Orientation  
Family Status  
Disability  
Age  
Insufficient Income  
Lack of sufficient quality affordable housing  
Insufficient public transportation  
Municipal codes, ordinances, or regulations  
Other (please list)

**15. Do you feel your housing choices are geographically limited to certain areas or neighborhoods in the City of Peoria?**

No  
Yes  
If yes, on what basis? (please select from lists above at questions #12 and/or #13)

**16. Do you think that affordable housing options are located throughout the City of Peoria, or are they concentrated in certain areas/neighborhoods?**

Spread throughout the City of Peoria  
Concentrated in certain areas/neighborhoods, such as:

**17. Do you perceive certain geographic areas or neighborhoods within the City of Peoria to be undesirable?**

No  
Yes  
If yes, please identify:

**18. Do you feel that there is an adequate supply of affordable housing that is available to all residents?**

Yes  
No  
Why/why not?

**19. Do you feel that there is an adequate supply of affordable housing that is available to disabled residents?**

Yes  
No  
Why/why not?

**20. Do you feel there is an adequate supply of affordable housing that is available to senior citizen residents?**

Yes  
No  
Why/why not?

**21. Do you feel there is an adequate supply of affordable housing that is available to residents with children?**

Yes  
No  
Why/why not?

**22. What did you, or would you do, if you were discriminated against in housing choice? (Check all that apply)**

Nothing  
I wouldn't know what to do  
Complain to the individual/organization that discriminated against me  
Contact City offices  
Contact my elected municipal representative  
Contact a local fair housing organization  
Contact HUD  
Contact a private attorney  
Contact the City Attorney  
Contact the State Attorney General  
Other (please identify)

**23. Are you familiar with fair housing or social services provided by the City of Peoria?**

Yes  
No

**24. Have you seen or heard information regarding fair housing programs, laws, or enforcement within the City of Peoria?**

List the services you know of such as senior, youth, disability, and employment services. Provide names/descriptions, if possible.  
Yes  
No, (please skip to question #26)

**25. If you answered yes to question #24, what information have you seen/heard? (check all that apply)**

fair housing flyers or pamphlets  
fair housing handbook  
fair housing public service announcement on the radio  
fair housing public service announcement on the television  
other (please list):

**26. Do you think that adequate fair housing information is available in other language translations?**

Yes  
No

**27. In your opinion, how effective are the current fair housing laws, programs, and enforcement mechanisms?**

Very Effective  
Somewhat Effective  
Not Effective

**28. What do you feel would be the most effective way to inform the residents of Peoria about their fair housing rights and/or responsibilities? (check all that apply):**

public meeting(s)  
fair housing literature/information in public libraries and City Hall  
television advertisements/announcements  
radio advertisements/announcements  
bilingual advertisements/announcements  
information on the City website  
Other (please describe):

**29. Do you have any suggestions for changes to fair housing laws and practices that would increase fair housing choice and/or remove impediments to fair housing choice?**

**If yes, please list:**

**30. Please list below what additional actions would you suggest that the City of Peoria could take to address impediments and improve fair housing choice for all residents:**

THANK YOU FOR PARTICIPATING IN THE HOUSING CONSUMER SURVEY. YOUR RESPONSES WILL INFLUENCE IMPORTANT FAIR HOUSING PLANNING DECISIONS MADE BY THE CITY OF PEORIA.

## APPENDIX 3 – NOTICE OF PUBLIC HEARING



### NOTICE OF PUBLIC HEARING AND SOLICITATION OF COMMENTS CITY OF PEORIA ANNUAL ACTION PLAN AND FAIR HOUSING TRAINING

A public hearing will be conducted on March 25, 2011 from 3:00 PM until 4:00 PM at the Peoria Community Center located at 8335 W. Washington, Peoria 85345. The dual purpose of the meetings is to discuss budgets and programs for the Annual Action Plan for Federal Fiscal Year 2011-12 as well as provide interested parties with information regarding the Fair Housing Act including training on the subject. The CDBG Annual Action Plan is required by the U.S. Department of Housing and Urban Development (HUD) for annual funding under the guidelines of a CDBG entitlement city. The CDBG Annual Action Plan identifies how the City plans to use the federal money during the next fiscal year to meet the goals and objectives approved in the Five-Year Consolidated Plan. The Fair Housing Act is a federal law prohibiting housing discrimination.

#### ANNUAL ACTION PLAN FEDERAL FISCAL YEAR 2011-2012

The City of Peoria will be receiving approximately \$750,532 in Community Development Block Grant (CDBG) funds in federal fiscal year 2011-2012. These funds are directed to the assistance of low and moderate income persons, primarily for City of Peoria residents. Proposed use of these funds and information on the Annual Action Plan is available to the public and comments are encouraged.

On March 14, 2011, the draft Annual Action Plan will be published on the City's website at [www.peoriaaz.gov](http://www.peoriaaz.gov) and will also be available at the Peoria Community Center, Peoria Main Library and Peoria Public Housing Authority for a 30 day comment period. Comments received on or before April 15, 2011 will be included in the final Annual Action Plan document.

Information and overviews of the Consolidated Plan or Annual Action Plan may also be obtained by written request mailed to:

City of Peoria  
Planning & Community Development Department  
Attn: CDBG Program  
9875 N. 85th Avenue  
Peoria, AZ 85345

Information may also be obtained by written request emailed to: [neighborhoodrevitalization@peoriaaz.gov](mailto:neighborhoodrevitalization@peoriaaz.gov) or [appleman@azcsi.com](mailto:appleman@azcsi.com)

Persons with disabilities using a TDD or TTY device may communicate with our office by calling the U.S. West relay service at 711. Disability access is provided at the meeting location. Asistencia en español: Para que le interpreten la solicitud en español, llame al 623-773-7250.



## APPENDIX 4 – OLD TOWN ZONING ORDINANCE EXCERPT

# ARTICLE 14-42

## OLD TOWN MIXED-USE DISTRICTS (OTMU)

(Ord. 04-19)

### CONTENTS

14-42-1	INTENT
14-42-2	GENERAL PROVISIONS
14-42-3	ZONING DISTRICTS
14-42-4	LAND USE MATRIX
14-42-5	GENERAL REGULATIONS FOR NON-RESIDENTIAL USES
14-42-6	PROPERTY DEVELOPMENT STANDARDS

### 14-42-1 INTENT

- A. The Old Town Mixed-Use Districts are intended to facilitate the revitalization of Old Town Peoria by encouraging a mixture of appropriate uses to be established within the same development or on the same lot. The design for the mixtures of uses intends to promote pedestrian activities and to create economic niches in the Old Town area. The Old Town Mixed-Use Districts implement the goals and policies set forth in the Central Peoria Revitalization Plan and the Peoria General Plan. The design of the Old Town Mixed-Use Districts aims to promote the following land uses:
1. High-quality office, storefront retail, restaurant and entertainment to integrate with various residential components in order to create an urban center where people live, work, and entertain.
  2. Developments that create a compacted pedestrian environment and promote pedestrian activities that would balance day and night uses.
  3. Innovative integration of compatible uses through the conversion of existing buildings and the development of new buildings in a manner that fosters sensitive and sustainable site design and architectural style.

**14-42-2 GENERAL PROVISIONS**

- A. The Old Town Mixed-Use Districts are designed to direct development in the Peoria central core area by allowing complimentary mixtures of commercial, specialized retail, office, and various types of residential developments. Development standards are modified to enhance the urban setting and to encourage private investment. All uses shall be subject to the applicable provisions of the Zoning Ordinance. However, where the regulations and standards established by the Old Town Mixed-Use Districts conflict with other provisions of the ordinance, the regulations and standards set forth in the Old Town Mixed-Use Districts shall govern.

**14-42-3 ZONING DISTRICTS**

- A. The Old Town Mixed-Use Districts encompass an area within the original town plat of Peoria with Grand Ave to the east, Monroe Street to the south, 85<sup>th</sup> Ave to the west and Peoria Ave to the north. The Old Town Mixed-Use Districts compose of three zoning districts: Core Commercial Mixed-Use (CCM), Core Residential Mixed-Use (CRM), and Park/Open Space (PO).

- 1. Core Commercial Mixed-Use (CCM)

- The Commercial Mixed-Use designation allows for retail and service businesses mixed with residential, cultural, educational, community, recreational, entertainment uses. Architecturally enhanced parking structure, street level office, business, or community uses that create a pedestrian friendly environment are strongly encouraged.

- 2. Core Residential Mixed-Use (CRM)

- The Residential Mixed-Use designation allows for primarily single-family residential uses. Limited types of non-residential uses adapted to the residential structures are permitted in the Residential Mixed-Use area. Non-residential uses may include small-scale entrepreneurial, pedestrian-oriented goods and services, family-owned business, bed and breakfast establishments, and small professional or home business whose business is primarily oriented to users in the Old Town area.

- 3. Park/Open Space (PO)

- The Park/Open Space designation is reserved for open space, passive recreational activities and support facilities. The Park and Open Space designation also provides venues for seasonal activities and short-term events such as arts and crafts sales, farmers' markets, out-door performances and similar uses in an urban park-like setting.

**14-42-4 LAND USE MATRIX**

- A. Uses permitted in specific zoning districts within the Old Town Mixed-Use Districts as permitted by right, permitted subject to a Conditional Use Permit, and permitted as an accessory to a principal use on the same lot are established in the Mixed Use Land Use Matrix (Table 14-42-4.a). In the event of a specific use not being identified on the matrix, the Community Development Director or designee(s) shall determine the closest associated use based on the provisions of this ordinance. The City will permit any accessory use customarily incidental to a permitted principal use on the same lot.

**Table 14-42-4.a  
Mixed Use Land Use Matrix**

LAND USE TYPES	CCM	CRM	PO
Multi-Family Residence	P	P	-
Single-Family Residence	P	P	-
<b>ADMINISTRATIVE &amp; FINANCIAL</b>			
Automatic Teller Machine (ATM)	P	-	-
Medical, Dental or Health Offices	P	-	-
Professional, Administrative or Business Offices	P	P	-
<b>AUTOMOTIVE USES (Ord. No. 05-36)</b>			
Automobile Diagnostic and/or Service Establishment, including engine & transmission overhaul, repair facilities & similar services <sup>#</sup>	C		
<b>EATING &amp; DRINKING ESTABLISHMENTS</b>			
Catering Establishment	P	-	-
Coffee Shop	P	-	-
Coffee Shop less than 2,000 square feet and without a drive-thru (Ord. No. 05-36)	P	P	
Outdoor Dining and Seating Areas (Ord. No. 07-22)	C	C	
Restaurants and Cafeterias	P	-	-
Tavern, Bar, Lounge or establishment that sells alcoholic beverages for consumption on premise, excluding restaurants <sup>#</sup>	C	-	-
<b>ENTERTAINMENT AND RECREATION</b>			
Dance, Theatrical, Arts, Music Studio and similar uses (Ord. No. 05-58A)	P	P	-
Health and Exercise Center	P	-	-
Wedding and Reception Center <sup>#</sup>	C	C	C
<b>GENERAL INDUSTRIAL &amp; MANUFACTURING</b>			
Essential Public Service or Utility Installation	P	P	P
Recycling Collection Point	A	A	A
<b>GENERAL RETAIL</b>			
Antiques, Crafts, and Collectibles Sales	P	p*	-
Book, Stationery & Greeting Card Store	P	p*	-
Candy and Ice Cream Store	P	p*	-
Florist	P	p*	-
Gift, Novelty and Souvenir Shop	P	p*	-
Hobby, Stamp and Coin Shop	P	p*	-
Newsstand	P	p*	-
Retail Sales of New & Used Merchandise, Indoor	P	p*	-
Video Rental Store	P	p*	-
Water and Ice Store	P	p*	-

P = Permitted Use

C = Permitted Conditional Use. Conditional Use Permit required. See Article 14-39.

A = Accessory use

\* = Due to potential traffic impacts, residential use shall be the primary use in these categories

# = Subject to special limitations as set forth in Article 14-9 Section 14-9-5

City of Peoria Analysis of Impediments to Fair Housing Choice 2011

LAND USE TYPES	CCM	CRM	PO
<b>INSTITUTIONAL</b>			
Art Gallery	P	P	-
Day Care Centers or Pre-School Centers #	C	C	-
Group Care Facility or Community Residential Facility #	C	C	-
Group Homes, less than 10 handicapped residents	P	P	
Nursing or Convalescent Home, Long Term Care Facility #	C	C	-
Performance Arts Center and similar uses (Ord. No. 05-58A)	P	-	-
Public Buildings #	P	P	P
Public Utility Buildings, Structures, Uses, Facilities and Equipment #	P	P	P
Religious Institutions & similar places of worship #	P	P	-
<b>INTENSE RETAIL</b>			
Appliance, Furniture, & Household Equipment Sales and Rentals	P	-	-
Commercial Service Establishments combining retail, showroom with workshop #	P	-	-
Farmer's and Crafts Markets	C	-	C
Outdoor Sales and Display Area #	P	-	-
<b>LODGING</b>			
Bed and Breakfast Inn #	P	C	-
Living quarter for night guards	A	A	A
<b>PERSONAL SERVICES</b>			
Custom Dressmaking, Furrier, Millinery or Tailor Shop #	P	p*	-
Dry Cleaning and Laundry Establishment	P	-	-
Laundromat, self-service	P	-	-
Locksmith	P	-	-
Palm Readers, Phrenologists, Fortune Tellers and Astrologers	P	p*	-
Photographic Studio	P	p*	-
Shoe Sales and Service, Clothing Alteration	P	p*	-
Ticket and Travel Agency	P	-	-
Watch and Clock Repair Shop	P	p*	-
<b>TRANSPORTATION</b>			
Parking lots or structures	A	-	-

P = Permitted Use

C = Permitted Conditional Use. Conditional Use Permit required. See Article 14-39.

A = Accessory use

\* = Due to potential traffic impacts, residential use shall be the primary use in these categories

# = Subject to special limitations as set forth in Article 14-9 Section 14-9-5

**14-42-5 GENERAL REGULATIONS FOR NON-RESIDENTIAL USES**

- A. All activities, except as otherwise permitted herein, shall be conducted entirely within enclosed buildings.
- B. Outdoor storage of goods and materials shall be prohibited.
- C. Warehousing or indoor storage of goods and material beyond that normally incidental to permitted uses shall be prohibited.
- D. Automotive Uses shall be limited to developments with arterial street frontages and to properties having a Certificate of Occupancy as of July 1, 2005. (Ord. No. 05-36)

**14-42-6 PROPERTY DEVELOPMENT STANDARDS (Ord. No. 06-16)**

- A. All mixed-use developments integrating a residential component in the CCM District shall be consistent with the *Non-Residential Design Standards* (Design Review).
- B. All mixed-use developments integrating a non-residential component in the CRM District shall be consistent with the *Residential Design Standards* (Design Review).
- C. Parking Facilities (Ord. No. 05-36)
  - 1. There is no minimum requirement for parking spaces in the Old Town Mixed-Used Districts. To promote the urban form outlined in Section 14-42-1, developments are encouraged to locate parking facilities behind buildings and structures, and/or offer shared or joint parking arrangements.
- D. Landscape Requirements
  - 1. There are no minimum on-site landscape requirements. However, all portions of the development not occupied by buildings, structures, vehicular access and parking shall be landscaped or finished with a natural topping material which may include, but is not limited to, turf (subject to Section 14-35-4.B.2), ground cover, decomposed granite (at a minimum size of ¾" minus and at a depth of 2"), river run rock, expanded shale or bark. A pre-emergent herbicide shall be applied to the ground prior to and after the initial installation of natural surface materials in any landscaped area to prevent weed growth.

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E. CCM and PO District Standards:

DEVELOPMENT STANDARDS	CCM	PO
<b>SETBACKS <sup>1</sup> (FEET)</b>		
Front Minimum <sup>2</sup>	0	0
Front Maximum <sup>3</sup>	10	0
Rear	0	0
Side	0	0
Interior	0	0
<b>MAXIMUM BUILDING HEIGHT</b>	60	30
<b>LANDSCAPE BUFFER ABUTTING RESIDENTIAL ZONES</b>	10	n/r
<b>ACCESSORY BUILDING</b>	(a)	(a)

<sup>1</sup> The Planning Commission and City Council may require additional setback requirements to mitigate potential adverse impacts of proposed uses on adjoining developments.

<sup>2</sup> A street frontage landscape buffer with a minimum width of 15 feet is required for any parking structure developed within the Old Town Mixed-Use District. (Ord. No. 05-36)

<sup>3</sup> Activities within the front setback areas shall be associated with the primary use of the building. Parking spaces within the front setback areas are discouraged. (Ord. No. 05-36)

n/r No minimum requirement

(a) All regulations and development standards applicable to the principal building shall apply.

F. CRM District Standards:

DEVELOPMENT STANDARDS	Single-Family Residence as the Primary Use	Multi-Family Residence as the Primary Use
<b>MINIMUM SETBACKS <sup>1</sup> (FEET) (Ord. No. 06-06)</b>		
Front	10	10
Rear	5	5
Side (Ord. No. 05-36)	5	5 <sup>2</sup>
Corner Side (Ord. No. 06-06)	8	8
<b>MAXIMUM LOT COVERAGE (%)</b>	45	n/r
<b>MAXIMUM BUILDING HEIGHT (FEET)</b>	25	30
<b>ACCESSORY BUILDING</b>	(b)	(b)

<sup>1</sup> The Planning Commission and City Council may require additional setback requirements to mitigate potential adverse impacts of proposed uses on adjoining developments.

<sup>2</sup> No minimum building separation along common wall. (Ord. No. 05-36)

n/r No minimum requirement

(a) Accessory buildings shall be subject to the limitations contained in Article 14-5 "Single-Family Residential Districts" Section 14-5-8 of the ordinance.