

# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE 2024 UPDATE



For Submission to the U.S. Department of Housing & Urban Development



**Sierra Vista**  
**Analysis of Impediments**  
**to Fair Housing Choice**  
**2024 Update**

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Prepared for:



City of Sierra Vista, Arizona

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## INTRODUCTION

### PURPOSE OF THE REPORT

The Fair Housing Act of 1968 states that it is the policy of the United States to provide for Fair Housing throughout the country and the Act prohibits any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including or otherwise making unavailable or denying a dwelling to any person because of race, color, religion, sex [including gender identity and sexual orientation], national origin, handicap, or familial status. The State of Arizona echoes such a goal and has also adopted legislation protecting equal access to housing.

Nationally, Fair Housing and impediments to Fair Housing are monitored by the United States Department of Housing and Urban Development (HUD) and Community Development Block Grant (CDBG) funding for Fair Housing advocacy groups. This role of HUD to act as an administrator of Fair Housing programs originated in 1968 with the passage of the Civil Rights Act, described below.

Each grantee which receives CDBG funding under Title I of the Housing and Community Development Act is required to further Fair Housing and Fair Housing planning by conducting an analysis to identify impediments to Fair Housing choice within the cities/communities within its jurisdiction. The grantee will also take appropriate actions to overcome the effects of any impediments identified and will maintain records which reflect the analysis and actions taken in this regard.

The City of Sierra Vista has consistently supported the concept of the provision of Fair Housing for its residents without regard to race, color, religion, sex [including gender identity and sexual orientation], national origin, handicap, or familial status. As a new entitlement community, the City will consistently use a portion of its funding to support programs of Fair Housing services for low- and moderate-income households. The fundamental Fair Housing goal is to make housing choice a reality through Fair Housing planning, which includes the following:

- Preparing an Analysis of Impediments to Fair Housing Choice (AI);
- Acting to eliminate identified impediments; and
- Providing Fair Housing records.

The purpose of this AI is to provide essential, specific, and detailed information and data to municipal officials and staff, policy makers, housing developers, lenders, and Fair Housing advocates. The AI helps build public support for Fair Housing efforts. This report represents Sierra Vista's efforts in making an objective assessment of the nature and extent of Fair Housing concerns in the City, and the potential impediments to making Fair Housing choice available to its residents.

This is the City's second AI. This AI considers the effects of population growth, an increasingly diverse population, economic change regarding jobs and the housing market, and the continued need for awareness, education, and outreach about Fair Housing.

## DEFINING FAIR HOUSING

### FEDERAL LAWS

The federal Fair Housing Act of 1968 and Fair Housing Amendments Act of 1988 (42 U.S. Code §§ 3601-3619, 3631) are federal Fair Housing laws that prohibit discrimination in all aspects of housing, such as the sale, rental, lease, or negotiation for real property. The Fair Housing Act prohibits discrimination based on race, religion, and national origin. In 1988, the Fair Housing Act was amended to extend protection to familial status and people with disabilities (mental or physical). In addition, the Amendment Act provides for “reasonable accommodations,” allowing structural modifications for persons with disabilities if requested, at their own expense, and sets housing code standards for new multi-family dwellings to accommodate the physically disabled.

Discrimination against families with children and persons with disabilities are further defined in the sections below.

### DISCRIMINATION AGAINST FAMILIES WITH CHILDREN

Familial Status (often called “families with children”) refers to a parent or another person having legal custody of one or more individuals under the age of 18 years. It refers also to a person who is pregnant or in the process of getting legal custody of a minor child (including adoptive or foster parents). Families with children have under the law the same protection against housing discrimination as other groups protected by the law. In only two instances, does the law permit, as exceptions, discrimination against families with children. Both exceptions pertain to so-called housing for older persons. Housing intended for and occupied solely by people 62 years of age or older and housing in which 80 percent of the units are intended for and occupied by at least one person who is 55 years of age or older do not need to comply with the law’s familial status provisions. Discrimination against families with children manifests itself in many ways, the most common of which are in advertising (e.g., indications that rentals are for “no children” or “adults only”), restrictive occupancy standards that unreasonably limit the number of children who may occupy a given space and steering of families with children to separate buildings or parts of buildings.

### PROVISIONS FOR PEOPLE WITH DISABILITIES

The Fair Housing Act defines "handicap" (or disability) as:

- 1) a physical or mental impairment which substantially limits one or more of such person's major life activities,
- 2) a record of having such an impairment, or
- 3) being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance.

### SPECIAL PROTECTIONS

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

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

## REASONABLE ACCOMMODATIONS

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

## REASONABLE MODIFICATIONS

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

## FULL ACCESSIBILITY OF “NEW” MULTI-FAMILY HOUSING

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

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

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

- The Housing for Older People Act of 1995 (HOPA) made several changes to the 55 and older exemption. Since the 1988 Amendments, the Fair Housing Act has exempted from its familial status provisions properties that satisfy the Act's 55 and older housing condition. First, HOPA eliminated the requirement that 55 and older housing have "significant facilities and services" designed for the elderly. Second, HOPA establishes protection from damages for persons who in good faith believe that the 55 and older exemption applies to a particular property, if they do not actually know that the property is not eligible for the exemption and if the property has formally stated in writing that it qualifies for the exemption.
- Changes were made in the Act to enhance law enforcement, including making amendments to criminal penalties in section 901 of the Civil Rights Act of 1968 for violating the Fair Housing Act.
- Changes were made to provide incentives for self-testing by lenders for discrimination under the Fair Housing Act and the Equal Credit Opportunity Act. See Title II, subtitle D of the Omnibus Consolidated Appropriations Act, 1997, P.L. 104 - 208 (9/30/96)<sup>1</sup>. In addition, it is also illegal for anyone to threaten, coerce, intimidate, or interfere with anyone exercising a Fair Housing right or assisting others who exercise that right and advertise or make any statement that indicates a limitation or preference based on race, color, religion, national origin, familial status, or handicap.

Both intentional discrimination and unintentional actions or conditions that limit choice are also prohibited.

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## ARIZONA LAWS

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

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

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## SIERRA VISTA ORDINANCE

The City of Sierra Vista does not currently have a Fair Housing ordinance. The City on a yearly basis passes a Fair Housing resolution focused on supporting the Mayor, City Council, City Manager, City policies and programs, and City staff to uphold the Fair Housing principals in the Housing and Community Development Act of 1974 and Civil Rights Act of 1968.



A citizen may contact the Southwest Fair Housing Council or the U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO) for assistance with Fair Housing questions or to file a complaint.

## FAIR HOUSING DEFINED

In light of the Fair Housing legislation passed at the federal, state, and local levels, Fair Housing throughout this report is defined as follows:

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

## IMPEDIMENTS DEFINED

Within the legal framework of federal and state laws and based on the guidance provided by the HUD Fair Housing Planning Guide, impediments to Fair Housing choice are defined as:

*Any actions, omissions, or decisions taken because of race, color, religion, sex [including gender identity and sexual orientation], disability, familial status, or national origin which restrict housing choices or the availability of housing choices; or*

*Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex [including gender identity and sexual orientation], disability, familial status, or national origin.*

To affirmatively promote equal housing opportunity, a community must work to remove impediments to Fair Housing choice.

### FAIR HOUSING AND AFFORDABLE HOUSING

When discussing “Fair Housing” and “affordable housing,” the two phrases are often used interchangeably. The concepts are distinct but intertwined. However, it is important to distinguish between the two to clearly identify issues and reduce Fair Housing discrimination. The phrase “Fair Housing,” in the context of preparation of an AI Report, refers to persons (families, seniors, individuals, and special needs populations) who are members of protected classes, as specified by federal statutes. It is illegal to discriminate against a person on the basis of their membership in a protected class in the sale, rental, financing, and insuring of housing.

On the other hand, “affordable housing” generally refers to the ability of households to afford, based on income, to buy or rent housing within their means. The key difference between the two concepts is **that issues of discrimination regarding Fair Housing can apply to all income levels, because protected classes are represented in all income groups.**

Because the two concepts are different, tools to address Fair Housing are distinguished from tools to increase the supply of affordable housing. Most local, state, and federal funding programs that support increasing the supply of affordable owner and renter housing are targeted to low- and moderate-income households. Low-income households are defined by most of those publicly funded programs as earning less than 50 percent of the HUD determined area median income (AMI), with moderate-income households earning 50 to 80 percent of the AMI. In certain instances, affordable housing programs address households with greater incomes.

There are many actions recommended in this AI Report that can be taken to reduce discrimination against locally and federally protected groups in the selling, renting, financing, and insuring of housing. Such actions include but are not limited to: increasing awareness, outreach, and education about Fair Housing laws and potential discrimination; increasing the supply of affordable housing, and evaluating government policies that directly or indirectly affect the housing market. While implementation of these actions will reduce discrimination in housing, it is not likely that such actions taken alone will eliminate housing discrimination.

It is difficult to talk about addressing impediments to Fair Housing, and actions to eliminate discrimination in housing, without simultaneously talking about development of policies, plans, programs, and projects to increase the supply of affordable housing. Discrimination in housing will, in part, be reduced by the provision of housing choices made affordable to all income groups in all communities, especially low- and moderate-income households.

Certain protected classes have disproportionate representation in the numbers of low- and moderate-income households in Sierra Vista, and so it is reasonable to expect that as the supply of affordable housing is increased in all communities, greater numbers of protected class members will have access to housing without discrimination.

### FILING A COMPLAINT

There are three primary agencies a Fair Housing Complaint may be filed. The first option is with the Southwest Fair Housing Council, the Arizona Attorney General’s Office, or the U.S. Department of Housing and Urban Development (HUD). A person has one year after an alleged violation to file a complaint, but it should be filed in good faith that a violation has occurred.



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## **SOUTHWEST FAIR HOUSING COUNCIL**

The Southwest Fair Housing Council is a non-profit organization that advocates for and facilitates the enforcement of the Federal and State Fair Housing Act in addition to the nondiscriminatory Ordinances of different Arizona municipalities. They act as a local Fair Housing center. If you are interested in their assistance, you may email them at [intake@swfhc.org](mailto:intake@swfhc.org) or call their office at 1-888-624-4611. They provide services in Spanish and English.



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## **ATTORNEY GENERAL'S OFFICE**

To initiate a complaint with the Civil Rights Division of the Arizona Attorney General's Office, a person must complete an intake complaint form, which is delivered to the Attorney General's office by mail, fax, or via the internet. This form may be found on the Internet or the following phone or mailing options:

<https://www.azag.gov/complaints/civil-rights>

Call the Attorney General's Office toll-free numbers: 877-491-5742 (Phoenix) or 877-491-5740 (Tucson)

Write a letter to the Attorney General that includes the following information:

- The person's name and address;
- The name and address of the person the complaint is about;
- The address of the house or apartment involved;
- The date when the incident occurred; and
- A short description of what happened.

Then mail the letter to:

Arizona Civil Rights Division  
Office of the Attorney General  
2005 N Central Ave  
Phoenix, Arizona 85004

Complaints must be filed with the Attorney General's Office Civil Rights Division within 12 months (i.e., one year after the alleged violation). After receiving the complaint, the Attorney General will investigate and will complete a dual filing with HUD at no charge to the complaining person.

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

If the Fair Housing Act has been violated, the Attorney General will try to reach a conciliation agreement with the respondent. If an agreement is reached, the Attorney General will take no further action on the complaint. If the Attorney General finds reasonable cause to believe that the discrimination occurred and no conciliation is reached within 30 days, or the conciliation agreement has been breached, the Attorney General will file a civil action for enforcement.

There are two other laws that do not directly address Fair Housing, but that deal with housing issues. The first is the Arizona Landlord and Tenant Act, which details the rights of both tenants and landlords with respect to rental property, while the second, the Arizona Mobile Home Landlord and Tenant Act, deals specifically with mobile homes.

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## U.S. HOUSING AND URBAN DEVELOPMENT (HUD) OFFICE

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

<https://portalapps.hud.gov/FHEO903/Form903/Form903Start.action>

A complaint form or additional information may also be obtained by calling the HUD Housing Discrimination Hotline at 1-800-669-9777, report online at <https://www.hud.gov/fairhousing/fileacomplaint> or by written report to the Regional FHEO Office:

San Francisco Regional Office of FHEO  
U.S. Department of Housing and Urban Development  
One Sansome Street Suite 1200  
San Francisco, CA 94104

After a formal allegation is filed one or more investigators will develop a formal report based on gathering information regarding relevant documentation, locations, timelines, conduct interviews, etc. The investigators will provide the party again whom the allegation has been filed against and provide an opportunity to respond.

A complaint may be resolved in several ways. HUD is required to try to first reach an agreement between the two parties involved. The conciliation agreement is voluntary and may be entered at any time. HUD may resolve the investigation through a conciliation agreement and/or a Voluntary Compliance Agreement. If an agreement is approved, HUD will take no further action unless the agreement has been breached.

The government may bring Fair Housing Act or other civil rights cases based on the HUD investigation. Example of relief sought include compensation for victims, changes to policies and procedures, and training. When the government brings a legal action, it does not charge any fees or costs to individuals who are alleging discrimination. Cases before the HUD Administrative Law Judge are handled by the HUD Office of General Counsel for litigation of the case. If cases are pulled into federal court, the cases are handled by the U.S. Department of Justice.

## SCOPE OF ANALYSIS

This AI Report provides an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual's or a household's access to housing. The AI Report involves:

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

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## GEOGRAPHIC AREA COVERED

This report constitutes the AI Report for the City of Sierra Vista, Arizona.

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## DATA AND METHODOLOGY

The purpose of this analysis is to identify any local housing concerns and impediments to the exercise of Fair Housing choice in the City of Sierra Vista. This analysis attempts to identify any attitudes, barriers, institutional practices, and public policies which create barriers to affirmatively further Fair Housing.

Research and analysis of information regarding housing choice and restrictions was based upon review of socioeconomic and housing characteristics. Data sources included, historical US Census figures (2000- 2021), reports and statistics from local, regional, State and Federal agencies, the City of Sierra Vista data, and interest groups. Reflecting HUD guidelines concerning “recommended contents,” this analysis incorporates the background of housing choice in Sierra Vista, federal, state and local public policies, profiles describing socioeconomic conditions of persons who make up the City of Sierra Vista, and community services provided by the City’s CDBG program. Last, this analysis includes institutional practices that affect the level of choice available within the area’s housing market.

The census data used is the U.S. Census which is a real count of specific individuals and American Community Survey (ACS) which is a statistically valid survey including results over a five-year period. For this report, the ACS data used is from 2017 to 2021.

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

- 2000, 2010, and 2020 U.S. Census and the 2017-2021 ACS
- Zillow Home Value Index 2023. URL: <https://www.zillow.com/home-values/192040/sierra-vista-az/>
- The City’s Consolidated Plan, 2019-2023
- Comprehensive Housing Affordability Strategy (CHAS) Data from HUD
- Home Mortgage Disclosure Act (HMDA) Data
- U.S. Department of Housing and Urban Development (HUD), Fair Housing and Equal Opportunity Complaint Data

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

## COMMUNITY PARTICIPATION

As with the development of the Consolidated Plan, this AI Report considers consultation input and builds upon existing participation mechanisms and venues. Citizens, not-for-profit organizations, and interested parties are afforded a variety of opportunities to:

- contribute during meetings, public hearings, and planning sessions;
- review and comment upon the Citizen Participation Plan;
- comment upon the AI Report and its amendments; and
- register complaints about the AI Report and its amendments.

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

- Preparing, adopting, and following a Citizen Participation Plan;
- Publishing informational notices about the AI Report;
- Holding public hearings in accessible places at convenient times after providing reasonable notice;
- Publishing a summary of the AI Report, describing its contents and purpose and a listing of locations where the entire document could be examined;
- Making the AI Report available for public examination and comment for a period of thirty (30) days before submission to HUD;
- Providing citizens, public agencies, and other interested parties reasonable access to records regarding uses of assistance for affordable and supportive housing the City may have received during the preceding five years; and
- Considering the views and comments of citizens and preparing a summary of those views for consideration with the submission.

The Department of Community Development staff held a City Council Work Session on January 9, 2024, a public meeting on February 15, 2024, a public hearing on March 14, 2024, an online survey February-March 2024, a public comment period from April 9 through May 8, 2024, and a public hearing on April 11, 2024. These meetings were part of a concerted effort to obtain public input on Fair Housing and the draft AI Report.

Representatives from community social service organizations, housing developers and advocates, and government departments were invited to attend the public meeting.

The City Council approved the AI Report and an executed Resolution of Authorization. The document was then forwarded to the HUD Regional Office.

## COMMUNITY PROFILE

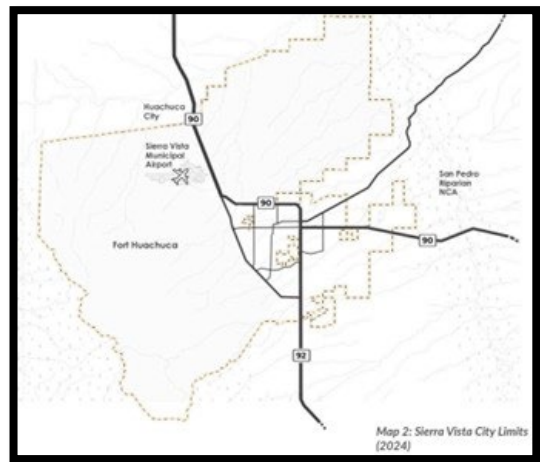
Fair Housing is concerned with ensuring that: 1) all people are treated equally in the rental, sale, or occupancy of housing; and 2) a range in types and prices of housing is available. This chapter examines the population, housing, and special needs characteristics and trends in the City that may affect equal housing opportunity.

This Community Profile provides insights for identifying potential impediments to Fair Housing choice. While not definitive indicators of impediments to Fair Housing choice in and of themselves, these data may point to conditions or situations that could be indicators of impediments to Fair Housing choice. Observations about issues that could arise are made at the end of this section.

## OVERVIEW

The City of Sierra Vista is located in Cochise County, Arizona, 75 miles southeast of Tucson. Sierra Vista is the largest of seven incorporated cities in Cochise County, accounting for one-third of the county's population, and is bordered on the northwest by the much smaller town of Huachuca City. The City has a total area of 140.17 square miles, which includes Fort Huachuca. Sierra Vista is flanked on the southwest side by the Huachuca Mountains, with Miller Peak rising to 9,466 feet and Carr Peak to 9,236 feet, both south of the City limits. The City is accessible via Arizona State Routes 90 and 92. The San Pedro River flows just east of the City limits. The City serves as the main commercial, cultural, and recreational hub of Cochise County. The City is served by the Sierra Vista Municipal Airport (FHU) which is jointly operated by the U.S. Army as Libby Army Airfield. Currently there are no commercial flights arriving to or departing from FHU.

In addition to serving as a retail center, Sierra Vista has a substantial employment base because of Fort Huachuca, the community's major employer. Because of contracts with the Army, the professional, scientific, and technical services sector has been unusually large, and nearly half of all jobs in Sierra Vista are in the government sector. Wick Communications, which publishes several dozen newspapers in some twelve states, is headquartered in Sierra Vista. Higher education is available through the University of Arizona South, Cochise Community College, the University of Phoenix, Wayland Baptist University, and Western International University.



## DEMOGRAPHICS

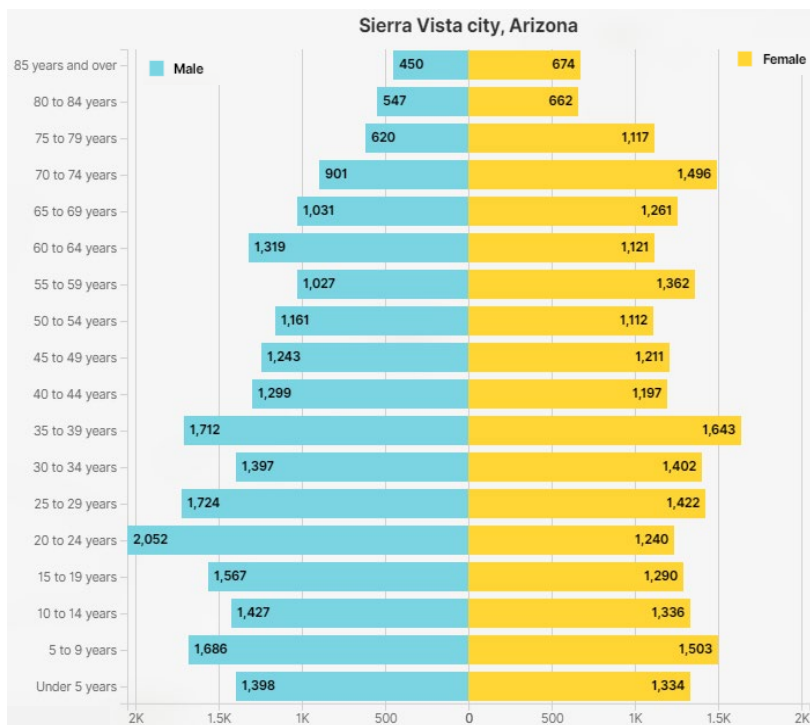
### POPULATION

According to the U.S. Census, the City's total population at the turn of the century was 35,553 residents. Between 2000 and 2010, Sierra Vista experienced a 23% population increase, or 8,335 people. Overall population growth slowed the following decade in large part due to 2013 budget sequestration, which was a series of automatic spending cuts triggered by the Budget Control Act of 2011. Sequestration led to furloughs of civilian employees, reduced training, and other budgetary cuts at the fort causing a local economic recession. The City ended the decade with a 3% overall gain in population with a 2020 Census population of 43,888 residents.

Age Cohort	Sierra Vista %	Arizona %	US %
Under 5	6.1%	5.8%	5.9%
5 – 9	7.1%	6.2%	6.1%
10 – 14	6.1%	6.8%	6.6%
15 – 19	6.4%	6.7%	6.6%
20 – 24	7.3%	6.8%	6.5%
25 – 29	7.0%	7.0%	6.9%
30 – 34	6.2%	6.6%	6.8%
35 – 39	7.5%	6.4%	6.6%
40 – 44	5.6%	6.1%	6.2%
45 – 49	5.5%	6.0%	6.2%
50 – 54	5.1%	5.9%	6.4%
55 – 59	5.3%	6.1%	6.7%
60 – 64	5.4%	6.0%	6.3%
65 – 69	5.1%	5.6%	5.3%
70 – 74	5.3%	4.8%	4.2%
75 to 79	3.9%	3.3%	2.7%
80 to 84	2.7%	2.0%	1.8%
85 years and older	2.5%	1.9%	1.9%

Source: 2017-2021 ACS 5-Year Estimates

Graphic 1



Source: U.S. Census Community Profile

The median age in the City is 37.3. The United States median age is 38.4 and the State of Arizona is 38.1 (2017-2021 ACS 5-Year Estimates). The lower median age is affected by the presence of a higher percentage of young, working-age adult cohorts between under 9 and 20 and 25.

**Table 1** and **Graphic 1** provides additional information on Sierra Vista's population by age and sex.

## RACE

**Table 2** below compares the racial composition of Sierra Vista, to Arizona, and United States. In the City, 23.6% of the population identifies as Hispanic or Latino. The U.S. Hispanic or Latino population is 18.7%, while Arizona is 30.7%. The City is above the national average with its Hispanic or Latino population, but below the state's average by about 7%. The black population is below the national, but above the state's average. Of those reporting as two or more races, the City exceeds both the state and national percentages.

	Sierra Vista %	Arizona %	US %
<b>Hispanic &amp; Latino</b>	23.6%	30.7%	18.7%
<b>Non-Hispanic:</b>			
<b>White</b>	56.5%	53.4%	57.8%
<b>Black or African American</b>	7.4%	4.4%	12.1%
<b>American Indian &amp; Alaska Natives</b>	0.5%	3.7%	0.7%
<b>Asian</b>	4.3%	3.5%	5.9%
<b>Native Hawaiian &amp; Pacific Islander</b>	0.7%	0.2%	0.2%
<b>Some Other Race</b>	0.7%	0.4%	0.5%
<b>Two or More Races</b>	6.2%	3.7%	4.1%

Source: 2020 Decennial Census

There are no census tracts in which a minority population constitutes over 50% of population of that tract.

The following data is from the 2017-2021 ACS 5-Year Estimates. Approximately 9.5% of the City's population is foreign born which is less than the state (13.1%) and national (13.6%) percentages. The percentage of the population in Sierra Vista that speaks a language other than English is 18.4%, which is under the state's percentage of 26.2% and national percentage of 21.7%. The most common language spoken beside English is Spanish at 12.4%.

## FAMILIES & HOUSEHOLDS

The total number of households in the City was 20,051 (2020 Census). **Table 3** shows that in the City, there is a higher percentage of male householder, female householder, nonfamily households, and those with a member of the household 65 year or more when compared to the state and national average. The City, state, and national percentage of households with a member 18 years or younger and married-couple households are similar. Households with a member 18 years or younger comprise approximately 30% of household types and married-couple households comprise approximately 47%.

	Sierra Vista %	Arizona %	US %
<b>Married-couple household</b>	47.3%	47.3%	47.8%
<b>Cohabiting couple household</b>	5.8%	7.9%	6.7%
<b>Male householder, no spouse/ partner present</b>	19.0%	18.6%	18.0%
<b>Female householder, no spouse/ partner present</b>	27.9%	26.2%	27.4%
<b>Nonfamily Households</b>	37.7%	34.9%	34.9%
<b>Households with one or more people under 18 years</b>	30.6%	30.5%	30.6%
<b>Households with one or more people 65 years and over</b>	34.4%	32.7%	30.2%
<b>Average Household Size</b>	2.99	3.16	3.20

Source: 2017-2021 ACS 5-Year Estimates

## DISABLED PERSONS & SPECIAL NEEDS POPULATION

The percentage of the total population in Sierra Vista with a disability is 15.7% which is higher than the State (13.2%) and Federal level (12.6%) based on the 2017-2021 ACS 5-Year Estimates.

Table 4: Elderly & Frail Elderly			
	Sierra Vista	Arizona	United States
Elderly	19.50%	17.60%	16.04%
Frail Elderly	9.50%	7.20%	6.50%

Source: 2017-2021 ACS 5-Year Estimates

Elderly for the purpose of this report includes those who are 65 year and older. Frail Elderly are those who are 75 year and older. **Table 4** shows that in the City there are more elderly and frail elderly persons than in the state and national average (2017-2021 ACS 5-Year Estimates).

The total number of Disabled Persons in the City is approximately 6,421 individuals or 15.7% of the total population. Those who are 65 years and over with disabilities include 2,881 individuals or 33.3% of the elderly population. These figures, based upon the Census Bureau definition of disability, include a wide range of disabilities and a precise figure for persons with physical disabilities is difficult to determine.

### THE DEVELOPMENTALLY DISABLED

The American Association on Intellectual and Development Disabilities (AAIDD) indicates that the base definition of intellectually or developmentally disabled is an IQ score less than 70-75. The Association for Retarded Citizens (ARC) indicates that the nationally accepted percentage of the population that can be categorized as intellectually or developmentally disabled is 2.5% to 3% of the population. By this calculation, there are an estimated 1,136 to 1,363 developmentally disabled persons in Sierra Vista.

The preferred housing options for the developmentally disabled are those that present a choice and integrate them into the community. This includes supervised apartments, supported living, a skills development home, and family care homes.

### THE PHYSICALLY DISABLED

In Sierra Vista, the number of persons under the age of 18 with disabilities is 742, while the number of persons aged 18 to 64 with disabilities is 2,798 based on the 2017-2021 ACS 5-Year Estimates. The number of persons 65 and over with disabilities is 2,881. A breakdown of those with hearing, vision, cognitive, ambulatory, self-care, and independent living difficulty is provided in **Table 5** by percentage of the total population for all age groups having these various disabilities.

Table 5: Disability Characteristics			
	Sierra Vista %	Arizona %	US %
Hearing Difficulty	4.8%	4.0%	3.5%
Vision Difficulty	2.4%	2.5%	2.3%
Cognitive Difficulty	6.3%	5.1%	5.1%
Ambulatory Difficulty	7.7%	6.8%	6.7%
Self-Care Difficulty	2.6%	2.4%	2.9%
Independent Living Difficulty	5.7%	5.5%	7.3%

Source: 2017-2021 ACS 5-Year Estimates

The implications for Fair Housing issues are that there is a need for smaller housing units for the elderly and those living alone. There is a need for housing for the frail elderly, but the City's population percentages indicate a moderate demand for the housing designed for these persons. The percentage of persons with disabilities is higher than that of the state and national average, which indicates a need for housing to meet the needs of this segment of the population.



## ECONOMIC FACTORS

For the population over the age of 25, the City has a higher percentage of those with some college, no degree, and associate degrees than the state and national average for education attainment. **Table 6** shows the population breakdown by education attainment.

Table 6: Education Attainment				
	Number	Sierra Vista %	Arizona %	US %
<b>Less than 9th grade</b>	630	2.1%	4.9%	4.8%
<b>9th to 12th grade, no diploma</b>	1,420	4.7%	6.8%	6.3%
<b>High school graduate (includes equivalency)</b>	6,270	20.8%	23.5%	26.5%
<b>Some college, no degree</b>	8,670	28.8%	24.6%	20.0%
<b>Associate's degree</b>	3,499	11.6%	9.0%	8.7%
<b>Bachelor's degree</b>	5,871	19.5%	19.3%	20.6%
<b>Graduate or professional degree</b>	3,751	12.5%	11.9%	13.1%

Source: 2017-2021 ACS 5-Year Estimates

## LABOR FORCE & EMPLOYMENT

Sierra Vista's labor force (persons 16 years or older) is 16,474 based on the 2017-2021 ACS 5-Year Estimates. This is 79.5% of the total population of Sierra Vista. This percentage is lower than the national percentage of 80.1% and state percentage of 79.8%. The **Table 7** shows employment by industry. Sierra Vista's top three employment industries are education services, healthcare, and social assistance (22%), public administration (19.6%), and professional, scientific, and management, and administrative and waste management services (17.2%). The City has a higher proportion of the work force in public administration and professional, scientific, and management, and administrative and waste management services than the state and national averages.

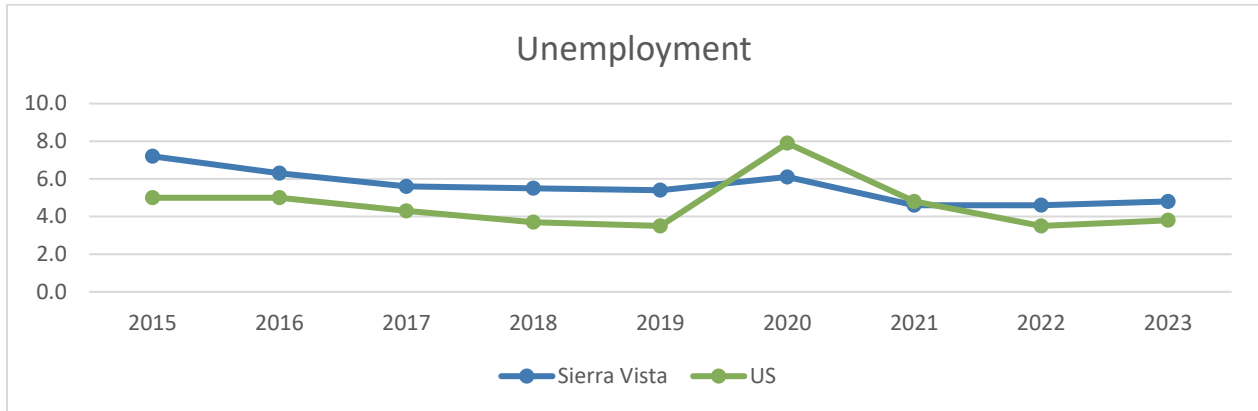
Table 7: Worker by Industry				
	Number	Sierra Vista %	Arizona %	US %
<b>Agriculture, forestry, fishing and hunting, and mining</b>	67	0.4%	1.2%	1.7%
<b>Construction</b>	1,148	7.0%	7.3%	6.8%
<b>Manufacturing</b>	649	3.9%	7.2%	10.0%
<b>Wholesale trade</b>	60	0.4%	2.2%	2.5%
<b>Retail trade</b>	1,653	10.0%	12.0%	11.0%
<b>Transportation and warehousing, and utilities</b>	354	2.1%	5.6%	5.7%
<b>Information</b>	184	1.1%	1.8%	1.9%
<b>Finance and insurance, and real estate and rental and leasing</b>	620	3.8%	8.7%	6.7%
<b>Professional, scientific, and management, and administrative and waste management services</b>	2,834	17.2%	12.5%	11.9%
<b>Educational services, and health care and social assistance</b>	3,624	22%	22.1%	23.3%
<b>Arts, entertainment, and recreation, and accommodation and food services</b>	1,552	9.4%	10.0%	9.1%
<b>Other services, except public administration</b>	504	3.1%	4.6%	4.8%
<b>Public administration</b>	3,225	19.6%	4.8%	4.7%

Source: 2017-2021 ACS 5-Year Estimates

## UNEMPLOYMENT

The unemployment rate is calculated by the Bureau of Labor Statistics. The unemployment rate is based on the Metropolitan Statistical Area (MSA) of Sierra Vista and Douglas Arizona. For the Sierra Vista-Douglas MSA in September 2023, the unemployment rate was 4.8%. In comparison to the unemployment rate in September of 2019 (five years prior), the unemployment rate was greater prior (5.4%). In review of the national trends, the unemployment rate in September of 2023 was 3.8% and in September of 2019 was 3.5%. Sierra Vista's unemployment rates were higher than the national rates. The unemployment rate of Sierra Vista and the US is illustrated in **Graphic 2** below.

**Graphic 2**



Source: Bureau of Labor Statistics

## INCOME & POVERTY

**Table 8** shows key income and poverty figures on the City, state, and national level. The median income in the City is higher than Arizona, but well below the national median income (approximately \$3,000 less). The median family income in the City is less than both the state (approximately \$3,000 less) and national median numbers (approximately \$6,000 less). The per capita income for the City is slightly above the state, but approximately \$3,000 less than the nation. The City has the lowest percentage below the poverty line at 7.1% for families and 10.8% for individuals.

Table 8: Median Income			
	Sierra Vista	Arizona	United States
<b>Median Household Income</b>	\$66,129	\$65,913	\$69,021
<b>Median Family Income</b>	\$79,935	\$81,622	\$85,806
<b>Per Capita Income</b>	\$34,651	\$34,644	\$37,638
<b>% Families Below Poverty Level</b>	7.10%	9.50%	8.90%
<b>% Individuals Below Poverty Level</b>	10.80%	12.50%	12.60%

Source: 2017-2021 ACS 5-Year Estimates

For City residents 70.6% of income came from earnings. The breakdown of income sources was 35.4% using social security, 34.5% retirement, 2.9% supplemental security, and 3.1% cash public assistance. The percentage of residents utilizing Food Stamp/SNAP benefits in the last 12 months was 11.5%.

The national standard for poverty level is a household making less than \$15,000 annually. **Table 9** shows that Sierra Vista has a larger percentage of households making less than \$15,000, at approximately 10%, than the state and national average. The state average is 8.4% and the national the average is 9.4%. In

the City, largest income household group is those making \$100,000 to \$149,000, which is fairly consistent with the state and national trend.

Table 9: Household Income			
	Sierra Vista %	Arizona %	US %
<b>Less than \$10,000</b>	4.9%	5.5%	5.5%
<b>\$10,000 to \$14,999</b>	5.1%	3.4%	3.9%
<b>\$15,000 to \$24,999</b>	7.1%	7.7%	7.8%
<b>\$25,000 to \$34,999</b>	8.6%	8.5%	8.2%
<b>\$35,000 to \$49,999</b>	12.7%	12.6%	11.4%
<b>\$50,000 to \$74,999</b>	16.6%	18.2%	16.8%
<b>\$75,000 to \$99,999</b>	14.6%	13.5%	12.8%
<b>\$100,000 to \$149,999</b>	17.7%	16.3%	16.3%
<b>\$150,000 to \$199,999</b>	8.4%	7.0%	7.8%
<b>\$200,000 or more</b>	4.2%	7.4%	9.5%

Source: 2017-2021 ACS 5-Year Estimates

HUD has provided detailed data as part of its Comprehensive Housing Affordability Strategy (CHAS) materials to assist in preparing the Consolidated Plan and implementing HUD programs. This information is from the CHAS data from 2016-2020 ACS 5-Year Estimates. HUD uses five income categories for its analysis. The five income categories are:

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

Table 10: Household Income Distribution & Cost Burden	
<b>Income Distribution</b>	Total
<b>0-30%</b>	1,405
<b>31-50%</b>	1,790
<b>51-80%</b>	2,480
<b>81-100%</b>	1,515
<b>100% and above</b>	10,635
<b>Housing Cost Burden</b>	Total
<b>0-30%</b>	13,280
<b>31-50%</b>	2,495
<b>51% or Greater</b>	1,800
<b>Not Available</b>	245

Source: 2017-2021 ACS 5-Year Estimates

**Table 10** shows the income distribution and housing cost burden by income for Sierra Vista, Arizona, as calculated by HUD. The largest income group is 100% and above with 10,635 households, and the second largest income group is 51-80% with 2,480 households. The income group most affected by cost burden is 0-30% with 13,280 households, and the income group second most affected by cost burden is 31-50% with 2,495 households. This means that households with lower incomes are disproportionately affected by higher housing costs compared to their household income, resulting in housing unaffordability.

## HOUSING DATA

### HOUSING UNITS

The total number of housing units in Sierra Vista is 20,155 based on the 2017-2021 ACS 5-Year Estimates. Of those housing units, 10.4% are estimated to be vacant. This is a lower percentage than the state (12.2%), and nation (11.2%). Please note that these are Census Bureau estimates, not current data from local sources.



**Table 11** breaks down housing units by type. The City is relatively similar to Arizona's percentages. There are fewer 1-unit attached, 2 units, 5 to 9 units, 20 or more units, and mobile homes in Sierra Vista than in the state or nation. The predominate housing structure is 1-unit detached at 67.9% of the City's total housing stock, followed by 10-19 units at 7.8%.

Table 11: Type of Structure				
	Number	Sierra Vista %	Arizona %	US %
<b>1-unit, detached</b>	13,677	67.9%	64.1%	61.6%
<b>1-unit, attached</b>	955	4.7%	5.0%	6.0%
<b>2 units</b>	97	0.5%	1.3%	3.5%
<b>3 or 4 units</b>	752	3.7%	3.4%	4.3%
<b>5 to 9 units</b>	589	2.9%	3.9%	4.6%
<b>10 to 19 units</b>	1,568	7.8%	4.0%	4.3%
<b>20 or more units</b>	1,360	6.7%	8.0%	9.7%
<b>Mobile home</b>	1,121	5.6%	9.9%	5.9%
<b>Boat, RV, van, etc.</b>	36	0.2%	0.4%	0.1%

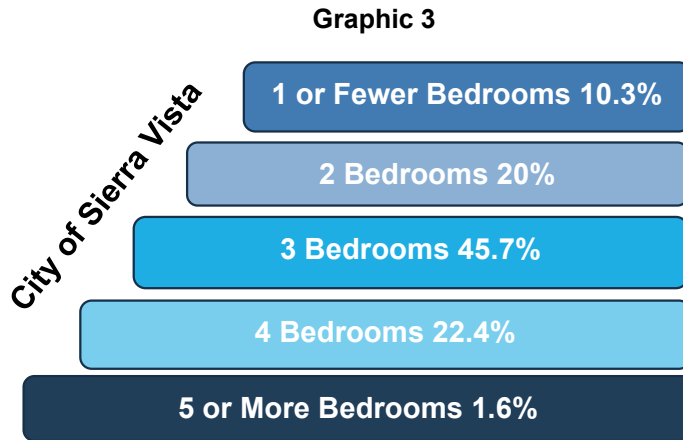
Source: 2017-2021 ACS 5-Year Estimates

The age of housing stock in the City is relatively consistent with state and national trends. **Table 12** shows the top three decades for housing development in the City are 1970-1979 (22.1%), 2000-2009 (21.9%), and 1980-1989 (18.6%). For homes that are 30 years or older, there is typically more maintenance and rehabilitation required to for proper maintenance. Of the housing stock, 57.2% meets this threshold (pre-1990). This could mean more significant costs for residents to live within the City.

Table 12: Structure Built			
	Sierra Vista %	Arizona %	US %
<b>Built 2020 or later</b>		0.1%	0.3%
<b>Built 2010 to 2019</b>		8.3%	8.6%
<b>Built 2000 to 2009</b>		21.9%	23.3%
<b>Built 1990 to 1999</b>		17.1%	19.4%
<b>Built 1980 to 1989</b>		18.6%	17.3%
<b>Built 1970 to 1979</b>		22.1%	16.2%
<b>Built 1960 to 1969</b>		6.6%	7.0%
<b>Built 1950 to 1959</b>		4.8%	5.1%
<b>Built 1940 to 1949</b>		0.2%	1.4%
<b>Built 1939 or earlier</b>		0.4%	1.4%

Source: 2017-2021 ACS 5-Year Estimates

The characteristics of housing include number of bedrooms and utilities. In the City, the top three most common number of bedrooms is 3 bedrooms (45.7%), 4 bedrooms (22.4%), and 2 bedrooms (20%), as shown in **Graphic 3**. The percentage of housing with 1 or fewer bedrooms in the City is 10.3% which is lower than the state (13.9%) and nation (13.4%). There is a concern regarding a diversity of housing size, specifically a lack of smaller units that are more affordable and desired by small families and the elderly.



Source: 2017-2021 ACS 5-Year Estimates

There are an estimated total of 113 housing units (0.6%) that do not have complete plumbing or lack complete kitchen facilities. The percentage of the total housing units that lack plumbing or kitchen facilities are approximately half (0.6%) compared to the state (1.4%) and national (1.2%) percentages.

### OVERCROWDED

Overcrowding is a housing problem for household living conditions. There are two forms of overcrowding defined by HUD:

- 1) Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- 2) Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

The City has a lower percentage of overcrowding than the state and nation as shown in **Table 13**. In the City, overcrowding (0.9%) is more prevalent than severe overcrowding (0.5%).

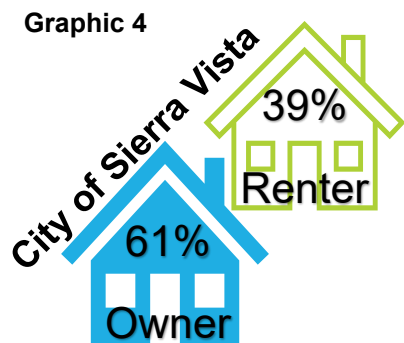
**Table 13: Overcrowding**

Persons per Room	Sierra Vista %	Arizona%	US %
1.00 or Less	98.6%	95.6%	96.7%
1.01 to 1.50	0.9%	3.0%	2.2%
1.51 or More	0.5%	1.5%	1.1%

Source: 2017 2021 ACS 5 - Year Estimates

### TENURE

Sierra Vista's percentage of owner-occupied housing units is lower than the state and national percentages. As illustrated in **Graphic 4**, in Sierra Vista, the percentage of owner-occupied housing units is 61% and renter-occupied housing units is 38.9%. According to 2017-2021 ACS 5-Year Estimates, the national percentage of owner-occupied units is 64.6%, and renter-occupied units is 35.4%. The state's percentage of owner-occupied units is 65.8%, and renter-occupied units is 34.2%.



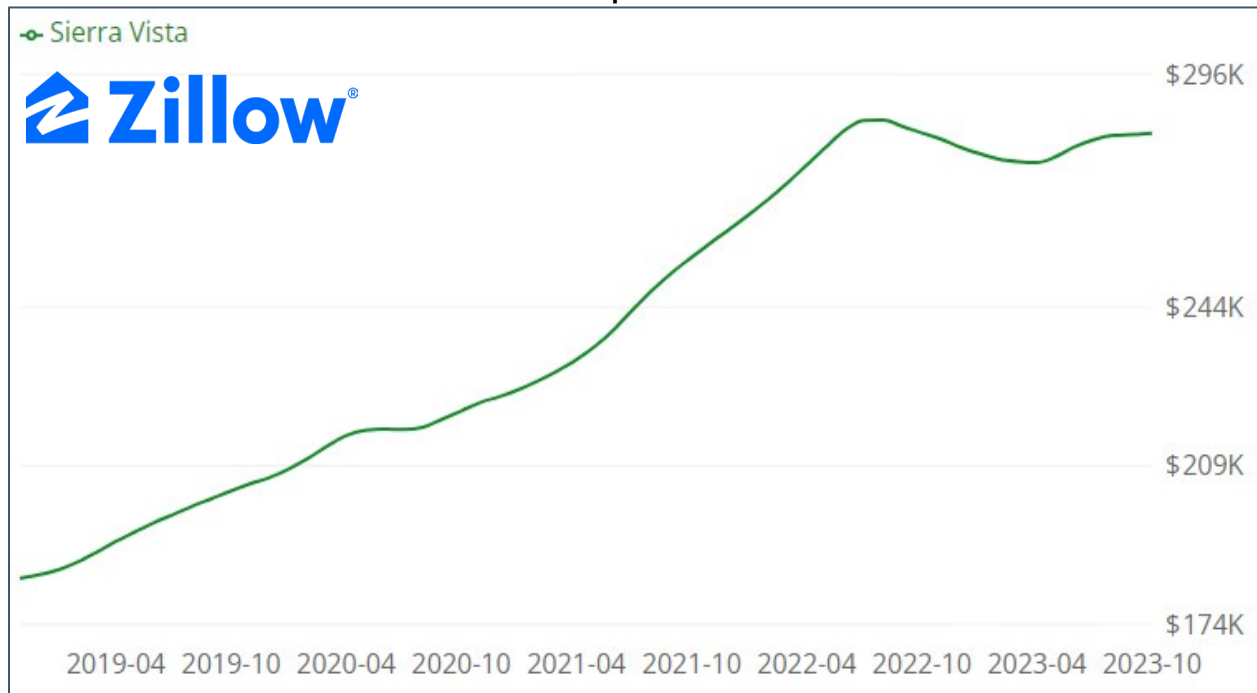
Source: 2017-2021 ACS 5-Year Estimates

The high percentage of renter-occupied units may result from the fact that some military families, as well as some contractors, rent rather than buy anticipating frequent transfer.

## HOUSING COST, COST BURDEN, AND AFFORDABILITY

According to Zillow, a national home sale service, the estimated median sale price on September 30, 2023, was \$281,167 in Sierra Vista. The estimated median sale price in September of 2019 was \$204,359. Over the five-year period, this represents a 37.6% increase. **Graphic 5** shows the change in median sale price over the last five years.

Graphic 5



Source: Zillow Home Value Index 2023. URL: <https://www.zillow.com/home-values/192040/sierra-vista-az/>

The median monthly household mortgage payment in the City is \$1,305 based on the 2017-2021 ACS 5-Year Estimates. This is below the state (\$1,545) and national (\$1,697) median monthly household mortgage payment. The median gross rent in the City is \$1,017, which is less than the state (\$1,172) and nation (\$1,163).

Using the rule of thumb that housing should cost no more than one third of household income, spending more than 30% of household income on housing is considered a “cost burden.” For those with a mortgage in the City, 18.3% have a mortgage that is 30% or more of household income. This is significantly below the state (26.7%) and national (27.2%) percentages. For renters, there is more of an affordability concern. The percentage of households in the City with a gross rent over 30% of their household income is 40.1%. However, this is still lower than the state (48.3%) and national (49.4%) percentages.

According to the 2024 Fair Market Rent determined by HUD for the Sierra Vista-Douglas MSA, the Fair Market Rent for a 2-bedroom apartment is \$1,067 per month. According to the National Low Income Housing Coalition 2022 Out of Reach Report for Arizona, for the Sierra Vista-Douglas MSA, the hourly wage necessary to afford a 2-bedroom apartment is \$17.44. This would require a minimum income of \$36,280 and 1.4 full time jobs at minimum wage to afford a 2-bedroom apartment. At the state level, the necessary minimum income is \$48,747 and hourly wage is \$23.44 with a 1.8 full time job at minimum wage to afford a 2-bedroom apartment. Arizona’s minimum wage was \$12.80 in 2022. Since the Out of Reach Report was published, Arizona’s minimum wage has increased to \$14.35, effective January 1, 2024.

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## **PUBLIC HOUSING**

The City of Sierra Vista does not have its own housing authority and there are no low rent public housing authority units located in the City. There are two place-based Section 8 complexes in the City: Mountain View Apartments (60 units of 2-, 3-, and 4-bedroom units) and Bonita Vista Apartment (100 one-bedroom units for seniors). The increasing number of elderly and younger disabled persons creates additional need for accessible units.

The Cochise County Housing Authority reports that there are approximately 100 persons on the Section 8 waiting list as of May 4, 2023 (Cochise County Housing Authority, Section 8 Housing Choice Voucher Wait List – Cochise & Graham Counties Report Published 5-4-2023). Approximately 30 wait listers are from the Sierra Vista area. Many of the applicants have been waiting since 2021 for an opening.

## **OBSERVATIONS**

Several key points emerge from the preceding discussion. While not definitive indicators of impediments to Fair Housing choice, they point to contributing factors that increase the likelihood of impediments to Fair Housing choice. These points are:

- 1) The population is relatively young and racially and ethnically diverse.
- 2) Despite a solid economic base, nearly one-third of the population is in the low-income categories as defined by HUD. Affordability is a problem for nearly one-third portion of the renter population.
- 3) There is a need for housing rehabilitation in the older neighborhoods and an increasing need for maintenance and rehabilitation of both rental and owner units as many properties are now thirty years old or older.
- 4) There is a relatively high percentage of persons with a disability.
- 5) The City has a higher percentage of senior and elderly persons when compared to the State of Arizona as a whole, and therefore there may be a need for smaller housing units meeting the unique needs of senior and elderly persons.

## FAIR HOUSING PRACTICES

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

## OVERSIGHT ORGANIZATIONS & ENFORCEMENT PROCESSES

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

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

The City of Sierra Vista passed City Resolution 2023-020 on April 13, 2023, which establishes the City's policy regarding Fair Housing. Resolution 2023-020 refers persons to the Southwest Fair Housing Council, the State Department of Housing, the Arizona Attorney General's Office, or HUD with regard to Fair Housing complaints.

As noted above, there are a number of avenues a Sierra Vista resident can take to file a discrimination complaint. Under the Federal Fair Housing Assistance Program (FHAP), the U.S. Department of Housing and Urban Development (HUD) contracts with the Arizona Attorney General's Civil Rights Division to investigate and rule on Fair Housing cases. These types of complaints include alleged violations under the Fair Housing Act (Title VIII) and other HUD programs (Section 504 of the Rehabilitation Act of 1973, American with Disabilities Act of 1990, etc.). **In addition, a citizen may contact the U.S. Department of Housing and Urban Development (HUD) San Francisco Regional Office of Fair Housing and Equal Opportunity (FHEO) directly.**

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



## COORDINATION & SUPERVISION IN THE HOMEOWNERSHIP MARKET

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

**Federal Financial Institutions Examination Council (FFIEC)** is a formal interagency body empowered to prescribe uniform principles, standards, and report forms for the federal examination of financial institutions by the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Office of the Comptroller of the Currency, and the Office of Thrift Supervision, and to make recommendations to promote uniformity in the supervision of financial institutions. The FFIEC provides data on loan originations, loan denials, and other aspects of the home loan process, as well as preparing Community Reinvestment Act rating reports on financial institutions.



**National Association of Realtors (NAR)** is a consortium of realtors, which represent the real estate industry at the local, state, and national level. As a trade association, members receive a range of membership benefits. However, to become a member, NAR members must subscribe to its Code of Ethics and a Model Affirmative Fair Housing Marketing Plan developed by HUD. The term “Realtor” thus identifies a licensed real estate professional who pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. “Realtors” subscribe to the NAR’s Code of Ethics, which imposes obligations upon realtors regarding their active support for equal housing opportunity.

The NAR has created a diversity certification, “At Home with Diversity: One America” to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR “At Home with Diversity” course. The certification signals to customers that the real estate professional has been trained on working with the diversity of today’s real estate markets.

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



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

**Southeast Arizona Association of Realtors** was founded in 1971, the Southeast Arizona Association of REALTORS® Inc. represents approximately 220 REALTORS® in the Southeast Arizona area, including Sierra Vista, Bisbee, and Douglas. As members of the National Association of Realtors and licensed real estate agents, members abide by the NAR Code of Ethics, and have received training and continuing education on Fair Housing topics.



**Cochise County Chapter**  
West & SouthEast REALTORS® of the Valley

## COORDINATION & SUPERVISION IN THE RENTAL MARKET

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

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



**Arizona Multi-housing Association (AMA)** is a statewide trade association for the apartment industry in legislation, legal and regulatory matters. The AMA provides services, products, educational programs, and networking opportunities to promote ethical, quality rental housing throughout Arizona.

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



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## OTHER ENTITIES

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



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

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



**RISE Services, Inc.** provides services in the Sierra Vista Arizona. RISE Services, Inc. provides children and adults that have developmental disabilities with developmental disability support services, safe housing, early intervention therapy, job coaching, and more. Their four main residential options include comprehensive in-home care for adults, group home care services, senior in-home care services, and independent living services.

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



The SWFHC works to affirmatively further Fair Housing and overcome identified impediments to Fair Housing choice for protected classes throughout the state and, collaborates with two Fair Housing Assistance Program (FHAP) agencies: the Arizona State Attorney General's Office and the City of Phoenix's Department of Equal Opportunity to address Arizona's Fair Housing needs.

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

## LENDING AND COMPLAINT DATA; ADVERTISING

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

### HOME LOAN ACTIVITY

Loan activity information is tracked by the Federal Financial Institutions Examination Council (FFIEC). Through the Home Mortgage Disclosure Act the HMDA data base is developed. In this **Table 14**, the column label 'Application Received' is the total number of applications that are submitted to obtain a mortgage. 'Loans Originated' are loans/mortgages that have been granted. The 'Percentage Originated' is the number of 'Loans Originated' divided by 'Applications Received' to evaluate if there are differences in the success rates.



The reasons why some loan applications do not make it to the 'Loan Originated' column is because an application does not accept the agreement, the application is denied by the mortgage company, the application is withdrawn by the applicant, or the file is closed due to incompleteness by the mortgage company.

### MORTGAGE BASED ON INCOME

**Table 14** provides information about mortgage applications and originations based on area median income for the Sierra Vista-Douglas MSA from 2021. In review the data below, the average success rate is 54% for all income levels. The lowest percentage originated rate is those who have an income <50% of the MSA median family income of 43%. All other income classifications are over 54% with successfully receiving a loan. The highest success rate (61%) for receiving a loan for those with the highest incomes of 120% or greater MSA median family income.

Income Applicants Median Family Income	Applications Received		Loans Originated		Percent Originated
	Number	Amount	Number	Amount	
<50%	670	\$78,940,000	285	\$33,675,000	43%
50% - 79%	1,049	\$163,325,000	582	\$94,170,000	55%
80% - 99%	332	\$56,680,000	179	\$30,345,000	54%
100% - 119%	1,041	\$209,455,000	591	\$123,525,000	57%
>120%	2,511	\$612,805,000	1528	\$386,660,000	61%
<b>Income Not Available</b>	514	\$120,360,000	277	\$70,475,000	54%

Source: HMDA Disposition of applications by income, race, and ethnicity of applicant (2021)

### MORTGAGE BASED ON RACE

**Table 15** provides information on mortgage applications and originations based on race and ethnicity for the Sierra Vista-Douglas MSA from 2021. In review the data below, the average success rate is 54% for all races. The two lowest loan originated race groups are American Indian or Alaska Native (36%) and Native Hawaiian or Other Pacific Islander (46%). The two highest loan originated race groups are Asian (66%) and Joint (two different race classifications) (60%). In review of the data breakdown by ethnicity, the average success rate is slightly higher at 56% than the average success rate for all races. Those who identify as Hispanic or Latino have a slightly lower average of success rate at 54%.

Table 15: Mortgage Applications and Originations Based on Race & Ethnicity					
Race	Applications Received		Loans Originated		Percentage Originated
	Number	Amount	Number	Amount	
American Indian or Alaska Native	45	\$7,505,000	16	\$2,960,000	36%
Asian	79	\$16,765,000	52	\$11,350,000	66%
Black or African American	193	\$47,975,000	110	\$27,540,000	57%
Native Hawaiian or Other Pacific Islander	13	\$2,035,000	6	\$1,000,000	46%
White	3965	\$779,475,000	2312	\$474,210,000	58%
2 or more minority races	12	\$2,990,000	7	\$1,615,000	58%
Joint	156	\$38,050,000	93	\$24,685,000	60%
Race Not Available	1140	\$226,410,000	569	\$125,015,000	50%
<b>Ethnicity</b>					
Hispanic or Latino	971	\$166,145,000	525	\$95,575,000	54%
Not Hispanic or Latino	3393	\$698,965,000	1988	\$424,650,000	59%
Joint	225	\$50,225,000	140	\$32,550,000	62%
Ethnicity Not Available	1012	\$205,480,000	511	\$115,445,000	50%

Source: HMDA Disposition of applications by income, race, and ethnicity of applicant (2021)

### FAIR HOUSING COMPLAINT DATA

As described earlier, there are several organizations and agencies with oversight of Fair Housing. This section of the AI Report will review and assess information about housing discrimination complaints and reports on housing opportunity in Sierra Vista.

In the past five years, there were two Title VIII cases in the Federal Court’s Arizona District, but none of these complaints involved entities in Sierra Vista.

The Arizona Attorney General’s Office is responsible for administration of Fair Housing complaints in Arizona. The HUD Office of Fair Housing and Equal Opportunity (FHEO) maintains data for the State of Arizona.

FHEO data was obtained for the City of Sierra Vista for the period between January 1, 2019, and December 31, 2023 (previous five years) and is presented in **Table 16** and **Table 17**. During the previous five-year period, only five Fair Housing complaints were filed, with no cases filed in 2019 and two cases filed in 2020. The majority of Fair Housing complaints filed in the previous five-years had a race basis for discrimination or involved discriminatory terms, conditions, or privileges. Other complaints were on the basis of disability, retaliation, and sex. These complaints included failure to make reasonable accommodations, refusal to rent, or was some other discriminatory act. No complaints were filed on the basis of color, national origin, familial status, or religion.

Table 16: Number of Case by Basis of Discrimination					
Cochise County, AZ	Year of Filing Date				
	2019	2020	2021	2022	2023
<b>Total*</b>	0	2	1	1	1
<b>Race</b>		1	1	1	1
<b>Color</b>					
<b>National Origin</b>					
<b>Disability</b>		1		1	
<b>Familial Status</b>					
<b>Religion</b>					
<b>Sex</b>				1	
<b>Retaliation</b>				1	1

Source: U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity (FHEO), Los Angeles FHEO Center, Fair Housing Complaints in Sierra Vista, AZ, 2019-2023. \*Some cases have more than one basis of discrimination.

**Table 17: Number of Case by Fair Housing Issue**

Cochise County, AZ	Year of Filing Date				
	2019	2020	2021	2022	2023
<b>Total*</b>	0	2	1	1	1
<b>Terms/Conditions/Privileges</b>		2		1	1
<b>Failure to Make Reasonable Accommodations</b>		1		1	
<b>Refusal to Rent</b>			1	1	
<b>Other Discriminatory Act</b>					1

Source: U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity (FHEO), Los Angeles FHEO Center, Fair Housing Complaints in Sierra Vista, AZ, 2019-2023. \*Some cases involve more than one Fair Housing issue.

## REAL ESTATE ADVERTISING

This assessment of Fair Housing practices in Sierra Vista included a review of several sources containing advertisements for housing, both for sale and rental. Overall, there does not appear to be any attempt to exclude or discriminate against any of the protected classes. Common methods for looking for housing are using websites such as affordablehousing.com, trulia.com, realtor.com, apartments.com, and Zillow.com.

Cochise County’s Housing Authority can also assist in helping to find affordable housing options. Information can be found on their website at <https://www.cochise.az.gov/373/Housing-Authority>, their office at 1415 Melody Lane, Building A, Bisbee, AZ 85603 or calling 520-432-8880.



Another method in looking for housing options is to contact a local real estate agent. Some of the local real estate agencies include but are not limited to DiPeso Realty, Long Realty-Sierra Vista, Keller Williams Southern Arizona, Tierra Antigua Realty, Coldwell Banker Realty, Realty Executives Arizona Territory, Haymore Real Estate LLC, Brad & Iwona Snyder Sierra Vista Realty, and Sierra Shows Realty.

## OBSERVATIONS

Several key points emerge from the preceding discussion. While not definitive indicators of impediments to Fair Housing choice, they point to contributing factors that increase the likelihood of impediments to Fair Housing choice. These points are:

- 1) The number of FHEO complaints for the period under review was modest (i.e., five cases).
- 2) There was no clear sign of discrimination in the language or illustrations of housing advertising in the area’s real estate online sites.

## PUBLIC POLICIES AND PRACTICES

### LAND USE PLAN - HOUSING

Public policies established at the local level can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. Fair Housing laws are designed to encourage an inclusive living environment and active community participation. An assessment of public policies and practices enacted by the City can help determine potential impediments to Fair Housing opportunity. To identify potential impediments to Fair Housing choice and affordable housing development, housing-related documents (e.g., zoning code materials, previous Fair Housing assessments) were reviewed. Additionally, interviews with Fair Housing advocates and practitioners were conducted in preparing this AI Report. This section of the analysis focuses on public policies that may impede Fair Housing choice in Sierra Vista.

Arizona law requires municipalities to prepare General Plans, including a Housing Element. This element establishes a goal of ensuring that all residents have access to adequate and affordable housing. The General Plan may also include a housing opportunities objective to provide quality housing and a range of housing size, cost, and density that should be made available in each community, to make it possible for all who work in the community to also live in the community. In these General Plans, local governments evaluate the composition and quality of the community's housing stock, the age and condition of housing, the cost of housing, the needs of households that are cost burdened, the relationship of local housing costs and availability to the socioeconomic characteristics of these households and special housing needs in the community (e.g., housing needs of residents who are elderly; homeless; persons with mental, physical, or developmental disabilities; and persons with HIV/AIDS).

The City's General Plan, approved by the City Council voters in June of 2014 and ratified by the voters in November of 2014, contains a chapter on housing. The housing goals note, in particular, the need to promote a range of available, accessible, and affordable housing, to provide quality housing, and to revitalize existing neighborhoods. The Plan is notable for its focus on providing housing meeting visitability standards, locating housing for citizens with special needs near transportation services, and for addressing the need to find or create housing for the "hard to house," including ex-offender and the homeless.

### BUILDING AND ZONING CODES

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

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

The Building Code for the City is based upon the 2018 edition of the International Building Code, amended to meet the specific needs of the City. As such, it incorporates policies, procedures and standards that are widely accepted and do not adversely affect housing choice.

The Development Code for Sierra Vista permits this range of development and permits a range of housing in a range of areas within the City. Manufactured housing is permitted, as are accessory units and group living arrangements. The standards do not restrict accessibility in particular. The current Zoning Code does address a number of terms, such as “disabled” and “family,” and in doing so avoids issues that could possibly impact housing choice. It should be noted that the Code does not mention visitability or universal design.

## TRANSPORTATION

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

Sierra Vista has a public mass transit system called Vista Transit, which is a division of the City's Department of Public Works. Vista Transit complies with Title VI of the Civil Rights Act of 1964 and service will be provided without regard to race, color, national origin, age, sex [including gender identity and sexual orientation], or disability. All fixed-route buses are fully accessible. The service has multiple routes that run between 7:00 AM and 5:00 PM, connecting residential areas to employment centers, amenities, and shopping.

Vista Transit's Paratransit curbside services are available to customers with disabilities and related information is provided in a variety of accessible formats. Vista Transit travels within the City Limits (Monday-Friday) to serve customers with special needs. All buses and vans are accessible compliant with the Americans with Disability Act (ADA) standards. Reservations must be made 7 days in advance, Monday-Friday during business hours.

## OBSERVATIONS

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

- 1) The City's General Plan emphasizes the development of a range of housing opportunities for all residents with an emphasis upon addressing the needs of persons with a disability and the “hard to house.”
- 2) The City's Building and Development Codes do not limit Fair Housing.
- 3) The City's public transit system provide adequate service and addresses public transportation needs as well as the needs of persons with disabilities.



## SURVEY AND PUBLIC MEETINGS

### SURVEY AND PUBLIC MEETING DISCUSSIONS

The City published an online survey including Fair Housing questions. When asked about Fair Housing and housing discrimination in Sierra Vista, the survey identify Fair Housing as a high priority and acknowledged that discrimination in housing is illegal. However, the survey did not indicate that housing choices were geographically limited to certain areas or neighborhoods. The survey also pointed to a lack of Fair Housing information and programs. At the January 7, 2024, City Council Work Session, Fair Housing was discussed in regard to continued literature and education about Fair Housing rights. Furthering Fair Housing is the responsibility of the City's Community Development Department through its day-to-day operations.

### OBSERVATIONS

The key point that emerges from the preceding discussion is that the residents involved in these discussions see Fair Housing as a high priority. However further Fair Housing information and education is needed. Based on recent complaint data, the common bases of discrimination are race and disability. Based on the limited number of Fair Housing complaints in recent years, housing discrimination is not a major issue in Sierra Vista. However, Fair Housing information and education should continue to be provided to the community to ensure that equitable housing opportunity.

## FAIR HOUSING ACCOMPLISHMENTS

The City of Sierra Vista has and will continue to participate in and educate the citizens in the community about the rights given to every person by the Fair Housing legislation. The City adopts a policy of acceptance through an annual Fair Housing Resolution each April and proclaims April to be Fair Housing Month in Sierra Vista. Most recently, at a regular meeting held on April 6, 2023, the Mayor proclaimed April “Fair Housing Month” and the City Council passed a resolution restating the City’s commitment to the principle of Fair Housing and the necessary actions to affirmatively further Fair Housing in the City. The City is scheduled to pass another Fair Housing resolution in April 2024.

The number of Fair Housing complaints reported in the City of Sierra Vista are modest, with only five complaints reported in the previous five years (FHEO, 2019-2023). If the City does receive a Fair Housing complaint directly, it refers the complainant directly to Southwest Fair Housing Council and HUD FHEO for investigation.

The City of Sierra Vista is required to affirmatively further Fair Housing as mandated by Section 808(e)(5) of the Fair Housing Act. Each Annual Action Plan for Sierra Vista’s Community Development Block Grant (CDBG) program includes initiatives to further Fair Housing choices and increase access to housing and housing programs and services. HUD also requires that the City conduct an Analysis of Impediments to Fair Housing Choice (AI Report) and to take appropriate actions to overcome the effects of any impediments identified through that analysis. The Department of Community Development also reports on Fair Housing issues to the Arizona Department of Housing and documents Fair Housing issues in its Comprehensive Annual Performance and Evaluation Reports (CAPER).

The City makes literature available to the public on Fair Housing rights, including a kiosk in the City Hall's lobby stocked with literature, in English and Spanish, regarding Fair Housing. Appropriate notices concerning Fair Housing are displayed at City Hall. All City housing programs are marketed to the Spanish speaking residents of Sierra Vista to the greatest extent feasible, using Spanish language brochures, community outreach, and interpretation, when necessary, at all City of Sierra Vista public hearings. To educate citizens on Fair Housing issues, educational materials are distributed at housing events sponsored by the City, including brochures published by HUD FHEO.

## IDENTIFIED IMPEDIMENTS, RECOMMENDATIONS AND ACTIONS

### BACKGROUND

This section summarizes the key findings of the AI Report and makes recommendations for actions to eliminate impediments to Fair Housing choice in Sierra Vista. This information is as comprehensive as possible, and there likely remain additional remedies to these and other problems faced by home seekers.

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

This 2024 AI Report analyzes recent data, identifies the private and public sector conditions that foster housing discrimination, and provides recommendations for dealing with the Fair Housing issues identified. Based upon research in statistical materials, a review of HMDA and complaint data, survey data, and public meeting discussion, the following is a list of key potential impediments identified in Sierra Vista. Each impediment below is followed by recommendations to address and eliminate that impediment.

Several of these topics are closely related and linkages among them are noted.

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

It should also be noted that Sierra Vista appears to have a low reported incidence of housing discrimination.

### IMPEDIMENTS, RECOMMENDATIONS, AND ACTIONS

#### 1) Need For Increased Awareness, Outreach, And Education

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

#### Recommendations:

- 1) Continue and expand efforts by City agencies, housing advocacy groups, and service organizations to inform renters and homebuyers of their rights and means of recourse if they feel they have been discriminated against.
- 2) Conduct City-led training sessions and information campaigns especially among rental property owners and managers, as well as apartment owner associations, and management companies.
- 3) Convene focus groups of advocacy groups, community-based organizations, real estate industry professionals, lenders, property owners, and government agency officials to review and assess Fair Housing issues. These groups should identify discriminatory practices, trends, or changes in

these practices, focal points of discriminatory practice, and the means or methods to address them.

- 4) Update Fair Housing information regularly and adjust strategies and actions accordingly. In particular, the groups mentioned above should continue to meet annually (or perhaps twice a year), for example at the Housing Summit.
- 5) Expand awareness efforts through school programs (e.g., poster contests, essay contests) coordinated with Fair Housing Month programs, and devote a Housing Summit session specifically to Fair Housing law and practice.
- 6) Work with housing advocacy and not-for-profit organizations to develop homeownership and home maintenance educational programs for first-time homebuyers to better prepare them for the responsibilities of ownership and home maintenance.
- 7) Continue and, if possible, expand existing programs to educate households and housing related organizations by disseminating Fair Housing law literature, conducting Fair Housing law seminars and training, and focusing public awareness campaigns about Fair Housing law in ethnic and minority neighborhoods, and among civic, social, religious, and special interest groups.
- 8) Provide Fair Housing materials and educational programs in Spanish, especially in neighborhoods and communities with high percentages of Spanish-speaking persons.
- 9) Provide materials and information regarding the Fair Housing Act, and federal and state housing laws and regulations regarding Fair Housing choice, including options to report complaints and request legal assistance.

## **2) Limited Supply of Affordable Housing**

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

Earlier sections of this Analysis addressed the issue of affordability. Suffice to say that even moderate-income households face challenges in purchasing a home in Sierra Vista, and low-income families face a significant cost burden for rental housing. Incentives for the creation of affordable housing should be structured so that they are stringent enough to produce the desired units, but palatable to the developer as well.

### **Recommendations:**

- 1) Continue to use all available federal and state funding resources and programs to address high priority housing needs for rehabilitation, preservation, and development of affordable units.
- 2) Continue to work with community-based organizations, affordable housing developers, and housing advocacy groups to increase the supply of disability accessible housing units, leveraging resources to the extent possible.
- 3) Continue and, if possible, expand housing rehabilitation programs to maintain the City's base of affordable units, both owner-occupied and rental.
- 4) Research other affordable housing programs for additional ideas and practices.

- 5) Continue to seek incentives to promote developers constructing a wide range of housing types at a number of price points, considering transportation, employment centers and the availability of services and shopping in their planning.
- 6) Housing for special needs populations and minorities should be scattered throughout the City.

### 3) Government Policies

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

#### Recommendations:

- 1) Ensure that reasonable accommodation and disabled access issues are properly addressed in municipal zoning and construction codes, especially noting the definitional issues raised earlier.
- 2) Do as much as possible to reduce review and approval process times for both new construction and home modification applications.
- 3) Encourage the use of universal design principles in new housing developments.
- 4) Ensure that local zoning ordinances and building codes properly address issues of concern with respect to higher density housing, persons with disabilities, and group homes/congregate living/community care, including small housing units for seniors living alone.
- 5) Seek new or additional incentives, as noted in Impediment Two, to get developers to undertake affordable projects or to include affordable units in market rate projects.

### 4) Awareness Of Potential Discrimination

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

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

In particular, potential discrimination affecting one protected class should be noted. **Disabled persons may face discrimination or difficulties in finding appropriate units because of the small number of small units and the costs of building or adapting units.**

#### Recommendations:

- 1) Increase housing choice alternatives for the disabled and families with children by encouraging the construction of affordable, and especially rental, housing.
- 2) Convene focus groups of advocacy groups, community-based organizations, real estate industry professionals, lenders, property owners, and government agency officials to review and assess Fair Housing issues. These groups should identify discriminatory practices, trends, or changes in

these practices, focal points of discriminatory practice, and the means or methods to address them.

- 3) The City could create, or participate in, a Fair Housing testing and auditing program, focusing upon rental properties at this time.