



City of Saginaw, MI

Analysis of Impediments To Fair Housing Choice

July 2015

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I. INTRODUCTION

Analysis of Impediments Background

The FY2015-2019 Analysis of Impediments to Fair Housing Choice (the AI) was prepared to meet the requirements of the Housing and Community Development Act of 1974 and is a part of the City's certification to "affirmatively further fair housing (AFFH)." The City is a recipient of federal block grant funds including Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development's (HUD) federal block grant funding administered through its Community Planning and Development (CPD) office. As such, it must certify that it will "affirmatively further fair housing" (AFFH) in accordance with federal regulatory requirements at 24 CFR 91.225(a) (1). With the certification, the City committed to conduct the AI within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.¹

The AI is usually conducted in tandem with the Consolidated Plan, also required by HUD, and HUD recommends that the AI is updated at least once every three to five years. The previous AI was completed in January 2008 and was described as "an update to the 1992 AI." The basis of the AI is the federal Fair Housing Act and equivalent state and local laws.

The City, through its Department of Community Services, contracted with ASK Development Solutions, Inc. to assist City staff in conducting the activities related to and preparing the AI report. The recommendations from the report will be used as a basis for the City's development and implementation of a Fair Housing Plan.

Context

Equal access to housing is one of the principles of equality desired for everyone who lives in the United States. Equal access includes protections from discrimination in housing; sale, rental, and financing of dwellings; lending; home appraisal; insurance and accessibility and the freedom for anyone to live where they choose.

Fair Housing Laws and Regulatory Framework

The Federal Fair Housing Act (FHA) or Title VIII of the Civil Rights Act of 1968, and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability (physical and mental). The persons represented in the above categories are referred to as "protected classes". The FHA covers most housing types including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.

Section 808 of the Act says that the authority and responsibility for administering the Act resides with the Secretary of Housing and Urban Development. Among the functions of the Secretary are to prepare an annual report to Congress; and *administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this subchapter.*

¹ <http://www.gpo.gov/fdsys/pkg/CFR-2004-title24-vol1/pdf/CFR-2004-title24-vol1-sec91-225.pdf>.

U.S. Government Printing Office retrieved March 20, 2015

The National Affordable Housing Act of 1990, which governs the HOME program, as amended, {Section 105 (b)(15)} requires jurisdictions to include a certification with the housing strategy certifying that the jurisdiction will *affirmatively further fair housing*. Specifically, Consolidated Plan Regulations at 24 CFR 91.225 (a) state that the AFFH certification must be included in the annual submission to HUD.

The regulations governing the CDBG program also address fair housing requirements. Under 24 CFR 570.506(g) – Records to be maintained - the grantee must maintain fair housing and equal opportunity records containing: a) Documentation of the analysis of impediments; and b) The actions the recipient has carried out with its housing and community development and other resources to remedy or ameliorate any impediments to fair housing choice in the recipient’s community. Also per 24 CFR 570.601 (a) (2) the Fair Housing Act (42 USC 3601-3620) applies. It states that “in accordance with the Fair Housing Act, the Secretary requires that grantees administer all programs and activities related to housing and community development in a manner to *affirmatively further the policies of the Fair Housing Act*. Section 104(b)(2) of the Act, for each community receiving a grant under subpart D goes on to state the grantee shall be required “*to assume the responsibility of fair housing planning*” the AFFH process as detailed above.

Finally, the Consolidated Plan certifications included under the “Specific CDBG Certifications” states that the Entitlement Community certifies under “Compliance with Anti- Discrimination Laws - that the grant will be conducted and administered in conformity with title VI of the Civil Rights Acts of 1964 (42 USC 2000d) , the Fair Housing Act (42UAC 3601-3619), and implementing regulations.

In addition to the abovementioned federal requirements, the City of Saginaw is required to comply with any state and local fair housing laws. The State of Michigan also prohibits discrimination in housing on the basis of the FHA protected classes. However, the state of Michigan through the Elliott-Larsen Civil Rights Act (Act 453 of 1976), and any subsequent amendments adds additional protected classes including Age, Marital Status, and Height and Weight. The Michigan Department of Civil Rights is the state department that oversee the provisions of the Act. The City’s local ordinance under Chapter 93 of eth General Code prohibits housing discrimination based on age, marital status, sexual orientation, and source of income.

Responsible Agency

The City’s Community Services Department is the City agency responsible for ensuring that the City’s fair housing requirements are met.

Purpose of the AI

The Fair Housing regulations of January 1989 did not include guidelines concerning how to “affirmatively further fair housing.” Requirements with review criteria and the areas to be covered by the analysis of impediments to fair housing choice were included in the CDBG regulations published in September 6, 1988. It was not until the Fair Housing Planning Guide was published that affirmatively furthering fair housing was defined. The HUD Fair Housing Planning Guide provides the following definitions and outlines the purpose of the AI.

According to HUD, impediments to fair housing choice are any actions, omissions, or decisions taken that restrict housing choice or the availability of housing or have that effect on one or more individual of a *protected class*.

The Guide states that the purposes of the AI are to:

- Serve as the substantive, logical basis for the fair housing planning;

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- Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- Assist in building public support for fair housing efforts within a City and beyond.²

The AI involves:

- A review of the City's demographic, economic, and housing characteristics;
- A review of a City's laws, regulations, and policies, procedures and practices and how they affect the location, availability and accessibility of housing;
- Public education and outreach efforts, and a community fair housing survey;
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes; and
- Identifying any existing impediments or barriers to fair housing choice and to develop an action plan containing strategies to overcome the effects of any impediments identified in the AI.³

The Guide provides suggested data sources, methods to obtain citizen participation, suggested outlines, a format for fair housing planning, sample of corrective actions and measurable results, and suggestions for complying with fair housing requirements for persons with disabilities. HUD allows grantees to use existing available data. Data includes HUD and Federal agency databases and studies, State and local information sources, private housing industry reports, and college university/research, and data from the Consolidated Plan.

Public Participation in the AI

In accordance with the City's Citizen Participation Plan and requirements at 24 CFR 91.105(a)(2)(i), the City conducted an inclusive community participation process to get perspectives on fair housing experiences, perceptions, and opinions on the fair housing laws, practices, and services in the City and helped identify impediments. The following were used:

1. **Fair Housing Surveys** – Four online fair housing surveys targeted to residents, housing service providers/advocates, Realtors, and lending institutions were administered online and in person. The resident survey was provided in a Spanish language version.
2. **Print and Broadcast Media** – The City also promoted the AI requirements, the public meetings and focus groups, and the surveys on the City's government television station, and a newspaper notice.
3. **Public meetings, Presentations and Focus Groups** – Meetings were held between March 17-18 to solicit input on fair housing from realtors, lenders, property managers, agencies serving the homeless, persons with disabilities, and faith based organizations. A presentation was made on the AI at the Human Planning Commission which advises on the City's federal grant allocations.
4. **Key Person Interviews** – Interviews were conducted with City staff from other departments that related to fair housing issues such as Planning and Zoning, Public Relations, and City Attorney's office. Interviews were also conducted with fair housing and housing related agencies such as the Saginaw Housing Authority. The

² U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-8) March 1996

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-7) March 1996

key person interviews were used to solicit feedback on fair housing issues in the City, the experience of agencies and organizations and data regarding housing discrimination.

Planning and Research Methodology

The AI methodology used in conducting the AI was based on the *Fair Housing Planning Guide Vol. 1* (published by HUD's Office of Fair Housing and Equal Opportunity in 1996); experience conducting AIs for other cities, and the City's program goals. Revisions to fair housing strategies, easier access to data and improved ways of conducting the AIs has taken place since 1996. However, both HUD and program participants have recognized that the AFFH certification has not been as effective as it could be due to inconsistencies in conducting AIs and in implementing the requirements. As a result, HUD published the "Affirmatively Furthering Fair Housing" Proposed Rule in July 2013. The intent of the rule as articulated in the Federal Register Notice is to "refine existing requirements with a fair housing assessment and planning process that will better aid HUD program participants fulfill this statutory obligation and address specific comments raised by the U.S. Government Accountability Office (GAO)."⁴ Much of the proposed new methodology, data sets, formats and instruments are still in development stage. As far as feasible, criteria and areas of focus identified in the proposed rule were used in the development of the AI.

The following approach was used to gather and analyze data and develop recommendations for the AI:

Task 1 - Community Data Review: Reviewed demographic, economic, employment and housing market information for the City from the Decennial 2000 and 2010 U.S. Census and the 2013 American Community Survey (ACS).

Task 2 - Regulatory Review: Researched and collected information regarding development regulations, planning and zoning codes, comprehensive plan housing element, building and design codes, housing policies and programs that affect housing choice. City staff completed a planning and zoning self-assessment questionnaire.

Task 3 - Compliance Data Review: Collected and analyzed available data regarding compliance with local, state and federal Fair Housing Laws, including the Home Mortgage Disclosure Act (HMDA), the Fair Housing Act, and the Community Reinvestment Act (CRA). Fair housing complaints and testing data was reviewed.

Task 4 - Review of Previous Studies: A review of the 2008 AI update was done to determine the status of the 2008 recommendations, actions taken, resources invested, and if the impediments still existed.

Task 5 - Review of Inventory of Affordable, Accessible Housing: Prepared an inventory of affordable and accessible housing including location to determine the incidence of racial, ethnic, and income concentration patterns in housing.

Task 6 - Internet Surveys, Direct Surveys, and Personal Interviews: Analyzed data from surveys completed by lenders, realtors, housing providers, and the public.

Task 7 - Identification and Analysis of Impediments: The findings were analyzed to determine the existence of impediments to fair housing choice in the City.

Task 8 - Recommendations and Action Planning: A list of recommendations to address the impediments and proposed timeline was developed. The Fair Housing planning process will begin within 45 days.

⁴ Government Printing Office, Federal Register, Volume 78, No. 139, Affirmatively Furthering Fair Housing. Proposed Rule, Published July 19, 2013,

<http://www.gpo.gov/fdsys/pkg/FR-2013-07-19/pdf/2013-16751.pdf> Retrieved April 10, 2015

Data Limitations

The data gathered for the AI has limitations that affect conclusions reached. It is assumed by the preparers of the AI that all of the data used from official sources, regardless of source, are accurate. All data is not consistent in the level of information provided. For example, more current data sources such as ACS data may not have as many data sets to analyze as the Bicentennial Census. The AI is a point in time study intended to analyze the current fair housing environment within the City of Saginaw and some of the identified impediment may need additional research.

Maps used in the AI represent data by census tracts with an overlay of the City boundaries. Census tract and block group boundaries do not match exactly and in some cases, census tracts are shared by adjacent municipalities. In addition, census boundaries between the 2000 and 2010 Census periods may have changed. For the surveys, respondents were asked to respond based on personal knowledge, perceptions, and experience. As such responses may be influenced by the respondents' perception and awareness of housing discrimination, fair housing, neighborhoods, and an understanding of terms. However, the sample size of respondents is sufficiently large and diverse and the experiences significant enough to extrapolate on fair housing experiences within the City.

Studies from other parts of the country may be used to support potential effects noted in the City but more research may be needed to verify conditions within the City.

Legal Framework

Definition of Terms

Protected Classes

The protected classes in Saginaw are as follows based on the FHA and the addition of additional classes by the State of Michigan and City ordinances:

<u>Protected under both federal and state law</u>	<u>Protected under Michigan Law</u>	<u>Protected under federal, state and local law</u>
<ul style="list-style-type: none">• Color• Race• Sex• Religion• National Origin• Disability• Familial Status	<ul style="list-style-type: none">• Color• Race• Sex• Religion• National Origin• Disability• Familial Status• Age• Height and Weight• Marital Status	<ul style="list-style-type: none">• Color• Race• Sex• Religion• National Origin• Disability• Familial Status• Age• Marital Status• Sexual Orientation• Source of Income

Affordable Housing

Throughout this document, there will be references and data on “affordable housing.” Affordable housing is defined as the availability of housing for persons at a rate they can afford usually measured in terms of the percentage of their income that one pays to rent or own housing. Fair housing is not synonymous with affordable housing and lack of affordable housing in and of itself is not an impediment to fair housing choice but affects it. HUD does not require that communities assist in the construction of affordable housing but has taken the position that the inclusion of “affordable” housing and promotion of a community as a “diverse community” are steps that communities can take to “affirmatively further fair housing.” Protected classes are often over represented in the low- and moderate-income categories and often likely to need “affordable” housing. However, the AI is required to address the geographic location of affordable housing and avoid segregation through the concentration of affordable housing in largely minority areas. The AI should also address the barriers experienced by members of the FHA protected classes in securing housing, one of which is affordability. The Court confirmed the above understanding in its summary judgment decision in the *Westchester County* case:

“The HUD Guide explains that while it is often the case that minorities are disproportionately represented among the low-income population, simply providing affordable housing for the low-income population is not in and of itself sufficient to affirmatively further fair housing. This unsurprising statement is grounded in the statutory and regulatory framework behind the obligation to AFFH, which, as already discussed, is concerned with addressing whether there are independent barriers to protected classes exercising fair housing choice. As a matter of logic, providing more affordable housing for a low income racial minority will improve its housing stock but may do little to change any pattern of discrimination or segregation. Addressing that pattern would at a minimum necessitate an analysis of where the additional housing is placed.”

U.S. ex rel. Anti-Discrimination Center v. Westchester County, 2009 WL 455269 (S.D.N.Y. Feb. 24, 2009), at *15.

Discriminatory Effect

Another concept that is used to assess impediments to fair housing in this study is “discriminatory effect.” Subpart G 100.500 (a) of the February 15, 2013 fair housing regulations define discriminatory effect as follows: a practice has a discriminatory effect where it actually or predictably results in a disparate impact on a group of persons or creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin.

HUD explains that the February 15, 2013 Fair Housing Act’s Discriminatory Standard Rule formalizes the longstanding interpretation of the Fair Housing Act to include discriminatory effects liability and establishes a uniform standard of liability for facially neutral practices that have a discriminatory effect. It adds that under this rule liability is determined by a “burden-shifting” approach. The charging party or plaintiff in an adjudication first must bear the burden of proving its prima facie case of either disparate impact or perpetuation of segregation, after which the burden shifts to the defendant or respondent to prove that the challenged practice is necessary to achieve one or more of the defendant’s or respondent’s substantial, legitimate, nondiscriminatory interests. If the defendant or respondent satisfies its burden, the charging party or plaintiff may still establish liability by demonstrating that this substantial legitimate, nondiscriminatory interest could be served by a practice that has a less discriminatory effect.

Subpart B Section 100.70 (d) adds subsection (5) as other prohibited conduct under discriminatory housing practices – enacting or implementing land-use rules, ordinances, policies, or procedures that restrict or deny housing opportunities or otherwise make unavailable or deny dwelling to persons because of race, color,

religion, sex handicap, familiar status, or national origin. The recent ruling on Disparate Impact will lend support to considering the impact of discriminatory effect.

Summary of Relevant Federal, State, and Local Laws

Fair Housing Act (42 U.S.C. § 3601, et. seq.), as amended: Title VIII of the Civil Rights Act of 1968 (Fair Housing Act): prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

Title VI of the Civil Rights Act of 1964: Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973: Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974: Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990: Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and referrals.

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

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

Executive Order 11063: Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 12892: Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898: Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166: Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

Executive Order 13217: Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

The Home Mortgage Disclosure Act (HMDA) requires certain lenders to make information available on the number and types of lending applications received and whether the applications were accepted. The information is broken down by census tract, sex, race and income.

The Community Reinvestment Act (CRA) requires financial institutions to meet the credit needs of their communities, with a particular focus on low- and moderate-income residents and areas, consistent with safe and sound operations. The requirements of the Act allow governments and advocacy groups to raise questions about the adequacy of a lending institution's regulatory compliance, thus creating an incentive for institutions to be responsive to the needs of their communities.

State Legislation

State of Michigan, the Elliott-Larsen Civil Rights Act (Act 453 of 1976 and any subsequent amendments) closely resembles the federal Fair Housing Act. The Elliott-Larsen Civil Rights Act has expanded the classes of individuals protected under the Fair Housing Act to further include: **age, marital status, height, and weight.**⁵

Local Legislation

The City of Saginaw implements the provisions of the FHA as it relates to housing discrimination but has added two additional protected classes through local ordinance. In addition, in 1984, the City Council adopted an ordinance under the City's General Code, Article 3 prohibiting housing discrimination based on sexual orientation. The ordinance gives the right of private action and has a penalty/fine not to exceed \$500 per occurrence or imprisonment not more than 90 days or both. The City also has a fair housing ordinance that **prohibits housing discrimination based on age, marital status, and source of income.**

The City has placed a proposed ordinance banning discrimination against gay, lesbian, bisexual, and transgender individuals on hold. However, the initial draft of the ordinance only addressed public accommodation and employment.

⁵ Michigan Department of Civil Rights, the Elliott-Larsen Civil Rights Act (Act 453 of 1976 and any subsequent amendments) states that "AN ACT to define civil rights; to prohibit discriminatory practices, policies, and customs in the exercise of those rights based upon religion, race, color, national origin, age, sex, height, weight, familial status, or marital status; to preserve the confidentiality of records regarding arrest, detention, or other disposition in which a conviction does not result; to prescribe the powers and duties of the civil rights commission and the department of civil rights; to provide remedies and penalties; to provide for fees; and to repeal certain acts and parts of acts.

II. REVIEW OF PAST FAIR HOUSING PLANS

2008 Update to the 1992 Analysis of Impediments to Fair Housing Choice

A. Previous Impediments and Recommended Actions

In January 2008, the City of Saginaw completed an update to its 1992 AI. The 1992 AI was not available for review. The main findings of the report and related actions are summarized below:⁶

- 1. Funding for Fair Housing:** Funding for fair housing activities has been sufficient and sporadic. **Action:** *Commit to long term and ample funding of fair housing activities.*
- 2. Fair Housing Education:** Residents are generally uninformed of their fair housing rights and responsibilities. **Action:** *Improve citizen's knowledge and awareness of fair housing issues and services through education and training and research how government regulations affect fair housing.*
- 3. Historic Isolation:** Federal housing policies and housing developments had an effect of segregating people by race and income especially the location of public housing in Saginaw. **Action:** *Support efforts to prevent segregated housing, study and support transportation improvements, and create and encourage mixed income communities.*
- 4. Availability of accessible housing choice:** The cost of retrofitting existing apartment buildings for accessibility is an impediment and the availability of affordable housing units appear to be decreasing. **Action:** *Support a community education program to reduce opposition to housing for protected classes, help to enforce laws to deter steering or blockbusting, and create alternative dispute resolution procedures for fair housing and lending issues.*
- 5. Affordability:** The price of new homes are generally high and many renters are in need of decent rental units. **Action:** *Continue to keep housing affordable to Saginaw residents and enforce fair housing laws.*
- 6. Lending Practices:** Banks in Saginaw are not proactively and affirmatively committed to the principles of the Community Reinvestment Act. Fewer loan applications are approved in areas with high percentage of minorities (Black and Hispanic) leading to lower homeownership rates and lack of capital for home improvements. **Action:** *Fund a comprehensive study on local lenders and insurance companies on lending patterns and how to increase access to home financing for all income and ethnic groups.*
- 7. Real Estate Practices:** There was some evidence of real estate steering in the past. A 1979 Affirmative Marketing Agreement with HUD has not been initiated or properly monitored by HUD. Uninformed and willingly unlawful landlords are refusing to rent to persons with disabilities. **Action:** *Engage with fair housing agency for education and complaint reporting, support fair housing testing for enforcement, coordinate efforts with state, county and local fair housing agencies to gather and share information.*

The AI further showed that the City's Index of Dissimilarity which measures the degree of residential segregation shows the highest percentage of any of Michigan central cities. Housing patterns reflect a high incidence of minority persons, particularly Blacks, residing in low-income census tracts with greater percentages of substandard housing. These concentrations are not adequately explained by income

⁶ Analysis of Impediments to Fair Housing Choice, Saginaw, Michigan, Community Housing Resource Board, January 2008, pages 14-16

differentials, cost of housing or individual preferences. The City's housing and zoning codes, which **may** [sic] not be discriminatory in intent, may be interpreted by the courts to be discriminatory in effect. City services such as transportation delivery to certain large employers was noted. City ordinances have limitation for the disabled and define "family" narrowly. The report noted that the City had no zoning ordinances that are excessive, exclusionary, and discriminatory or duplicative.

B. City Actions to Address Impediments

The Community Services Department completed a "Status of Previous Impediments" matrix which provided an update of actions taken by the City to address the identified impediments, the entities that carried out the actions, the year completed, and the amount of funding invested in fair housing and related activities. A summary of the City's report is provided below and a copy of the completed matrix is attached as Appendix I.

The Community Services Department of the City of Saginaw completed the following activities:

- Funded fair housing education, outreach, and testing with a fair housing agency and participated in housing fairs to promote the Department's activities and fair housing.
- Provided training for City staff.
- Invested in affordable housing programs for new homebuyer and rehabilitation for owner-occupied units.
- Invested in homeless services
- Used NSP funds to build a low-income elderly apartment complex and build homeownership units for households with incomes at 120% AMI and below.

The City invested \$25,000 in fair housing activities and over \$1 million in affordable housing developments over the past five years. However, the City did not complete several of the proposed activities which have been incorporated in this AI as part of the recommendations. These include:

- Actively support Fair Housing Month activities. Due to the national awareness on fair housing issues during this month, this is an opportunity to spotlight fair housing issues. A 2015 recommendation is included.
- Work to identify fair housing issues in the community. The ongoing AFFH mandate, the 2013 proposed Fair Housing Rule, and the results of this study dictates that this must be addressed. A 2015 recommendation is included.
- Study and support transportation improvements. Inadequate public transportation between residential areas and employment centers affects protected class members ability to live where they choose. A 2015 recommendation is included.
- Address NIMBYism and opposition to affordable housing for minorities and persons with disabilities. The current AI shows evidence from data and feedback from residents that segregation between the East and West sides of the City and affordable housing concentration is still perceived as prevalent. In addition, to combat racial concentration, strategies related to developing housing in areas of low poverty and high opportunities. A 2015 recommendation is included.
- Enforcement of fair housing laws to deter housing discrimination through steering and block busting. Anecdotal feedback suggest that there is still evidence of steering when co-related with NIMBYism. A 2015 recommendation is included.
- Fair housing complaint process. At the heart of the HUD mandate to affirmatively further fair housing is allowing for a process whereby residents who have experienced discrimination are able to report alleged discrimination and a process to quickly address complaints. A 2015 recommendation is included.
- Fund a comprehensive study of local lenders and insurance companies to determine geographic lending patterns. There is still evidence that loan denial rates among racial and ethnic minorities are

disproportionally higher. It was also noted property insurance rates in zip codes with higher minority percentages are much higher than non-minority areas. A 2015 recommendation is included.

- Increase regional coordination to gather and share information related to fair housing. HUD has encouraged regional fair housing efforts in the Fair Housing Planning Guide and in the 2013 Proposed Fair Housing Rule.⁷ A 2015 recommendation is included.

III. COMMUNITY PROFILE

Introduction

The City of Saginaw was incorporated in 1857 and what is now the City of Saginaw is the result of the merger of the cities of East Saginaw and Saginaw City in 1889. The City of Saginaw is located in the Flint/Tri-Cities region of Michigan. The region is located in Michigan's Lower Peninsula and is composed of Flint, the Tri Cities (Bay City, Saginaw, and Midland), the Saginaw Bay, and the Saginaw River. The City is the county seat of Saginaw County. Saginaw is the largest principal city in the Saginaw-Bay City-Saginaw Township North CSA. The City covers approximately 18 square miles, and has a population of 51,508 persons according to the 2010 U.S. Census.

The community profile data for the Saginaw AI consists of indicators that were analyzed in identifying fair housing impediments. These indicators include population, race, ethnicity, age, household characteristics, disability, economic status, housing costs and conditions.

Demographic Changes and their Implication for Fair Housing Choice

During the 20th century, the City of Saginaw experienced population growth due to domination of the manufacturing industry. During the 1960s and 1970s, the City was home to numerous General Motors plants and an Eaton Manufacturing Plant with 5,000 employees. The City also produced military vehicles and equipment during World War II. During this period of expansion, migration increased Saginaw's population. The population growth increased the presence of African Americans and persons of Hispanic ethnicity in Saginaw.

Concerning population shifts and the implications it may have for fair housing choice, the same is documented in a Study prepared by DC Data Warehouse and the Urban Institute, published by Noah Sawyer and Peter A. Tatian on October 2003. In this Study – Segregation Patterns in the District of Columbia 1980 through 2000 – the authors measured population changes and segregation in the District of Columbia. The Study defines segregation as the extent to which different groups are separated geographically from each other, and it focused on three different segregation measures: the dissimilarity index, the exposure index, and the diversity index.

The findings of the above study confirmed that demographic changes may produce the need for fair housing education and intervention.

Population, Race, and Ethnicity

The City of Saginaw had a total population of 51,508 persons at the time of the 2010 Census. The 2000 Census reflects a population of 61,799. Saginaw's population decreased by 10,291 persons (16.7%) between 2000 and 2010. According to the 2010 Census, the racial makeup of the community was majority Black or African

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American (46.1%), White (43.5%), Some Other Race (5.2%), Two or More Races (4.4%), American Indian and Alaska Native (0.5%), and Asian (0.3%). Approximately 14% of the Saginaw's population identified themselves as being of Hispanic or Latino ethnic origin. Table 1 shows the demographic changes by race and ethnicity in Saginaw between 2000 and 2010.

Table 1. Population/Race/Ethnicity: 2000 and 2010 Census Change – Saginaw, MI

	2000 Population	% of Total 2000 Population	2010 Population	% of Total 2010 Population	2000 to 2010 % Change
Total Population	61,799	100.0%	51,508	100.0%	-16.7%
White	29,056	47.0%	22,401	43.5%	-23.0%
Black or African American	26,735	43.3%	23,721	46.1%	-11.3%
American Indian and Alaska Native	302	0.5%	268	0.5%	-11.3%
Asian	205	0.3%	165	0.3%	-19.5%
Native Hawaiian and Other Pacific Islander	10	0.0%	15	0.0%	50.0%
Some Other Race	3,619	5.9%	2,693	5.2%	-25.6%
Two or More Races	1,872	3.0%	2,245	4.4%	19.9%
Hispanic or Latino Origin	7,259	11.7%	7,344	14.3%	1.2%

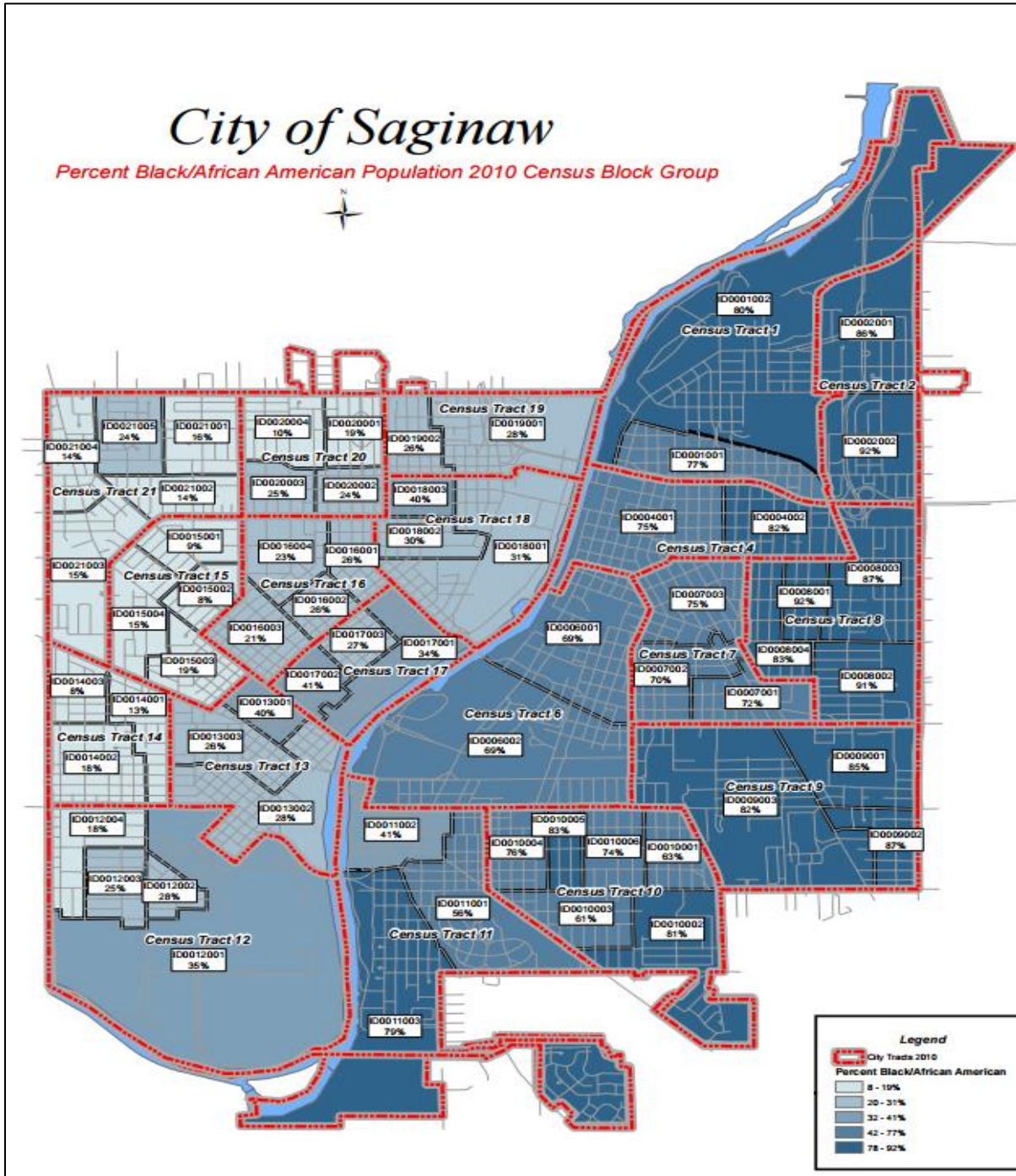
Source: 2000 and 2010 U.S. Census

From the 2000 to 2010 Census counts, the majority of the groups declined in size with the exception of Native Hawaiian and Other Pacific Islanders, persons of two or more races, and Hispanics/Latinos. The major population shift occurred in the White and Black or African American groups. In 2000, Whites represented the majority of the Saginaw population at 47.0% but in 2010, the White population decreased by 23%. On the other hand, the Black or African American population also decreased between 2000 and 2010 however, with the more significant decline amongst Whites, the Black or African American population became the majority in 2010 accounting for 46.1% of the total population.

These overall demographic shifts especially the increase in the Black or African American population could result in housing discrimination among those groups. As such, the City should proactively increase its fair housing education and outreach to ensure that persons within these protected classes and all City residents are aware of rights and responsibilities under the federal and State's Fair Housing Acts.

Maps 1 and 2 shows the percentage of Black/African Americans and persons of Hispanic origin by census tract.

Map 1. Percent Black/African American – Saginaw, MI

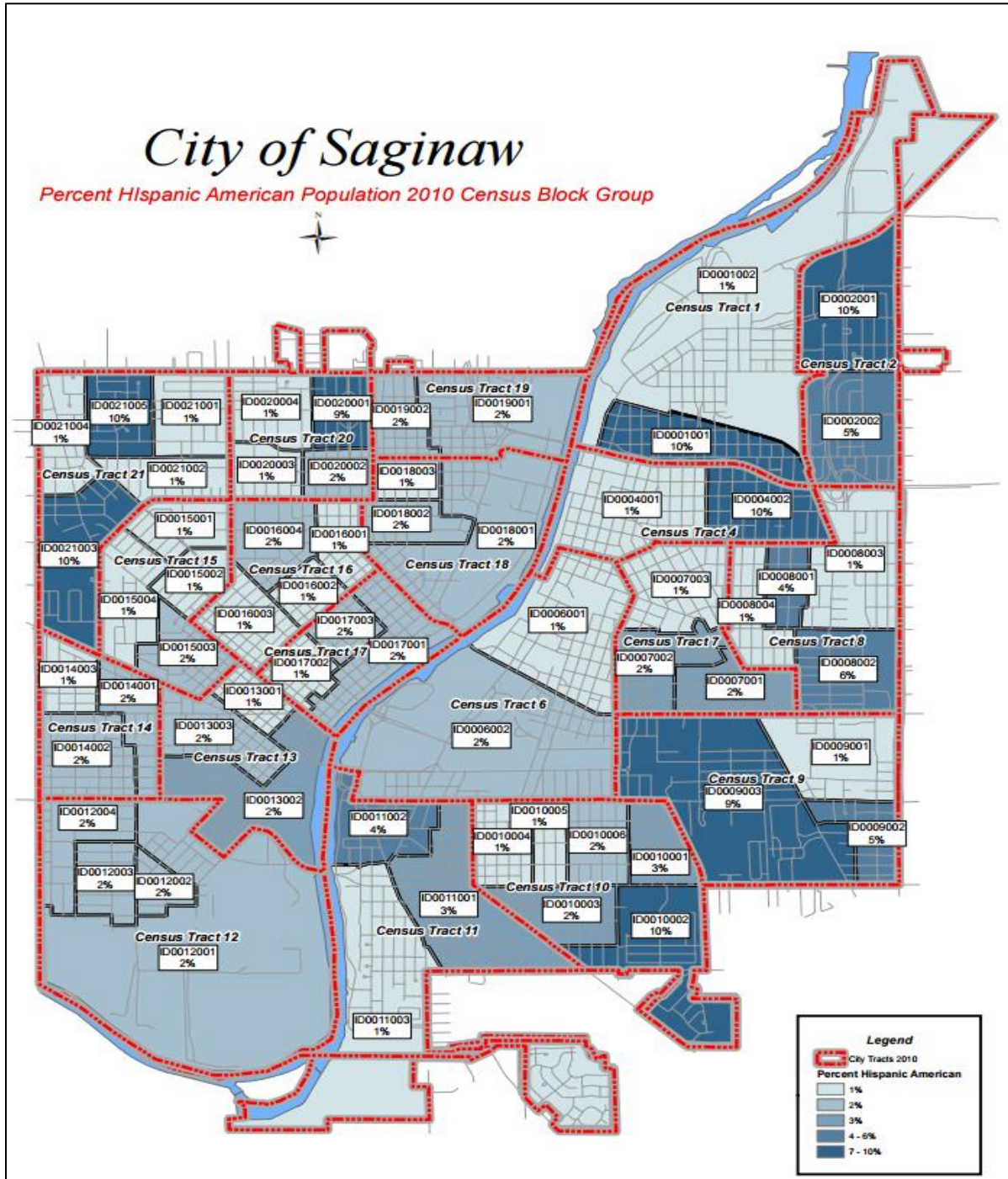


Source: 2010 U.S. Census

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Map 2 Percent Hispanic –Saginaw, MI



Source: 2010 U.S. Census

According to the 2013 ACS, 98.4% of the people living in Saginaw were native residents of the United States. Seventy-nine percent (79%) of 2013 ACS residents were living in the state in which they were born. In 2013,

1.5% of the people living in Saginaw were foreign born (defined by the ACS as those born outside of the United States). Of the foreign born population, 46.2% were naturalized U.S. citizens, and 53.8% were not U.S. citizens.

Age and Sex

It is important to review the makeup of the City’s population in terms of age since age is a factor in the type of housing that is needed. Generally, younger persons with families need larger homes, and seniors are often downsizing into smaller dwellings and may require accessible units. The median age of Saginaw residents is 33.8 years. The largest age group is persons between the ages of 15 and 44 years. Seniors over the age of 65 represent 11.5% of the City’s population. Table 2 shows the breakdown of the Saginaw population by age and by gender.

Table 2. Age and Gender – Saginaw, MI

Age Categories	Total (51,165/100.0%)	Male (24,228/47.4%)	Female (26,937/52.6%)
5 to 14 years	14.9%	15.5%	14.3%
15 to 17 years	4.9%	5.3%	4.4%
18 to 24 years	11.1%	11.8%	10.4%
15 to 44 years	40.5%	41.0%	40.0%
16 years and over	75.8%	74.8%	76.8%
18 years and over	72.8%	71.3%	74.1%
65 years and over	11.5%	10.1%	12.8%
75 years and over	5.7%	4.6%	6.8%

Source: 2013 ACS

Household Characteristics

The average household size in Saginaw according to the 2013 ACS was 2.58 persons. There were a total of 19,353 Saginaw households. Family households (households with family members related through birth, marriage, or adoption) represented 59.5% of all households (11,523), including 5,219 married couple family households; 1,083 male-headed households; and 5,221 female-headed households. See table 3 and figure 1.

Table 3. Households by Type – Saginaw, MI

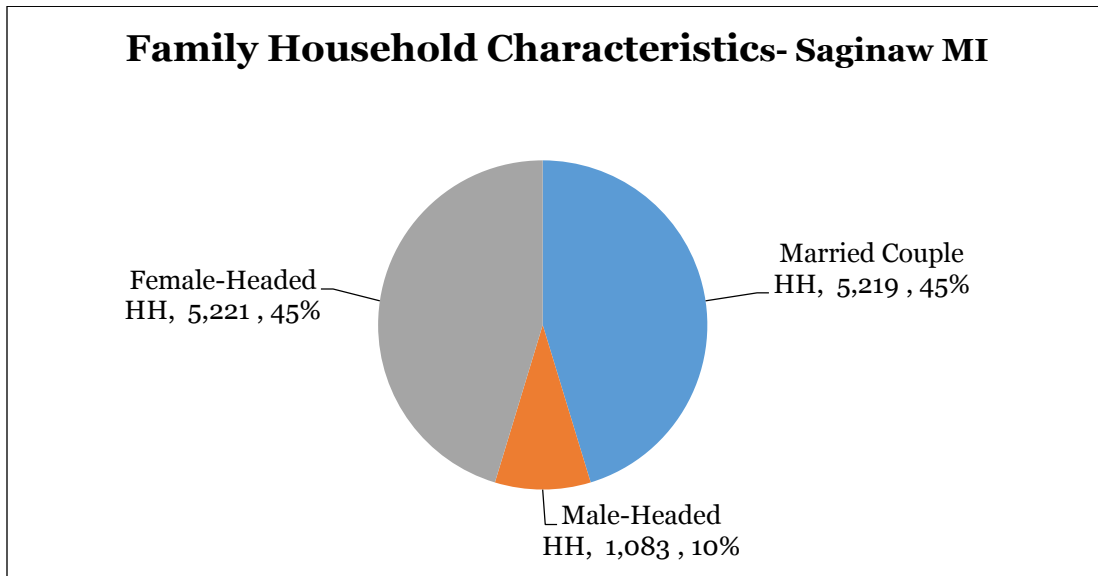
Households	19,353	100.0%
Family households	11,523	59.5%
With own children under 18 years	5,435	28.0%
Married-couple family household	5,219	27.0%
With own children under 18 years	1,825	9.4%
Male householder, no wife present, family household	1,083	5.6%
With own children under 18 years	588	3.0%
Female householder, no husband present, family household	5,221	27.0%
With own children under 18 years	3,022	15.6%
Non-family households	(X)	(X)

Source: 2013 ACS

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Figure 1. Household Characteristics – Saginaw, MI



Source: 2013 ACS

Table 4 provides information on marital status from the 2013 ACS. Among persons 15 and older, 28.9% of the population was married.

Table 4. Marital Status – Saginaw, MI

Population 15 years and over	Persons	Percentage
Total	39,721	100.0%
Never married	18,073	45.5%
Now married, except separated	11,479	28.9%
Separated	1,231	3.1%
Widowed	2,780	7.0%
Divorced	6,157	15.5%

Source: 2013 ACS

Income, Education, and Employment

Income Characteristics

The 2015 median income for Saginaw County, Michigan is \$54,400 which is approximately 2% lower than the 2013 Area Median Income (AMI) of \$55,500. Table 5 shows HUD’s 2013 Income Limits for Saginaw County. Although income limits are available from HUD for more recent years, the 2013 income limits were used for comparison with 2013 ACS data.

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Area Median Income is used to determine eligibility for HUD programs including CDBG and HOME. The income levels include extremely low income (0-30% AMI), very low income (31-50% AMI) and low income (51-80% AMI). For 2013, based on a household size of four, the extremely low (30%) income limit was \$0-\$16,650; the very low income limit was \$16,651-\$27,750; and the low income limit was \$27,751-\$44,400.

Table 5. Income Limits Summary – Saginaw County, MI

FY 2013 Income Limit Category	1 Person Household	2 Person HH	3 Person HH	4 Person HH	5 Person HH	6 Person HH	7 Person HH	8 Person HH
Extremely Low (30%) Income Limits	\$11,700	\$13,350	\$15,000	\$16,650	\$18,000	\$19,350	\$20,650	\$22,000
Very Low (50%) Income Limits	\$19,450	\$22,200	\$25,000	\$27,750	\$30,000	\$32,200	\$34,450	\$36,650
Low (80%) Income Limits	\$31,100	\$35,550	\$40,000	\$44,400	\$48,000	\$51,550	\$55,100	\$58,650

Source: U.S. Department of Housing and Urban Development (HUD)

CHAS data provides information on households by income level. Based on the 2011 CHAS, there were 11,490 (59.2%) low- and moderate-income households in Saginaw. See Table 6.

Table 6. Households by Income Level – Saginaw, MI

Income Limit Category	# of Households
0-30%	4,855
31-50%	3,075
51-80%	3,560
81-100%	1,840
>100%	6,070

Source: 2007-11 CHAS

Within the city limits of Saginaw, there was a lower median household income of \$27,701 (2013 ACS). In 2000, the City of Saginaw median household income was \$26,485 (2000 Census SF 3). The 2013 ACS further illustrates that of the total 19,353 households in Saginaw, 45.7% (8,845) earned less than \$25,000 annually, with another 29.2% (5,651) earning between \$25,000 and \$50,000. For the middle and upper income brackets in 2013, 15.2% (2,942) earned between \$50,000 and \$75,000; 4.8% (929) earned between \$75,000 and \$99,000; and 5.1% (987) earned \$100,000 and up. See Table 7 for the breakdown of households by income level. Map 3 shows the median household income in the City of Saginaw by census tract.

Map 3. Median Household Income by Census Block Group- Saginaw, MI

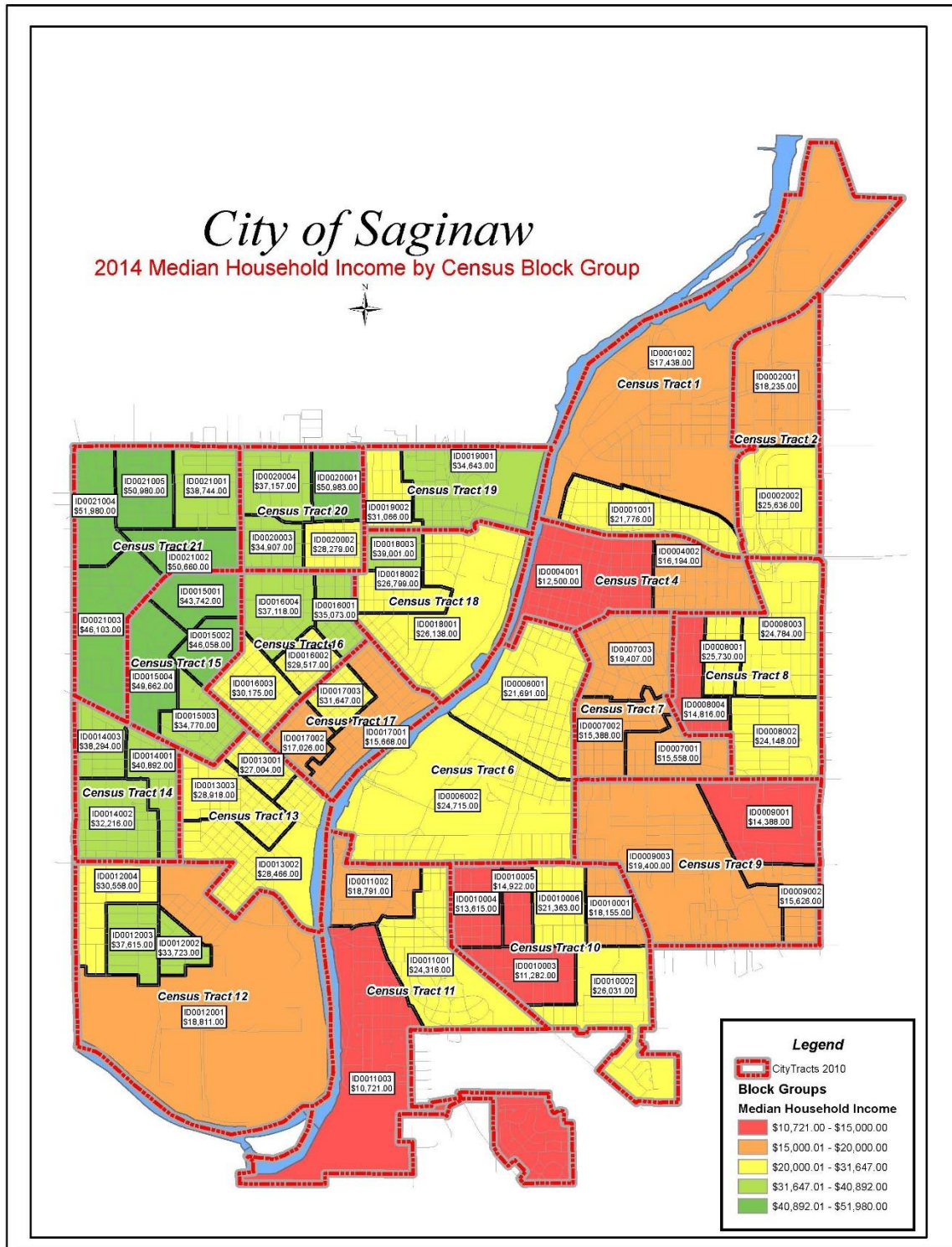


Table 7. Household Income in the Past 12 Months – Saginaw, MI

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
Less than \$10,000	3,600	18.6%
\$10,000 to \$14,999	1,839	9.5%
\$15,000 to \$24,999	3,406	17.6%
\$25,000 to \$34,999	2,806	14.5%
\$35,000 to \$49,999	2,845	14.7%
\$50,000 to \$74,999	2,942	15.2%
\$75,000 to \$99,999	929	4.8%
\$100,000 to \$149,99	813	4.2%
\$150,000 or more	174	0.9%

Source: 2013 ACS

Per the 2013 ACS, 37.4% of the Saginaw population subsists below the poverty level. This reflects a significant increase from 2000, when 28.5% of the population was below poverty level. In 2013, people ages 65 years and over experienced an overall lower rate of poverty at 17.3%. The poverty level of individuals is influenced by factors such as educational attainment and employment status. The ACS data shows that 6,750 (13.5%) individuals that did not graduate from high school and 4,790 (9.6%) unemployed individuals experience some of the highest poverty levels and are 43.8% and 52.9% below the poverty level, respectively. Among race/ethnic groups, Black or African Americans live 45.6% below the poverty level compared to Whites at 30.6%. Persons of Hispanic or Latino origin are 38.7% below the poverty level. See Table 8 for the percentage of people living below the poverty level.

Table 8. People Living below the Poverty Level – Saginaw, MI

All People	37.4%
Under 18 Years	54.3%
Related Children Under 18 Years	54.0%
Related Children Under 5 Years	60.8%
Related Children 5 to 17 Years	51.5%
18 Years and Over	31.1%
18 to 64 Years	33.6%
65 Years and Over	17.3%
People in Families	36.2%
Unrelated Individuals 15 Years and Over	41.4%

Source: 2013 ACS

Families also experienced an overall higher rate of poverty in 2013 at 32.6% compared to 24.7% in 2000. Married couple families had a significantly lower rate, with 11.2% living below the poverty level. Female-headed households experienced poverty at the greatest rate of all groups: 50.4% of female households with no husband present and 61.9% of female households with related children less than 18 years old. This measurement is particularly stark when compared to their incidence in the total population (female headed households with children make up 15.6% of all Saginaw households). Table 9 shows the percentage of families living below the poverty level.

Map 4. Percentage of Households on Public Assistance by Census Block Group – Saginaw, MI

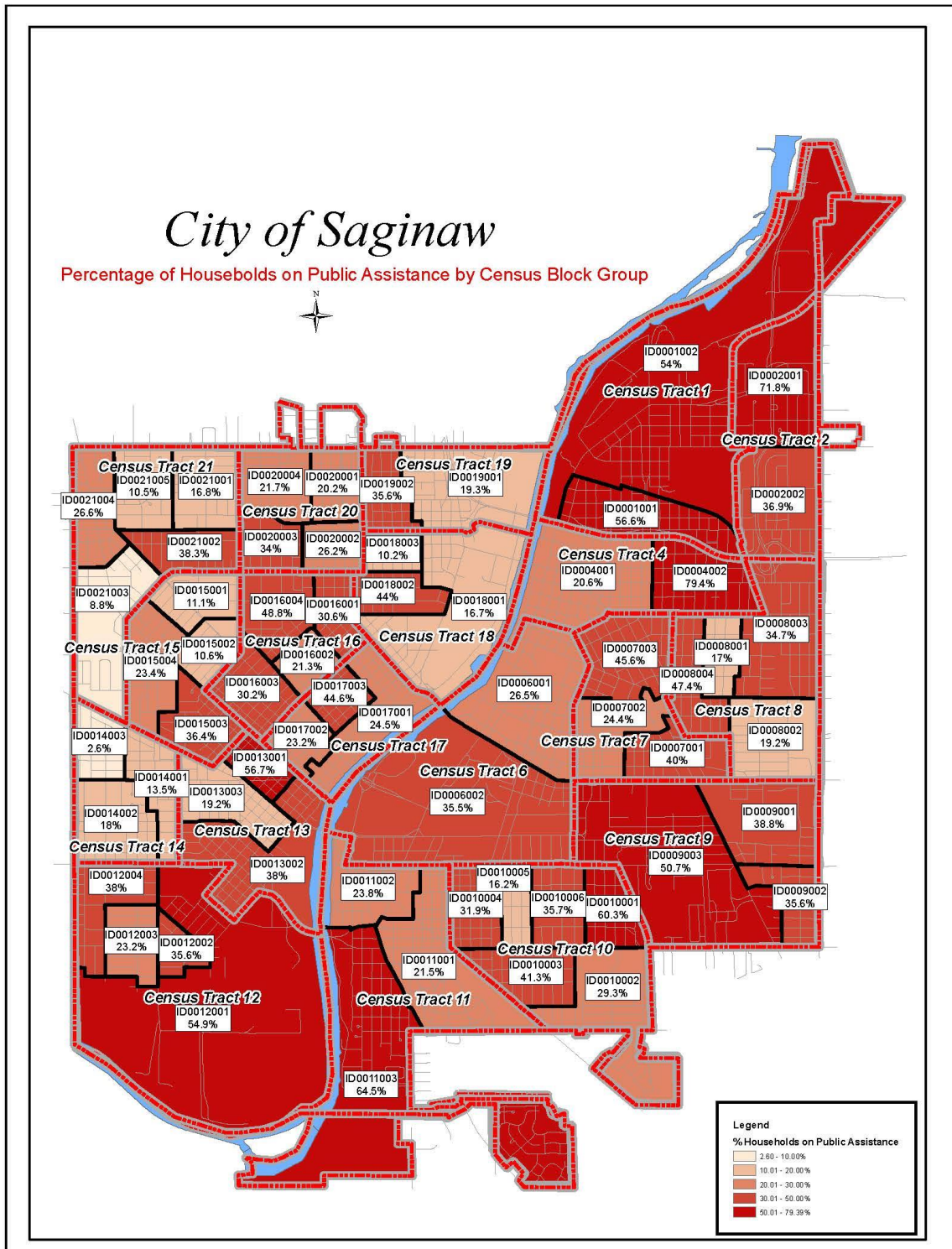


Table 9. Families Living below the Poverty Level – Saginaw, MI

All Families	32.6%
With Related Children Under 18 Years	47.9%
With Related Children Under 5 Years	56.7%
Married Couple Families	11.2%
With Related Children Under 18 Years	19.6%
With Related Children Under 5 Years	16.4%
Families With Female Householder, No Husband Present	50.4%
With Related Children Under 18 Years	61.9%
With Related Children Under 5 Years	70.7%

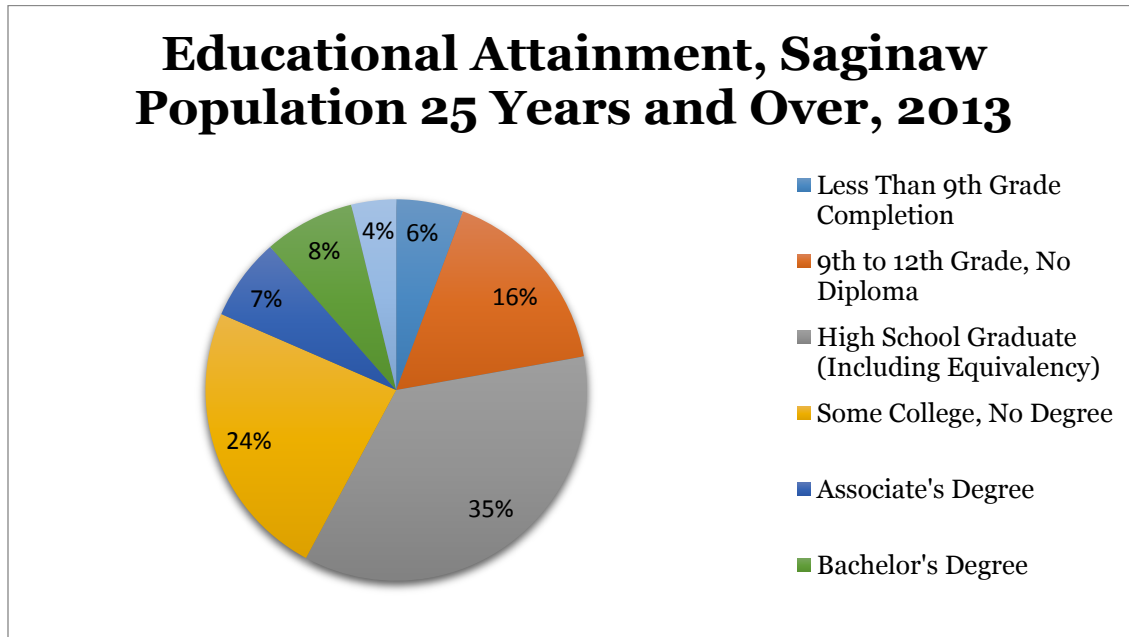
Source: 2013 ACS

Of the 19,353 estimated Saginaw households in 2013, 32.0% received Social Security income; 14.2% received Supplemental Security Income; 9.7% received cash public assistance income; 20.9% received retirement income; and 41.3% received Food Stamp/SNAP benefits. Map 4 shows the percentage of households on public assistance by census tract.

Educational Attainment

Within the 2013 Saginaw population of persons 25 years and over, 35.7% of people had at least graduated from high school (including equivalency), 7.0% had an associate’s degree, 7.7% had a bachelor’s degree, and 3.8% had a graduate or professional degree. Of the same population (25 years and older), 22.2% had less than a high school education diploma. See Figure 2, below.

Figure 2. Educational Attainment – Saginaw, MI



Source: 2013 ACS

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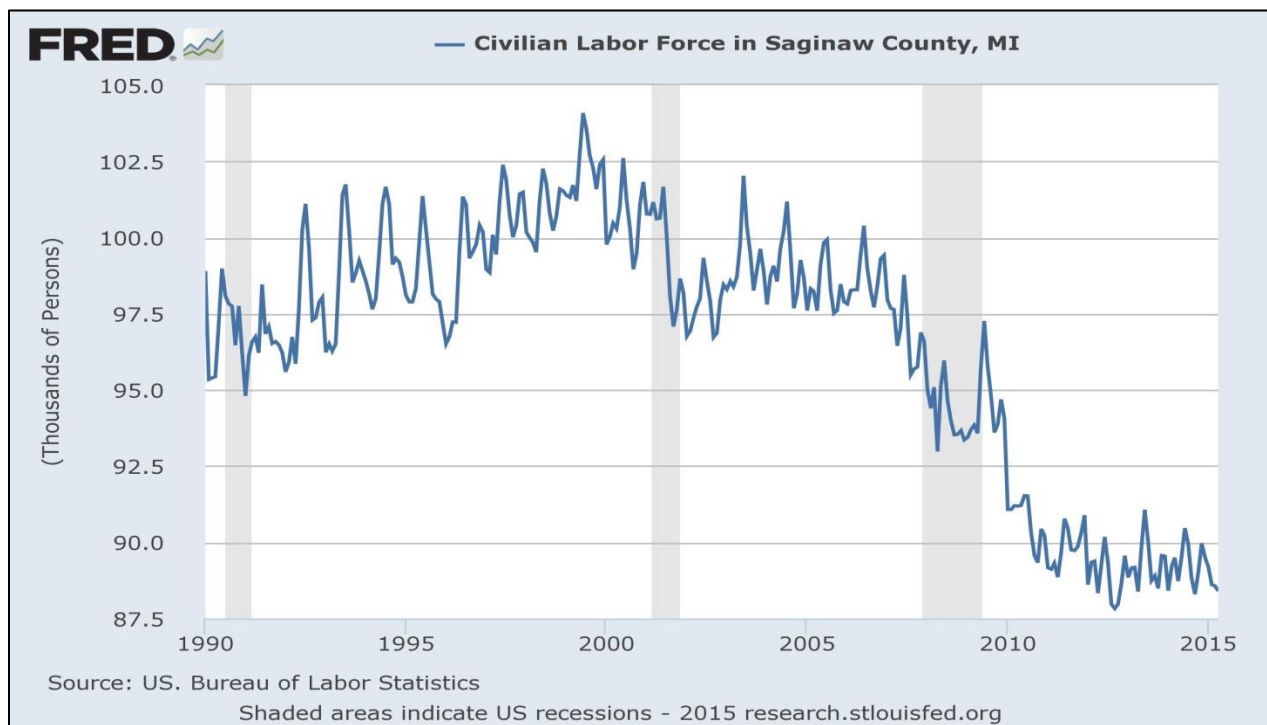
City of Saginaw, MI

The total school enrollment for the population aged 3 years and over in Saginaw was 14,894 in 2013. School enrollment is broken down into the following categories: 6.0% in nursery school/preschool; 4.7% in kindergarten; 42.2% in grades 1-8; 23.4% in high school; and 23.6% in college or graduate school.

Employment

As of 2013, the Saginaw population aged 16 years and over numbered 38,808 persons, of which approximately 56.0% (21,732) were in the labor force and 43.7% (16,959) were unemployed. This reflects a decline in the labor force since 2000 when Saginaw had 44,017 persons aged 16 and over. In 2000, 58.8% (25,901) of those persons were in the labor force and 51.1% (22,500) were employed. Figure 3 gives a larger view of the labor force changes within Saginaw County from January 1990 to September 2014.

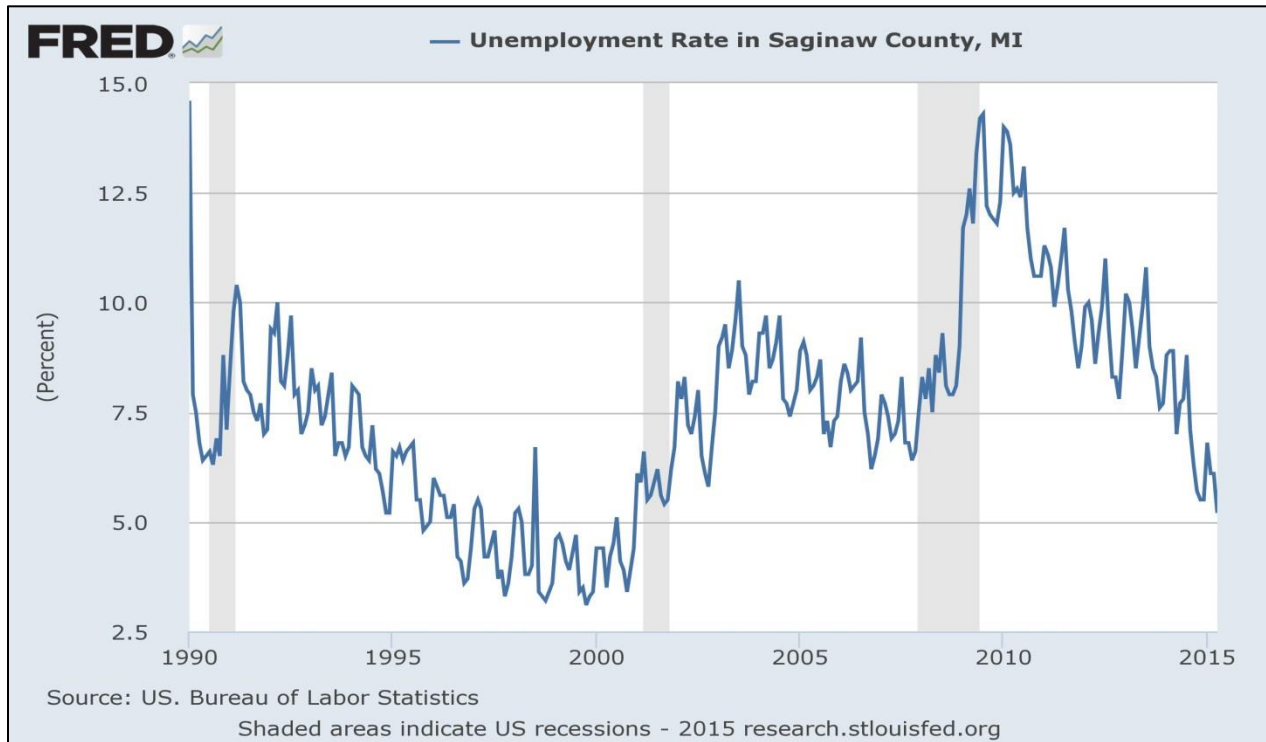
Figure 3. Civilian Labor Force: 1990-2015 – Saginaw County, MI



Source: Federal Reserve Bank of St. Louis, Missouri

The national economic downturn in recent years has affected the Saginaw area, and unemployment in Saginaw rose from 8.3% in July 2007 and peaked at 14.3% in July 2009. The recovery of the economic climate has positively impacted the employment rate and as of April 2015, the unemployment rate in Saginaw County was down to 5.2%. Figure 4 illustrates the changes in unemployment rate in Saginaw County.

Figure 4. Unemployment Rate: 1990-2015 – Saginaw County, MI



Source: Federal Reserve Bank of St. Louis, Missouri

The City of Saginaw has job opportunities in a fairly diversified economy, and the character of its population is reflected in the major industries of employment. According to the 2013 ACS, the following five top industries provide employment for 77.2% of the City's civilian workforce:

- Educational services, and healthcare and social assistance ----- 27.7%
- Arts, entertainment, and recreation, and accommodation and food services ----- 13.6%
- Retail trade ----- 13.4%
- Manufacturing ----- 12.5%
- Professional, scientific, management, administrative and waste management services -- 10.0%

Table 10 provides a list of the top employers in Saginaw County. Over 31,000 (33.6%) persons in the County's labor force are employed by these primary employers.

Analysis of Impediments to Fair Housing Choice, July 2015

City of Saginaw, MI

Table 10. Top Employers – Saginaw County, MI

Rank	Employer Name	Type of Business	Employees	Web Sites
1	Nexteer Automotive	Automotive	4,820	http://www.nexteer.com/
2	Covenant HealthCare	Medical	4,512	http://www.covenanthealthcare.com
3	St. Mary's of Michigan	Medical	1,800	http://www.stmarysofmichigan.org/
4	Morley Companies, Inc.	Display, Interactive Services, Travel	1,750	http://www.morleynet.com
5	Meijer	Department Store	1,425	http://www.meijer.com/
6	Saginaw Valley State University	Education	1,071	http://www.svsu.edu/
7	Hemlock Semiconductor / Dow Corning Corporation	Polycrystalline Silicon, Solar, Medical	1,000	http://www.hsepoly.com/ http://www.dowcorning.com/
8	Frankenmuth Bavarian Inn Inc.	Restaurant, Hotel	940	http://www.bavarianinn.com/
9	Aleda E. Lutz Veteran Affairs Medical Center	Medical	904	http://www.saginaw.va.gov/
10	County of Saginaw	Government	676	http://www.saginawcounty.com/
11	Saginaw Public Schools	Education	657	http://www.spsd.net/
12	Fashion Square Mall	Retail	650	http://www.shopfashionsquaremall.com/
13	Saginaw Township Community Schools	Education	621	http://www.stcs.org/
14	Saginaw ISD	Education	613	http://www.sisd.cc/
15	Frankenmuth Insurance	Insurance	604	http://www.fmins.com/
16	United States Post Office	Mail, Shipping	580	http://www.postofficehours.net/MI/Saginaw.html
17	HealthSource Saginaw	Medical	562	http://www.healthsourcesaginaw.org/

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City of Saginaw, MI

Rank	Employer Name	Type of Business	Employees	Web Sites
18	Wal-Mart	Retail	505	http://www.walmart.com/
19	Zehnder's of Frankenmuth	Restaurant	503	http://www.zehnders.com/
20	General Motors Powertrain - SMCO	Automotive	476	http://www.gm.com/
21	Wellspring Lutheran Services	Health Care	469	https://wellspringlutheran.com/
22	Duro-Last, Inc. / Plastatech Engineering Ltd.	Roofing Systems & Laminated Vinyl	464	http://duro-last.com/ http://www.plastatech.com/
23	Merrill Technologies Group	Machining	442	http://merrilltg.com/
24	Birch Run Prime Outlets	Retail	410	http://www.premiumoutlets.com/
25	Consumers Energy	Energy	407	http://www.consumersenergy.com/
26	City of Saginaw	Government	405	http://www.saginaw-mi.com/
27	MBS International Airport	Travel, Shipping	325	http://www.mbsairport.org/
28	Orchid Bridgeport	Medical Manufacturer	320	http://www.orchid-orthopedics.com/
29	Saginaw Correctional Facility	Corrections	315	http://www.michigan.gov/corrections/0,4551,7-119--5263--,00.html
30	Hehr International Inc.	Glass Products	312	http://www.hehrintl.com/
31	Bronners CHRISTmas Wonderland	Retail / Tourism	294	http://www.bronners.com/
32	CMU Healthcare	Medical	289	http://www.synergymedical.org/
33	Saginaw Control & Engineering	Electronic Controls	280	http://www.saginawcontrol.com/
34	Saginaw County Community Mental Health Authority	Medical	274	https://www.sccmha.org/
35	Health Delivery Inc.	Medical	256	http://www.healthdelivery.org/
36	Glastender, Inc.	Metal Fabricator,	202	http://www.glastender.com/

Rank	Employer Name	Type of Business	Employees	Web Sites
		Manufacturer		
37	Means Industries	Auto Stampings	199	http://www.meansindustries.com/
38	Mobile Medical Response	Emergency Transportation	187	http://www.mobilemedical.org/
39	Stone Transport LP	Shipping	184	http://www.stonetransport.com/
39	Meggitt - Thomson Aerospace & Defense	Manufacturing	184	http://www.thomsonaerospace.com/
40	SVRC Industries, Inc.	Job Training	165	http://svrcindustries.com/

Source: Saginaw Future accessed June 18, 2015 <http://saginawfuture.com/data-demographics/primary-employers/>

Transportation and Commuting

Transportation

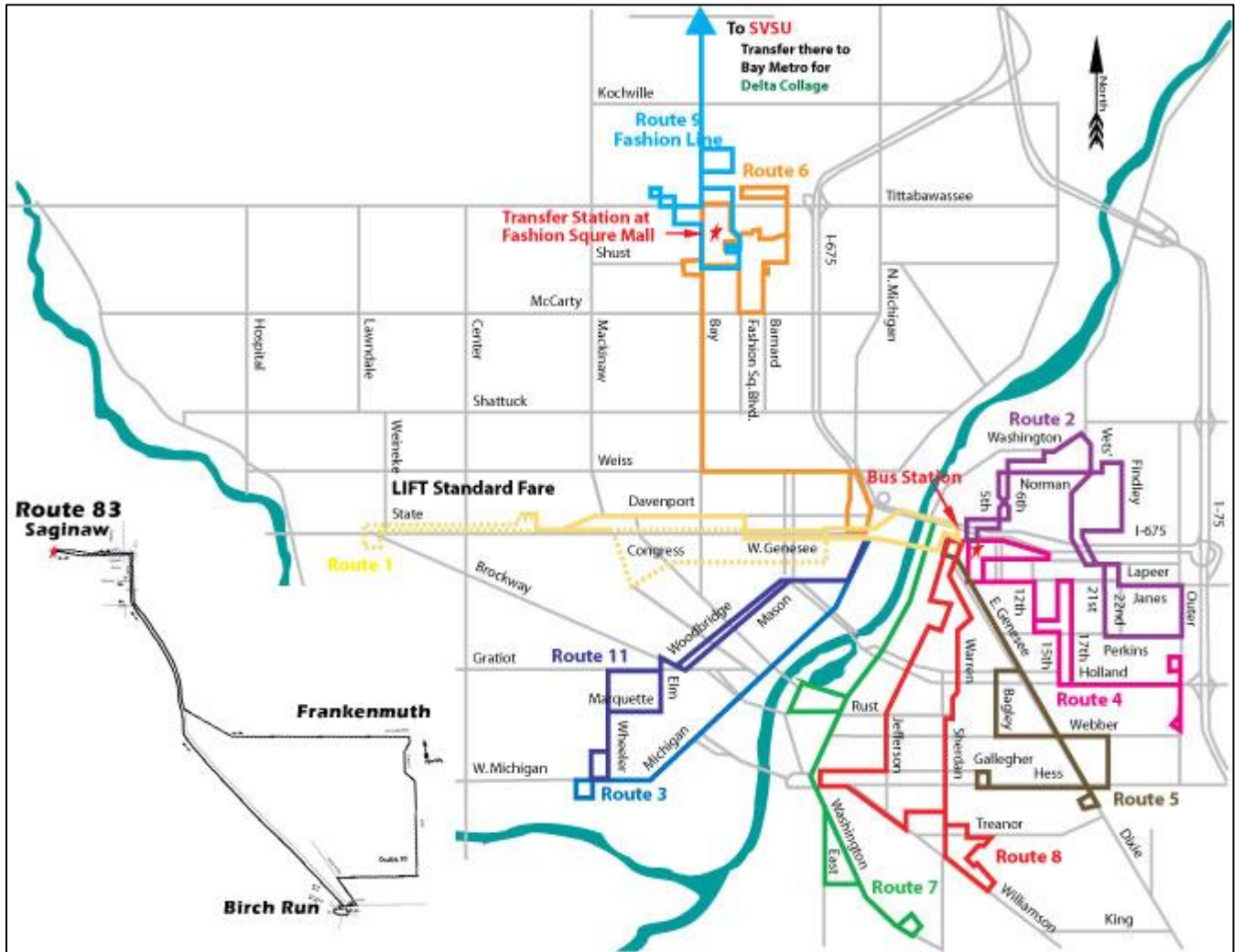
The Saginaw Transit Authority Regional Services (STARS) is the public transportation system for the Urbanized Saginaw Area. STARS services include fixed routes and lift service. There are ten fixed routes and a Delta Express route that serves 500 STARS bus stops. STARS Lift Service is a curb-to-curb service for mobility challenged residents including seniors and persons with disabilities. According to the STARS website, over 48,000 residents utilize the Lift Service annually for their transportation needs. Figure 5 is a map showing the STARS fixed routes.

The fare for the fixed routes is \$1.25 for adults and \$0.60 for children. Discounts are available for persons over the age of 62, individuals with disabilities, and persons with a Medicare card. The reduced fare is \$0.60. The fare for lift services is \$5.00 for adults and \$3.00 for children. The reduced lift service fare is \$3.00.

In addition to the fixed route and lift services, the City of Saginaw plans to introduce other subsidized or low cost transit options. The Saginaw Transit Master Plan (TMP)⁸ is a 25-year plan for public transportation in Saginaw County. Recommended services for the City of Saginaw include a subsidized taxi service that will operate evenings and Sundays when there is low demand for fixed route transit service. There is also a plan to add “Med Line” service that will provide connection to major medical institutions in Saginaw.

Figure 5. STARS Route Map- Saginaw, MI

⁸ http://media.mlive.com/saginawnews_impact/other/Transit%20Master%20Plan%20FINAL.pdf



Source: <http://www.saginaw-stars.com/Routes.aspx>

Employment and Transportation

Generally, public transportation is used by lower income persons, persons who are elderly, and persons with disabilities; thus these are the groups disproportionately impacted by insufficient public transportation. The lack of public transportation is a barrier to employment opportunities and has a direct impact on fair housing choice. The siting of public transportation and services areas also influences fair housing choice.

The Saginaw Transit Master Plan (TMP) included a transit needs assessment that identified trends in the population of traditional transit riders. Specifically, the Saginaw County population was aging and more seniors were residing in suburban, rural, and small village areas; the number of households in poverty increased significantly between 2000 and 2009; and youth and minority populations declined slightly while the number of single parent households increased.

The TMP includes three community goals to address the transit needs namely: 1) support economic development; 2) support education; and 3) support community social service needs.

The objectives associated with the goals are:

1. Provide access to jobs for county and city residents by connecting major employment areas as well as support corporate sustainability efforts.
2. Support area's efforts to be a tourist destination for both local and out-of-town people.
3. Attract more choice riders.
4. Provide opportunities for job training/retraining at area universities and colleges.
5. Provide rural to urban services.
6. Provide transportation for seniors to allow "aging in place."
7. Provide access to medical care.

In regards to the goal of supporting economic development and providing access to jobs, the key actions identified in the TMP are to provide later evening service and weekends as well as better out-county access. The TMP includes potential funding sources to meet its objectives and one grant program that the City already utilizes is the State-funded Job Access and Reverse Program (JARC). JARC covers funding for capital and operating expenses for projects that transport low income persons to and from employments related activities.

The Saginaw Metropolitan Area Transportation Study: 2040 Metropolitan Transportation Plan⁹ (SMATS) prepared in November 2012, stated that employment in the region is concentrated in the City of Saginaw and the adjacent townships. SMATS also includes an objective to improve access to employment centers.

Based on the review of Saginaw's transportation plans, it is clear that the City of Saginaw is working to improve service availability to transit users and to make transportation accessible to jobs. In addition, STARS policies support fair housing choice because of its commitment to providing quality transportation services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. However, insufficient transportation is still an impediment in Saginaw because the areas where public transportation is not available, or does not connect residents with employment or their other needs makes the area inaccessible to those without means to have a personal vehicle. Public comments were received during the development of the City of Saginaw Master Plan 2011¹⁰, which identified the need for improved transit and the consideration of small local rail lines to stimulate development at nodes through linkage between job centers and neighborhoods.

Commuting

According to an article published in The New York Times¹¹, a lack of reliable and efficient transportation is a huge barrier for low income people and the longer the average commute, the worse the chances of upward mobility. This barrier can impact fair housing choice if low income persons do not have access to a personal vehicle and/or reside in areas not served by reliable public transportation.

According to the 2013 ACS, 77.8% of Saginaw workers drove to work alone and 13.3% carpooled. Only 2.6% of workers utilized public transportation. A review of the data in Table 11 shows that approximately 46.0% of

⁹ <http://www.saginawcounty.com/Docs/SMATS%202040%20MTP%20Nov%202012.pdf>

¹⁰ <http://www.saginaw-mi.com/pdfs/city-of-saginaw-master-plan-2011.pdf>

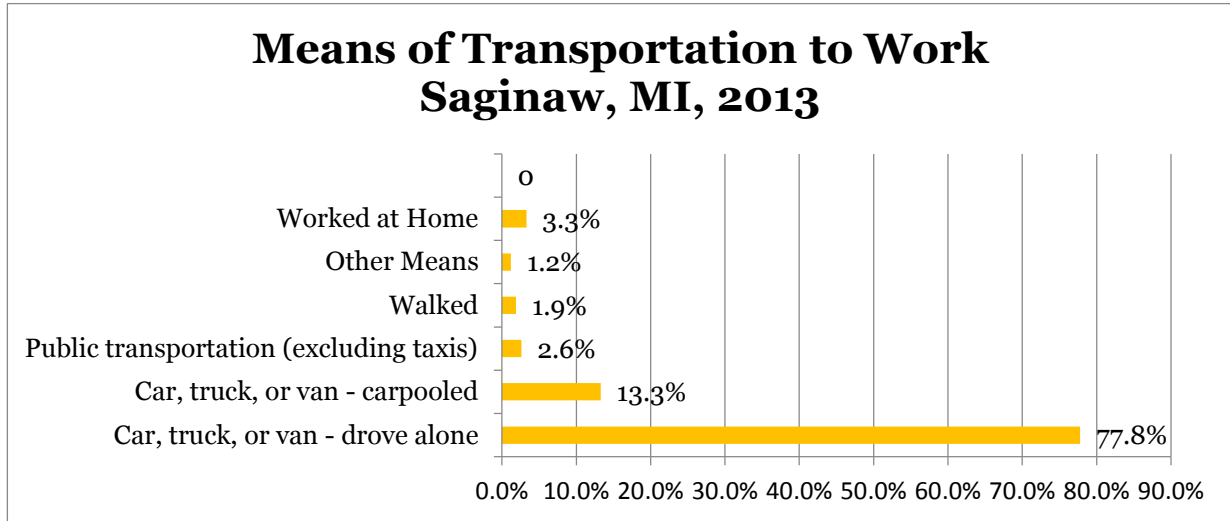
¹¹ Bouchard, Mikayla. "Transportation Emerges as Crucial to Escaping Poverty." *New York Post* 7 May 2015. Web. 8 May 2015
"<http://nyti.ms/1F7gIVr>

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commuters spent less than 15 minutes commuting one way to work. An additional 36.7% spent less than 30 minutes commuting one way to work. The mean travel time to work was 18 minutes. See Figure 6 and Table 11.

Figure 6. Means of Transportation – Saginaw, MI



Source: 2013 ACS

Table 11. Commute Times – Saginaw, MI

Travel Time to Work (one way)	Rate (%)
Less than 10 minutes	20.9%
10 to 14 minutes	25.1%
15 to 19 minutes	18.1%
20 to 24 minutes	14.3%
25 to 29 minutes	4.3%
30 to 34 minutes	9.0%
35 to 44 minutes	2.2%
45 to 59 minutes	3.2%
60 or more minutes	3.0%

Source: 2013 ACS

IV. COMPLIANCE DATA AND ANALYSIS

Introduction

This section contains an analysis of community reinvestment, fair housing complaint data, legal cases, foreclosure data, and HMDA data. Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data are used in AIs to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist. Review of HMDA data and foreclosure rates assist in determining if abusive and predatory lending practices are present in the City.

CRA Compliance

The CRA, enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. The CRA requires the FDIC, in connection with the examination of a State nonmember insured financial institution, to assess the institution's CRA performance. CRA examinations are conducted by the Federal Financial Institutions Examinations Council (FFIEC) of federal agencies that are responsible for supervising depository institutions: the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS)¹².

The CRA requires that each institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is used in considering an institution's application for deposit facilities, including mergers and acquisitions. A financial institution's performance is evaluated along with its financial condition and business strategies, its community, and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system of "Outstanding, Satisfactory, Needs to Improve, and Substantial Noncompliance."

A search of the FFIEC website produced four CRA Performance Ratings for two banks based within the city limits of Saginaw. The 1st State Bank received a rating of "Satisfactory" for both years examined while Second National Bank of Saginaw received a "Satisfactory" rating in 1991 and an "Outstanding" rating in 1995. See Table 12.

Table 12. FFIEC CRA Performance Ratings - Saginaw, MI

Exam Date	Bank Name	City	State	FFIEC CRA Rating	Asset Size (in thousands)
8/1/2006	1 st State Bank	Saginaw	MI	Satisfactory	\$69,725
4/1/2011	1 st State Bank	Saginaw	MI	Satisfactory	\$166,357
12/6/1991	Second National Bank of Saginaw	Saginaw	MI	Satisfactory	\$650,922
9/15/1995	Second National Bank of Saginaw	Saginaw	MI	Outstanding	\$661,654

Source: FDIC, <http://www.ffiec.gov/craratings>

¹² OTS is no longer an active regulatory agency therefore there will be no CRA ratings updates after June 30, 2011 for the OTS.

Founded in 2013, the Saginaw Community Reinvestment Act Bankers Forum is a consortium of area financial institutions including seven local banks, Neighborhood Renewal Services of Saginaw, and the Saginaw Habitat for Humanity. The Bankers Forum works to address educational and financial needs related to affordable housing and community improvement.

Fair Housing Complaint Data

Chapter 93.06, Non-Discrimination, of the City of Saginaw’s Code of Ordinances describes the housing discrimination complaint and investigation process. Persons who believe they have been discriminated against may file a written complaint with the City specifying the type of discrimination alleged. The City may conduct its own investigation into the matter or defer the investigation to the state of federal authorities.

Complaints received by HUD

The data used for this analysis was provided by the HUD Office of Fair Housing and Equal Opportunity for the period January 2009 through September 2014 and covers the housing discrimination complaints filed along with the basis of the complaints. Data on how cases were resolved including closed with no cause found, conciliation, determined to have cause (FHAP), withdrawn without resolution, and administratively closed.

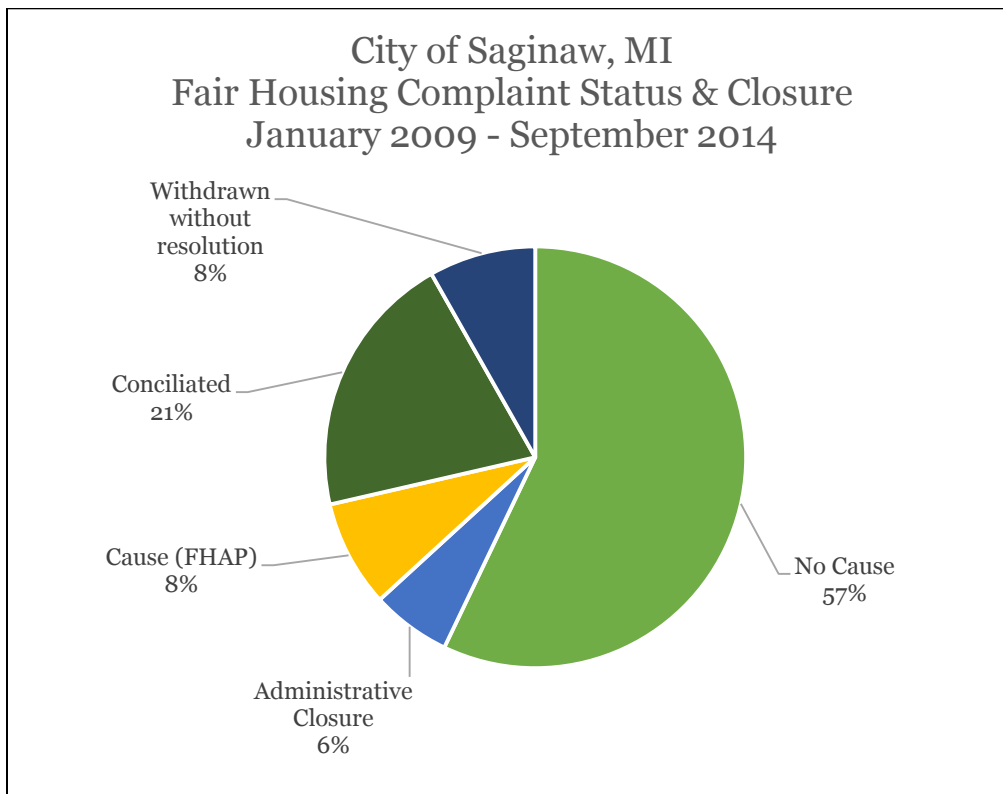
During the above period, there were 49 housing complaints filed in the City of Saginaw. Housing discrimination complaints were filed on the basis of race, disability, familial status, national origin, sex, and retaliation. In some cases, complaints were filed on more than one basis. For the period reviewed, the majority of complaints were based on disability (32.7%) and race (30.6%) alone. Another 8% of complaints were based on multiple allegations in a single complaint specifically race, disability, retaliation and sex. Table 13 shows the breakdown of fair housing complaints filed in the City of Saginaw by type of discrimination.

Table 13. Fair Housing Cases Closed by Basis for 2009-2014 - Saginaw, MI

Type of Discrimination	Year Complaint Closed						Total
	CY2009	CY2010	CY2011	CY2012	CY2013	CY2014	
National Origin	4	-	-	1	3	1	9
Disability	3	4	1	-	6	2	16
Race	3	2	4	1	3	2	15
Familial Status	1	-	1	1	1	-	4
Race + Disability	-	1	-	-	1	-	2
Retaliation	-	-	-	1	-	-	1
Race + Retaliation	-	-	-	-	1	-	1
Race + Disability + Sex	-	-	-	-	1	-	1
TOTAL	11	7	6	4	16	5	49

In reviewing closed cases, it is important to assess how cases were resolved. Of the 49 complaints, four were determined to have cause, 10 were settled through conciliation, three were administratively closed, four were withdrawn without resolution, and 28 were determined to have no cause. Figure 7 shows the breakout of closed cases by status.

Figure 7. Disposition of Housing Discrimination Cases 2009-2014 – Saginaw, MI



Legal Cases

As part of the fair housing analysis, recent legal cases involving fair housing choice were reviewed to identify any significant fair housing issues that may exist in the City of Saginaw and surrounding region. The purpose of the case analysis is to understand fair housing issues and challenges and to identify possible impediments or barriers to fair housing choice. Information was gathered from court documents and rulings, newspaper articles, and press announcements. The review provides a summary of the case highlights.

United States of America v. Community State Bank (Civil Action No. 13-10142)

The case brought against Community State Bank by the U.S. Justice Department alleged that the bank violated the FHA and the Equal Credit Opportunity Act (ECOA) by discriminating on the basis of race in their lending practices. Community State Bank is headquartered in St. Charles, MI and has several branches in Saginaw, Genesee, and Shiawassee Counties.

In May 2010, the Federal Deposit Insurance Corporation (FDIC) conducted an examination of the bank that included a review of lending activities in predominantly African American census tracts between 2006 and 2009. Based on the examination, the FDIC and the DOJ concluded that the bank did not serve the credit needs of primarily African American census tracts to the extent that it served the credit needs of residents in predominantly non-minority census tracts.

The case was settled in January 2013 and Community State Bank was required to (i) open a new loan office in an African American neighborhood in Saginaw; (ii) invest \$165,000 in predominantly African American census tracts in and around Saginaw; and (iii) take other steps to resolve the allegations.

United States of America v. Dalton Township, MI (Civil Action No. 1:10-cv-726)

A complaint was filed against Dalton Township, MI in July 2010 alleging that the Township violated the FHA and ADA by refusing to grant reasonable accommodation to the ‘Serenity Shores’ group home, a sober home for men recovering from drug and alcohol addictions.

The owner of the group home requested an exception to the Dalton Township Zoning Ordinance to allow him to operate a group home for up to nine men with alcohol and drug dependency which was denied by the Township. The court found that the Township violated the FHA by making dwelling unavailable to persons with disabilities and by failing to make reasonable accommodation.

The consent agreement required the Township to pay \$55,000 to the owner of the group home, allow the group home to serve up to nine persons, develop a written policy to request reasonable accommodations or modifications on the basis of disability, and obtain training on the FHA and the ADA for Township officials involved in land use and zoning decisions.

Treatment of Foreclosure

For analysis of foreclosure impacts in Saginaw, data was gathered from RealtyTrac.com. RealtyTrac is recognized as the most comprehensive, one-stop source of foreclosure data. Data included homes in pre-foreclosure, at auction, and bank-owned (REO) properties representing current data or data recorded as of May 2015.

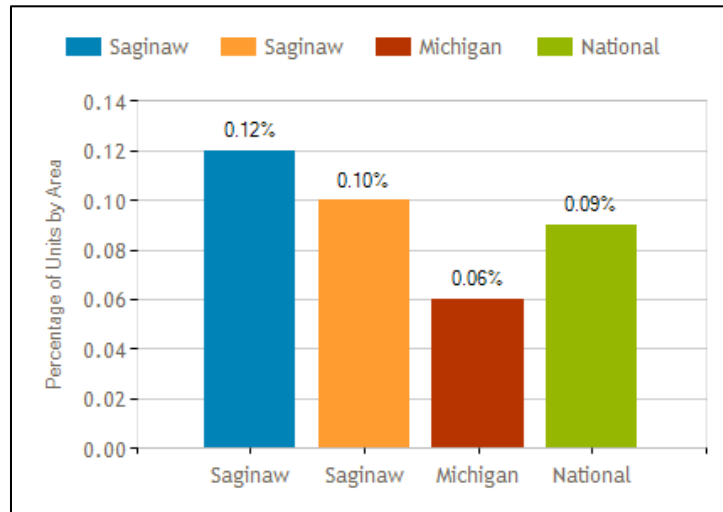
According to RealtyTrac, one out of every 803 homes in Saginaw was under foreclosure in May 2015. RealtyTrac further analyzes foreclosures according to zip code within the City of Saginaw. In May 2015, the zip codes with the highest foreclosure rate were as follows: one in every 447 homes in zip code 48602; one in every 763 homes in zip code 48601; one in every 993 homes in zip code 48604; one in every 1,147 homes in zip code 48607; and one in every 1,226 homes in zip code 48638.

RealtyTrac provides a geographical comparison of foreclosures within the city, county, state, and on the national level. Figure 8 shows that the City of Saginaw’s rate of foreclosure (0.12%) is higher than that of Saginaw County (0.10%), the state rate (0.06%), and the national rate (0.09%).

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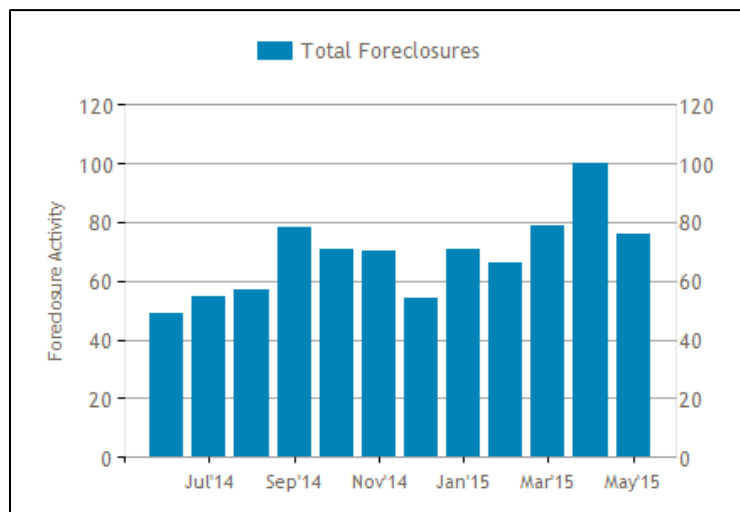
Figure 8. Foreclosure Rate Comparison for Saginaw (city), Saginaw County, Michigan, and United States



Source: RealtyTrac, 2015

RealtyTrac shows that the number of foreclosures within Saginaw has varied over the last year. The following figure shows foreclosure activity between June 2014 and May 2015. The number of foreclosures peaked in April 2015 and the lowest point occurred in June 2014.

Figure 9. New Foreclosure Activity – Saginaw, MI



Source: RealtyTrac, 2015

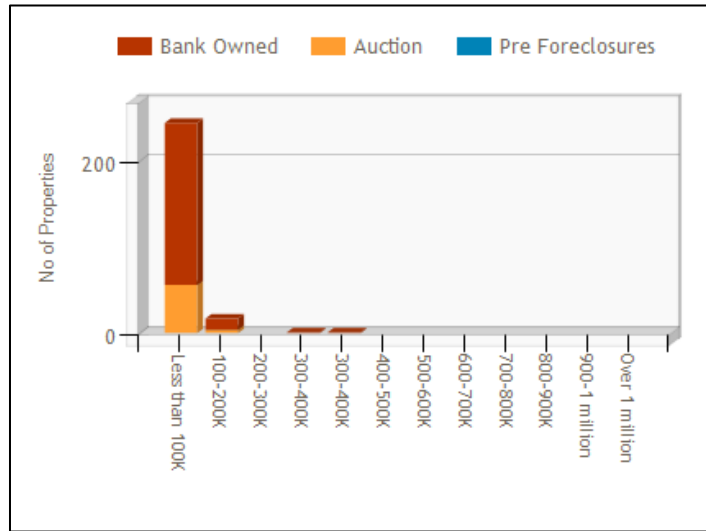
According to RealtyTrac, there are currently 319 properties in Saginaw that are in some stage of foreclosure (default, auction or bank owned) while the number of homes listed for sale on RealtyTrac is 338. In May 2015, the number of properties that received a foreclosure filing in Saginaw was 24% lower than the previous month and 65% higher than the same time last year. RealtyTrac shows that all current foreclosure properties are either bank owned or at auction status, as shown below. Bank-owned foreclosure properties account for 48.7%

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of the number of active foreclosure homes in Saginaw up by 68.2% from the prior year and down 43.9% from the prior month. The number of foreclosed properties up for auction increased by 62.5% from the prior year and is 14.7% higher than the prior month. These foreclosure units make up 51.3% of the number of active foreclosures in Saginaw. RealtyTrac reports that of the 319 Saginaw properties in some stage of foreclosure, the highest availability rate occurs in the less than \$100,000 price range (245 properties). See Figure 10 below.

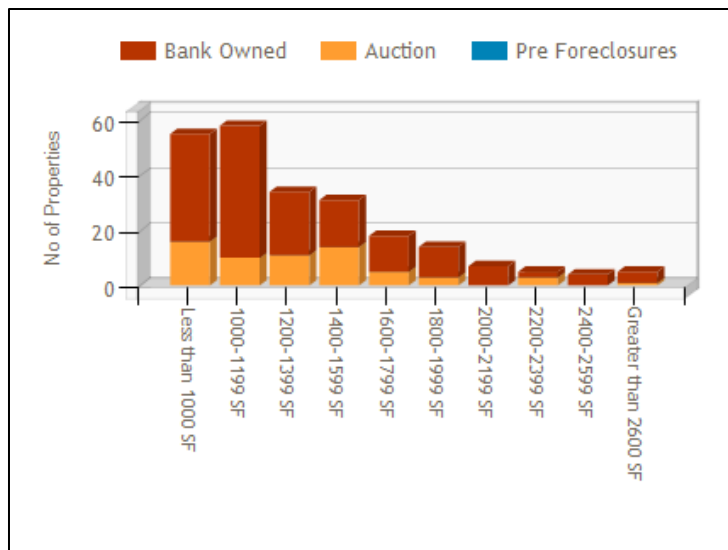
Figure 10. Number of Foreclosure Properties Available Per Market Value – Saginaw, MI



Source: RealtyTrac, 2015

Of the foreclosure properties available in the Saginaw market, the following figure show that the highest availability of properties occurs with those that are 1,000-1199 square feet (58 properties), studio (96 properties), and built before 1950 (86 properties).

Figure 11. Number of Foreclosure Properties per Square Footage – Saginaw, MI



Source: RealtyTrac, 2015

Foreclosures can have an effect on homeowners, renters, banks and financial institutions, neighborhoods, and government. Homeowners and renters are more directly impacted because persons who lose their homes or are evicted due to foreclosure will need to change their living situation and may even become homeless. The effect on neighborhoods can be far reaching including blight due to abandoned and deteriorated properties, decline in property values, crime, and decrease in availability of public services.

In regards to fair housing, foreclosure rates can be analyzed to determine if the reasons for foreclosures include discriminatory practices. The National Fair Housing Alliance (NFHA) published a 2014 report titled, *Zip Code Inequality: Discrimination by Banks in the Maintenance of Homes in Neighborhoods of Color*¹³. NFHA conducted a nationwide examination of Real Estate Owned (REO) maintenance and marketing practices of major lenders and Fannie Mae over the last five years. The examination considered several aspects of maintenance and marketing including curb appeal, structure, signage, and indications of water damage, condition of paint, siding, and gutters. NFHA worked with 17 partners to gather data including the Fair Housing Center of West Michigan in Grand Rapids, MI. The examination was conducted in 29 metropolitan areas between April 2012 and December 2013. The results for all the areas are summarized below:

- REOs in communities of color were 2.2 times more likely to have significant amounts of trash and debris on the premises than REO properties in White communities.
- REOs in communities of color were 2.3 times more likely to have unsecured, broken, or damaged doors than REOs in White communities.
- REOs in communities of color were 2.0 times more likely to have damaged, broken, or boarded windows than REO homes in White communities.
- Holes in the structure of the REO were 2.1 times more likely in communities of color than in White communities.
- REO properties in communities of color were 1.3 times more likely to have no professional “for sale” sign than REO homes in White communities.

¹³ National Fair Housing Alliance, *Zip Code Inequality: Discrimination by Banks in the Maintenance of Homes in Neighborhoods of Color*. Published August 27, 2014 http://www.mvfairhousing.com/pdfs/2014-08-27_NFHA_REO_report.PDF

HMDA Data Analysis

Introduction

This section contains an analysis of Home Mortgage Disclosure Act (HMDA) data for the City of Saginaw. HMDA was enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C. This regulation provides the public loan data that can be used to assist in determining whether financial institutions are serving the housing needs of their communities; public officials are distributing public-sector investments so as to attract private investment to areas where it is needed; and possible discriminatory lending patterns can be identified.

Using the loan data submitted by the financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual institution disclosure reports. The FFIEC provides the HMDA databases online as raw data and with retrieval software on compact disk. Data can be retrieved or ordered at their website <http://www.ffiec.gov/hmda/hmdaproducts.htm>. The data contain variables that facilitate analysis of mortgage lending activity, such as race, income, census tract, loan type, and loan purpose.

HMDA data consist of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions and some mortgage companies. The data contain information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data deemed most pertinent to this report and analyzed herein is limited to loan denial rates by location within areas of racial/ethnic and income distinction for loans for one to four family dwellings and manufactured homes, but excluding data on loan applications for investment purposes (non-owner occupancy). Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the census tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race.

For purposes of this analysis, a “minority” tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Saginaw as a whole (56.5% based on 2010 Census). Therefore, tracts with a 61.5% or greater minority population would be considered a “minority” tract.

It should be noted, discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas. HMDA data for the three-year period, 2011-2013, were used (extracted from HMDA Flat Files, 2011-2013).

Among the tracts analyzed, there were 3,262 loan applications submitted for purchase, refinancing, improvement of owner-occupied homes, and FHA/VA loans. Of this total, 776 (23.8%) of all applications were denied. Our analysis will focus largely on the characteristics of those applications that were denied.

Overall Loan Application Comparison Data Analysis by Census Tract

The HMDA analysis focuses on 19 census tracts that are entirely within the corporate limits of Saginaw, MI. In 2011-2013, 3,262 total applications were submitted with 888 (27.2%) of them coming from minority applicants. Of the minority applications, 309 (34.8%) of those applications were denied. This is 11% higher than the 23.8% overall denial rate for all applications. Of the 19 census tracts, 10 (52.6%) had a higher minority applicant denial rate than that of their respective tract. Of the 10 census tracts with higher minority denial rates, 3 (30.0%) of them are “minority” tracts (census tracts 2, 4, and 9). Among the 19 identified Saginaw tracts, nine met the criteria for minority tracts in the analysis. Therefore, the data shows that 33.3%, or three

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out of the 9 total minority tracts had higher minority applicant denial rates than that of the overall denial rates. Table 14 below shows a breakdown of the total denial rate of all 19 tracts as well as the minority denial rate by census tract.

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Table 14. Saginaw Total and Minority Applications and Denial Rates (2011-2013)

Census Tracts	Total Applications	Total App Denials	Total App Denial Rate	Total Hispanic Applications	Total Minority Applications (Non- Hispanic)	Total Hispanic Denials	Total Minority Denials (Not Including Hispanic)	Total Hispanic Denial Rate	Total Minority Denial Rate
1	3	3	100.0%	0	0	0	0	0.0%	0.0%
2	45	23	51.1%	0	30	0	16	0.0%	53.3%
4	15	12	80.0%	1	3	1	3	100.0%	100.0%
6	60	20	33.3%	8	30	2	10	25.0%	33.3%
7	42	21	50.0%	1	19	1	9	100.0%	47.4%
8	79	32	40.5%	2	52	2	21	100.0%	40.4%
9	82	38	46.3%	8	53	6	25	75.0%	47.2%
10	118	52	44.1%	7	66	7	27	100.0%	40.9%
11	35	20	57.1%	7	15	4	6	57.1%	40.0%
12	125	32	25.6%	16	19	3	7	18.8%	36.8%
13	114	30	26.3%	10	11	3	1	30.0%	9.1%
14	304	50	16.4%	10	51	4	10	0.0%	19.6%
15	494	84	17.0%	41	42	8	10	19.5%	23.8%
16	290	57	19.7%	19	33	7	9	36.8%	27.3%
17	118	30	25.4%	7	23	3	5	42.9%	21.7%
18	94	33	35.1%	4	25	2	8	50.0%	32.0%
19	123	33	26.8%	11	20	5	9	45.5%	45.0%
20	376	83	22.1%	27	63	9	28	33.3%	44.4%
21	745	123	16.5%	55	99	14	24	25.5%	24.2%

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Analysis of Tracts by Income Characteristics

High Income Tracts: Table 15 breaks down the median income category for the 19 Saginaw census tracts. The table notes that 2 census tracts within the City of Saginaw exhibit median incomes that are higher than that of the MSA (those with a median income of >100%). Neither of these tracts were minority tracts. Conversely, of the census tracts that met HUD's definition of low- income (less than 80% AMI) Saginaw had a total of 16 tracts which included the 9 minority census tracts.

Table 15. Total Median Categories for All Census Tracts: 2011-2013 – Saginaw, MI

Census Tract	Tract Median Family Income %	Tract Income Level
4	22.06	Low
11	24.84	Low
1	30.38	Low
9	32.21	Low
2	40.24	Low
10	40.94	Low
7	48.76	Low
13	54.31	Moderate
8	57.06	Moderate
16	62.69	Moderate
6	62.95	Moderate
12	64.08	Moderate
19	68.41	Moderate
20	69.96	Moderate
17	70.66	Moderate
18	73.37	Moderate
14	81.49	Middle
21	102.18	Middle
15	112.05	Middle

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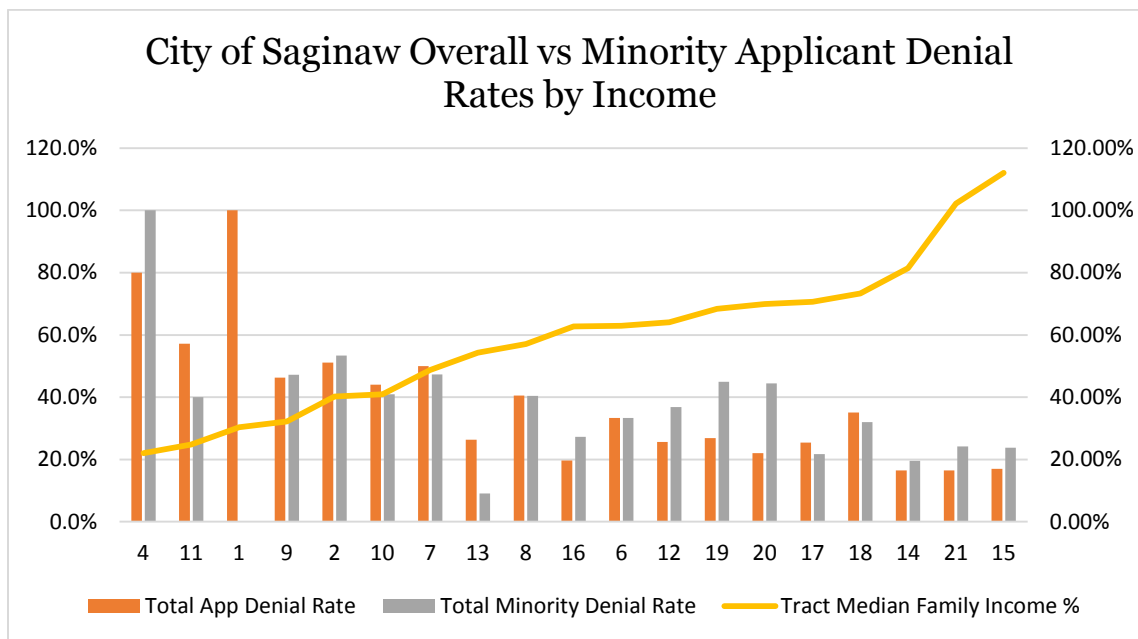
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In addition, to breaking down the median income category data. The HMDA data can also be used to analyze any connection between denial rates and median income. The two census tracts with income levels higher than the MSA (CT 15 and CT 21) both have a higher minority applicant denial rate than that of the overall denial rate. For CT 15, the overall denial rate is 17% compared to a minority denial rate of 23.8%. CT 21 has an overall denial rate of 16.5% and a minority denial rate of 24.2%. This would seem to indicate that higher income applicants may still face hurdles in qualifying for loans and disproportionately affect even high income minority households.

Low Income Tracts: Of the 16 tracts with median incomes that fell below 80% of their MSA, 7 (43.8%) of the tracts had a higher minority applicant denial rate than that of the overall denial rate for their tract. The overall denial rate within these 16 tracts was 30.2%, therefore, minority applicants are also disproportionately affected in low-and moderate income census tracts.

All Tracts by Income: Figure 12 shows a comparison of all 19 Saginaw census tracts and the trend of higher denial rate for minorities can be seen across all tracts when using median income as the main comparison. The data shows that as income levels increase, loan applications approvals increase. However, minority application denial rates are still higher with the biggest differences occurring in low and moderate income tracts.

Figure 12. Overall vs Minority Applicant Denial Rates by Income – Saginaw, MI



These income characteristics do not necessarily suggest discriminatory practices based on income but could mean that these households may be facing other challenges such as credit, low income, and higher debt loads.

Denial Rates and Minority Loan Applications

Tract 20 has the largest difference between overall and minority denial rate, with an overall application denial rate of 22.1% and a minority application rate of 44.4%, has a tract minority population of 35.09%. Of the other tracts with the greatest difference between minority application denial rate and overall denial rate (Tracts 4, 19, and 12), Tract 4 which has the second largest disparity (20%) is skewed due to a relatively small number of total applications. Conversely, the disparity between overall denial rates and minority denial rates in the 9

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minority tracts is small with only three of these tracts exhibiting higher minority denial rates as show in table 16.

Table 16. Total Application Denial Rates Compared to Minority Denial Rates- Saginaw, MI

Census Tract	Total App Denial Rate	Total Minority Denial Rate	Difference
1	100.0%	0.0%	-100
2	51.1%	53.3%	2.2
4	80.0%	100.0%	20
6	33.3%	33.3%	0
7	50.0%	47.4%	-2.6
8	40.5%	40.1%	-0.1
9	46.3%	47.2%	0.8
10	44.1%	40.9%	-3.2
11	57.1%	40.0%	-17.1

Overall, the data indicates that the elevated denial rate among census tracts appears to be based on an applicant’s financial ability to qualify for a loan and not the racial/ethnic characteristics of the tract. A definitive conclusion would require a greater degree of analysis taking into consideration additional data not available from HMDA at the geographic level specific to the City of Saginaw.

Loan Application Denials Breakdowns by Loan Type

There are three classifications for loan type: conventional, FHA, and VA loans. Conventional loans are loans that are not guaranteed or insured by the federal government under the Veterans Administration (VA), the Federal Housing Administration (FHA), or the Rural Housing Service (RHS) of the U.S. Department of Agriculture. FHA and VA loans are backed by the government, meaning that the FHA or the Department of Veteran’s Affairs promises to pay lenders if a borrower defaults on the loan. Borrowers must meet certain requirements to be eligible for each loan type.

Between 2011 and 2013, the majority of loan applications in the City of Saginaw were for refinancing – 1,726 (52.9%), followed by home purchase loans – 1,063 (32.6%) and home improvement loans - 473 (14.5%). The loan denial rate for refinancing loans was 20.2% and the denial rate for home purchase loans was 15.6%. Home improvement loans had a denial rate of 55.4% but this is skewed by the relatively small number of home improvement loan applications. Tables 17 – 19 provide details of each loan purpose.

Table 17. Home Purchase Loan Applications: 2011-2013 – Saginaw, MI

Home Purchase Loan Applications, Saginaw, Michigan, 2011-2013				
Home Purchase	Home Purchase Loans Applications	Home Purchase Loan Denials Application Denials	Home Purchase Loan Applications Denial Rates %	2013 Tract Minority %
1	0	0	0.0%	90.26
2	7	3	42.9%	96.7

Home Purchase Loan Applications, Saginaw, Michigan, 2011-2013				
Home Purchase	Home Purchase Loans Applications	Home Purchase Loan Denials Application Denials	Home Purchase Loan Applications Denial Rates %	2013 Tract Minority %
4	1	1	100.0%	91.89
6	31	9	29.0%	84.91
7	10	2	20.0%	91.19
8	10	4	40.0%	97.38
9	15	3	20.0%	94.08
10	26	3	11.5%	90.69
11	7	4	57.1%	91.34
12	23	1	4.3%	48.37
13	34	4	11.8%	51.8
14	95	10	10.5%	30.92
15	191	28	14.7%	30.07
16	114	12	10.5%	42.66
17	58	4	6.9%	53.31
18	34	14	41.2%	52.73
19	40	4	10.0%	47.24
20	126	25	19.8%	35.09
21	241	35	14.5%	29.39

Table 18. Refinance Loan Applications: 2011-2013 – Saginaw, MI

Refinance Loan Applications, Saginaw, Michigan, 2011-2013				
Home Purchase	Refinance Loans Applications	Refinance Loan Denials Application Denials	Refinance Applications Denial Rates %	2013 Tract Minority %
1	0	0	0.0%	90.26
2	21	9	42.9%	96.7
4	2	1	50.0%	91.89
6	22	6	27.3%	84.91
7	11	5	45.5%	91.19
8	25	7	28.0%	97.38
9	36	10	27.8%	94.08
10	56	24	42.9%	90.69
11	7	1	14.3%	91.34
12	76	19	25.0%	48.37
13	56	15	26.8%	51.8

Refinance Loan Applications, Saginaw, Michigan, 2011-2013				
Home Purchase	Refinance Loans Applications	Refinance Loan Denials Application Denials	Refinance Applications Denial Rates %	2013 Tract Minority %
14	182	27	14.8%	30.92
15	269	38	14.1%	30.07
16	129	24	18.6%	42.66
17	38	12	31.6%	53.31
18	53	13	24.5%	52.73
19	68	22	32.4%	47.24
20	221	50	22.6%	35.09
21	454	65	14.3%	29.39

Table 19. Home Improvement Loan Applications: 2011-2013 – Saginaw, MI

Home Improvement Loan Applications, Saginaw, Michigan, 2011-2013				
Census Tracts	Home Improvement Loans Applications	Home Improvement Loan Application Denials	Home Improvement Application Denial Rates	2013 Tract Minority %
1	3	3	100.0%	90.26
2	17	11	64.7%	96.7
4	12	10	83.3%	91.89
6	7	5	71.4%	84.91
7	21	14	66.7%	91.19
8	44	21	47.7%	97.38
9	31	25	80.6%	94.08
10	36	25	69.4%	90.69
11	21	15	71.4%	91.34
12	26	12	46.2%	48.37
13	24	11	45.8%	51.8
14	27	13	48.1%	30.92
15	34	18	52.9%	30.07
16	47	21	44.7%	42.66
17	22	14	63.6%	53.31
18	7	6	85.7%	52.73
19	15	7	46.7%	47.24
20	29	8	27.6%	35.09

Home Improvement Loan Applications, Saginaw, Michigan, 2011-2013				
Census Tracts	Home Improvement Loans Applications	Home Improvement Loan Application Denials	Home Improvement Application Denial Rates	2013 Tract Minority %
21	50	23	46.0%	29.39

Loan Originations and Comparison Analysis

This section examines originations (the number of applications that result in loans being made) and denial rates broken down by race/ethnicity. Table 20 breaks these characteristics down by the three conventional loan types. Of the 3,262 loan applications submitted between 2011 and 2013, 2,036 or 62.4% were conventional loans; 1,163 or 35.7% were FHA loans; and 62 or 1.9% were VA loans. The loan denial rate for conventional loans was 28.7%, 14.9% for FHA loans, and 30.6% for VA loans.

Table 20- Loan Denials by Loan Source and Race/Ethnicity (2011-2013) – Saginaw, MI

Home Mortgage Disclosure Act (HMDA) Analysis, Saginaw, MI, 2011-2013					
Loan Type	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Conventional	2,036	998	49.0%	584	28.7%
FHA	1,163	393	33.8%	173	14.9%
VA	62	25	40.3%	19	30.6%
FSA	1	1	100.0%	0	0.0%
	3,262	1,417		776	
	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Race & Ethnicity					
White (Not Hispanic)	1,533	929	60.6%	329	21.5%
White (Hispanic)	193	82	42.5%	61	31.6%
Black or African-American (Not Hispanic)	604	275	45.5%	206	34.1%
Black (Hispanic)	4	0	0.0%	2	50.0%
American Indian or Alaska Native (Not Hispanic)	13	5	38.5%	4	30.8%
American Indian or Alaska Native (Hispanic)	0	0	0.0%	0	0.0%
Asian (Not Hispanic)	14	4	28.6%	7	50.0%

Home Mortgage Disclosure Act (HMDA) Analysis, Saginaw, MI, 2011-2013					
Loan Type	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Asian (Hispanic)	0	0	0.0%	0	0.0%
Native Hawaiian and Pacific Islander (Not Hispanic)	0	0	0.0%	0	0.0%
Native Hawaiian and Pacific Islander (Hispanic)	1	1	100.0%	0	0.0%
Race Not Provided (Not Hispanic)	34	14	41.2%	11	32.4%
Race Not Provided (Hispanic)	36	10	27.8%	18	50.0%
Not Applicable	830	97	11.7%	138	16.6%
	3,262	1,417		776	

Table 20 also compares the denial and originations rates of whites and minorities. The majority of loan applications by White households across all loan types in Saginaw (1,533 applications) had a denial rate of 21.5%. Comparatively, non-white applications were 53% of the application pool and had a denial rate of 25.9%. Origination rate for Whites was 60.6%. Black or African Americans were the next largest applicant group with 604 applications submitted and an origination rate of 45.5%. Applications from Hispanics (who did not identify as white) were the third largest loan applicants with 193 application and an origination rate of 42.5%. All of the minority groups had a higher loan denial rate than Whites.

When broken down by loan purpose it is noted that for home purchase loans, non-white applications made up 63.8% of the total applications and had a 15.0% denial rate while Whites made up 36.2% of the total applications but had a 16.6% denial rate. For home improvement loans, minority applications made up 57.9% of the total applications and had a 63.5% denial rate while Whites made up 44.2% of the total applications and had a 33.6% denial rate. Finally, for refinance loans, minority applications made up 45.0% of the total applications and had a 22.0% denial rate while Whites made up 55.0% of the total applications but had an 18.7% denial rate.

This review of the HMDA data suggests that there may be discriminatory lending based on race/ethnicity. As mentioned before, to make a definitive conclusion would require a greater degree of analysis taking into consideration other variables and characteristics that may be affecting the results.

V. HOUSING PROFILE

Housing by Tenure

According to the 2013 ACS, the City of Saginaw’s population decreased 17.2% from 2000 (61,799) to 2011 (51,165). The 2013 ACS reported 24,171 housing units of which 19,353 (80.1%) were occupied housing units, and 4,818 (19.9%) were vacant. Of the occupied housing units 60.8% were owner-occupied and 39.2% were renter-occupied. Of the vacant housing units, 719 (14.9%) were for rent, 111 (2.3%) were rented, not occupied, 629 (13.1%) were for sale, 1,417 (29.4%) were sold not occupied, 43 (0.9%) were seasonal, and 1,899 (39.4%) were all other vacant. The homeowner vacancy rate was 4.6% and the rental vacancy rate was 8.5%.

According to the 2013 ACS, 71.6% or 8,430 of the owner-occupied units were 3 bedrooms, followed by 26.6% or 3,130 2 bedroom units, and 1.5 or 174 1 bedroom units. Unlike owner-occupied households, the majority of renters resided in 2 bedroom units with 40% or 3,037 units. This was closely followed by 39.3% or 2,982 3 bedroom renter-occupied units, and then 18.3% or 1,386 1 bedroom units.

The predominant type of housing as noted in the Table 21 is single unit detached structures (77.2%), followed by structures with 2-4 units (11.7%) and structures with 5-19 units (4.5%). There are only 903 (3.7%) in larger multifamily development of 20 or more units. One-unit attached structures and mobile homes, RVs, boats, etc. represented 2.9% of the total number of housing units in Saginaw.

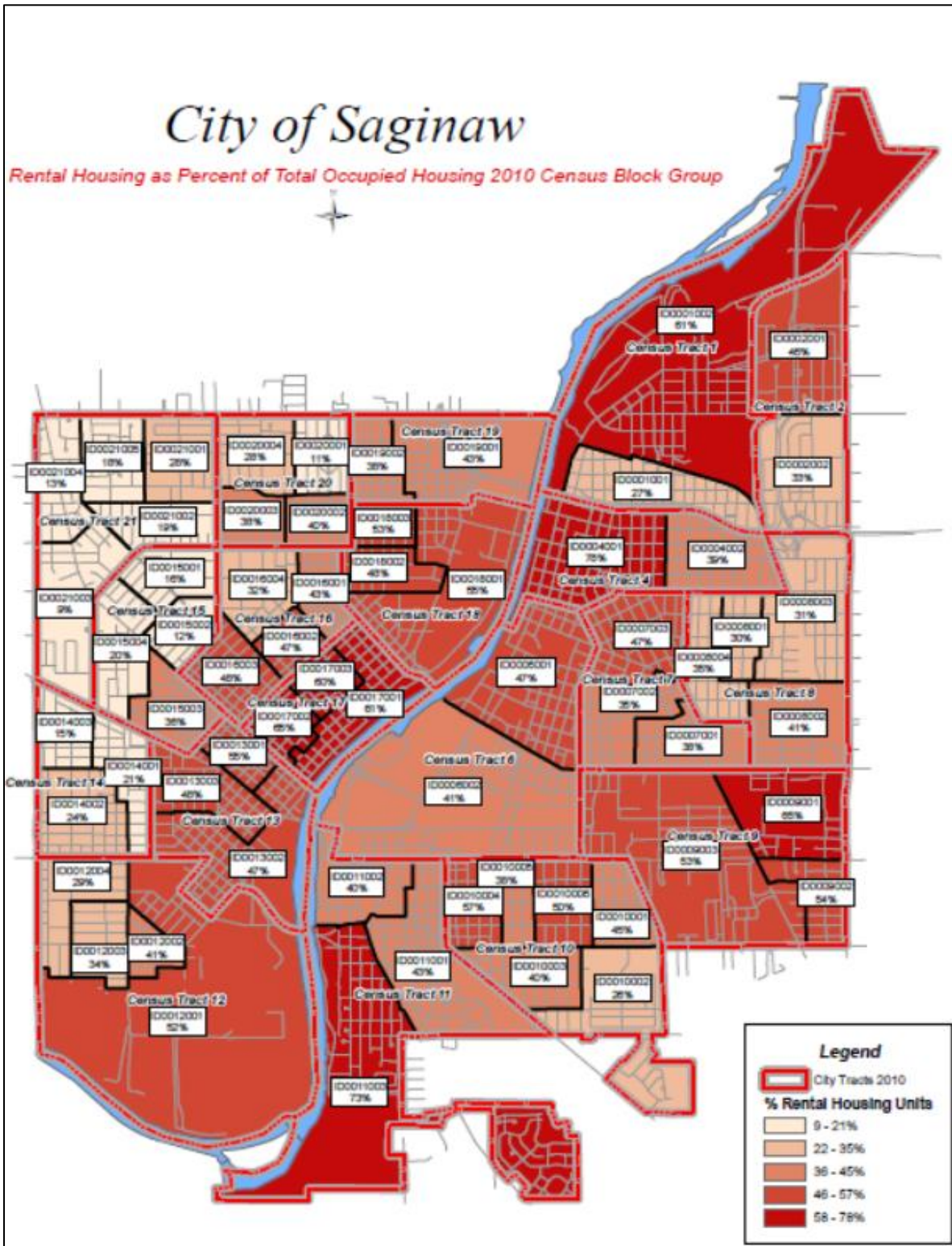
Table 21. Residential Properties by Unit Number – Saginaw, MI

Property Type	Number	Percent (%)
1-unit detached structure	18,653	77.2%
1-unit, attached structure	549	2.3%
2-4 units	2,836	11.7%
5-19 units	1,086	4.5%
20 or more units	903	3.7%
Mobile Home, boat, RV, van, etc.	144	0.6%
Total	24,171	100%

Source: U.S. Census, 2009-2013 ACS

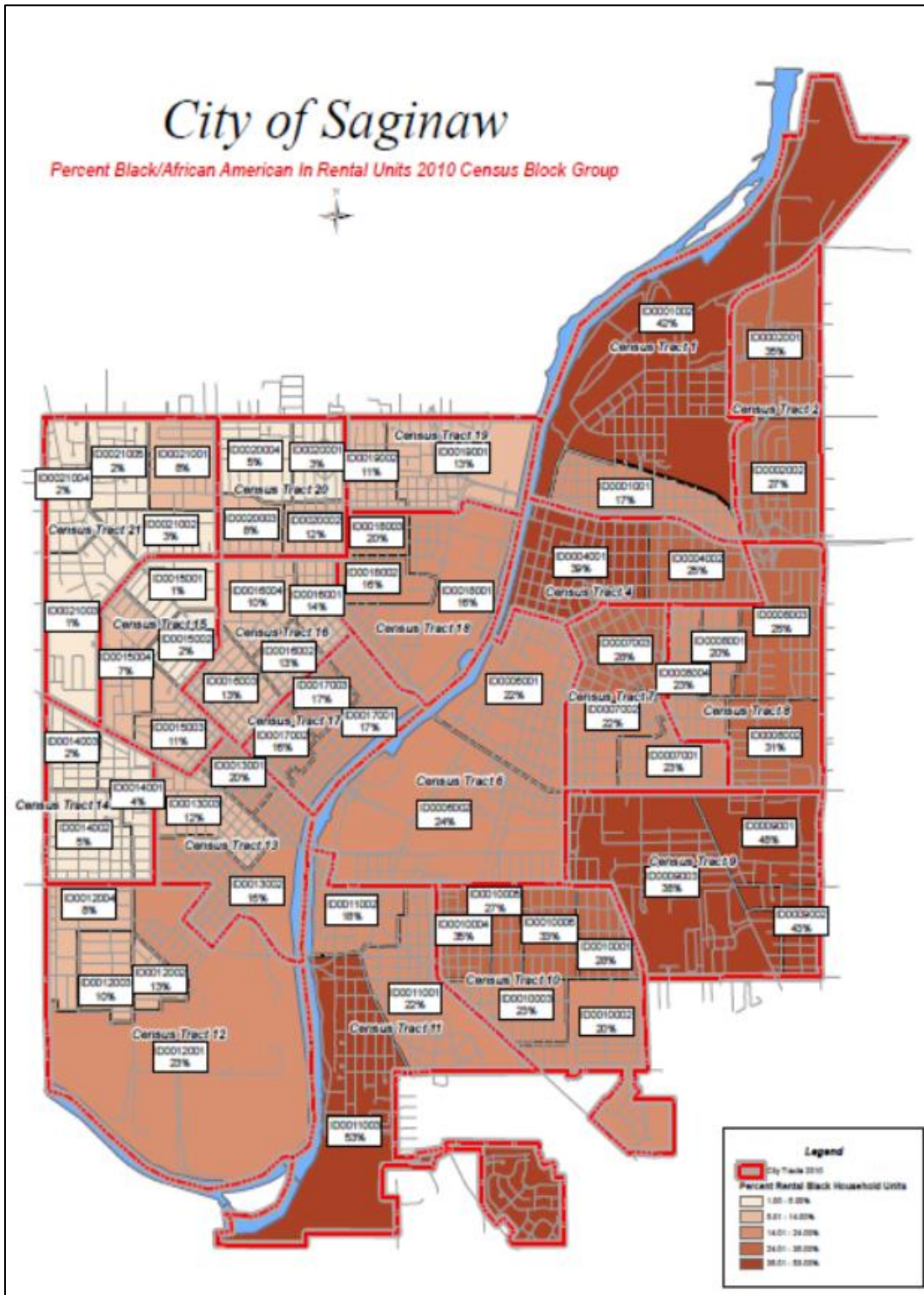
Based on 2010 census data, the census tracts which had the highest percentage (50%-100%) of renter households were 1, 4, 9, 11, 17, and 18. In cross referencing these census tracts with the percentage of African American residents, the data for the tracts with the highest renter occupants had some of the highest African American residents ranging between 34.5%-96.1%. For persons of Hispanic ethnicity, only one of the high renter occupancy tracts, tract 11, shows a high percentage of Hispanic households (21.3%). See maps 5-7 for comparison of renter household by race.

Map 5. Rental Housing as a Percentage of Total Occupied Units – Saginaw, MI



Source: 2010 U.S. Census

Map 6. Percent of African Americans in Renter Occupied Housing – Saginaw, MI

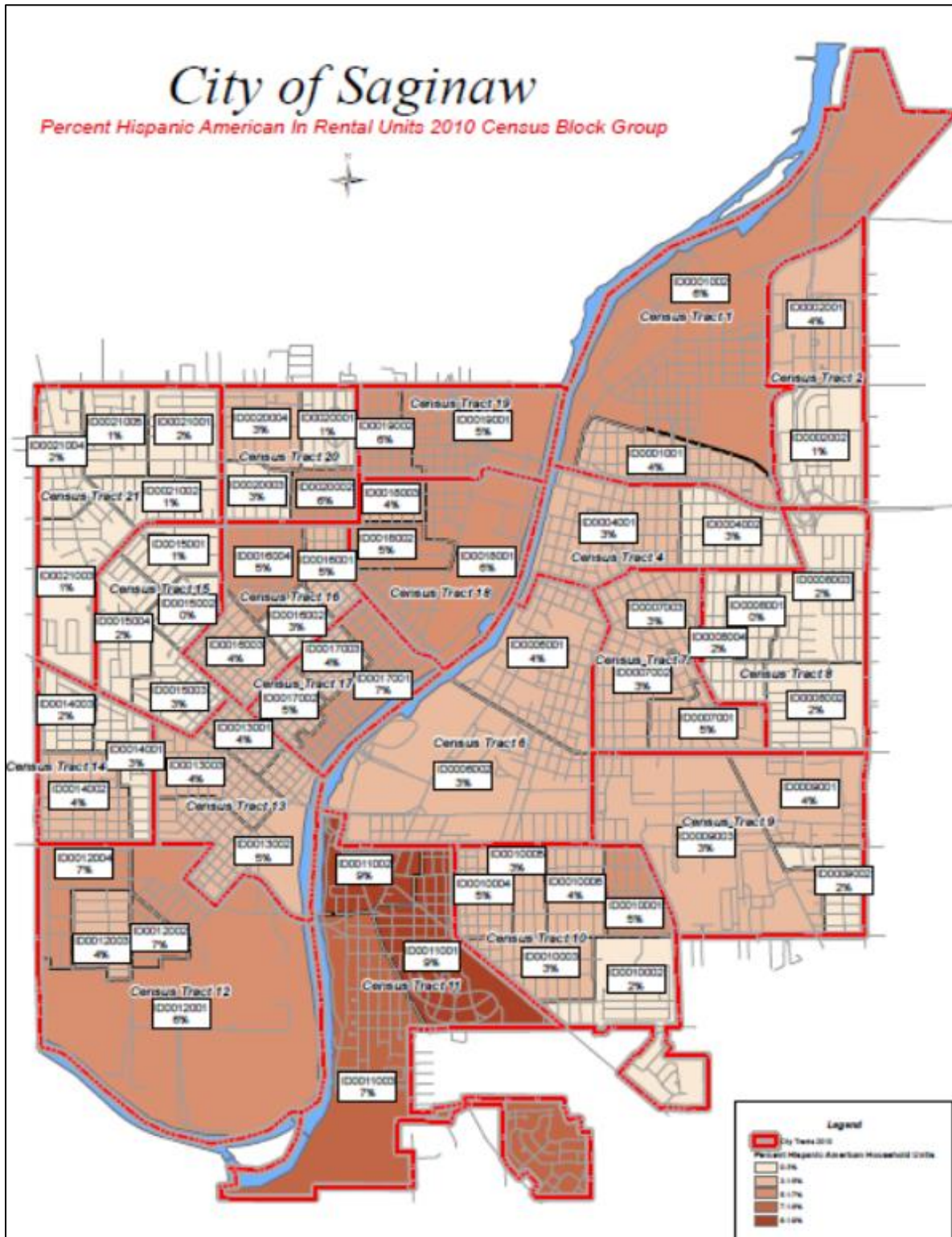


Source: 2010 U.S. Census

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Map 7 Percent of Hispanics in Renter Occupied Housing – Saginaw, MI



Source: 2010 U.S. Census

Homeownership by Race and Ethnicity

Table 22 depicts homeownership rates by race and ethnicity in Saginaw, Saginaw County, and other neighboring communities. Rates of homeownership vary widely by race/ethnicity in the City of Saginaw and its neighboring communities. The overall rate of homeownership in Saginaw, for all races, was 60.8% (2013 ACS). In all the communities examined, with the exception of the City of Saginaw, Whites have the highest rate of homeownership, followed by Hispanic households, and then Black or African American households. In the City of Saginaw Asians have an 84.0% homeownership rate.

Other minority groups including American Indian/Alaska Native households and Native Hawaiian and other Pacific Islanders do not represent a significant size of the population in the region.

The HMDA Data Analysis section of this document will evaluate whether there are any discriminatory lending practices in Saginaw that contribute to the lower homeownership rate for minorities.

Table 22. Comparison of Homeownership Rates by Race/Ethnicity by Jurisdiction

County or City	Overall Ownership Rate	Ownership Rate - White	Ownership Rate – Black/African American	Ownership Rate – American Indian	Ownership Rate - Asian	Ownership Rate – Pacific Islander	Ownership Rate – Hispanic
Saginaw (city)	60.8%	73.9%	48.4%	50.6%	84.0%	0.0%	58.8%
Birch-Run	84.0%	84.3%	33.3%	0.0%	0.0%	0.0%	71.8%
Bridgeport	78.7%	86.0%	59.0%	41.7%	0.0%	0.0%	78.5%
Buena Vista	64.4%	78.3%	60.5%	0.0%	0.0%	0.0%	74.2%
Carrollton	73.5%	72.9%	68.1%	0.0%	0.0%	0.0%	95.9%
Flint	56.5%	66.3%	50.3%	56.6%	43.7%	23.1%	49.5%
Lansing	52.6%	61.2%	37.1%	56.7%	18.2%	36.8%	46.1%
Saginaw County	72.7%	79.3%	50.0%	47.8%	52.1%	0.0%	63.9%
St. Charles	78.8%	79.0%	0.0%	100.0%	0.0%	0.0%	61.5%

Source: 2009-2013 ACS

Condition of Housing

The housing stock in Saginaw as shown in Table 23 is older with over 42% being built before 1939 and a total of 86% being built before 1970. Only 27% of the housing stock was built in 1970 or later. Housing construction declined between 1970 and 2009 but picked up after 2010 with an increase of 11%. With the age of the housing stock, older units may be in need of repair if they were not properly maintained. Generally low- and moderate-

income households and special needs populations such as seniors and persons with disabilities need assistance to maintain, repair, or make accessibility modifications to their homes, if needed.

Table 23. Year Structure Built – Saginaw, MI

YEAR STRUCTURE BUILT		
Total:	24,171	100%
Built 2010 or later	32	13.2%
Built 2000 to 2009	498	2.1%
Built 1990 to 1999	507	2.1%
Built 1980 to 1989	612	2.5%
Built 1970 to 1979	1,752	7.2%
Built 1960 to 1969	3,345	13.8%
Built 1950 to 1959	4,528	18.7%
Built 1940 to 1949	2,663	11.0%
Built 1939 or earlier	10,234	42.3%

Source: U.S. Census, 2009-2013 ACS

Housing Affordability

The median value of an owner-occupied housing unit in 2000 was \$47,000, compared to the 2013 median value of \$49,200, a 4.7% increase. Using the industry standard of three times household income to afford a home, a household would need to earn \$16,400 annually to affordably own a home in Saginaw based on the 2013 value.

Median contract rent grew by 29.4%, from \$347/month in 2000 to \$449/month in 2013. Based on HUD standards that a household should not pay more than 30% of its gross income for a housing unit to be considered affordable, a 2013 household would need to earn \$17,960 annually to afford the median contract rent.

Table 24 shows a comparison between the cost of housing in Saginaw and other nearby communities. Of the ten communities assessed, the City of Saginaw has the lowest median contract rent at \$449/month. Saginaw’s median home value is higher than two of the other communities examined, Buena Vista and the City of Flint. When compared to Saginaw County, the City of Saginaw’s median contract rent is 16% less than the County and the median home value in Saginaw is almost 50% less than that of the County’s.

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Table 24. Median Rent and Median Home Value – Saginaw, MI

Geographic Area	Median Contract Rent	Annual Income Required to Afford Median Rent	Median Home Value	Annual Income Required To Afford Median Home Value
Saginaw (city)	\$449	\$17,960	\$49,200	\$16,400
Bay City	\$457	\$18,280	\$69,200	\$23,067
Birch-Run	\$596	\$23,840	\$94,000	\$31,333
Bridgeport	\$508	\$20,320	\$73,100	\$24,367
Buena Vista	\$503	\$20,120	\$39,800	\$13,267
Carrollton	\$588	\$23,520	\$69,200	\$23,067
Flint	\$464	\$18,560	\$41,700	\$13,900
Lansing	\$610	\$24,400	\$85,000	\$28,333
Saginaw County	\$535	\$21,400	\$97,800	\$32,600
St. Charles	\$463	\$18,520	\$80,800	\$26,933

Source: U.S. Census, 2009-2013 ACS

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

According to the 2013 ACS data, Saginaw has 6,683 owners with mortgages. Of these owners, 492 or 7.5% pay 30 to 34.9% of their household income on housing costs; and 2,020 or 30.6% pay 35% or more. Also, there are 5,085 owners without mortgages, 284 or 5.7% pay 30 to 34.9% on housing costs and 780 or 15.8% pay 35% or more on housing costs.

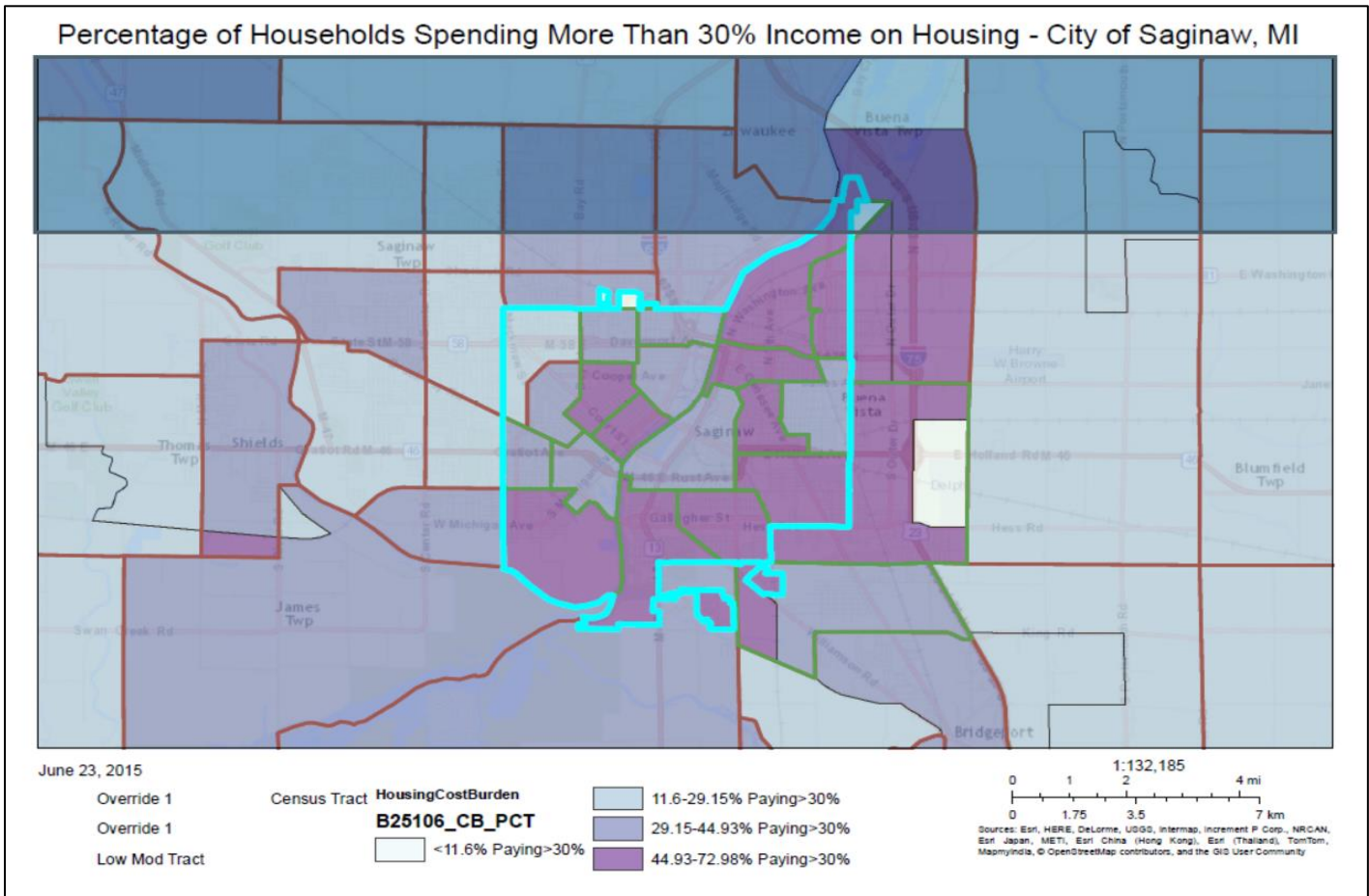
According to the 2013 ACS, 7.1% of renters pay 30 to 34.9% of their household income on housing costs and another 59% pay more than 35% of their household income on housing costs.

According to RealtyTrac, the median sales price for a home in Saginaw in April 2015 was \$45,000. Based on household income reported in the 2013 ACS, an estimated 64.3% of Saginaw owners (7,569 households) and 50.5% of renters (3,832 households) could afford to purchase the median-priced home without cost burden. Map 8 shows the percentage of households spending more than 30% of their income on housing costs.

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Map 8. Percent Homeowners Spending more than 30% Income on Housing – Saginaw, MI



Source: U.S. Census, 2007-2011 ACS

In regards to affordability of rental units, Table 25 provides the FY 2015 Fair Market Rents (FMR) for Saginaw County. Rents ranged from \$419 for an efficiency unit to \$1,072 for a four-bedroom unit. The average household size of renter-occupied households in 2013 was 2.54. Approximately 28% of renters (2,176 households) can afford to rent a two-bedroom unit, 17% (1,286 households) can afford to rent a 3-bedroom units.

Table 25. FY 2015 Fair Market Rents by Unit Bedrooms – Saginaw County, MI

Final FY 2015 FMRs By Unit Bedrooms				
Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
\$419	\$556	\$699	\$931	\$1,072

Comprehensive Housing Affordability Study (CHAS)

As an additional measure of determining housing affordability and its impact on members of the protected classes, the AI uses HUD's Comprehensive Housing Affordability Study (CHAS) to gauge housing affordability, or lack thereof. It should be noted here that lack of affordability is not an impediment in itself because income is not a protected class. However, census and HUD CHAS data shows that lack of affordability often has the potential to disparately impact some members of the protected classes.

In using CHAS data to assess housing affordability, the following definitions are used:

Cost Burdened: HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction. Generally, for renters housing costs include rent and utilities; and for owners housing costs include mortgage payments, taxes, insurance, and utilities.

Severe Cost Burdened: In the situation where the household expends greater than 50% of its income on housing cost, the household is considered **severely** cost burdened.

Housing Problems: According to HUD, a household with housing problems consists of persons or families living in units with one or more of four characteristics:

1. Lacking complete kitchen facilities; or
2. Lacking complete plumbing facilities; or
3. Overcrowded conditions (greater than 1.01 persons/room); or
4. Cost burdened (paying more than 30% of income for housing, including utilities).

Severe Housing Problems: According to HUD, a household with severe housing problems consists of persons or families living in units with one or more of four characteristics:

1. Lacking complete kitchen facilities; or
2. Lacking complete plumbing facilities; or
3. Overcrowded conditions (greater than 1.5 persons/room); or
4. Cost burdened (paying more than 50% of income for housing, including utilities).

Disproportionately Greater Housing Need: According to HUD, A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

Income Categories: Data on the following income groups were assessed for the AI:

- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: greater than 30%-50% of the AMI
- Moderate Income: greater than 50%-80% of the AMI
- Middle and Upper Income: greater than 80% or more of the AMI

Number of Households

According to the 2007-2011 ACS data, there were a total of 19,403 households in the City of Saginaw. Of this total, 11,490 or 59.2% were considered to be low- and moderate- income households, with 18.3% being moderate income, 15.8% being low income, and 25.0% being extremely low income households. Among the households in Saginaw, there are 8,185 (42.2%) small family households with two or four members; 1,630 (8.4%) large family households with five or more members; 2,940 (15.1%) households with an elderly family member between the ages of 62 and 74; and 2,055 (10.6%) households with a frail elderly family member age 75 and older. See Table 26.

Table 26. Number of Households by Income Category– Saginaw, MI

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households *	4,855	3,075	3,560	1,840	6,070
Small Family Households *	2,235	1,185	1,240	585	2,940
Large Family Households *	430	250	405	120	425
Household contains at least one person 62-74 years of age	510	425	650	315	1,040
Household contains at least one person age 75 or older	265	280	660	360	490
Households with one or more children 6 years old or younger *	1,295	475	544	169	845

* the highest income category for these family types is >80% HAMFI

Source: U.S. Census, 2007-2011 CHAS

There are a total of 13,330 households in Saginaw with incomes between 0%-100% AMI. Of these households, 9,039 (67.8%) experience one or more housing problems. Of the 9,039 households experiencing a housing problem, 4,865 (51.8%) are renters and 4,354 (48.2%) are owners. According to the 2007-11 CHAS, the most common housing problem for Saginaw households is cost burden and severe cost burden. See Tables 27 and 28.

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Table 27. Housing Problems (Households with one of the listed needs), Saginaw, MI

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	30	20	10	-	60	25	10	25	-	60
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	-	20	-	-	20	-	4	-	-	4
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	150	10	30	-	190	15	15	70	20	120
Housing cost burden greater than 50% of income (and none of the above problems)	2,160	650	50	-	2,860	1,005	510	275	55	1,845
Housing cost burden greater than 30% of income (and none of the above problems)	265	565	450	30	1,310	210	500	735	315	2,075

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	245	-	-	-	245	250	-	-	-	250

Source: U.S. Census, 2007-2011 ACS

Table 28. Housing Problems (Households with one or more Severe Housing Problems), Saginaw, MI

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,340	700	90	-	3,130	1,045	540	370	75	2,030
Having none of four housing problems	670	960	1,000	380	3,010	305	875	2,105	1,385	4,365
Household has negative income, but none of the other housing problems	245	-	-	-	245	250	-	-	-	250

Source: U.S. Census, 2007-2011 ACS

Tables 29 and 30 provide cost burden and severe cost burden data by tenure and household type. Of the 11,490 LMI households, 6,005 (52.2%) are renters and 5,490 (47.8%) are owners. Cost burden is experienced by 1,320 (22%) of renters and 1,454 (26.5%) of owners. Severe cost burden is experienced by 2,974 (49.5%) of renters and 1,834 (33.4%) of owners.

Of the 1,320 low- and moderate-income renter households experiencing cost burden, 35.2% (465) are small related households, 9.5% (125) are large related households, 15.5% (205) are elderly households, and 39.8% (525) are other households.

Of the 1,454 low- and moderate-income owner households experiencing cost burden, 40.6% (590) are small related households, 7.6% (110) are large related households, 32.2% (469) are elderly households, and 19.6% (285) are other households.

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For low- and moderate-income renter households that are severely cost-burdened, 50.8% (1,510) are small related households, 8.2% (245) are large related households, 7.2% (214) are elderly households, and 33.8% (1,005) are other households.

Severely cost-burdened low- and moderate-income owner households are comprised of 41.4% (760) small related households, 9.5% (174) large related households, 20.7% (380) elderly households, and 28.4% other households.

In summary, the households types most affected than others by cost burden and severe cost burden are as follows:

Cost Burden

Renter: Low income (30-50% AMI) Other households

Owner: Low income (30-50%) Small Related households

Severe Cost Burden

Renter: Very low income (0-30% AMI) Small Related households

Owner: Low Income (30-50% AMI) Small Related households

Table 29. Cost Burden > 30% by Household Type, Saginaw, MI

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,325	450	200	1,975	530	460	360	1,350
Large Related	240	75	55	370	135	80	69	284
Elderly	175	155	89	419	284	285	280	849
Other	815	550	165	1,530	305	190	310	805
Total need by income	2,555	1,230	509	4,294	1,254	1,015	1,019	3,288

Source: U.S. Census, 2007-2011 ACS

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Table 30. Cost Burden > 50% by Household Type, Saginaw, MI

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,225	275	10	1,510	445	230	85	760
Large Related	225	20	-	245	110	60	4	174
Elderly	110	85	19	214	210	70	100	380
Other	720	270	15	1,005	280	150	90	520
Total need by income	2,280	650	44	2,974	1,045	510	279	1,834

Source: U.S. Census, 2007-2011 ACS

Overcrowding is a problem for more renters than owners. Approximately 79% of single family renter households and 56.5% of multiple, unrelated owner households are living in overcrowded conditions. See Table 31.

Table 31. Crowding (More than one person per room) by Household Type, Saginaw, MI

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	105	30	30	-	165	15	4	35	-	54
Multiple, unrelated family households	45	-	-	-	45	-	15	35	20	70
Other, non-family households	-	-	-	-	0	-	-	-	-	0
Total need by income	150	30	30	-	210	15	19	70	20	124

Source: U.S. Census, 2007-2011 ACS

Disproportionately Greater Need: Housing Problems

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. This Section will analyze disproportionate greater need for income levels 0-30%, >30-50%, >50-80%, >80-100% AMI, by race or ethnicity. Housing problems are defined as follows: lacks complete kitchen and plumbing facilities, overcrowding –more than one person per room, and cost burden greater than 30% and less than 50%. Tables 32-35 show housing problems by race and ethnicity by income level.

Table 32. Disproportionally Greater Need 0-30% AMI – Saginaw, MI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	3,860	500	495	79.5%
White	910	155	170	73.7%
Black / African American	2,360	340	325	78.0%
Asian	4	0	0	100.0%
American Indian, Alaska Native	15	0	0	100.0%
Pacific Islander	0	0	0	100.0%
Hispanic	410	4	0	99.0%
Other	165	0	0	100.0%

Source: U.S. Census, 2007-2011 ACS

Table 33. Disproportionally Greater Need 30-50% AMI – Saginaw, MI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	2,300	775	0	74.8%
White	970	345	0	73.8%
Black / African American	1,055	280	0	79.0%
Asian	0	0	0	0%
American Indian, Alaska Native	0	0	0	0%
Pacific Islander	0	0	0	0%
Hispanic	235	145	0	61.8%
Other	40	0	0	100.0%

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Source: U.S. Census, 2007-2011 ACS

Table 34. Disproportionally Greater Need 50-80% AMI – Saginaw, MI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	1,645	1,920	0	46.1%
White	675	1,020	0	39.8%
Black / African American	665	695	0	48.8%
Asian	20	0	0	100.0%
American Indian, Alaska Native	0	10	0	0%
Pacific Islander	0	0	0	0%
Hispanic	280	165	0	62.9%
Other	0	25	0	0%

Source: U.S. Census, 2007-2011 ACS

Table 35. Disproportionally Greater Need 80-100% AMI – Saginaw, MI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	420	1,420	0	22.8%
White	250	785	0	24.2%
Black / African American	145	445	0	24.6%
Asian	0	0	0	0%
American Indian, Alaska Native	0	0	0	0%
Pacific Islander	0	0	0	0%

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Hispanic	10	170	0	5.6%
Other	0	30	0	0%

Source: U.S. Census, 2007-2011 ACS

According to the 2011 ACS, Saginaw had a racial makeup that was primarily Black or African American at 45.2%, followed by Whites at 38.6%, Asians at 0.36%, American Indian and Alaska Natives at 0.27%, some other race at 0.27%, and Two or more races at 2%. Of the total, 13.2% were of Hispanic or Latino of any race.

Analysis of the 2007-2011 CHAS data for Saginaw indicates that persons of several race and ethnic groups are experiencing *housing problems* at a disproportionately greater rate in comparison to the jurisdiction as a whole, as follows:

- Asian in the 0-30% AMI, 50-80% AMI
- American Indian, Alaska Native in the 0-30% AMI
- Pacific Islander in the 0-30% AMI
- Hispanic the 0-30% AMI and 50-80% AMI
- Other in the 0-30% AMI and 30-50% AMI

Disproportionately Greater Need: Severe Housing Problems

In this section, the AI will assess the need of any racial or ethnic group that has a disproportionately severe housing problems as defined above in comparison to the needs of that category of need as a whole.

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Analysis of the 2007-2011 CHAS data for Saginaw, indicates that several racial or ethnic groups are experiencing *severe housing problems* as defined above at a disproportionately greater rate in comparison to the jurisdiction as a whole, as follows:

- Asian in the 0-30% AMI and 50-80% AMI;
- American Indian, Alaska Native in the 0-30% AMI
- Hispanic in the 0-30% AMI
- Other in the 0-30% AMI and 30-50% AMI

Tables 36-39 shows severe housing problems by race and ethnicity by income level.

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Table 36. Severe Housing Problems 0-30% AMI – Saginaw, MI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	3,385	975	495	69.7%
White	820	245	170	66.4%
Black / African American	2,010	690	225	68.7%
Asian	4	0	0	100.0%
American Indian, Alaska Native	15	0	0	100.0%
Pacific Islander	0	0	0	0%
Hispanic	380	35	0	91.6%
Other	165	0	0	100%

Source: U.S. Census, 2007-2011 ACS

Table 37. Severe Housing Problems 30-50% AMI – Saginaw, MI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	1,240	1,835	0	40.3%
White	530	790	0	40.2%
Black / African American	575	765	0	42.9%
Asian	0	0	0	0%
American Indian, Alaska Native	0	0	0	0%
Pacific Islander	0	0	0	0%
Hispanic	110	270	0	28.9%
Other	25	15	0	62.5%

Source: U.S. Census, 2007-2011 ACS

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Table 38. Severe Housing Problems 50-80% AMI – Saginaw, MI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	460	3,105	0	12.9%
White	115	1,585	0	6.8%
Black / African American	280	1,090	0	20.4%
Asian	20	0	0	100.0%
American Indian, Alaska Native	0	10	0	0%
Pacific Islander	0	0	0	0%
Hispanic	50	395	0	11.2%
Other	0	25	0	0%

Source: U.S. Census, 2007-2011 ACS

Table 39. Severe Housing Problems 80-100% AMI – Saginaw, MI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Percent %
Jurisdiction as a whole	75	1,765	0	4.1%
White	55	975	0	5.3%
Black / African American	20	565	0	3.4%
Asian	0	0	0	0%
American Indian, Alaska Native	0	0	0	0%
Pacific Islander	0	0	0	0%
Hispanic	0	180	0	0%
Other	0	40	0	0%

Source: U.S. Census, 2007-2011 ACS

Disproportionately Greater Need: Housing Cost Burdens

Regarding the disproportionately greater needs in the area of housing cost burden, analysis of the 2007-2011 CHAS data for Saginaw, indicates that Asians, American Indian/Alaska Natives, and Other households are experiencing severe cost burden at a disproportionate rate. However, these numbers are skewed due to the small size of these racial and ethnic groups. See Table 40.

Table 40. Disproportionately Greater Need: Housing Cost Burdens – Saginaw, MI

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	10,490 (54.0%)	3,485 (18.0%)	4,884 (25.1%)	550 (2.8%)
White	5,490 (64.0%)	1,440 (16.8%)	1,475 (17.2%)	170(2.0%)
Black / African American	3,850 (45.2%)	1,575 (18.5%)	2,765 (32.5%)	325 (3.8%)
Asian	10 (29.4%)	0 (0%)	24 (70.6%)	0(0.0%)
American Indian, Alaska Native	10 (40.0%)	0 (0%)	15 (60.0%)	0 (0%)
Pacific Islander	0 (0%)	0 (0%)	0 (0%)	0 (0%)
Hispanic	1,035 (52.9%)	445 (22.8%)	420 (21.5%)	55 (2.8%)
Other	95 (31.1%)	25 (8.2%)	185 (60.7%)	0 (0%)

Source: U.S. Census, 2007-2011 ACS

Racially and Ethnically Concentrated Areas of Poverty

The definition of a racially/ethnically-concentrated area of poverty (R/ECAP) as developed by the HUD Office of Policy Development and Research (OPDR) requires R/ECAPs census tracts to have a minority population of 50% or more and an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower). Analyzing the concentration of minorities in high poverty areas assists in the review of access to housing.

The data used for this analysis was gathered from the Federal Financial Institutions Examination Council (FFIEC) census files. The tract population, minority percentage, and poverty data is based on 2010 census data. Based on definition of R/ECAP there are 10 census tracts in Saginaw where racial/ethnic groups are segregated. There is a total of 24,349 persons residing in the 10 R/ECAP tracts representing 47.4% of the City's total population. Of this amount, 21,525 persons are minorities and account for 66.9% of the share of Saginaw's minority population. Table 41 below provides a list of the R/ECAP census tracts and population data.

Table 41. Racially and Ethnically Concentrated Areas of Poverty by Census Tract – Saginaw, MI

Census Tract	Tract Median Family Income %	% Below Poverty Line	2013 Tract Minority %	Tract Population	Tract Minority Population
1	30.38	58.42	90.26	1047	945
2	40.24	51.82	96.7	1485	1436

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Census Tract	Tract Median Family Income %	% Below Poverty Line	2013 Tract Minority %	Tract Population	Tract Minority Population
4	22.06	78.13	91.89	1393	1280
6	62.95	45.41	84.91	1948	1654
7	48.76	42.06	91.19	1976	1802
8	57.06	40.1	97.38	3249	3164
9	32.21	56.36	94.08	3397	3196
10	40.94	53.63	90.69	4233	3839
11	24.84	64.93	91.34	3188	2912
17	70.66	40.59	53.31	2433	1297
TOTAL				24,349	21,525

Of the racial/ethnic groups in Saginaw, the predominantly segregated group is Black or African Americans, 75.6% of the City's African American residents live in R/ECAP tracts. The second largest group is Native Americans with 59.2% of all Native Americans residing in Saginaw, living in R/ECAP tracts. This figure is skewed due to the small number of Native Americans living in Saginaw. Over 44% of the Hispanic population live in the R/ECAP tracts. Table 42 below provides a breakdown of the minority population by race/ethnicity for the R/ECAP tracts and the share of the total Saginaw population.

Table 42. Racially/Ethnicity Areas of Poverty as a share of Total Population – Saginaw, MI

R/ECAP Tracts	R/ECAP Population	Total Population	Share in a R/ECAP
Total Population	24,349	51,317	47.4%
Non-White:	21,525	32,178	66.9%
Black/African-American	17,508	23,115	75.6%
Hispanic/Latino	3,284	7,338	44.8%
Asian/Hawaiian/Pacific-Islander	48	155	31.0%
Native American	106	179	59.2%
Other/2 or more races	579	1,391	41.6%

Source: 2013 FFIEC Census Reports (based on 2010 SF 1 census data)

Subsidized Multi-family Affordable Housing Stock

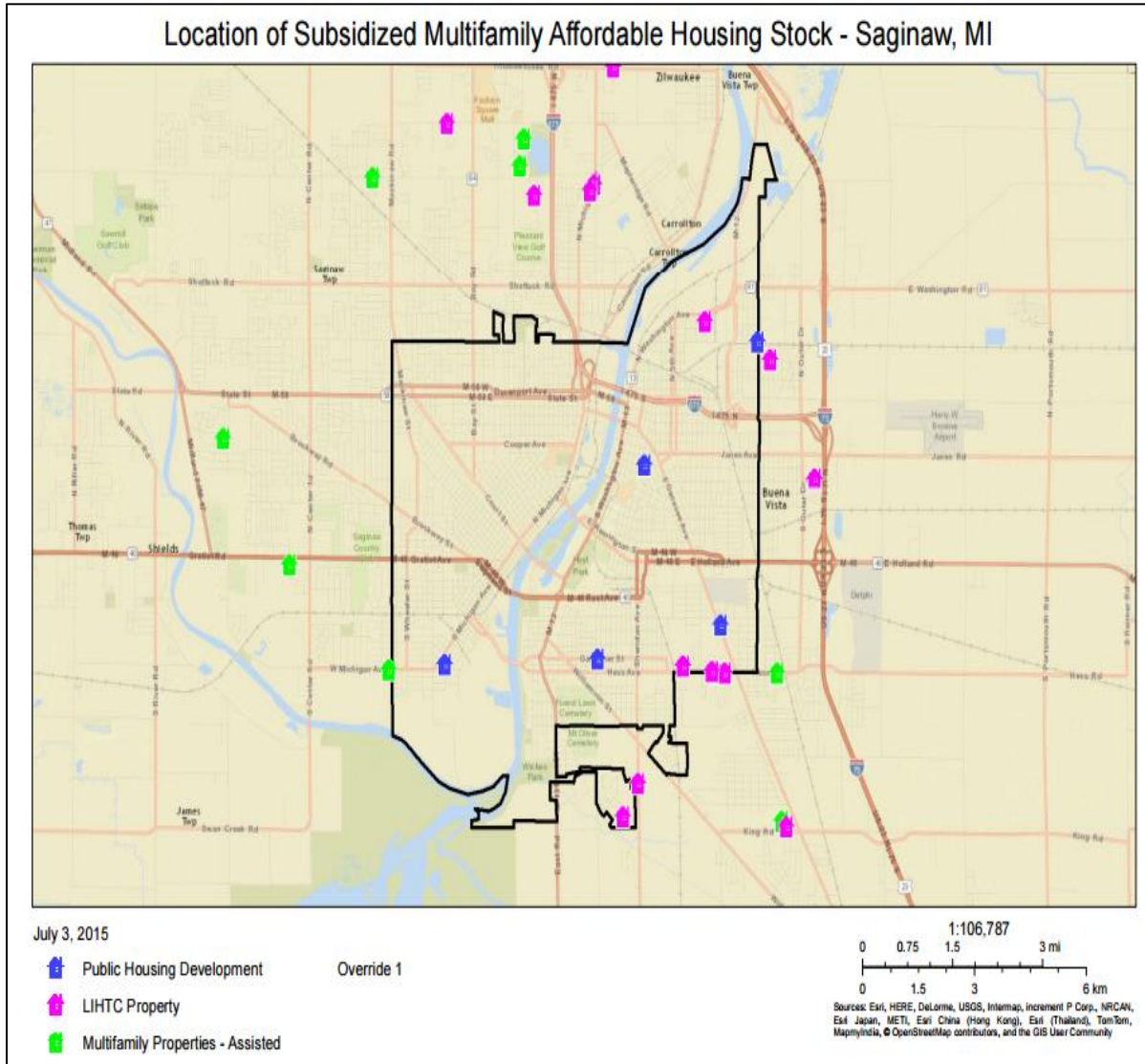
One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. For communities that have a higher need for rental housing stock, multi-family housing developments for a variety

of income groups and ages such as the elderly. Accessible housing needs can also be addressed by providing housing for persons with disabilities. However, in addressing these needs, there are concerns about racial and ethnic concentrations of housing especially in areas of high poverty and low opportunities. The following are some of the multi-family housing types that meet the needs of low income, elderly and persons with disabilities in the City of Saginaw:

- Low income housing tax credits (LIHTC) – The LIHTC program administered by the Michigan State Housing Development Authority (MSHDA) provides for the development costs of low-income housing by giving a federal tax credit to investors for investing in housing for low-income households at 60% AMI.
- Section 202 Supportive Housing for the Elderly – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for very low-income elderly persons.
- Section 811 Supportive Housing for Persons with Disabilities – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for persons with disabilities. The program also provides rental assistance to state housing agencies for new and existing multi-family housing developments.
- Section 8 Loan Management Set-Aside (LMSA) Program – A HUD-funded program that provides financial assistance in the form of rental subsidies to multi-family properties subject to Federal Home Administration (FHA) insured mortgage loans which are in immediate or potential financing difficulty; and thereby to reduce the volume of mortgage loan defaults as well as claims for FHA mortgage insurance benefits from private lenders holding the FHA insured mortgage loans n such projects.¹⁴
- Public Housing – A HUD-funded program that provides financial assistance to local housing agencies (HAs or PHAs) to develop and operate decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. The public housing program in Saginaw is administered by the Saginaw Housing Commission.
- Section 8 Housing Choice Voucher Program – A HUD-funded program that provides financial assistance for the rental of housing from private landlords for eligible low-income families, the elderly, and persons with disabilities. Tenants are able to find their own housing including single –family homes, townhouses, and apartments. Map 9 shown below is a visual depiction of the location of public housing, LIHTC, and HUD-assisted Multifamily projects in Saginaw.

¹⁴ U.S. Department of Housing and Urban Development (HUD) website. Section 8 Program Background Information. http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/rfp/s8bkinfo
Accessed March 22, 2015

Map 9. Location of Subsidized Multifamily Affordable Housing Stock – Saginaw, MI



Low Income Housing Tax Credit Program

The Michigan State Housing Development Authority (MSHDA) administers the Housing Tax Credit Program and allocates tax credits for rental housing development throughout the State of Michigan. Table 43 below provides information on each of the LIHTC projects in Saginaw including the project address, total number of units, and location by census tract. The location characteristics, minority population and median family income, for each project is also provided based on U.S. Census data from the FFIEC Census reports for 2013. The data in table below shows a pattern of LIHTC being concentrated in areas of minority concentration and low- and moderate income census tracts. Overall, 89% of LIHTC projects are located within a R/ECAP area.

Table 43. LIHTC Housing Units – Saginaw, MI

Project Name	Project Address	Total Number Of Units	Census Tract	Minority Tract % (2013)	Tract Median Family Income %
Reuben Daniels Townhomes	1101 N 12th St	50	1	90.3%	30.4%
Bancroft Eddy	107 S. Washington Ave	150	4	91.9%	22.1%
Birch Park Apts.	3000 Birch Park Dr	120	9	94.1%	32.1%
Brookwood Park	1 Brookwood Ln S	60			
St Paul Townhomes	359 Vestry Drive	230	11	91.4%	24.5%
Wickes Park Homes	359 Vestry Dr	24			
Bliss Park Senior Housing	1111 N Harrison St	35	18	52.7%	73.4%
South Saginaw Homes, Phase II	3700 Sheridan Rd	42			
		711			

Housing Stock Available to Elderly Persons

According to the 2010 U.S. Census, there are 5,635 elderly persons (over 65 years of age) living in Saginaw comprising 10.9% of the population. Of the 5,635 elderly persons, 2,881 persons (51.1%) are age of 75 and over and are considered to be extra elderly or frail elderly.

In terms of population change, between 2000 and 2010, Saginaw residents between 55-64 years of age is the only age group that experienced growth, with a 42.9% increase. The population between 65-74 years declined by 23.8%, and the population over 75 years of age, declined by 16.6%. Overall, there was a 16.7% decrease in Saginaw’s total population. See Table 44.

Table 44. Population Distribution by Age Group – Saginaw, MI

Saginaw	No. of persons (2000)	%	No. of persons (2010)	%	% change
Under 44	43,162	69.8%	32,945	64.0%	-23.7%
45-54	7,484	12.11%	7,091	13.8%	-5.3%
55-64	4,085	6.6%	5,837	11.3%	42.9%

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Saginaw	No. of persons (2000)	%	No. of persons (2010)	%	% change
65-74	3,613	5.8%	2,754	5.3%	-23.8%
Over 75	3,455	5.6%	2,881	5.6%	-16.6%
Total	61,799	100.0%	51,508	100.0%	-16.7%

Source: 2000 and 2010 U.S. Census

Elderly and Extra Elderly

Elderly is defined as a household composed of one or more persons at least one of whom is 62 years of age or more. Extra elderly is defined as a 1 or 2 member household where either person is 75 years of age or older. The 2007-2011 CHAS data indicates that there were 2,940 elderly and 2,055 extra elderly households. Of the 2,940 elderly households, 1,585 (53.9%) are low- and moderate-income households. Of the 2,055 extra elderly households, 1,205 (58.6%) are low- and moderate-income households. There were 1,268 elderly LMI cost-burdened households. Approximately 10% of elderly renter households pay more than 30% of their household income for housing costs compared to 25.8% of elderly owner households. The CHAS data supports the need for affordable housing units that are suitable for elderly persons. Suitability of units is dependent on accessibility and availability of supportive services, if needed.

The Saginaw County Commission on Aging provides programs and services to meet the needs of seniors, specifically those living independently in their own homes. The services include information and referral, Meal on Wheels, case management, Care Giver Support Program, transportation, emergency food assistance, In-Home Support Services Program, and Minority Outreach Program.

Senior housing in Saginaw consists of subsidized rental developments including HUD Multifamily and LIHTC projects with units designated for elderly or disabled persons, public housing, and Adult Foster Care and nursing homes. The Saginaw Housing Commission operates six public housing developments for mixed populations. According to the 2015-2020 Five-Year PHA Plan, some public housing developments were previously designated for elderly persons and persons with disabilities. However, in 2011, the City of Saginaw expressed concern about the number of units designated for the disabled population and SHC determined that public housing waitlists did not support designations because the disabled population exceeded the elderly population.

There are four multifamily subsidized projects in Saginaw designated as housing for the elderly and one family development with a significant amount of units designated for the Elderly. They are Lakeside Village, South Colony Place I, Bliss Park Senior Housing Carrollton Village II, and Swan Haven Manor. These projects provide 486 affordable housing units for seniors in the City of Saginaw. Table 45 provides details of each of the multifamily projects with units for the elderly.

Table 45. Multi-family Inventory of Units for the Elderly and Disabled – Saginaw, MI

Property Name	Occupancy Eligibility	Total Units	Units Designated for the Elderly
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Lakeside Village	Family	200	161
South Colony Place I	Elderly	201	199
Bliss Park Senior Housing	Elderly	35	35
Carrollton Village Phase II	Elderly	25	25
Swan Haven Manor	Elderly	66	66

Source: 2010 HUD Multifamily Inventory of Units for the Elderly and Persons with Disabilities

The Michigan Department of Licensing and Regulatory Affairs (LARA) Adult Foster Care and Homes for the Aged Licensing Division provides licensing and regulation of adult foster care homes, homes for the aged and specialized programs for persons with disabilities. A search on LARA’s website produced the following list of adult foster care facilities in Saginaw.

Table 46. Homes for the Elderly – Saginaw, MI

Facility Name	Number of Beds
Community Village	90
Edgewood Assisted Living Center	70
Meadow View North	20
Meadow View South	20
New Hope Valley	80
Saginaw Bickford Cottage	55
Saginaw Geriatrics Home	58
Shields Comfort Care	54
Total Home for Aged Beds	447

Source: Michigan Department of Licensing and Regulatory Affairs

Housing Stock Available to Persons with Disabilities

To determine if there is sufficient housing available for persons with disabilities, you need to first determine the number of persons in the City that meet the definition of disabled. HUD defines a person with disabilities as “ any person who has a physical or mental impairment that substantially limits one or more major life events (walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for one self); has a record of such impairment; or is regarded as having such an impairment.

The most recent comprehensive data on disability status among Saginaw’s population was the 2013 ACS. According to the 2013 ACS, 19.8% (10,000 persons) in Saginaw’s civilian non-institutionalized population reported a disability. The data included in Table 47 shows the breakdown of persons with disabilities by age group: under 5 years (1.5%); 5-17 years (9.9%); 18-64 years (20.4%). The highest percentage of persons with disabilities occurred in the 65 and over population group (47.4%).

Table 47. Disability Status of the Civilian Non-Institutionalized Population - Saginaw, MI

Population Status	Number	Percentage
Total Population	50,400	100.0%
With a Disability	10,000	19.8%
Population Under 5 years	3,825	7.6%
With a Disability	57	1.5%
Population 5 to 17 years	10,087	20.0%
With a Disability	1,003	9.9%
Population 18 to 64 years	30,909	61.3%
With a Disability	6,298	20.4%
Population 65 years and over	5,579	11.1%
With a Disability	2,642	47.4%

Source: 2009-2013 ACS

The 2013 ACS also provides information regarding types of disabilities within the Saginaw population, as well as the incidence of two or more disabilities within age groups. Persons with ambulatory disabilities are the most common in the City and the least common disability reported among Saginaw residents was vision difficulty. Within the 65 and over age group, the most common disabilities are ambulatory, independent living, and hearing while the majority of persons with disabilities in the 18 to 64 age group have ambulatory and cognitive difficulties. Table 48 below, shows the breakdown of persons with disabilities based on type of disability and age for 2013.

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Table 48. Disability Characteristics of the Saginaw, MI Population

Population/ Characteristic	Total	# With a Disability	% With a Disability
Total Population	50,400	10,000	19.8%
Population under 5 years	3,825	1,003	9.9%
With a hearing difficulty		9	0.2%
With a vision difficulty		57	1.5%
Population 5 to 17 years	10,087	1,003	9.9%
With a hearing difficulty		57	0.6%
With a vision difficulty		206	2.0%
With a cognitive difficulty		819	8.1%
With an ambulatory difficulty		91	0.9%
With a self-care difficulty		95	0.9%
Population 18 to 64 years	30,909	6,298	20.4%
With a hearing difficulty		642	2.1%
With a vision difficulty		1,200	3.9%
With a cognitive difficulty		2,883	9.3%
With an ambulatory difficulty		3,631	11.7%
With a self-care difficulty		1,164	3.8%
With an independent living difficulty		2,280	7.4%
Population 65 years and over	5,579	2,642	47.4%
With a hearing difficulty		917	16.4%
With a vision difficulty		617	11.1%
With a cognitive difficulty		640	11.5%
With an ambulatory difficulty		1,796	32.2%
With a self-care difficulty		800	14.3%
With an independent living difficulty		1,207	21.6%

Source: 2009-2013 ACS

Many of the persons with disabilities in Saginaw have more than one reported disability. Therefore, there is duplication between categories of disability items. Of the number of persons with disabilities, 5,413 (47.6%) report having two or more disabilities. Approximately 60.5% of elderly persons with a disability report having two or more disabilities and 50% of persons between the ages of 18 and 64 with disabilities have two or more disabilities. See Table 49.

Table 49. Age and Number of Disabilities – Saginaw, MI

Population	Number
Total Population	49,981
Population under 18 years	13,898
With one type of disability	1,162
With two or more types of disability	177
No disability	12,559
Population 18 to 64 years	30,529
With one type of disability	3,680
With two or more types of disability	3,661
No disability	23,188
Population 65 years and over	5,464
With one type of disability	1,028
With two or more types of disability	1,575
No disability	2,861

Source: 2011-2013 ACS

To further analyze the housing challenges of persons with disabilities in Saginaw, CHAS data was examined to determine the extent of housing problems and housing needs, particularly for low- and moderate-income independent disabled households. Information on disability status is available in the 2008-2010 ACS. The data provides the most recent detailed data of housing problems of disabled residents based on their household income.

In Saginaw, there were 10,695 independent disabled households, of which 8,060 (75.4%) were low- and moderate-income. Among the disabled low- and moderate-income households, Table 50 indicates that there were 4,285 (40%) disabled renter households and 6,410 (60%) disabled owner households.

According to the CHAS data in Tables 51 and 52, 5,600 (69.5%) low- and moderate-income disabled households had housing problems. Within disabled renter households, 2,915 (74.7%) households had a housing problem while 2,685 (64.5%) disabled owner households had a housing problem. Both Extremely low income

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and low income disabled renter and owner households are the income groups most troubled with housing problems.

Table 50. Independent Disabled Households with Housing Problems – Saginaw, MI

Income Category	Number of Independent Disabled Households	# of Independent Disabled Households with Housing Problem	% of Independent Disabled Households with Housing Problem
Extremely Low Income	3,400	2,855	84.0%
Low Income	2,250	1,855	83.8%
Moderate Income	2,410	860	35.7%
TOTAL Low/Moderate-Income	8,060	5,600	69.5%
Middle Income	2,635	535	20.3%
TOTAL	10,695	6,135	57.4%

Table 51. Independent Disabled Renter Households with Housing Problems - Saginaw, MI

Income Category	Number of Disabled Member Renter Households	# of Disabled Member Renter Households with Housing Problem	% of Disabled Member Renter Households with Housing Problem
Extremely Low Income	2,040	1,550	76.0%
Low Income	1,405	1,190	84.7%
Moderate Income	455	175	38.5%
TOTAL Low/Moderate-Income	3,900	2,915	74.7%
Middle Income	385	60	15.6%
TOTAL	4,285	2,975	69.4%

Table 52. Independent Disabled Owner Households with Housing Problems - Saginaw, MI

Income Category	Number of Disabled Member Owner Households	# of Disabled Member Owner Households with Housing Problem	% of Disabled Member Owner Households with Housing Problem
Extremely Low Income	1,360	1,305	96.0%
Low Income	845	695	82.2%
Moderate Income	1,955	685	35.0%
TOTAL Low/Moderate-Income	4,160	2,685	64.5%
Middle Income	2,250	475	21.1%
TOTAL	6,410	3,160	49.3%

The CHAS data does not provide details on the type of housing problems faced by persons in disabled households. The four housing problems reported by CHAS are incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30% and 50%. Typically having a disability impacts earning potential therefore, residents with disabilities often face housing affordability challenges.

With close to 9,000 disabled persons over the age of 18 years residing in Saginaw (2013 ACS) of which 3,487 have an independent living difficulty and 5,518 have an ambulatory difficulty and with 5,600 (69.5%) disabled low- and moderate-income households having a housing problem according to the CHAS, there is a significant need for affordable, accessible housing as well as institutional living options. The extent of the need is difficult to quantify because of insufficient data on the number of accessible units in the City, particularly in the private market.

In Saginaw, housing for disabled persons consists of subsidized rental developments including LIHTC units, public housing, Section 202 units, and adult foster care facilities.

The HUD Multifamily Inventory of Units for the Elderly and Persons with Disabilities provides a listing of HUD insured and HUD subsidized multifamily properties that serve the elderly and/or persons with disabilities. The latest available inventory is from 2010. The database includes one Section 202 project, Joan Manley Wolfe Apartments, and several LIHTC or HUD Multifamily funded projects. Within the developments, there are 47 units designated for disabled persons. Table 53 provides details on each of the subsidized multifamily properties that include units designated for persons with disabilities.

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Table 53. Subsidized MF Inventory of Units for Persons with Disabilities – Saginaw, MI

Property Name	Occupancy Eligibility	Total Units	Units Designated for the Disabled	Units with Accessible Features
Bancroft Eddy	Family	150	13	13
Birch Park	Family	120	8	8
Joan Manley Wolfe Apts.	Disabled	16	16	16
Lakeside Village	Family	200	8	0
Northfield Center	Family	120	0	6
South Colony Place I/II	Elderly/Family	299	2	9
Westchester Village Apartments	Elderly and Disabled	326	0	12

Source: HUD Multifamily Inventory of Units for the Elderly and Persons with Disabilities

According to the Michigan Department of Licensing and Regulatory Affairs (LARA), there are 77 adult foster care facilities with a total of 548 beds in Saginaw for persons with disabilities. Table 54 provides a list of the facilities and the capacity of each facility.

Table 54. Adult Foster Care Facilities – Saginaw, MI

Facility Name	Number of Beds
A Touch Of Gentleness	5
Agnes Rambo	8
Angel Haven Afc Home	6
Athens Afc	5
Brookdale Saginaw Al	20
Brookdale Saginaw Mc	20
Caldana Afc	6
Cambridge Clf	8
Cardinal Care Afc	6
Conquests Afc Home	12
D.E.B. Afc Inc.	11

Facility Name	Number of Beds
D.E.B. Afc Inc. #4	6
D.E.B. Afc, Inc. #2	6
Daniel's Den Afc & Services	5
Divine Love Afc Ii	4
Emb Family Home	2
Geddes Home	6
Glenvale	6
Grays Afc Home	6
Hayden Street Afc	12
Heaven Angels	4
Heavenly Realm 1	6
Heavenly Realm 2	6

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Facility Name	Number of Beds
Heavenly Realm 3	6
Heavenly Realm 4	6
Heavenly Realm 5	5
Holland Afc	12
Home Away From Home Afc	6
Hoornstra Afc Home	12
Hope Afc	6
Hospital Road Home	6
House Of Hope Afc Llc	6
Howell's Group Home	11
Hunter Afc	5
Iowa's Place	5
J & L Afc Home	2
Jayden - Janes	5
Jayden Transitional Housing	6
Kneaded Angels Adult Living	6
Korting Afc Home	3
Krasinski Afc Home	12
Lee Lee's Afc Home	6
Lous Adult Foster Care Home	20
Love Sharing & Caring Afc	4
Magline Whitley Afc Home	6
Michigan A Home	6
New Beginning	3
Open Arms	4
Open Arms	6
Pack Afc	6

Facility Name	Number of Beds
Paradise Afc	6
Patton Afc	6
Piper Home	6
Reis Afc Home	12
Rescare Premier Mccarty	6
Roy's Afc	4
Saginaw Meadows	8
Saginaw Valley Afc	6
Sandra Court	6
Schiavone Afc Home I	6
Schiavone Afc Home II	12
Schiavone Afc Home III	12
Schiavone Afc Home Iv	6
Schiavone Afc V	6
Schiavone Afc Vi	12
Schiavone Afc Vii	12
Shattuck Rd Home	6
Slatestone Home	6
Southport Home	6
St. Augustine Group Home	6
St. Augustine Group Home Ii	6
The Prosperity House	6
Victory Afc I	6
Victory Afc Ii, Llc	6
Weiss Facility	5
Whitley Afc I	12

Public Housing

Public Housing is a program funded by the U.S. Department of Housing and Urban Development (HUD) for low-income residents. Annual gross income must be within limits as established by HUD, and eligible families pay a monthly rent equal to the greatest of 30% of their monthly adjusted income or 10% of unadjusted monthly income.

The HUD Section 8 Housing Choice Voucher Program, administered locally by public housing agencies (PHAs), is a federal program for assisting very low-income families, the elderly, and the disabled to secure affordable, decent, safe, and sanitary housing in the private market. Housing assistance is provided on behalf of the family or individual, and participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. A housing subsidy is paid to the landlord directly by the PHA for the family with them paying the difference between the rent charged and the subsidy.

Since 1974, HUD has helped low income households obtain better rental housing and reduce the share of their income that goes toward rent through a program that relies on the private rental market. A key parameter in operating the certificate and voucher programs is the Fair Market Rent (FMR). The following table shows the FY 2015 FMRs for Saginaw County by unit bedrooms:

Table 55. Final FY 2015 Fair market Rents

Final FY 2015 FMRs By Unit Bedrooms				
Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
\$419	\$556	\$699	\$931	\$1,072

The Saginaw Housing Commission (SHC) is the agency that serves as the City’s public housing authority (PHA). The mission of the SHC is to enhance the community by providing quality, affordable housing and promoting economic opportunity and self-sufficiency for residents.

The SHC owns and operates public housing within the City of Saginaw and administers the Section 8 Housing Choice Voucher within Saginaw County. SHA also offers the Family Self-Sufficiency (FSS) program for program participants. According to the FY 2015 Five-Year and Annual Plan¹⁵ for SHC, the agency owns 632 public housing units and currently meets the rental needs of residents who cannot afford housing in the private market through the administration of 1,257 Section 8 housing choice vouchers.

The agency’s Tenant Statistical Report (as of June 10, 2015) shows that 72% of public housing residents are extremely low income (<30% AMI), 15.3% are very low income (31.50% AMI), and 10% are low income (51-80% AMI). There are 179 (38.5%) elderly families and 349 (75.2%)

¹⁵ http://www.saginawhousing.org/images/annual_%20plan_2015_mi006.pdf

persons with disabilities. In regards to racial composition of public housing residents, the majority are Black or African American (76.9%) followed by Whites (23.1%). Hispanic families represent 3.2% of the population.

For housing voucher recipients, 33.1% are extremely low income (< 30% AMI), 5.1% of recipients are very low income (31-50% AMI), and 1.9% of recipients are low income (51-80% AMI). As of June 2015, there were a total of 2,965 persons residing in publicly assisted units. There are 91 (3.1%) elderly families and 18.9% disabled households. In regards to race/ethnicity, 86.7% of the families are Black/African American, 11.3% are White and 5.7% are of Hispanic ethnicity.

The SHC maintains a waiting list for both public housing and Section 8. A total of 2,313 families are on the waiting lists: 478 public housing families and 1,835 Section 8 families. The housing needs of families on the waiting list are similar to those of existing tenants. For the Public Housing program, 89% of the families on the waiting list are extremely low income, 7% very low income, and 4% low income. There are 18 (4%) elderly families, 183 (38%) families with children, and 169 (35%) families with disabilities. The majority of families on the waiting list are Black or African American (72%), followed by Whites (22%), and Hispanics (6%).

The characteristics of families on the waiting lists for Section 8 vouchers is as follows: 81% Black or African American, 16% White, and 9% Hispanic. In regards to household income, 86% of families on the waiting list are extremely low income, and 8% are very low income, and 5% are low income. According to the Five-Year PHA Plan, 2% of those on the waiting list for Section 8 vouchers are elderly, 22% of the families are disabled, and 40% are families with children.

Location of Public Housing

The SHC owns and operates six public housing developments. The developments are Davenport Manor, Elmwood Manor, Maplewood Manor, Pinewood Manor, and Rosien Towers, and Town and Garden. The SHC also operates several scattered site single family homes and duplexes. According to the PHA Five-Year and Annual Plan, all high-rise developments are mixed-populations.

Table 56. Public Housing Developments – Saginaw, MI

Property Name	Address	Number of Units	Census Tract	Minority Tract % (2013)	Tract Median Family Income %
Davenport Manor	2811 Davenport Ave	61	21	29.4%	102.2%
Elmwood Manor	2814 E. Genesee Ave	128	9	94.1%	32.1%
Maplewood Manor*	535 S. Warren Ave	98*	7	91.2%	48.8%
Pinewood Manor	2715 S. Jefferson Ave	95	10	90.7%	40.9%
Rosien Towers	310 S. Harrison Ave	110	17	53.3%	70.7%

Town and Garden	1803 Norman Avenue	94	1	90.3%	30.4%
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* Maplewood Manor includes 8 LIHTC units

Table 56, provides information on the location of each public housing development and the characteristics of each census tract. Based on 2013 FFIEC data, 415 (70.8%) of public housing units are located in minority tracts. A “minority” tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Saginaw as a whole (56.5% based on 2010 Census). Therefore, tracts with a 61.5% or greater minority population would be considered a “minority” tract. Additionally, 525 (89.6%) public housing units are located in low- and moderate-income census tracts. Davenport Manor is the only public housing development that is not located in a low- and moderate income census tract.

In regards to the location of Section 8 vouchers, based on data available from the HUD CPD Mapping Tool, 1,014 Section 8 vouchers are being utilized within the City of Saginaw. Since these vouchers are used to rent housing from private landlords, there is a wider dispersion in where the vouchers are used. While the vouchers are dispersed over the City, there are some census tracts in which units are more concentrated relative to the total housing units in the tract. The highest concentrations of section 8 vouchers were in tract 2 at 27.7%. The next concentrations ranged from 11.58% to 20.44% in tracts 11(19.1%); 1(17.6%); 15(17.2%); 10(16.1%); 8(15.6%); 12(14.9%); 18(14.2%); 16(13.9%); 20(12.4%); and 9(11.6%). The tracts that had the highest concentration of section 8 assisted housing were in areas that were predominantly low- and moderate-income. Only one of the 11 tracts was a middle income level tract.

Fair Housing Policies

Public housing authorities are required to certify that they will carry out the public housing program in conformity with several federal laws, including the Fair Housing Act. A review of the PHA Five-Year and Annual Plan reveals that the agency has taken the following actions to promote fair housing:

- Distributes Fair Housing Equal Opportunity for All, EEO is Law, and Are you Victim of Housing Discrimination pamphlets at HCV housing briefings;
- Posts equal opportunity and fair housing posters at all office locations; and
- Places applicants who require accessible units on a waitlist based on their needs to ensure they are placed in the first available accessible unit.

City Regulatory Review

This Section focuses on the review of the local public sector policies to determine if such policies affect housing choice by limiting or excluding dwellings or housing facilities for persons with disabilities or other protected class members from certain residential areas. HUD believes that there are instances where policies have the effect of violating the provisions of the Fair Housing Act (FHA) since they may indirectly discriminate against persons with disabilities and racial and ethnic minorities. Under the current state of the law, a local government cannot adopt ordinances or other regulations based on race, ethnicity, or national origin, even if for their

benefit, unless the ordinance or regulation are justified by a compelling governmental interest and are narrowly tailored to further that interest. However, laws and ordinances may have disparate impact on protected class members.

In order to make this determination, the 2011 Saginaw Master Plan¹⁶, and the Saginaw Administrative Code¹⁷ were reviewed. As well, a planning and zoning questionnaire self-assessment questionnaire was completed by the Planning staff. A copy of the questionnaire is attached as Appendix III. The following section is from the review and the questionnaire.

Review of the Saginaw Master Plan

In general, a comprehensive plan is defined as a long-term guide for the development of a community outlining existing conditions and providing goals, policies, and actions to meet future needs as determined by factors such as population, economic conditions, and impacts of regional change. Developed with input from stakeholders in the community, the comprehensive plan provides guidance for the City's future in regards to the type and intensity of development, land uses, and open space.

Adopted by the Saginaw City Council in September 2011, the Master Plan seeks to guide the physical and economic development of the City. It is important to point out that the preparation of the Master Plan began in 2010 at a time when the national and local economy and housing market were beginning to recover from the recession. Saginaw was also experiencing substantial job loss and decline in the population due to the downsizing of the automotive history which historically was the driving force of Saginaw's economy.

Based on citizen input and evaluation of existing conditions, the framework for the Plan was developed. The Plan includes a number of goals, strategies, and action items that seek to achieve the City's vision to "capture the core identity and desired future state that will enable the City to be successful in the future both internally and externally." The vision was adopted by the City Council in March 2011 along with the goals of Neighborhood Revitalization and City Beautification, Recreation Offerings and Youth Activities, Public Safety, Enhancement of City Revenue Efforts, and Organizational Development.

As stated before, the Master Planning process led to the development of goals, strategies, and action items to implement the City's vision. Nine goals were development with the categories of economic development, quality of life, and place making.

Some of the City's other goals that impact the economy and public services include creating a new economy by developing a diverse job base; re-envisioning and re-branding Saginaw regionally and globally; adequate and cost-effective infrastructure and public services for a dynamic City; capitalizing on the City-wide and regional importance of the Saginaw River as an asset for economic development and quality of life by encouraging new mixed-use developments; and sub-area planning and site-specific improvements.

The purpose of reviewing the Saginaw Master Plan is to identify to what extent the plan helps the City to implement its commitment to equal housing opportunity and to what extent portions of the plan may serve as impediments to fair housing choice for persons protected by the FHA.

¹⁶ <http://www.saginaw-mi.com/pdfs/city-of-saginaw-master-plan-2011.pdf>

¹⁷ http://www.amlegal.com/saginaw_mi/

As such, the review covers six subject areas selected because of their correlation with fair housing choice. These areas are:

1. Inclusion of Protected Group Demographic Description
2. Plans for Affordable Housing/Diverse Community
3. Reference to CDBG or Other Federal Housing Programs
4. Affirmatively Furthering Fair Housing
5. Compliance with Applicable Laws and Regulations
6. Community Participation in the Planning Process

a. Inclusion of Protected Group Demographic Description

The Saginaw Master Plan includes a brief history of the City and its original inhabitants. This historical review describes how the population of Saginaw grew rapidly due to a booming manufacturing economy in the 19th and early 20th centuries. This led to a change in the racial or ethnic makeup of Saginaw residents, specifically the increase in African Americans that immigrated to the City.

The Master Plan also includes a demographic profile of the City that analyzes population and other trends including age, race, educational attainment, and income. The Saginaw Master Plan does not include demographic data for most of the FHA protected groups. For example, the Plan does not include any data on the number of persons with disabilities in the City or an analysis of types of disabilities or accessibility needs.

As a proactive and preventative approach, inclusion of information about race, national origin, familial status, or disability status of persons in a comprehensive plan is to assist those who are most likely to need the protection of the FHA in their attempts to find or occupy housing. Inclusion in the demographic profile can help ensure that protected persons are not excluded or neglected when communities make plans that involve housing related issues. It is for these reasons that a review of demographic information is undertaken and it is recommended that such data be included in comprehensive plans and other neighborhood planning documents.

b. Plans for Affordable Housing/Diverse Community

The FHA does not require that communities plan for constructing or assisting in the construction of “affordable” housing nor require that communities be, or advertise themselves as “diverse communities”. Although affordable housing is not equivalent to fair housing, increasing the availability of affordable housing would benefit minority families and persons with disabilities. Therefore, HUD has recognized the inclusion of “affordable” housing and promotion of a community as a “diverse community” are steps that communities can take to “affirmatively further fair housing”. Racial minorities, some recent immigrants, single mothers with children, and persons with disabilities, all protected by the FHA, are over represented in the low- and moderate-income categories, and are among the persons most likely to need “affordable” housing. Taking steps to address the housing needs of lower income persons and to

establish “diverse” communities are therefore viewed by HUD as “affirmatively furthering fair housing actions”.

In 2003, the City updated the Housing Element of the 1992 Master Plan. The Housing goals identified in the Plan are to:

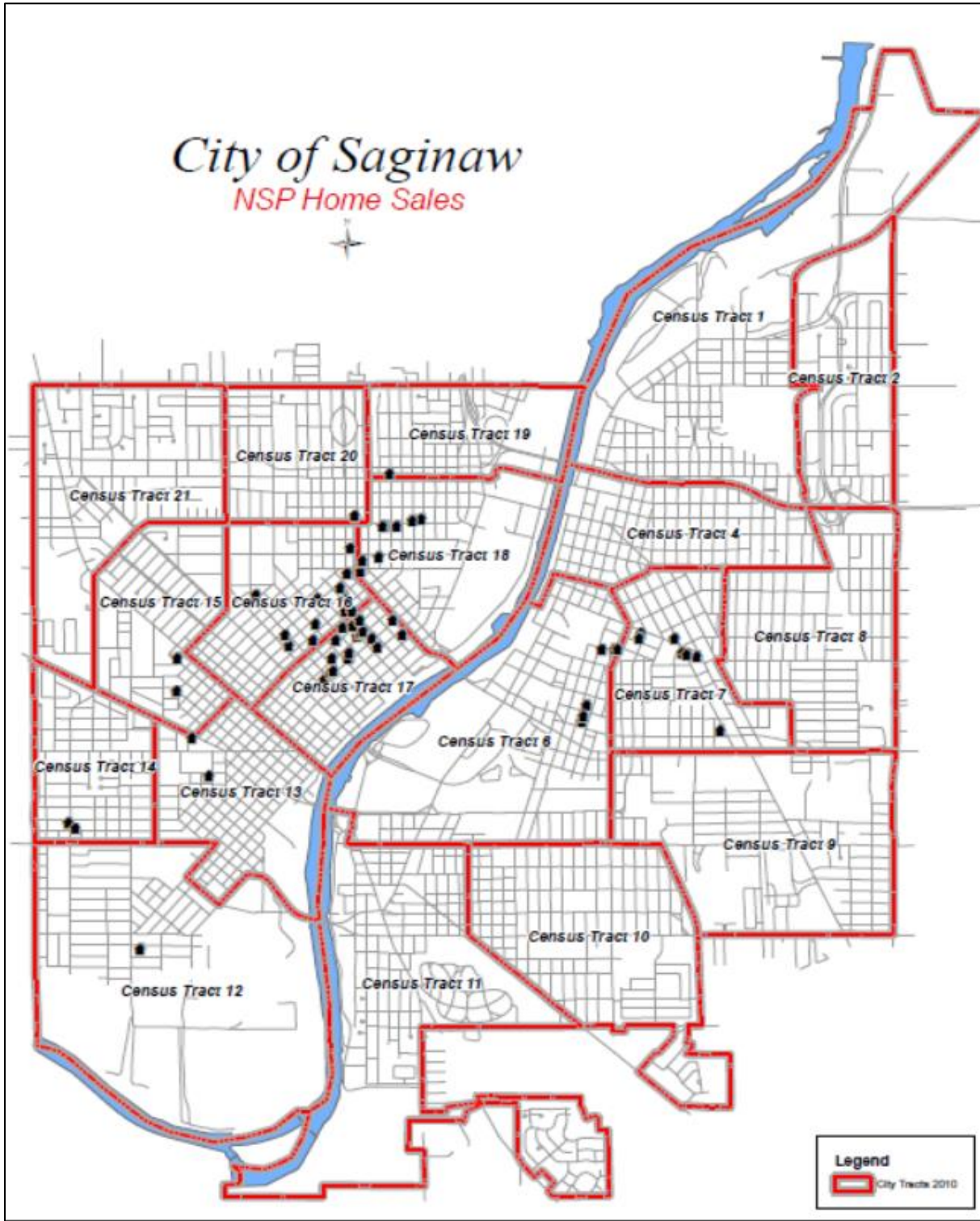
- Identify vacant land and redevelopment opportunities;
- Improve existing housing stock; and
- Pursue private/public partnerships to improve housing stock and build new homes.

The current Master Plan describes Saginaw’s housing market as inundated with residential foreclosures. These vacant and abandoned properties have led to blighted neighborhoods that are undesirable and that push down the value of neighboring properties. The City of Saginaw’s approach to addressing the housing and neighborhood issues includes utilizing federal funding, specifically Neighborhood Stabilization Program (NSP) funds to minimize the further decline of the neighborhoods. The City employed land banking, demolition, and acquisition and rehabilitation strategies to stabilize neighborhoods.

The City has partnered with Saginaw County Land Bank Authority and in the long term plans to pursue infill housing and redevelopment on assembled property. The NSP program requires that direct beneficiaries be of low, moderate- and middle-income (0-120%AMI) therefore residential dwellings that are redeveloped under this program will benefit mainly lower income households.

The City has utilized NSP1 and NSP3 funds to assist 60 households. The racial or ethnic makeup of the beneficiaries was 64% Black or African American, 22% White, and 14% Hispanic. The NSP1 and NSP3 programs required that grantees expend funds in ‘areas of greatest need’ based on HUD provided foreclosure index scores. The map below shows that Saginaw’s NSP funds were primarily expended in census tracts 16, 17, and 18. Based on 2014 FFIEC data, the NSP areas of greatest need were all moderate income level tracts and did not meet the definition of minority tracts.

Map 10. NSP Home Sales – Saginaw, MI



c. Reference to CDBG or Other Federal Housing Program

The Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) are federal housing and community development programs that provide funding to entitlement communities such as Saginaw. The funds are allocated on an annual basis from HUD with the goal of principally benefitting low- and moderate-income persons. On the other hand, the HOME Program is designed exclusively to create affordable housing for low income households.

This review is done to determine if the Comprehensive Plan and related documents include reference to the existence and value of the CDBG and/or other Federal housing programs, as the City is a recipient of those funds. Federal housing programs continue to be a valuable funding source to fill gaps that must be addressed in order to provide all residents in a community access to decent housing options. Inclusion of references to CDBG and other Federal housing programs in comprehensive plans also serves as a way to inform local citizens of the valuable existing relationships and those that can be developed, between Local, State and Federal governments.

As mentioned in the Plans for Affordable Housing/Diverse Community discussion above, the City's revitalization strategy relies heavily on NSP funding. One of the action items in the Saginaw Master Plan is to support neighborhood stabilization programs. One of the major projects undertaken by the City is the redevelopment of the Green Zone – a 346 acre portion of the northeast section of the City. The Green Zone project involves demolition of blighted properties that are then placed in a land bank for future development opportunities.

d. Affirmatively Further Fair Housing

As mentioned previously, each community that accepts federal block grant funds certifies that it will “affirmatively further fair housing” and will report to HUD the actions it has taken to implement the certification. Although the Saginaw Master Plan did not include a specific reference to “affirmatively furthering fair housing”, Chapter 93.01 of the Code of Ordinances, Discrimination in Housing, states that it is the policy of the City to “protect public safety, public health, and general welfare, for the maintenance of business and good government, and for the promotion of the City's trade, commerce, and manufacture, to assure equal opportunity to all persons to live in adequate housing facilities, and to that end to prohibit discrimination in housing”. The Ordinance describes discriminatory housing practices, the role of the City in enforcing fair housing law, and the process for residents to file a complaint. More details on the actions the City has taken to affirmatively further fair housing can be found in the Recent Housing Accomplishments section of this AI.

e. Compliance with Applicable Laws and Regulations

HUD has started the process of formulating specific regulations to be followed in the preparation of the AI. The new rule proposes to incorporate fair housing planning into the Consolidated Plan and the Public Housing Authority (PHA) Annual Plan processes. When finalized, the new rule will incorporate fair housing priorities into housing, community development, land-use, and other policy making documents. The proposed changes came about as a result of a Report by the US Government Accountability Office where it was determined that HUD needs to enhance its requirements and oversight of jurisdictions' fair housing plans. HUD's Office of Fair Housing and Equal Opportunity (FHEO) oversees all fair housing matters

including a jurisdiction's compliance with the Affirmatively Further Fair Housing (AFFH) certification included in the Consolidated Plan and Action Plan. Should HUD determine that the AFFH is inaccurate, HUD has the authority to disapprove a Consolidated Plan, which may result in withholding CDBG and other formula grant funds until the AFFH matter is resolved.

f. Community Participation in Planning Process

During the development of the Saginaw Master Plan, the City consulted with various stakeholders including interested citizens to gather input on the future of the City. The City used several methods to reach out to the public including a project website and blog, online survey, social media, open houses, business leader meeting, and high school student input session. Over 700 citizens responded to the online survey and a total of 56 persons participated in four open houses. The City also conducted a workshop titled "A Conversation with You about Your City" with the Neighborhood Association Action Group (NAAG), a group of 19 neighborhood associations. All the input and recommendations from the community were shared with the Master Plan Working Committee, the Planning Commission, and the City County. The citizen input assisted with the formulations of the various goals and actions outlined in the Master Plan.

Based on the review of the Master Plan, it appears that it is the City's practice to seek citizen input and encourage public participation in its planning process. The City is encouraged to continue with citizen participation activities and include persons from diverse backgrounds that reflect the socio-demographic makeup of the City.

Zoning Code

Zoning Ordinances are enforceable in courts of law by the local community and therefore warrant even closer attention to help ensure that the ordinances help the community "affirmatively further fair housing" and do not, either intentionally or unintentionally, serve as "impediments to the exercise of fair housing choice". The Zoning Code of the City of Saginaw covers key areas that have an impact on fair housing choice including land use, building regulations, accessibility standards, and other policies and practices. The following subject areas were selected to be reviewed:

- Minimum Lot Size for Single Family Residential
- Definition of "Family"
- Adult Foster Care Facilities
- Multifamily Maximum Structure Height and Densities
- Other Comments

In general, zoning and land use codes can have the effect of impeding fair housing choice for several reasons. Zoning codes while intended to allow for orderly development and congruent neighborhoods, can limit the ability of housing for some persons living in those neighborhoods. For example, minimum lot sizes that require larger lots and increased setbacks can limit the development of affordable housing in some neighborhoods. Minimum lots sizes can also limit the development of group homes and other types of permanent supportive for person with

disabilities and the frail elderly. Zoning codes can also be used to facilitate NIMBYism where residents of a neighborhood can protest rezoning and limit type of developments. Limitations on the definition of family such as definitions that limit the number of unrelated persons living together also restrict housing choices.

Minimum Lot Size for Single Family Residential

Chapter 153 of the Saginaw Code of Ordinances, Zoning Regulations, identifies and describes the residential districts in the City. Saginaw is divided into 14 zoning districts. Six of the zoning districts are residential and the others are commercial and industrial districts. The residential districts are Single Family Residential (R-1), Agricultural Residential (R-1A), Two Family Residential (R-2), Low Density Multiple Dwelling Residential (R-3), High Density Multiple Dwelling Residential (R-4), and Restricted Office (RO-1). The City also has a Planned Development District (PDD) that encourages the development of a variety of dwelling types and provides flexible development standards.

The minimum lot width in the R-1 to R-4 districts ranges from 50 feet to 200 feet. For single family homes, the minimum lot width is 50 feet and two family homes have a minimum lot width of 60 feet. The zoning districts in the City are designed mainly for smaller lot sizes and according to the Saginaw Master Plan, “the dense development pattern is consistent throughout the City, except for some areas in the north and western portions of the City”. The minimum lot size per dwelling unit in the single family residential district is 6,000 sq. ft. Smaller minimum lot sizes typically means lower costs for developers and can reduce housing prices.

Definition of “Family”

Under subchapter 153.021 of the Zoning Ordinance, family is defined as one of the following:

- A. One (1) or more persons living together and interrelated by bonds of consanguinity, marriage, or legal adoption, and occupying the whole or part of a dwelling unit as a single housekeeping unit. A family shall be deemed to include domestic servants, gratuitous guests, and not more than four (4) foster or boarded children who are sponsored or whose room and board is paid by a recognized child care agency or organization. A family shall also be deemed to include not more than six (6) persons occupying the dwelling unit and living together as a single nonprofit housekeeping unit, if said occupants are handicapped persons as defined in Title VIII of the Civil Rights Act of 1968, 42 USC 2000e *et seq.*, as amended by the Fair Housing Amendment Act of 1988.
- B. A group of not more than three (3) persons, who need not be related by bonds of consanguinity, marriage, or legal adoption, living together as a single housekeeping unit, as distinguished from individuals occupying a hotel, club, boarding house, rooming house, fraternity or sorority house. The group living in the dwelling unit must occupy such dwelling unit in the same manner as a dwelling occupied by a family defined in paragraph (A) of this definition.

The Ordinance also states that if at least one of the following criteria exists, then the City will not consider the occupants to meet the definition of a family:

1. Bedroom doors that can be locked on the exterior and interior sides of the door;
2. More than one (1) mailbox provided per group;
3. Bedroom doors designated by number or letter.

It is important to consider how families are defined in a zoning ordinance because the Fair Housing Act requires that groups of unrelated persons be treated equally as traditional families and be held to the same regulatory requirements. The City indicated in the questionnaire on public policies and practices that the definition of family in the Zoning Ordinance does not discriminate against unrelated individuals with disabilities who reside in a group living arrangement. The definition of family limits the number of unrelated persons in a home to a maximum of three or four individuals. The Saginaw Zoning Ordinance allows a larger number of unrelated persons to reside in handicapped group dwelling units, therefore the cap on unrelated persons does not negatively impact persons with disabilities.

Adult Foster Care Facilities

The City's Administrative Code defines handicap as a "a determinable physical or mental condition of an individual which may result from birth, or functional disorder which constitutes a physical or mental limitation which is unrelated to an individual's ability to acquire, rent, or maintain property.

Facilities for seniors or persons with disabilities include adult foster care family homes, adult foster care large group homes, adult foster care small group homes, and convalescent or nursing homes. Each type of facility is defined as follows:

- Adult Foster Care Family Home - A private residence with the approved capacity to receive not more than six (6) adults who shall be provided foster care for five (5) or more days a week and for two (2) or more consecutive weeks. The adult foster care family home licensee shall be a member of the household and an occupant of the residence.
- Adult Foster Care Small Group Home - An adult foster care facility with the approved capacity for not more than twelve (12) adults who shall be provided foster care.
- Adult Foster Care Large Group Home - An adult foster care facility with the approved capacity to receive at least thirteen (13) but not more than twenty (20) adults who shall be provided foster care.
- The Zoning Ordinance provides restrictions on each of the facilities in terms of permitted districts based on occupancy limits. Adult foster care family homes are permitted in all residential districts and have the additional requirement of being at least 1,500 feet apart. Adult foster care family group homes are permitted in R-2, R-3, R-4, and RO-1 districts. Adult foster care large group homes are permitted in R-3, R-4, and RO-1 districts. Convalescent and nursing homes are permitted in R-3 and R-4 districts. Other requirements for all adult foster care facilities is that the site be evaluated for potential conflicts with residential-commercial use. Adult foster care and large group homes also have off-street parking requirements of 1 space for every 3 beds. The City of Saginaw should take care in ensuring that the spacing requirement for adult foster care family

homes does not have the effect of restricting housing opportunities for persons with disabilities and that adult foster care facilities are integrated into communities citywide.

Multifamily Maximum Structure Height and Densities

The inclusion of multifamily and high density housing in municipal codes typically encourages the development of affordable housing. The maximum building height in zoning districts R-1, R-1A, and R-2 is 2.5 stories or 35 feet. The R-3 district permits multi-family dwellings, including apartments, townhouses, terrace, and row houses. The R-4 district allows for higher density and permits high rise apartment structures in addition to the housing types in the R-3 district.

Other Comments

Planned Development District: Subchapter 153.425 of the Zoning Ordinance provides regulations for Planned Development Districts (PDD). The purpose of this district as stated in the Zoning Ordinance is to provide flexible land use and design regulations for innovative residential and commercial design. The PDD allows for deviation from the development specifications in other districts in order to achieve economy and efficient in the use of the land. The development standards for PDDs include a minimum of 2 acres; at least 2 off-street parking spaces for each dwelling unit; higher densities; and a building height of 3 stories or 35 feet without Planning Commission approval.

Building Codes and Accessibility

Local jurisdictions such as the City of Saginaw adopt building or construction codes to regulate building safety and other standards for residential and commercial buildings. These codes are enforced through a permitting and inspection system which authorizes a specific governmental unit, typically a building department, to set fees and carry out actions.

The responsibility of ensuring that federal accessibility requirements are included in residential projects are left to the developers, designers, and operators of such buildings. State and local accessibility requirements must be enforced by the local governmental unit such as the City of Saginaw.

The FHA and the American with Disabilities Act (ADA) has design and accessibility standards but does not have a permitting and plan review process for enforcement. However, the issuance of a certificate of completion and building permits by the City's building department does not protect the developer or owner from compliance actions under the FHA and does not pass liability for such compliance unto the City.

The City of Saginaw adopted the Michigan Building Code which is based on the 2012 edition of the International Building Code. The City's Building Official is responsible for building code compliance. In regards to accessibility, Section U.S.C 3604 (f)(3)(C) and (f)(7) of the Fair Housing Act defines discrimination as a failure to design and construct covered multifamily housing (building of four or more units) for first occupancy after March 13, 1991 in a manner that allows those buildings to be readily accessible and useable for persons with disabilities. Accessibility and use includes items such as wider doors and passages for wheelchairs, and adaptive design features such as accessible ingress and egress, accessible switches and outlets,

reinforced bathroom walls for later grab bar installation, and usable kitchen and bathroom spaces for wheelchair maneuverability.

The provisions of the Act covers a wide range of residential housing and other units funded through federal block grant funds. Redevelopment of an existing property to add four or more units or public and common areas is considered a new building and subject to the provisions. Per U.S.C 3604 (f) (7), for buildings that meet the criteria of four or more units and have at least one elevator, all units are subject to the provisions. For covered buildings without an elevator, only the ground floors and common use areas are subject to the provisions. While single-family detached units are not subject to the provisions except for those funded with federal grants.

In addition to the FHA, the following requirements apply to accessibility of residential units:

- The Architectural Barriers Act (ABA) Standards – applies to facilities designed, built, altered, or leased with federal funds
- Section 504 of the Rehabilitation Act of 1973 – applies to residential units designed, built, altered, or leased with federal funds
- Uniform Federal Accessibility Standards (UFAS) or a stricter standard (41 CFR Ch. 101, Appendix A) – applies to new constructed housing with five or more units in which 5% or at least one unit, whichever is greater, must be accessible for persons with mobility disabilities. Also, 2% of the units or at least one unit, whichever is greater, must be accessible for persons with visual or hearing disabilities.

Off-Street and Handicap Parking: Subchapter 153.116 of the Zoning Ordinance, Off-Street Parking Requirements, addresses off-street parking provisions in all zoning districts. In residential districts, one- family, two-family homes, and multiple dwellings are required to have 2 spaces per dwelling unit. The parking requirement for low-rent public housing is 1 space per dwelling unit. Senior citizen housing requires 1 space per two dwelling units and senior citizen low rent housing requires 1 space for every three dwelling units. According to the questionnaire on public policies, the City follows the ADA Standards for Accessible Design in regards to handicap parking.

Accessory Structures: The Zoning Ordinance defines an accessory building as a supplementary building or a portion of a main building, the use of which is incidental to that of the main building and which is located on the same lot as the main building. The City of Saginaw does not permit accessory buildings to be utilized for habitation.

Boards and Commissions

The City of Saginaw has several boards and commissions that relate to fair housing issues. The boards and commissions members are resident volunteers that give input and assist in the functions of the City. Maintaining active boards and commissions allows residents of Saginaw with diverse backgrounds to have input on the programs and the actions of the City. Some of the City's board include but are not limited to:

Zoning Board of Appeals–The Board hears and decides on appeals for variance from the application of the zoning code. The board is composed of six private citizens.

City Planning Commission – The Commission reviews and approves site plans, requests for special uses, and makes recommendations to City Council on requests for rezoning or zoning code text changes.

Saginaw Human Planning Commission – The Commission reviews applications and makes funding recommendations for CDBG, HOME and ESG funds awarded to the City.

Citizens' Advisory Committee –

Housing Board of Appeals- The Board reviews complaints regarding building codes and enforcement.

Visitability and Universal Design

HUD's CPD Notice 05-09: *Accessibility Notice – Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act and their applicability to Housing Programs funded by HOME and CDBG*, recommends the use of the visitability concepts in addition to the requirements of Section 504 and the FHA. Visitability is defined by AARP in the *Increasing Home Access: Designing for Visitability*¹⁸ brief as a house built to include a zero-step entrance, wide doorways with 32" of clear passage space, and a half bathroom on the main floor. The visitability concept applies to single family and other housing types that are not covered by federal law to incorporate accessibility features.

Property Tax Policies

Policies regarding property tax increases and tax relief impacts housing affordability. Tax relief programs are usually targeted to persons protected under the FHA and local laws including the elderly and persons with disabilities.

There are three main tax relief programs provided by the City of Saginaw: Hardship Property Tax Reduction, Home Improvement Tax Relief, and the Payment in Lieu of Property Taxes (PILOT). Each form of tax relief is subject to certain specific criteria and must be applied for. These forms of tax relief reduce or eliminate tax liability for owners and reduce housing costs making housing units more affordable.

Hardship Property Tax Reduction

The City of Saginaw Assessor provides hardship property tax reduction for homeowners that are unable to pay their property taxes. To receive the exemption, households must meet Federal poverty guidelines. All applicants, if approved by the Board of Review, pay taxes equal to 3.5% of their total household gross income. Applicants over 65, paraplegic, quadriplegic, hemiplegic or totally and permanently disabled, will pay taxes equal to the following percentages:

- Total household gross income less than \$6,000 - 0%
- Total household gross income \$6,001 to \$7,000 - 1%
- Total household gross income \$7,001 to \$8,000 - 2%
- Total household gross income \$8,001 to \$9,310 - 3%
- Total household gross income greater than \$9,310 - 3.5%

¹⁸ http://assets.aarp.org/rgcenter/il/inb163_access.pdf

Home Improvement Tax Relief

The Tax Assessor provides home improvement tax relief for homeowners who perform rehabilitation work on their home that leads to increased property value.

Payment in Lieu of Property Taxes

The City of Saginaw under the State Housing Development Act of 1966 provides for the payment of a service charge in lieu of property taxes for low income housing. Under the PILOT program, the City establishes the amount of the service charge as long as it does not exceed the property taxes that would have been paid without the exemption. The service charge is a percentage of annual shelter rents for the development. Typically, the tax exemption is granted for a period of 15 years as long as the development continues to serve low income persons. Current development in the PILOT program include Unity Park, Saginaw Homes I & II, Birch Park Apartments, Wickes Park Homes, St. Paul Townhomes, Saginaw Shelter for the Homeless, and scattered site Saginaw Housing Commission properties.

Non-Owner Occupied Dwelling Registration

The City of Saginaw adopted Ordinance O-160 on April 20, 2015 requiring that all rental property be registered with the City Clerk and that the properties be maintained according to local and State codes. The City's Housing Inspection Division is responsible for inspecting all registered rental properties. The properties are to be inspected at least once annually by the owner, property manager, or by the City to ensure compliance. The goal of the program, in addition to reducing the number of poorly maintained rental property in the City, is to address the security of these properties and to reduce criminal activity through the use of a Crime Free Lease Addendum. According to the Ordinance, any criminal activity on the property by a resident, household member, or a guest, is a 'quality of life' violation which may be grounds for eviction. The City utilizes a Public Safety Incident Notification Alert System that inform landlords when Police or Fire Departments are called to their property.

Studies have shown that due to the possibility of eviction, victims of crime, especially women and children affected by domestic abuse; do not call the police as often for fear of eviction when a crime free housing program is in place. A review of the 2013 Fair Housing Equity Assessment¹⁹ being conducted by the Chicago Metropolitan Agency for Planning in conjunction with other agencies addresses concerns about Crime Free Rental Ordinances. According to the assessment, an increased number of jurisdictions are adopting crime free rental ordinances with the goal of making their communities safer for its residents. However the research shows that there is a disparate impact on African American and Latino renters, as well as women who have been the victims of domestic abuse.

Since this Ordinance recently went into effect, it is recommended that the City research and collect data on how the crime free housing program is affecting fair housing because policies such as this may have the potential to disproportionately affect minorities who may be more prone to criminal activity due to socio-economic conditions. Once the data is available, it should

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<http://www.cmap.illinois.gov/documents/10180/198094/Chicago%20Region%20FHEA%20November%202013%20HUD%20Submission.pdf/b0c6946e-4425-49fe-8d0a-f336903bc464/>

be analyzed to determine if the program is having an unintended impact on persons that may require protection of the FHA, victims of domestic abuse, or other groups that may be excessively impacted. Depending on the results of the analysis, the City may consider making changes to the crime free housing program.

Recent City Housing Accomplishments and Use of Resources

As part of the Consolidated Planning process, the City is required to prepare an annual report of its accomplishments known as the Comprehensive Annual Performance Evaluation Report (CAPER). The CAPER generally includes an assessment of the City's progress towards meeting the goals and objectives established in its 5-year Consolidated Plan and subsequent Annual Action Plans. The CAPERs for the 2009-2011 program years as well as the 2011-2016 Consolidated Plan²⁰ were reviewed to determine recent housing accomplishments and actions taken to promote fair housing.

According to the City of Saginaw's 2011-2016 Consolidated Plan, the City's housing priorities are to provide rehabilitation assistance to income-eligible homeowners, encourage affordable homeownership opportunities for low- and moderate-income homebuyers, and encourage the development of new infill housing in established neighborhoods for all income ranges. The CAPERs reviewed indicate that the City has consistently provided funding to non-profit and for-profit developers, subrecipients, and other community-based organizations to operate programs and carry out projects aimed at providing decent housing conditions for low- and moderate income residents.

The City administers and implements several housing programs to achieve the objectives of the Consolidated Plan and to address fair housing choice.

Residential Grants Program: This is a grant program for low income owner occupants limited to repair or replacement of existing heating, plumbing, and electrical and structural elements in single family properties. HOME funds support this activity.

50/50 Residential Loan/Grant Program: This is a loan/grant program for low and moderate income owner occupants limited to repair or replacement of existing heating, plumbing, electrical and structural elements in single family properties.

Basic Needs Program: This is a grant and/or loan program that the city operates city wide. It makes basic repairs to owner occupied dwellings.

Elderly and Disabled Program: This is a grant program operated by Saginaw County Community Action Committee in a designated area. It makes repairs and improvements for the elderly and the disable that allows them to remain in their homes.

HOME CHDO: This Program assists low and moderate income first time home buyers to secure HOME funded rehabilitation.

²⁰ <http://www.saginaw-mi.com/pdfs/Approved-Saginaw-Consolidated-Plan-2011-2016.pdf>

Section 8 Housing Choice Voucher Program: Administered by the Saginaw Housing Commission, the Section 8 HCV Program subsidizes a tenant’s rent and allows voucher recipients to reside in privately owned rental properties in Saginaw County.

Public Housing Program: This program allows low income households, including elderly persons and persons with disabilities, to reside in quality, affordable rental housing owned by the Saginaw Housing Commission.

The following figures in Table 57, extracted from the FY 2009-2011 CAPERS represent the number of households assisted with housing related activities by year.

Table 57. CDBG and HOME Housing Accomplishments 2009-2011 – Saginaw, MI

Housing Program	No. of Households Assisted (2009)	No. of Households Assisted (2010)	No. of Households Assisted (2011)
Residential Grants Program	18	14	3
50/50 Residential Loan/Grant Program	3	1	2
Basic Needs Program	5	7	19
Elderly and Disabled Program	24	23	22
HOME CHDO	0	1	3
TOTAL	50	46	49

Fair Housing Accomplishments

The last AI for the City of Saginaw was updated in January 2008. Annually, the City funds and supports non-profit public service agencies to address fair housing problems in the City. The City of Saginaw contracts with Legal Services of Eastern Michigan (LSEM) to provide outreach and education, and testing and referral services. During FY 2013-2014, the agency performed the following tasks:

- Distributed fair housing materials and brochures to clients;
- Attended Continuum of Care (CoC) meetings about fair housing issues;
- Conducted trainings with landlords and realtors, conducted tests of Saginaw Housing Commission sites to ensure handicap accessibility;
- Met with local government officials in Bay City, the City of Flint, and Genesee County on Impediment Studies;
- Screened housing clients for housing discrimination issues;

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- Conducted survey and complaint based tests;
- Filed enforcement complaints with HUD; and
- Conducted conciliation negotiations

In regards to staff training, fair housing staff attended training at the John Marshall Law School on 'Effective Advocacy under the Fair Housing Laws' and also participated in a webinar on 'Fair Housing Enforcement and the FHAP Administrative Complaint Process. LSEM also provided training for testers.

Some of the other fair housing accomplishments discussed in the CAPER include the adoption of a Fair Housing Ordinance in December 2010.

The City of Saginaw also hosts or participates in housing forums and in 2011, the City of Saginaw co-hosted a Housing Forum with the Saginaw County Community Action Committee SC-CAC at the SC-CAC facility to promote fair housing as well as promote the many housing programs available to low-moderate income households in Saginaw. During 2012, City participated in a Housing Forum titled Show Me the Money, hosted by United Way. The purpose of the latter housing forum was to let citizens know about City of Saginaw opportunities as well as promote the many housing programs available to low-moderate income households throughout the area.

The City posts Form HUD-928.1 in the City Hall and has distributed the form to Saginaw sub-grantees of CDBG, HOME, and ESG funds. The poster and equal housing opportunity logo have been incorporated onto documents distributed by the City in conjunction with HUD-related activities.

VI. PUBLIC OUTREACH

Introduction

This section summarizes the results of the surveys, focus groups, public meetings, and agency consultations through key person interviews, document review, and websites conducted as part of the public outreach process for the Saginaw AI. As part of the Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i) and in accordance with its Citizen Participation Plan, the City of Saginaw conducted a very inclusive community participation process that incorporated input from City officials, residents, and key persons involved in the housing and community development industry, and in particular, fair housing. Additional information was gathered via teleconferences and email correspondence with nonprofit and advocacy groups. City staff from various departments provided relevant information for development of the AI.

Input was received from the public and stakeholders prior to the completion of the AI and during the 30-day public comment period for the AI which took place between July 12, 2015 and August 10, 2015. [REDACTED] public comments were received during the 30-day comment period. Public notices included provisions for reasonable accommodation and alternative formats for information for persons with Limited English Proficiency and persons with disabilities, including the hearing-impaired.

Print and Broadcast Media

As outlined in the City's Citizen Participation Plan, the public was educated and informed about the AI requirements through the City's website and a newspaper of general circulation. A public notice was published on the City's cable television station and through a press release. See attached copies of newspaper ads as **Appendix # [REDACTED]**.

Fair Housing Surveys

Four (4) fair housing surveys were created and issued online through SurveyMonkey, an Internet survey service for Saginaw residents, housing providers/advocacy agencies, area Realtors, and lending institutions. The survey asked respondents about their experience and perception of housing discrimination, knowledge of fair housing laws, and experience with City housing assistance and social service programs and were anonymous. Paper copies of the resident survey were administered at events and through agencies. A resident Spanish language version was available but no responses were received. Fair housing survey links were posted on the City's website. The survey findings are discussed below:

Resident Surveys

Three hundred and five (305) persons who resided, worked or owned businesses in the City completed the survey from March 10 to June 8, 2015. Question tallies were not equal as some persons may have chosen to skip a question. For some questions, respondents could select multiple answers and/or provide explanation by written comments. It should be noted that the opinions of the respondents do not reflect the views, statements, or stated opinions of the report

preparer or the City. Please refer to the Appendix section of the AI to view the resident survey instrument.

Of the 305 respondents, the majority, 264 persons (86.6%), noted that they lived within the City limits of Saginaw. The remaining 13.8% (42) of the sample said they lived outside of the city limits. Of the non-residents, 81.0% or 34 persons, worked or operated a business in the City.

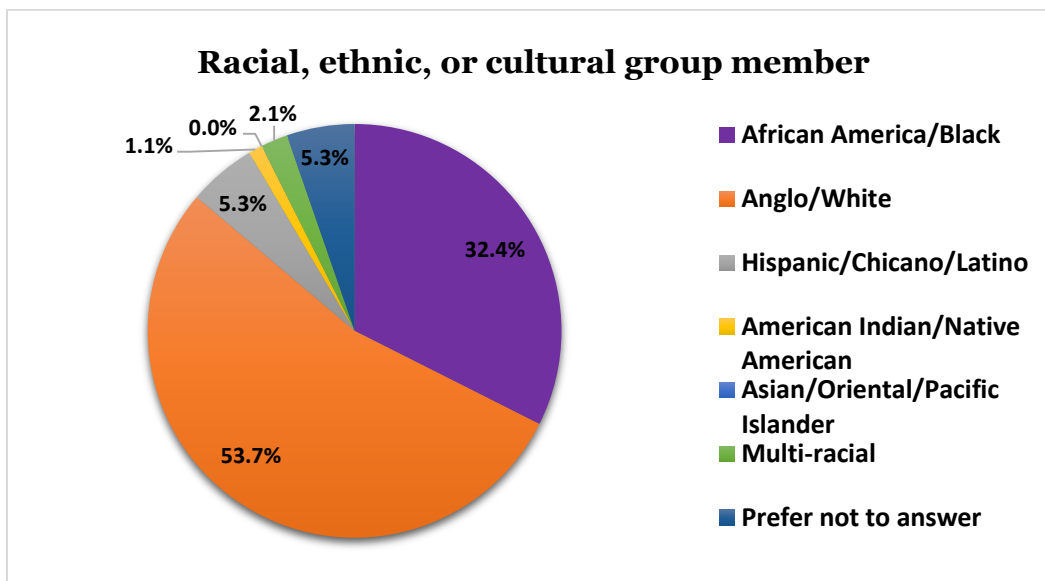
Demographics

Of the respondents, those who identified as Anglo/White made up the largest portion of the sample with 53.7% (151). The second largest group identified as African American/Black, making up 32.4% (91). Thirty-nine (13.2%) of the participants skipped the question. Four respondents selected “Other” as an American of another ethnicity.

According to the 2010 Census, the largest racial groups in Saginaw were Anglo/White (76.8%) and Black/African American (19.3%). Only 8.0% of the population identified as Hispanic/Latino.

Compared to the Census, the resident responses showed a similar breakdown with whites and blacks showing a lower and higher representation respectively. See figure below.

Figure 13. Racial Ethnic or Cultural Group – Public Survey, Saginaw, MI



Other Characteristics

Other characteristics of the survey sample included:

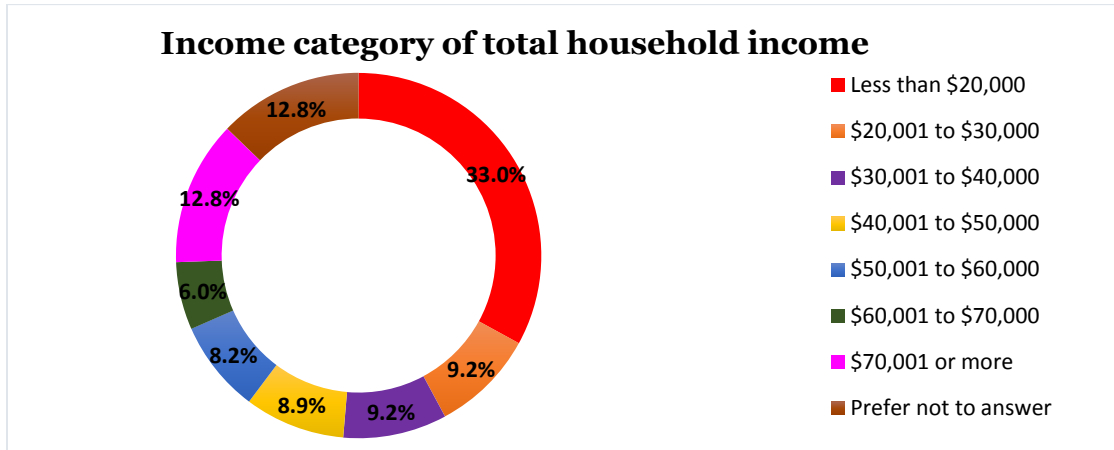
- 40.8% of the respondents indicated they are single head of household followed closely by the 37.0% who indicated they are married. Eight percent did not respond to the question;
- 25.8% (73) stated that they or someone in their household had a disability or handicap;
- 35.6% (100) had children under 18 years of age. Eight percent did not respond;

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- 33.0% (93 persons), reported the lowest household income reporting income of less than \$20,000. 12.8% (36) reported they had a household income of \$70,001 or more. See figure below for more details.

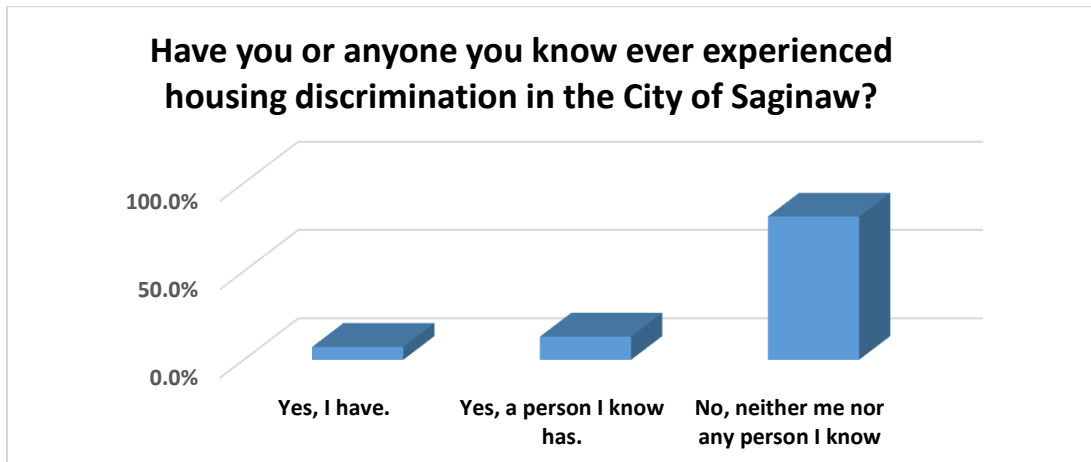
Figure 14. Income Category – Public Survey, Saginaw, MI



Housing Discrimination

Survey respondents were also asked to identify ways in which housing discrimination can occur, based on a list of the federal, state, and local protected classes and other bases that have an impact on fair housing choice. As indicated in Figure# below, when asked if they or anyone they knew had experienced housing discrimination in the City 20.4% (56) of respondents responded yes. Of that number, 7.3% (20 persons) had first-hand experience while the other 13.1% (36 person) knew of someone who had. Race was cited as the most common basis on which housing discrimination can occur, followed by Disability/Handicap, Religion, and Sex. It is also important to note that a significant portion, 30.3%, also cited poor language skills. This coupled with over 38.3% citing that there was inadequate fair housing information available in other language translations indicates an impediment to be addressed. See Appendix# II for detailed responses.

Figure 15. Housing Discrimination Experienced – Public Survey, Saginaw, MI



Respondents who had experienced or had knowledge of discrimination were then probed further about their experience. Their results are detailed in the charts and can be found in Appendix II. Of the 56 respondents who felt they were discriminated against, 38.2% reported it by a landlord of a single-family housing unit followed closely by the 36.8% by a rental property manager/multi-unit housing. “Other” responses included a housing agency, and by neighbors due to race. Regarding the location where the discrimination occurred, 36.3% indicated at an individual housing unit for rent, followed closely by 36.3% at a rental apartment complex.

Familiarity and Knowledge of Housing Programs and Fair Housing Laws

A significant number of Saginaw residents 57.9% (146 persons) appear to be unaware of fair housing laws, services, and responsibilities. Over 40% indicated that they had not seen any information while 31.8% (77) indicated they had seen fair housing flyers and pamphlets.

Regarding knowledge of Fair Housing laws, only 5.9% (14) considered themselves to be Very Knowledgeable while 48.2% Somewhat Knowledgeable, and 46.3% (118) Not Knowledgeable.

See figure below for respondents’ suggested methods of disseminating fair housing information.



Effectiveness of Current Laws

When asked if current fair housing laws and enforcement mechanisms are effective, 49.8% of respondents feel they are Somewhat Effective, 26.6% Very Effective, and 23.7% Not Effective. Respondents were asked to list the reason for their responses and their reasons included:

- Bad Landlords
- Irresponsible Tenants
- Lack of Knowledge of Fair Housing Rights
- Laws Need More Testing
- Lack of City Resources to Fight Housing Discrimination
- Dependent on Areas
- Absentee Landlords
- Communication
- Discrimination is Addressed When Reported
- Lack of LGBTQ Ordinances

While, the majority of respondents, 66.6%, feel the current laws are effective to some degree, due to a significant enough portion of responses indicating they are not effective, it is still important that the City continues its efforts to educate and address impediments to fair housing choice.

Current Impediments

When asked about the current impediments to fair housing choice in Saginaw, answers included Federal, State, and Local Protected Classes and other responses as follows:

- *Property Management and Maintenance Issues*
- *Don't think there is a problem in Saginaw*
- *The housing I can afford isn't in safe neighborhoods*
- *There is some discrimination in public housing assistance based on being a single white guy male. I was discriminated by a governmental rental agent in location of housing.*
- *Sexual orientation and gender identity are missing from this list.*
- *Lack of affordable housing*
- *Landlords on our block have stated they will not rent to "Mexicans" or "Section 8ers".*
- *I'm sure discrimination exists yet I am not in any area where I'd experience this nor have I heard complaints from residents in our Association.*
- *Tenants are being steered away from the East side or any area of poverty and crime!*

Geographic Limitations of Housing Choice

The majority of respondents (62.7%) perceived that affordable housing choices were spread throughout the City of Saginaw and not concentrated in certain projects/areas/neighborhoods. The main reasons provided for geographical limitations were:

- Level of income and closeness to work
- Transportation
- Certain people are forced into low income areas due to high rents
- Homes are close to public transportation
- High Crime and Run Down Homes are factors that limit housing choice.
- No grocery on or schools on East side
- Just seems like affordable and decent places are separated by the river.
- Affordable housing is overwhelmingly

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- Unaffordable areas or the property taxes located on the East side

The following were perceived as having concentrated affordable housing:

- Westside
- The East Side
- The West side of Saginaw--closer to the Saginaw Township boundary
- Townships
- First Ward, Wickes Park, and Birch Park
- "Brookwood", Autumn Ridge etc.
- Buena Vista, First Ward, Projects

Certain geographic areas or neighborhoods were perceived to be undesirable by a majority (76.0%) of respondents. Undesirable areas were identified by those surveyed to include:

- The East Side
- The West side of Saginaw--closer to the Saginaw Township boundary Townships
- Bates and Band Street
- Around Atwater, Genesee, Washington
- Vista Villa
- Bond Street
- N E Genesee Ave and south of St. Mary Hospital
- First Ward, Wickes Park area, Birch Park
- "Brookwood", Autumn Ridge etc.
- Buena Vista, First Ward, Projects
- Saginaw West Side certain areas South Michigan to North Michigan
- Northeast Saginaw, Saginaw High area, eastern area of southwest Saginaw city.
- Eastside East Genesee
- Owen, Gallages

Housing for Special Needs

Less than 30% of respondents perceived that there was an inadequate supply of affordable housing available to residents with disabilities, senior citizen residents, and residents with children. When asked to expand on their choices, answers included income, credit history, age of housing and cost to adapt, houses with 5-6 steps up to the porch, shortage of good rest homes, more houses for families with children, and long waiting lists at the Housing Commission.

Fair Housing Education and Enforcement

When asked how they would respond to housing discrimination, the largest number of respondents (98 persons, or 38.6% of all responses) answered that they would contact City offices. A similar percentage said that they would complain to the individual/organization that discriminated against them. Of those who selected "Other," responses included unaware of where to go, pursue legal action, find somewhere else to live, contact TV station, or use social media.

When asked to indicate the most effective ways to inform residents about fair housing rights and/or responsibilities, the use of public meetings, television ads and the City's website were selected. The next most effective means selected were fair housing literature and radio spots.

When asked how effective are the City of Saginaw's current fair housing laws, programs, and enforcement mechanisms in reducing housing discrimination 26.6% (55) felt they were Very Effective, 49.8% (103) Somewhat Effective, and 23.7% (49) felt they were Not Effective.

Suggestions for additional actions or changes to fair housing laws and practices that could be taken by the City to address impediments and improve fair housing choice for all residents included:

- Increase above poverty level jobs
- More elderly housing in safe areas and affordable housing for single parents, the disabled, and students
- Hold people more accountable for housing discrimination
- Literature should reduce amount of “legal speak.”
- More public meetings and literature on fair housing
- Support and protect LGBT community through ordinance prohibiting discrimination based on sexual orientation and gender identity.
- More property owners and landlord rights
- Fair housing should include property upkeep
- Hold landlords to higher standard of service

Realtor Surveys

Saginaw real estate professionals were invited to attend an informational AI meeting/feedback session for realtors, lenders and housing providers, as well as complete the fair housing survey for realtors. The survey was available from March 10 until June 2015 and completed by one Realtor.

The Realtor indicated they were Somewhat Knowledgeable of fair housing laws, including City of Saginaw fair housing laws. They noted that they had training materials on fair housing and participated in continuing education. Lack of education about fair housing options was cited as an impediment by the Realtor. They also considered current fair laws and enforcement mechanisms to be Highly Effective.

The Realtor noted that the following practices and procedures were used in their business:

- written policies addressing Fair Housing Laws
- marketing materials and advertisements using images of diverse racial/ethnic models
- accept listings/show homes outside of niche market and regardless of home value
- accept listings in low-income or minority neighborhoods of the City of Saginaw
- serve clients participating in public homebuyer subsidy programs

In addition, they felt that existing fair housing laws were enforced in a fair and impartial manner.

Conversely, the realtor also noted they did not:

- publish in local minority and multi-lingual publications
- undertake any special/affirmative marketing efforts to target minorities clients

- intentionally employ bilingual individuals on management and sales staff in order to serve clients with limited English language skills
- perceive certain groups or individuals to be less desirable as clients

In addition, the realtor noted they did not have any groups or individuals file complaints against their real estate company, or initiated legal action on the basis of fair housing discrimination, with any Federal, State, or local regulators.

Housing Provider Surveys

Saginaw housing providers were invited to attend an informational AI focus group/feedback session for realtors, lenders and housing providers, as well as complete the fair housing survey for housing providers. A total of 14 housing providers completed the survey. The majority of respondent, 64.3% (9 persons) provided services relating to Property Management for rental housing, followed by 16.67% (2 persons) that provided Fair Housing education and training. In addition, over seventy-one percent received fair housing training at various events

The majority of survey respondents, 64.3% (9 persons) felt that they were Somewhat Knowledgeable of fair housing laws, including Michigan fair housing law. The following table shows responses regarding fair housing business practices.

Table 58. Responses to Questions for Housing Providers

Questions for Housing Providers	Yes # and %	No # and %
Does your agency assist with fair housing complaints?	6 42.9%	8 57.1%
Do you have any materials displayed to promote fair housing?	9 69.2%	4 30.8%
Does your organization conduct fair housing enforcement such as testing and litigation in the City of Saginaw?	0 0.0%	10 100.0%

Complaints assisted occurred at rental complexes, individual rental units, and a Public Housing Authority and concerned Disability, Familial Status, and Sexual Orientation.

Providers cited insufficient income, lack of handicap accessible housing, domestic violence, sexual orientation/gender identity, criminal background, and evictions as impediments to fair housing. Housing providers also noted that certain areas were perceived by residents as undesirable. They were similar to the list of areas provided above.

Housing providers also identified appropriate actions for clients who have experienced housing discrimination including filing complaints, contacting the City, State or HUD, seeking legal help, and registering complaints with the Tenant Advisory Committee which hear discrimination cases.

Provider suggestions for improving fair housing also included:

- The City could provide handouts on non-biased screening techniques with new/renewal registrations of rentals
- Enforce housing codes

Lender Survey

Saginaw lenders were invited to attend an informational AI focus group/feedback session for realtors, lenders and housing providers. In addition four lenders completed a lender fair housing survey. Three of the 4 lenders stated that they received fair housing training either through certification training or continuing education and noted that they were Somewhat Knowledgeable of Fair Housing Laws, including State of Michigan Fair Housing Laws. Additionally, they also felt that current fair housing laws and enforcement mechanisms were Somewhat Effective.

The lenders noted that the following practices and procedures were used in their business:

- Three had written policies addressing Fair Housing Laws
- Three had marketing materials and advertisements using images of diverse racial/ethnic models
- Three had marketing materials in languages other than English and intentionally employed bilingual individuals to serve clients with limited English language skills?
- Three undertook special marketing efforts to target minorities and low-income clients
- Three wrote mortgages for home purchases in neighborhoods with primarily minority or low-income households in the City of Saginaw
- Two stated that they did not have a different fee structure, points, and/or interest rate quotes for mortgages minority and/or low-income neighborhoods
- One lender offered subprime loans and one didn't provide mortgages for clients participating in subsidy programs
- All respondents stated they did not deny loans based on protected class membership
- One lender provide construction and permanent loans for affordable housing developers

Of the three lenders who chose to answer the question, all stated that they did not perceive certain groups of individuals to be less preferred as borrower clients. Also all lending providers noted no complaints were filed or legal actions initiated against their lending institution with any Federal, State, or local regulators on the basis of discrimination under the Fair Housing Act and local laws.

Focus Groups and Public Meetings

In order to elicit input on public perceptions of the impediments to fair housing choice and housing discrimination in Saginaw, focus group meetings were held on March 17 and 18, 2015 with the following groups:

- Realtors, lenders, property managers

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- Housing providers and advocates, as well as community housing development organizations meeting the needs of low income families, persons with HIV/AIDS, homeless, and persons with disabilities.
- City Officials and staff

Meetings were held at the Saginaw City offices. The meetings were advertised on the City's website, via email, and publicized on the City's TV channel, as well as the City's Facebook page.

At each session, the meeting attendees were educated on the purpose of the AI and the process to be used. Participants were asked to identify fair housing choice issues that were of particular concern to them and their comments were recorded.

In addition, members of the general public, as well as representatives of various community groups were invited to a public meeting held on Wednesday, March 18, 2015.

General Issues Discussion from Focus Groups, City Officials, and Public Meetings

Discussions regarding fair housing choice in focus groups, key person interviews, public meetings, and with City staff resulted in the following observations. Participants and interviewees raised some issues that limit housing choice but did not fall under the protection of the FHA. A summary of responses and discussions from the focus group and public meetings are provided below.

General Comments:

- The City of Saginaw is viewed as a culturally diverse community
- The City has a sizeable Hispanic community.
- The housing market is moving in the direction of new development of luxury housing. Affordable properties are now turned into luxury housing causing a decrease in affordable housing inventory. There is need for more affordable housing.
- After the housing crisis more persons moved to the West side of the City due to lower housing prices increasing diversity and reducing racial concentration.
- Tenants are sometimes afraid to file fair housing and code related complaints due to fear of eviction and possible repercussions when they try to relocate. The City currently has a mandatory rental licensing program for single-family dwelling units with an inspection done annually and upon each change in tenancy.
- There have been complaints regarding sexual orientation and religious discrimination.
- Some redlining has been noted in the City.
- Housing options are more limited for persons with disabilities (there is lack of accessibility, accommodations not made). Ramps can be rented

A list of the focus groups and a summary of fair housing issues discussed at each meeting follows.

Focus Group: Realtors, Lenders & Property Managers:

Agencies represented:

- Saginaw Landlords Association
- Chemical Bank

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- First Merit Bank
- PNC Bank
- Century 21 Realty
- Berkshire Hathaway Home Services
- Saginaw County Land Bank
- Housing Commission
- Mid -Michigan Family Homes

Views expressed included:

- Perception of wear and tear on housing from Section 8 tenants. Some landlords do not want to accept vouchers although the majority of the payment is guaranteed.
- Low portion amount paid by tenant sometimes not forthcoming. Landlords need to enforce the terms of the lease agreement. Ignorance on the part of landlords can lead to unfair treatment of persons, including the homeless.
- Older homes are not easily converted to accommodate disability, very expensive
- Over 50 percent of housing are rentals.
- Vacancy rate – there are many homes for sale; owners do not want to rent.
- Fixed disability income – no choice but to rent.
- Saginaw Housing Commission- has vacancies; houses ready to be occupied.
- During March – September easier period to fill vacancies.
- There is an East/ West divide – many higher income residents are moving further west.
- Perception of crime affects people’s willingness to live downtown.
- Home and auto insurance rates are higher in certain zip codes.
- There is no market appreciation. Property values are stabilizing, not increasing.
- Very little new construction except for NSP houses

Focus Group: Housing Providers

Agencies represented:

- Community Action Committee
- Saginaw Habitat for Humanity
- Restoration Community Outreach
- Underground Railroad
- Youth Protection Council
- Saginaw Housing Commission
- Saginaw Community Mental Health
- Project/United Way

Views expressed included:

- The Landlord’s Association provides education regarding requirements.
- Most landlords do not discriminate and are very accommodating.
- There is a housing resource center.
- The current housing stock is less than desirable and retrofitting is very difficult and expensive. One agency reported receiving a grant to work with the elderly. Older homes were equipped with grab bars. Occasionally, more extensive modifications can be made.

- Despite high vacancy levels, poor credit history often prevents some residents from accessing public housing. Other prohibiting factors include criminal background and prior evictions. In such cases, options are limited to low quality housing
- Most people cannot afford to pay higher rent.
- The elderly are often a target for crime.
- There needs to be a certification process to distinguish between Companion dogs and Service dogs.
- Latinos are more likely to be taken advantage of on an individual basis. An example was given of a resident with living in a mold-infested residence but was not sure how to access the resources to address the problem.

Human Planning Commission – Public Meeting

- There are neighborhoods where high-income homes are not allowed.
- Development of higher –priced homes is a possible impediment. However, development of these homes is also part of the City’s revitalization and improvement effort.
- Houses are being demolished in some areas due to gentrification.
- Crime is a factor –correlation between desirability of living in certain neighborhoods, school buildings, abandoned and vacant building
- People may not be aware of rights – the majority of people are not.
- Legal Services disseminates information regarding fair housing. A PSA campaign is planned to increase awareness.
- There are instances of NIMBYISM. For example, there is resistance to location of a Halfway house for rehabilitation of ex-convicts and registered sex offenders coming into neighborhoods. Fear of effect on housing values causes flight from these areas.
- It was noted that federally-sponsored housing does not allow ex-convicts to live in their residential units.
- Accessibility – City and volunteer groups are available to help.
- There was mixed response regarding location of subsidized housing throughout the City– some individuals stated that this type of housing is dispersed throughout the City while others indicated that it was concentrated on the East Side.
- There are several vacant homes that have been abandoned by owners and their heirs.

Additional Community Outreach – Key Person Interviews

Saginaw Housing Commission

- Each new lessee or Section 8 applicant is provided with HUD contact information in the event that the individual feels he/she has been discriminated against.
- There have been sporadic complaints of landlords not accepting Section 8 vouchers. The perception is that Section 8 voucher holders do not maintain property. Instances of occur once or twice per month and occur in the outlying areas of the City.
- There have been no reports regarding refusal to rent due to physical or mental disability.
- The City should continue efforts to keep residents informed about fair housing.

Family Self-Sufficiency Program – Section 8

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- The Commission’s Self-Sufficiency program offers a Section 8 component which allows voucher holders to transfer subsidy from rental to homeownership.
- Inhibiting factors such as disability, poor credit and income insufficiency prevent many individuals from being able to take advantage of this opportunity.
- Low income, disabled, have garnishments are supplied with pro bono legal counsel to assist in filing bankruptcy.
- 1200 Vouchers – 80 on Family Self-sufficiency program, majority (72) has homeownership as the goal. Ninety –percent of caseload African-American females, mostly single mothers; there a few Hispanics, not many males in the program
- Family size is not as much a factor for discrimination as is having a Section 8 voucher
- Partnership established with Habitat to have persons rent while working on credit repair.
- Eight persons have graduated in the last seven years. First time Homebuyer classes educate clients re housing they can afford.
- Most clients want to live in the Township. Seem to get along well with neighbors.
- The Program invites trainers/presenters to conduct in-house sessions in homeownership. They also outsource training courses at no cost to clients as their needs dictate.

Saginaw Landlords Association

- Agency has approximately 800 members, most of whom are smaller landlords and sole proprietors. Minority representation include approximately one-third African-American and 10-15 percent Hispanic
- Association provides fair housing guidelines to landlords when properties are being registered; and property registration is renewed annually. Fair housing information is provided as part of orientation for new members. Material covers topics such as legal reasons for refusing tenants, and provision of reasonable accommodations, including allowance of service animals.
- On average, the agency receives approximately five complaints per year. Fair housing complaints are screened for legitimacy, then referred to the City’s Legal Services Department.
- No complaints specifying refusal of Section 8 vouchers have been received. Typically, the person only indicates that they were refused without being given a reason.
- The main barrier to fair housing access is perceived to be income.
- Since the City has access to all landlords (while the agency access is limited to its membership) it should send out updates on fair housing. The Association could partner with the City in this endeavor since they require annual registration of their landlords.

Key Person Interviews:

Key Person interviews were conducted person-to-person, by teleconference, and via email correspondence with members of the City of Saginaw staff as well as nonprofit and advocacy groups.

Organization	Key Person	Title
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Organization	Key Person	Title
City of Saginaw		Assistant City Attorney
City of Saginaw	Debbie Buck	Executive Assistant to the City Manager/Public Information
City of Saginaw	John Stemple	Chief Inspector
City of Saginaw	Michael J. Foust	Associate Planner
Saginaw Housing Commission	Patricia Krogman	Deputy Director
Saginaw Housing Commission	Priscilla Prude	Family Self-Sufficiency Coordinator
Saginaw Landlords Association	Kay Siler	Office Manager

VII. FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS

Current 2015 Impediments and Recommendations

Introduction

The City of Saginaw has identified impediments to fair housing choice and recommendations for specific actions that the City could take to reduce or remove those impediments. This section will review any current impediments identified through this 2015 study, discuss the issues related to the impediments and their impact on members of the protected classes and the community, and provide recommendations to the City. The recommendations will consist of both reactive and proactive actions to address the impediments and ultimate acceptance and implementation of any or all recommendations will be done by the City's governing Council. This section will also review the impediments and action plan identified in the City's prior 2011 AI and the status of fair housing activities and whether the impediments then still need addressing.

One of the main implications of the July 2013 Proposed Fair Housing Rule is more of a focus on "affirmatively furthering fair housing" activities in the Consolidated Plan process. Fair housing planning will become one of the factors in setting Consolidated Plan priorities and how resources are to be committed including fair housing activities. Many of the recommendations contained in this report are based on a proactive or "affirmative" approach that reflects the goals and objectives of the proposed Fair Housing Rule up to its becoming a final rule.

In order to develop a viable implementation plan, the City may view the recommendations as a framework for addressing the impediments and a guide to facilitate further community dialogue, research, feasibility testing, and fair housing action planning.

Impediments and Recommendations

Based on research of available demographic and housing data and feedback from residents and entities involved in the affordable and fair housing, this section reviews the current impediments to fair housing choice identified in 2015 in both the public and private sectors. It must be noted that there are some impediments that were previously identified in 2008 that are also included in this current list due to their continued impact. For each impediment, recommendations were formulated for use in fair housing action planning to address the impediment national best practice models.

- A. *Impediment: Lack of or inadequate affordable housing for Saginaw minority and low income residents especially in low poverty "high-opportunity" areas limits fair housing choice.***

Action: Increase the production and preservation of affordable housing units.

Recommendation #A-1: Increase the supply of affordable housing for renters and homeowners and further residential integration by supporting the development of “inclusive” housing projects by leveraging public funding with private sector funding in “High Opportunity” areas.

Status: The review of CHAS data and an analysis of housing affordability in the City of Saginaw indicates that there is a shortage in the supply of affordable housing units for both owners and renters and that minorities are disproportionately impacted by housing cost burden as a result of economic pressures and other external conditions. In addition, data shows that subsidized housing is concentrated in census tracts with high minority and poverty concentrations. Many of these census tracts have lower levels of community assets, older housing stock, and community safety issues. The levels of concentration are not explained by the lower cost of land, economic means, and other factors and this concentration perpetuates segregation on the basis of race, national origin, familial status, and disability and denies equal opportunity to members of the FHA protected classes. City support for housing projects should be contingent on the location of projects in areas with more community assets and business and employment opportunities.

In recent years, public funding, including CDBG and HOME funds have been declining in many jurisdictions. In order to increase the number of affordable housing units for both renters and owners, the City shall work towards leveraging, as much as possible, with private sector funds and other government funds to increase the variety of housing for different types of households. HUD funds can be used as financing mechanisms including low interest loans, grants or loan guarantees

Recommendation #A-2: Encourage non-profit developers and community housing development organizations (CHDOs) under the HOME program to use resources such as the National Community Stabilization Trust (NCST) to access foreclosed properties before they go on the open market.

Status: The City has good relationships with experienced nonprofit developers that could have access to foreclosed single family properties from banks through the NCST. Most of the larger lenders are part of the Trust. Access to the trust will reduce the amount of competition that non-profits receive from investors seeking to purchase and “flip” properties. Based on the level of foreclosures, pre-bid access would facilitate more affordable housing for homebuyers or renters.

Recommendation #A-3: Facilitate relationships between non-profit developers and individual banks to have foreclosed properties be transferred to developers and assist in funding rehabilitation costs with other partners.

Status: Banks that are not a part of the NCST could develop relationships with local non-profits to transfer foreclosed properties to these entities to be used as affordable housing. The City’s provision of CDBG or HOME funds or Neighborhood Stabilization Program Income as direct low interest loans or grants or loan guarantees could be an incentive to the banks to provide funds through the Community Reinvestment Act for the redevelopment of those properties. Other resources such as Federal Home Loan Bank of Indianapolis could be leveraged for rehabilitation. The bank provides funds to its members to fund affordable housing. See link to their website: <http://www.fhlbi.com/housing/ahprog.asp>.

Recommendation #A-4: In order to maintain or increase homeownership in Saginaw, the City should increase the provision of services including housing, credit, and foreclosure prevention counseling and financial assistance with the goal of reaching an increased number of minorities and low- and moderate income households.

Status: Some of the affordable homeownership stock in the City of Saginaw is being reduced by foreclosures in minority concentrated areas. An analysis of the foreclosure rates throughout the City indicated that foreclosures occurred at higher rates in lower income areas attributable to predatory lending practices or other discriminatory housing practices as well as unemployment, underemployment, or creditworthiness. Of properties in some stage of foreclosure, 77% are valued at \$100,000 or less, the majority are bank owned and the largest number are also smaller houses (1,000-1,199 square feet). The data also shows that 26.5% of home owners in the City are cost burdened and members of the protected classes such as the elderly, and racial and ethnic minorities are more disparately impacted. It is also important to maintain community stability by helping homeowners to remain in their homes and prevent homelessness.

Recommendation #A-5: The City will work with community development lenders and developers to preserve existing affordable rental housing especially in low poverty, high-opportunity areas to prevent them from being converted to market rate housing.

Status: There are affordable housing developments such as LIHTC projects that have met their affordability requirements and are eligible to be converted to market rate housing which will remove them from the inventory. City supported projects through financial and other incentives should include agreement provisions providing tenants with early and clear notification of conversions to market rate housing and providing first right of refusal to nonprofit and public entities and organization to purchase the units to maintain affordability. The City of Saginaw will identify funding resources to be used to assist developers to purchase such properties.

Recommendation #A-6: The City will offer density bonuses, fee waivers and other incentives along with inclusionary zoning for multifamily developments and single- family developments that propose to increase affordability and access to housing opportunities in racially and ethnically integrated, high-opportunity areas.

Status: Developer incentives have been shown to work along with mandatory inclusionary zoning to promote mixed income housing. Voluntary inclusionary zoning requirements have traditionally been undersubscribed.

B. Impediment: Public and Private Actions (inadequate accessible housing) and private attitudes (NIMBYism) limits housing choices for seniors and persons with disabilities.

Action: *Increase the number of accessible housing units based on need.*

Recommendation #B-1: Conduct an inventory of the current supply of decent, safe, and affordable housing and projected growth of residents with disabilities and an aging population, the City should assess the need for accessible units and resources to fill any gap.

Status: It is clear from the City's Consolidated Plan that there are currently not enough resources available to meet the housing needs of persons with disabilities. In order to address this issue, the City of Saginaw should develop a listing of housing units available to disabled

persons that are both affordable and accessible. This listing should also be updated on a regular basis and made available to the public to assist in locating accessible housing. The City can support the development or retrofitting of additional accessible housing units and should establish a reasonable goal to increase the number of accessible units based on available funding.

Recommendation #B-2: The City should establish a community board consisting of persons with special needs, advocacy organizations, service providers, and regional jurisdictions to advise and identify priorities and needs for housing persons with special needs.

Status: There is the need for accessible housing and the engagement of a representative stakeholder group is important in setting priorities and promoting the needs of that population. HUD has also encouraged jurisdictions to work on regional solutions to fair housing issues.

Recommendation #B-3: The City should consider enacting an ordinance that requires all new construction homes to meet visitability standards and that requires first floor visitability for homes constructed with HOME or other housing and community development funds, LIHTC or bond funds based on MSHDA's "Visitability Standards for New Construction Projects."

Status: The cost of retrofitting existing older houses for protected class members based on age and disabilities as determined by federal, state, and local is challenging as many are currently cost burdened. Other jurisdictions have successfully instituted such provisions for all new housing. The City should assess the level of increased costs in order to address claims that it raises the cost of housing. Features include zero thresholds, wider doorways, and reinforced walls for grab bars.

C. Impediment: Historic and consistent pattern of concentration of racial/ethnic and low income populations in the City.

Action: Develop strategies to address patterns of concentration and balance housing investments between minority areas and non-minority areas.

Recommendation #C-1: The City will include concentration reduction strategies in the City's Comprehensive Plan and Housing Policy, if applicable, and encourage the development of mixed income housing projects.

Status: Due to historic and ongoing patterns of concentration, the City will need to ensure that subsidized housing is sited in areas with higher level of community assets. Providing more affordable housing does not further fair housing if that housing is still concentrated in certain areas. In addition, the City can also facilitate such a shift by addressing historical disinvestment in infrastructure, facilities, public services, and education; addressing environmental and undesirable land use hazards; ensuring that transportation connects residents to employment centers; and creating economic and job opportunities.

D. Impediment: Lack of financial resources for both individuals and housing providers limit fair housing choices. Non-compliance with Section 3 of the Housing and Urban Development Act of 1968 prevents members of protected classes from gaining economic opportunities necessary to allow them to exercise fair housing choice.

Action: Improve and expand Section 3 economic opportunities for eligible persons and businesses.

Recommendation #D-1: The City will provide independent training to city staff and local sub recipients and consultants on best practices for implementing Section 3.

Status: As part of its Annual Action Plan, under its Ant-Poverty strategy where it worked with a Community Center to help recruit low income citizens for work opportunities. While affordable housing is a necessary strategy in improving the life of residents, it has to be coupled with an income strategy as ____% of owners and renters in the City are cost burdened (paying more than 30% of their income on housing).

Recommendation #D-2: The City will provide independent training to city staff and local sub recipients and consultants on best practices for implementing Section 3.

Recommendation #D-3: The City will adopt an initiative to require all city contracting to operate under the Section 3 program.

E. Impediment: Protected class member are disproportionately impacted by lending practices based on disparities in loan denial rates, high costs and predatory practices.

Action: The City should work with lenders in Saginaw and seek through research, dialogue, and training to develop and implement strategies to reduce the disparities experienced by the protected classes.

Recommendation #E-1: The City will coordinate with lenders, mortgage brokers, realtors, and their associations, as well as community and fair housing groups to discuss issues and solutions to lending disparities.

Status: It appears that based on an analysis, prepared by city staff of Home Mortgage Disclosure Act (HMDA) data and Community Reinvestment Act (CRA). The analysis shows that the denial rate in census tracts with higher racial and ethnic minorities, protected class members are higher.

Recommendation #E-2: The City will continue its education of the public on predatory lending and loan scams and invite lenders to participate in the education process.

Status: Anecdotal information indicates that there has been an increase in loan scams targeted to ethnic and minority communities. It would be strategic for banks to partner with the City on the education of residents.

Recommendation #E-3: The City will enact an ordinance requiring all subrecipients, mortgage lenders, mortgage brokers, Realtors, and other housing professionals that participate in the City's program to have completed a training course on "affirmatively furthering fair housing" and update the training every three years.

Status: The City is required to include in its agreement with CDBG subrecipients provisions for affirmatively further fair housing and may choose to include such clauses in agreements with other parties to ensure that its AFFH requirements are met. While many real estate

professionals are receiving fair housing training, the training to be offered by the City would have a wider scope.

Recommendation #E-4: The City will require all homebuyers or other participants in the City's housing programs to participate in homebuyer education prior to purchasing a house and home care and the perils of subprime borrowing after occupancy.

Status: Only the Neighborhood Stabilization Program has a requirement for pre-purchase homebuyer counseling. Prior to NSP, many non-profits were requiring such education as a best practice. The value of these programs have been demonstrated by low foreclosure rates. Owner-occupied rehabilitation programs under HOME and CDBG do not require homebuyer education because ownership is current. However, the increase in predatory lending, which has a disparate impact on the protected classes, may necessitate such as strategy.

Recommendation #E-5: The City of Saginaw will develop and distribute educational materials and through the city's website on the fair housing duties of lenders and real estate professionals.

Status: The City will focus its efforts on articulating the duty of lenders participating in programs administered by the City to assist the City in its obligation to affirmatively further fair housing.

F. *Impediment: Concentration of Housing Choice Vouchers in high poverty low-opportunity areas and refusal to accept vouchers in better areas can restrict the fair housing choice for members of the protected classes.*

Action: Implement strategies that reduce the concentration of housing choice vouchers in areas with high poverty and low opportunities.

Recommendation #F-1: The City will work with the Saginaw Housing Authority and the landlords association to fund and implement a voluntary program that encourage rental property owners in low poverty and high opportunity areas to participate in the Section 8 Program

Status: It has been established that some landlords are refusing to accept tenants with housing choice vouchers. A national study using HUD customer satisfaction survey titled Racial and Ethnic Disparities in Rents of Constant Quality Units in the Housing Choice Voucher Program: Evidence from HUD's Customer Satisfaction survey, HUD March 2011. Although the City of Saginaw was not included in the national sample, the data analysis demonstrates the following for some jurisdiction which may apply to the City: Minorities vouchers could pay more than white families for the same type of housing and seem to pay a premium for selecting a low poverty area more than a white family would pay. The City has an ordinance that protects source of income.

Recommendation #F-2: The City will review awareness of the source of income ordinance and assess how it is working.

Status: The City of Saginaw passed an ordinance making it illegal to discriminate in housing based on source of income. There is no evidence that the program has been assessed. Both the above mentioned study and anecdotal comments from participants suggest that the number of

incidences regarding this type of housing discrimination is becoming a pattern. The survey results suggest that residents and affected persons may not be aware of this ordinance.

Recommendation #F-3: The City will work with the Saginaw Housing Authority to provide housing mobility counseling and financial assistance for voucher families for units in low poverty, high opportunity areas.

Status: Best practices suggest that a well-informed family with a voucher is at an advantage over someone who is not. Research shows that such assistance to families provides measurable improvements in the lives of the children whose families receive such assistance to move.

Recommendation #F-4: The City will encourage and work with the Saginaw Housing Authority for the PHA to conduct periodic analysis of the distribution of vouchers by family type and race/ethnicity to determine if there is a pattern of segregation and take actions to promote greater housing choices for voucher holders.

Status: The review of Section 8 voucher use in Saginaw census tracts demonstrated that there may be a location pattern of minority voucher holders in primarily minority neighborhoods. The finding is derived based on the large minority population receiving public housing assistance and the use of these vouchers in census tracts with a higher minority percentages. The PHA should conduct further analysis based on the race/ethnicity of each voucher holder to determine if minorities are located in predominantly minority neighborhoods and Whites in predominantly white neighborhoods. The PHA has existing policies to assist Section 8 voucher holders to locate housing units outside of minority areas and to market the Section 8 Program to property owners outside minority concentrated areas.

G. Impediment: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.

Action: Promote education on reasonable accommodation and support services for persons with mental disabilities.

Recommendation #G-1: The City will work with its partners to promote education and awareness about mental disabilities and encourage housing providers to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability.

Status: The City's Development Department has received cases involving potential loss of housing due to mental disabilities and the need for adjustments to assist persons who may be affected. For example, a person with a mental disability may lose housing because they have not heeded recertification notices due to hospitalization or failure to follow directions.

H. Impediment: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP) affect their fair housing choice.

Action: Continue and expand fair housing education and outreach especially for underrepresented populations such as Asian Americans, persons with disabilities

including the hearing impaired, the Lesbian, Gay, Bisexual, and Transgender (LGBT) community, and persons with LEP.

Recommendation #H-1: The City will expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts among those population groups.

Status: The demographics of the City show an increase in minority population groups some of which don't typically avail themselves of the City's housing and community development services. It was also noted that housing discrimination issues for some groups such as Asian Americans and the LGBT community present in different ways. For example, anecdotal feedback shows that Asian Americans face more concerns regarding the condition of housing and steering especially for immigrants with refugee status. LEP and multiple languages are also factors.

Recommendation #H-2: The City will use the City's cable television channel(s) and social media to disseminate fair housing information and events including the use of public service announcements and fair housing videos from HUD's YouTube channel.

Status: Input from focus groups and key person interviews suggest that these are effective mediums to disseminate information on fair housing which the City does not currently use. Of the 252 persons who answered the question concerning whether or not they had seen fair housing information, 39% had not. Additionally, 46% of the residents surveyed felt that they had no knowledge of federal, state or local fair housing laws and only 5.49% considered themselves very knowledgeable. Regarding familiarity with the City's housing or social services related programs, 57.9% of the respondents had no familiarity with the City's programs.

Recommendation #H-3: The City will develop an educational web page to inform housing consumers of their rights to fair housing and equal access to credit with a link to fair housing agencies and to HUD. The City will track complaints filed. The City will develop a fair housing web page with a link from the City's main web page, which will be used to educate residents on fair housing law, how to spot acts of discrimination, and to provide a portal for the online filing of complaints alleging violations of the law.

Status: The City's website does not include housing discrimination and fair housing information or links to fair housing agencies or HUD, as well as directions and links on how to file and track a housing discrimination case.

Recommendation #H-4: The City will require that City elected officials, city managers and assistant city managers and relevant city department heads and assistant city department heads participate in a an affirmatively furthering fair housing workshop session conducted by an independent fair housing training professional.

Status: In response to the proposed Fair Housing Rule and the significant changes, including City Council approval, that it will bring, the City Council and management should be made aware of fair housing and the AFFH requirements.

I. Impediment: The City lacks an effective fair housing complaint and referral process.

Action: Review current system for processing fair housing complaints and make changes, as needed.

Recommendation #I-1: The City will review its subrecipient relationship with the Legal Services of Eastern Michigan and determine how testing data from Saginaw will be used in its fair housing planning.

Status: The Development Department has provided CDBG public service funding in three of the past four years to assist the City with its obligation to affirmatively further fair housing. The contract includes testing and education but it is unclear how the data is used in the City's fair housing planning.

Recommendation #I-2: The City will establish a fair housing complaint referral system and monitor the disposition of fair housing cases and use this data for fair housing planning and its annual report to HUD.

Status: Currently all complaints of any kind come into the City's Call Center or a resident can go directly to the City Clerk's Office and file a complaint. The Clerk processes and disposes of all complaints which could include referral to other agencies. The Development Department does not receive a report on how many fair housing complaints are received, type of complaints and how they are disposed of. This loop should be closed possibly through the subrecipient relationship with Legal Services of Eastern Michigan.

J. Impediment: The City has zoning codes, land use controls, and administrative practices that may impede fair housing choice and fail to affirmatively further fair housing.

Action: Review current laws and regulations to determine their impact on fair housing choice and make changes, as appropriate to comply with the FHA.

Recommendation #J-1: The City will review zoning and other land use controls and certify that these local controls do not constitute barriers to fair housing. The City will produce a list of zoning and land use controls that impact fair housing and assign the appropriate departments, board and commissions to assess those impacts and bring forward for Council consideration.

Recommendation #J-2: The City will conduct an analysis of zoning and land use controls and building codes related to residential care facilities and group homes and report the results to the City Council with recommendations to ameliorate any barriers to fair housing choice.

Recommendation #J-3: If disparate impact against members of the FHA protected classes is identified within the zoning or land-use controls of the City of Saginaw, the City will make changes or adopt strategies to address the disparities.

Recommendation #J-4: The City will include more specific

Status: Planning, land use and zoning laws affects housing choice in a variety of ways but one of the more important impacts may be lengthy approval times and the resultant added costs.

K. Impediment: Housing discrimination by landlords of single family dwelling and multi-family developments restrict fair housing choice among members of the FHA protected classes.

Action: Develop policies and approaches that will target compliance with the FHA among landlords.

Recommendation #K-1: The City will require developers of City-funded or supported projects to include a restrictive covenant and/or agreement clauses that require property managers to participate in fair housing training periodically during the compliance period of the property. At a minimum, each new property manager must show proof of fair housing training.

Recommendation #K-2: The City will work with the local landlords association and Legal Services of Eastern Michigan to ensure that fair housing training is offered to landlords within the City. At least two sessions should be held annually.

Recommendation #K-3: The City will conduct a compliance desk review of rent rolls and tenant records to determine the number of protected class members under the Fair Housing Act within City funded projects. The City will ask the Legal Services of Eastern Michigan to conduct matched pair fair housing testing for non-City funded multi-family properties in the City.

Status: The City's current agreement with the Legal Services of Eastern Michigan includes testing. Any City funded development agreements include non-discrimination clauses but not a requirement for property managers to do fair housing training.

L. Impediment: A Crime-Free Lease Addendum to the City's Rental Property Registration Ordinance may have a disparate impact on certain members of the FHA protected classes.

Action: Ensure that crime-free housing is not disproportionately applied in minority communities and doesn't impact the protected classes especially families with children.

Recommendation #L-1: The City will review data on the implementation of crime-free housing programs nationally and determine their impact on fair housing choice and ensure that the crime-free addendum to the rental property registration ordinance does not discriminate based on race, familial status or any of the protected classes.

VIII. FAIR HOUSING PLANNING

Introduction

In "the Future of Fair Housing," a 2008 report of the National Commission on Fair Housing and Equal Opportunity, the authors state that "...despite the strong statutory underpinning for the affirmatively furthering obligation, the testimony unanimously reported that the process was not functioning as intended. HUD has not been successful in bringing the affirmatively

furthering obligation to life.”²¹ Such statements and studies that demonstrate that segregation of housing by race and ethnicity and housing discrimination still occurs at levels that surprise us raises the question of what is the disconnect between desire and execution.

The Saginaw 2008 AI update has identified barriers that impede the desire and vision of a City where all residents are guaranteed the “right to choose where to live without facing discrimination or legally imposed obstacles” as envisioned by Congress when the Fair Housing Act of 1968 was passed. As a result of data gathered from research, meetings with residents and stakeholders, document reviews, and surveys, and to address impediments, recommendations were made which included education and awareness, legislative review, development of a housing policy, forming local and regional partnerships, investment and leveraging of resources, and using accessibility and Universal Design concepts.

While the City must continue to work to achieve fair housing choice for its residents, it should be recognized that the City may not have the resources to reduce or remove these impediments without local and regional partnerships. Perhaps, the challenge in moving from desire and execution is the planning that takes place out of a study such as the AI.

Fair Housing Action Planning Framework

In response to the impediments identified and recommendations to address them contained in this report, the City of Saginaw is required to develop a Fair Housing Action Plan (FHAP) in accordance with Chapter 2 of the HUD Fair Housing Planning Guide: Volume 1. In light of constrained federal, state, and local budgets, Saginaw, like many other jurisdictions, may not have all of the resources that will be needed to carry out the recommendations contained in this report. The recommendations are intended to serve as a basis for fair housing planning by the City. Priorities will have to be determined, goals established, and human and financial resources as well as partnerships identified to ensure that the City addresses fair housing choice issues raised in the study.

The FHAP will indicate the specific actions to be undertaken to address each impediment based on the resources available to the City and established priorities. A timeframe for implementation of the actions will also be prepared as determined by the City consisting of one, three, and five-year increments as well as activities that will be carried out on an ongoing basis over the five years covered by the City’s Consolidated Plan. There are some resources, partnerships, and systems that are currently in place and can be deployed in the short term while other issues may have to be addressed over a longer time period. The FHAP will be developed with input from City Council, City Departments that participated in the AI process, the City’s Manager’s office, housing providers, realtors, lenders, non-profits, fair housing advocates, and the general public.

The following steps are proposed for the fair housing planning process:

1. Establish an AI Implementation Coordinator

Upon completion of the AI, the City’s Community Services Department will be responsible for and held accountable for the implementation and ongoing compliance with the AI. The

²¹ National Fair Housing Organization website, The Future of Fair Housing Report, page 9
http://www.nationalfairhousing.org/Portals/33/reports/Future_of_Fair_Housing.PDF accessed April 21, 2015

Department will be responsible for coordinating the fair housing planning, implementation, and monitoring functions. That unit of the City will be act as liaison between the City and external agencies and other City departments.

2. Communicate AI Results

The City should communicate the results of the AI to the public and all stakeholders through:

- Print copies of the AI and place in locations such as community centers, libraries, and City hall for the public to review;
- Communicate conclusions and recommendations to policy makers, planners, key city staff, community organizations, and the public;
- Provide access to a copy of the AI on the City's website;
- Provide a means other than public forums for other citizen participation (e.g. written comments, comment via the electronic and social media) regarding the conclusions and recommended actions resulting from the AI;
- Utilize alternative formats (e.g. braille, large type, tapes or readers) for persons with visual impairments; and
- Solicit broad-based community support for developing the fair housing action plan in order to meet the City's certification to "affirmatively further fair housing."

3. Set up Structure for Action Planning to Eliminate Identified Impediments

Prior to taking actions to address the identified impediments, the City should prepare the community for the process as follows:

- Develop a system for diverse community groups to be involved in the action plan process;
- Create a structure for the design and implementation of the actions or incorporate the design and implementation of housing and community development activities;
- Determine which local partners, subrecipients, and City departments will have primary and secondary responsibilities for designing and carrying out activities; and
- Ensure that partners and subrecipients solicit input from community stakeholders.

4. Establish Fair Housing Objectives and Goals

In determining actions to be taken to successfully address the impediments identified in the AI, the City should define a clear set of objectives with measurable and achievable results. According to the HUD *Fair Housing Planning Guide*, "the objectives should be directly related to the conclusions and recommendations contained in the AI. For each objective, the jurisdiction should have a set of goals. These might be the completion of one or more discrete actions, or set of actions, which serve as milestones toward achieving each objective."²²

5. Determine Fair Housing Actions

²² U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing For Fair Housing Planning, Page 2-22) March 1996*

The HUD *Fair Housing Planning Guide* outlines the following steps for determining fair housing actions which shall serve as guide for the City of Saginaw:²³

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities.
- Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities.
- Schedule actions for a time period which is consistent with the City's Five Year Consolidated Plan cycle.

Fair Housing Implementation Tracking

The City's AI Coordinating Function should be responsible for the oversight and tracking of the implementation of the fair housing action plan. The AI Coordinating Function will track the progress of the actions to address the impediments to fair housing choice. The purpose of the implementation tracking is to analyze the impact of the actions taken and demonstrate that the City has met its obligation to affirmatively further fair housing. This section describes the process for tracking the City's progress in carrying out the recommendations to address the impediments.

Ongoing Self-assessment

It is recommended that the City conduct an ongoing self-assessment annually to determine its progress in addressing the identified impediments and recommendations. The City's fair housing activities will be compared to the timelines stipulated in the fair housing action plan. If the City notices any deviations from the timeline, it should take the necessary steps to address any deficiencies or revise the timeline and document its files. Each recommendation in the AI includes a timeframe for completion in periods of one, three, and five-years, or on an ongoing basis.

Recordkeeping

A key element of the monitoring process is recordkeeping. The City should maintain a fair housing file where all actions taken are recorded and updates are made on a regular basis. HUD requires that at a minimum, the file contain:

- A copy of the AI; and

²³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1* (Chapter 2: Preparing For Fair Housing Planning, Page 2-22) March 1996

- Records that show the grantee has taken actions to overcome the effects of impediments identified in the AI.

City staff shall maintain information in the fair housing file through the use of the suggested Fair Housing Compliance File Checklist.

Reporting

In addition to the on-going self-assessment, the City will prepare its Consolidated Annual Performance Evaluation Report (CAPER), explaining how the jurisdiction is carrying out its housing and community development strategies, projects, and activities. As part of the report, the City must describe how it is carrying out its certification to affirmatively further fair housing by a) identifying the actions taken during the year; b) providing a summary of impediments to fair housing choice in the AI, and c) identifying actions taken to overcome effects of impediments identified in the AI.

Mid-period Assessment

The AI is typically updated every five years. However, much can change within a five year span of time and as such, it is recommended that the City conduct a mid-period assessment. The purpose of the mid-period assessment is to take a comprehensive look at the community in light of the changes that have been made due to the implementation of the actions outlined in the fair housing action plan and in relation to changes in population, demographics, economy, legislation, or any other factors that may impact fair housing choice. The mid-period assessment should be conducted at the end of the third year of implementation and should include the annual assessment for the year as well as a cumulative review of the actions taken and their impact for the three year period.

The City should compile and include the following in the mid-period assessment:

- Population demographic data relating to race, ethnic group, sex, age, and head of household;
- Characteristics of program beneficiaries;
- Affirmative marketing strategy and actions;
- Discrimination complaints filed and trends;
- Amendments or revisions to policies impacting land development, site selection, and zoning;
- Actions taken to affirmatively further fair housing; and
- Results of any needs assessments or studies for the area impacting fair housing.

Fair Housing Compliance File Checklist

Grantee: _____

Fiscal Year: _____

DATE	DESCRIPTION

_____	Current Consolidated Plan section applicable to Fair Housing

_____	Analysis of Impediments to Fair Housing Choice

_____	Annual Resolution or Proclamation of Fair Housing Month

_____	A summary report of all activities related to the AI

_____	List of the actions taken during the program year

_____	Notice of public meetings showing the fair housing and equal opportunity logo. Should also include language providing for accommodations for persons with Limited English Proficiency, disabilities including the hearing impaired.

_____	Summary or transcript of all public meetings, hearings, and citizen comments or other public input

_____	Sign-in sheet or list of attendees at public meetings or hearings

_____	Fair housing brochures and publications including subrecipient educational material

_____	Information about housing discrimination complaints and the disposition of each

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DATE	DESCRIPTION
_____	Notice of training or workshops regarding fair housing and list of attendees

_____	Description of funding or fair housing providers and bi-annual reports from such agencies

_____	Studies or reports evaluating the impact of the actions undertaken including applicable sections of its required CDBG Annual Report CAPER to HUD.

_____	Other:

APPENDIX I: Status of Previous 2008 Impediments

CITY OF SAGINAW, MI ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE STATUS OF PREVIOUS IMPEDIMENTS JANUARY 2008

Instructions: Complete columns C and D. Then answer question of whether the impediment identified in 2011 still remains as an impediment by checking one box: Yes, No, or TBD (to be determined) for each impediment in Column A. Enter date of completion below.

Date of Completion: March 2015

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
Impediment: Funding - Funding for fair housing activities in the city has been insufficient and sporadic to say the least over the past 10 years.	1. Commit to long term and ample funding of fair housing activities including but not limit to a Fair Housing Center or structurally institutionalization at the City by departmentalization	We have funded Legal Services of Eastern Michigan to conduct fair housing education outreach and testing.	\$22,702 \$18,240
Impediment: Fair Housing Education & Analysis - Survey and research shows individuals often times lack information on fair housing, specifically regarding their rights and their responsibilities on housing issues. Many impediments to fair housing could be addressed if people were better informed.	1. Fund, develop, or support consumer education programs such as first-time homebuyer and ongoing fair housing presentations and training.	We have funded Legal Services of Eastern Michigan for education programs and habitat for first time home buyer training. With NSP we funded CAC for homebuyer training as well.	Est \$50,000 on counseling
	2. Participate in fair housing education efforts for City employees and CDBG sub grantees	One training for staff was held regarding fair housing.	
	3. Develop a formal system to provide information to the public on the City's housing programs via the website, City's information channel, brochures, newsletters and public events.	City has participated in housing fairs to let residents know what programs are available.	
	4. Continue to support fair housing through its	The City has funded CAC and Habitat for	At least \$1

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(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
<p>Action: Increase awareness of Fair Housing issues and services by providing information, education, and training to the community</p> <p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input checked="" type="checkbox"/></p>	<p>affordable housing activities:</p> <ul style="list-style-type: none"> • Provide support to agencies attempting to better affordable housing opportunities in Saginaw. • Partner with the development groups to create and maintain affordable housing opportunities for low and extremely low income. 	<p>Humanity for affordable housing programs including new construction for low and moderate income persons and homeowner occupied rehabilitation programs.</p>	<p>million over the last five years</p>
	<p>5. Continue support to agencies that assist the homeless</p>	<p>City has continued to invest in homeless agencies.</p>	<p>Estimate \$657,000</p>
	<p>6. Actively support Fair Housing Month activities</p>	<p>Have not actively done.</p>	
	<p>7. Continue to review and study 'how government regulations may be the cause of instructional impediments to fair housing:</p> <ul style="list-style-type: none"> • Zoning regulations on density, lot size and number of unrelated tenants • Parking • Criminal background checks • Building code requirements • Non-traditional families • Rental inspections 	<p>Ongoing.</p>	
	<p>8. Work to identify fair housing issues in the community:</p> <p>a. Incorporate fair housing questions into the baseline community assessments that are conducted by the City of Saginaw</p> <p>b. Develop or create a formal process of complaint intake process/database to gather information from citizens on fair housing complaints and concerns.</p>	<p>Not in place yet.</p>	

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(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
<p>Impediment: Neighborhood Diversity and Historic Isolation - The pattern of past and modern developments has effectively segregated people by race and income in the community. In Saginaw it related to the location of public housing.</p> <p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	1. Continue to support the Community Housing Resource Board's (CHRB) efforts to prevent segregated housing in our neighborhoods	CHRB is no longer active.	
	2. Continue to study and support transportation improvements, including para-transit for individuals with disabilities	Has not happened.	
	3. Develop specific actions to create and encourage mixed income neighborhoods throughout the community.	City used NSP funds to build low income.	
<p>Impediment: Availability - The economic feasibility of retrofitting existing apartment buildings for accessibility can be seen as an impediment to fair housing choice. Consistent integration of accessibility enhancements in newly constructed rental housing is also important to fair housing choice. The availability of affordable housing units appears to be decreasing. The pre-existing shortage of these units is evident in the length of the waiting lists for public housing.</p>	1. Support a community-wide education program to help reduce public opposition to the minorities and the disabled.	Not done.	
	2. Create materials for the City to distribute when residents call to complain about discrimination	Not done.	
	3. Provide information on and support for enforcement of fair housing laws to help deter efforts to discriminate or to racially steer and Block bust.	Not done.	
	4. Develop and approve a formal process that encourages the use of alternative dispute resolution to help neighborhoods reconcile differences arising from fair housing or lending issues.	Not done.	

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(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
<p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input type="checkbox"/> TBD <input checked="" type="checkbox"/></p>			
<p>Impediment: Affordability- When assessing fair housing concerns in Saginaw, affordability must be considered to fully understand the circumstances of low to moderate-income persons. The prices of new homes are generally too high for low-income populations. Without financial assistance, most of these residents will not become homeowners due to down payment and closing cost requirements.</p> <p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> TBD <input type="checkbox"/></p>	<p>1. Update and enforce the City's Fair Housing Law {Sec. 93.07 Enforcement - 0) and also expand the complaint process system and its flexibility.</p>	<p>Although complaint process is not in place the problems are not there that were. Affordable housing is available all over the City of Saginaw.</p>	
<p>Impediment: Lending Practices: Survey participants expressed a concern that banks in Saginaw meet CRA conditions primarily to comply with regulatory</p>	<p>1. Fund a comprehensive study of local lender and insurance company to determine geographic lending patterns in the City and what steps are needed to increase access to home financing by all income and ethnic groups.</p>	<p>Have not done.</p>	

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City of Saginaw, MI

(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
<p>requirements (not because of their commitment to commodity development). Some banks do only what is necessary to receive a satisfactory rating and will not take the additional steps to help the community and become outstanding over the long term.</p> <p>There is also evidence that fewer loan applications are approved in areas with high percentages of minorities. The decline in minority loans application, coupled with the higher percentage of loans denied to minorities, results in a lower homeownership percentage and lack of capital for residents to make home improvements.</p> <p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input type="checkbox"/> TBD <input checked="" type="checkbox"/></p>		<p>Have not done. No evidence today that this impediment exists.</p>	
<p>Impediment: Real Estate Practices – In 02/07/ 1979, the Saginaw News did an investigation into racial steering</p>	<p>1. Maintain a CHRB/Fair Housing Center relationship that will respond to and follow up on matters relating to illegal discrimination, including housing discrimination, in addition</p>	<p>CHRB no longer active.</p>	

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(A) Key Impediments/Actions/Status of Impediments	(B) City Activities to Meet Proposed Actions	(C) Current Status, Implementing Entity, Year Completed (City to Complete)	(D) Invested (\$000)
<p>in Saginaw. The Newspaper concluded, "As described in a story on page A-4 today, racial segregation in housing patterns has been a major factor in the decline of urban areas during the last 20 years. That certainly has been true in Saginaw." The practices the paper concluded is against the law. It's against the ethics of the professional real estate broker.</p> <p>Does the City still consider this an impediment? (Check one below) YES <input type="checkbox"/> NO <input type="checkbox"/> TBD <input checked="" type="checkbox"/></p>	<p>providing education and resources on fair housing issues and public forums for citizen to report housing discrimination.</p>		
	<p>2. Continue to support fair housing testing to ensure that fair housing laws are enforced and meritorious cases brought forward</p>	<p>Funded Legal Services of Eastern Michigan.</p>	
	<p>3. Increase coordinative efforts between the state, the county, and local housing organization to gather and share information related to fair housing issues</p>	<p>Not done.</p>	

APPENDIX II: Public Survey Tables

Table #1

Areas in Which Housing Discrimination Can Occur	% of Respondents	# of Responses
Race	82.8%	202
Color	67.6%	165
Religion	68.0%	166
Sex	68.0%	166
Disability/Handicap	70.5%	172
Familial Status (family with one or more children under 18 years of age)	43.4%	106
National Origin	50.4%	123
Age	55.7%	136
Sexual Orientation	51.2%	125
Poor English Language Skills	30.3%	74
Citizenship Status	34.8%	85
Level of Income	44.7%	109
Source of Income (public assistance)	37.3%	91
Other (please list)	5.3%	13

Table #2

Which of the following best describes the person or organization that discriminated against you or the person you know?	# of Respondents	% of Responses
rental property manager/multi-unit housing	36.8%	28
landlord of a single-family housing unit	38.2%	29
seller of a housing unit	9.2%	7
condominium or homeowner's association	3.9%	3
non-profit or for-profit housing services agency	3.9%	3
real estate professional	7.9%	6
loan officer or mortgage broker	11.8%	9
government employee (subsidized housing)	5.3%	4
public housing authority	14.5%	11
other (please list)	19.7%	15

Table #3

What best describes the location of where the discrimination occurred?	% of Respondents	# of Responses
a rental apartment complex	36.3%	29

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What best describes the location of where the discrimination occurred?	% of Respondents	# of Responses
an individual housing unit for rent	38.8%	31
an individual housing unit for sale	17.5%	14
a real estate office	5.0%	4
a lending institution	10.0%	8
a public housing authority	13.8%	11
a county or city housing office	6.3%	5
a housing services agency office	6.3%	5
other (please list)	16.3%	13

Table #4

What do you believe was the basis for the discrimination you or the person you know experienced?	% of Respondents	# of Responses
Race	50.6%	44
Color	31.0%	27
Religion	11.5%	10
Sex	12.6%	11
Disability/Handicap	14.9%	13
Family Status	12.6%	11
National Origin	6.9%	6
Age	16.1%	14
Sexual Orientation	17.2%	15
Poor English language skills	3.4%	3
Citizenship Status	4.6%	4
Level of Income	27.6%	24
Source of Income (public assistance)	19.5%	17
Other (please list)	21.8%	19

APPENDIX III: Planning and Zoning Questionnaire

FAIR HOUSING IMPEDIMENT STUDY

Review of Public Policies and Practices (Zoning and Planning Codes)

Name of Jurisdiction: City of Saginaw, MI

Reviewing Agency: _____

Reviewer: _____

Date: _____

The Fair Housing Impediments Study reviews the Zoning and Planning Code and identifies land use and zoning regulations, practices and procedures that act as barriers to the development, the site and the use of housing for individuals with disabilities. The Study analyzes the Code and other documents related to land use and zoning decision-making provided by the participating jurisdiction. Additional information should be provided through interviews with Planning and Building and Safety Department staff and non-profit developers of special needs housing. In identifying impediments to housing for individuals with disabilities, the Study should distinguish between *regulatory* impediments based on specific Code provisions and *practice* impediments, which describe practices by the jurisdiction.

- **Zoning Regulation Impediment:** Does the Code definition of “family” have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? Yes _____ No _____
- **Zoning Regulation Impediment:** Does the Code definition of “disability” the same as the Fair Housing Act.? Yes _____ No _____
- **Practice Impediment:** Are personal characteristics of the residents considered?
Yes _____ No _____
- **Practice Impediment:** Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as a “boarding or rooming house” or “hotel”? Yes _____ No _____
- **Practice Impediment:** Does the zoning ordinance deny housing opportunities for disability individuals with onsite housing supporting services?
Yes _____ No _____
- Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled?
Yes _____ No _____

Analysis of Impediments to Fair Housing Choice, July 2015

City of Saginaw, MI

- Does the jurisdiction policy not allow disabled persons to make reasonable modifications or provide reasonable accommodation for disabled people who live in municipal-supplied or managed residential housing? Yes _____ No _____
- Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants? Yes _____ No _____
- Does the zoning ordinance address mixed uses? Yes _____ No _____

a. How are the residential land uses discussed?

b. What standards apply?

- Does the zoning ordinance describe any areas in this jurisdiction as exclusive?
Yes _____ No _____

Are there exclusions or discussions of limiting housing to any of the following groups?

No _____ If yes, check all of the following that apply:

Race _____ Color _____ Sex _____ Religion _____ Age _____ Disability _____
Marital or Familial Status _____ Creed of National Origin _____

- Are there any restrictions for Senior Housing in the zoning ordinance? Yes _____ No _____
If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)? Yes _____ No _____ If No, explain:

- Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities? Yes _____ No _____
- Does the zoning ordinance establish occupancy standards or maximum occupancy limits? Yes _____ No _____ Do the restrictions exceed those imposed by state law? Yes _____ No _____ N/A _____
- Does the zoning ordinance include a discussion of fair housing?

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Yes ___ No ___ If yes, how does the jurisdiction propose to further fair housing?

- Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking.

- Does the zoning code distinguishes senior citizen housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup). Yes ___ No ___

- Does the zoning code distinguishes handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)? Yes ___ No ___

- How are “special group residential housing” defined in the jurisdiction zoning code?

- Does the jurisdiction’s planning and building codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? Yes ___ No ___. Is there any provision for monitoring compliance? Yes ___ No ___

The jurisdiction should conduct a study of new housing construction over the last ten years to review compliance with the accessibility guidelines contained in the Fair Housing Act.